



The Beartooth Alliance is a non-partisan organization of citizens - based in the Cooke City area of Montana - who are committed to influencing environmental and social issues affecting their quality of life. By anticipating problems, providing information and directing resources, the Alliance can ensure the welfare and vitality of the area. Our members and supporters come from all walks of life and have deep roots in our community. The Alliance brings people who love this region together to find ways to protect and enhance our unique mountain environment.

August 21, 2025

Gardiner Ranger District
805 Scott Street W
Gardiner, MT 59030

Re: Cooke City Fuels and Forest Health Project Objection

To Gardiner Ranger District:

The Cooke City Fuels and Forest Health Project will directly affect the residents and property owners of the Cooke City-Silver Gate community, who are members of Beartooth Alliance. Beartooth Alliance members and supporters have a strong interest in management decisions that impact the local national forest adjacent to our community, homes, and businesses. The Custer Gallatin National Forest's robotic response of "*Comment considered but no changes needed*" stated throughout the Final Environmental Assessment to the concerns of the citizens who are immediately impacted undermines the relationship between stakeholders and government agencies.

Beartooth Alliance members desire to protect and enhance the unique Greater Yellowstone Ecosystem we are fortunate to reside in. Some members live year-round in the Cooke City-Silver Gate community; others return year-after-year, drawn to the refuge-like intact ecosystem that abounds with native flora and fauna. The Forest Service's disregard of those most impacted confirms the use of current political changes to force unclear agendas at the public's expense.

The Cooke City Fuels and Forest Health Project uses the fear of intense wildfire to create a logging and timber sale program. Additional public meetings have been requested to attempt to build a working relationship; however, the forest service failed to meet with the public once directly affected citizens had the proper time to become informed of the project and its implications to the community.

Beartooth Alliance submitted written concerns for both the scoping and Draft Environmental Assessment. Our concerns have not been addressed. Beartooth Alliance files this objection to the proposed Cooke City Fuels and Forest Health Project.

Reasons for the objection:

- The Executive Order titled "Immediate Expansion of American Timber Production," dated April 3, 2025, is included in the Appendix, as the Cooke City Fuels and Forest Health Project appears to stem directly from the language and actions in this document. The intent of the order is stated in the title. Except for meeting minimum legal requirements, the document shows no concern to invite a conversation with citizens who will be impacted most and who know the treatment areas best. This has been the format throughout the Cooke City Fuels and Forest Health Project. The process has been circumnavigated and concerns have been dismissed with unsubstantiated evidence.

- o The first stated goal of the Executive Order—*Support rural economies and forest product industry partners*—is a false claim for the Cooke City-Silver Gate community. Cooke City is one of the most remote locations in the lower 48 states. Our rural economy is based on tourism. Tourists from all over the country and world visit with the purpose of recreating in mountains that have not been affected by timber harvest. They come to see the wildlife and enjoy the solitude of the mountains with pristine views (Jorgenson et al., 2013).
 - The Cooke City Fuels and Forest Health Final Environmental Assessment states scenic views have been taken into account. Beartooth Alliance members who recreate and live in the area year-round disagree. The commercial logging and mechanical treatments to occur on Republic Creek and Woody Creek and the mechanical treatments along the north aspect of Republic Mountain and the north aspect slopes above the Soda Butte Creek campground will be visible from every listed High Scenic Integrity Objective Areas stated to be taken into consideration in the Cooke City Fuels and Forest Health Project: *Critical viewing platforms in the project area are Clark's Fork trailhead, Colter campground, Soda Butte campground, Highway 212, Lulu Pass Road, Daisy Pass Road, and Round Lake Road* (p.102). Every viewpoint will be negatively impacted, including Miller Road, which was not listed. Wildlife will be impacted as the forest canopy and forest floor will be abruptly changed for decades.
- Planned mitigation of future winter activity conflicts between motorized and non-motorized recreation must be more substantial. This concern was not addressed. Historically, because of the density of the forest within the Woody Creek and Republic Creek drainages (Units 42, 44, 45, 99, 113), non-motorized use has dominated the area; however, this project plans to open up the spacing between dense stands of trees that will permit motorized use and potentially invite increased misuse of non-motorized areas
 - o The response to this concern was the following: *Units 44, 45, 99 and 113 are located within an area designated for both motorized and non-motorized use according to the OSVUM travel decision. This area will be managed as it has been historically in the area with signage and Forest Service employee patrols. Unit 42 is located in a motorized closure area. This area will also be managed as it has been historically with signage and Forest Service patrols.*
 - Historical forest service management and signage is not sufficient. Frequent misuse of land and boundaries occurs during the winter and summer seasons. Forest service patrols are not present. With decreased funding, patrols will be even less frequent. I have stopped off-road vehicles from driving in the upper Stillwater River. I have encountered off-road vehicle tracks within the wilderness boundary at Goose Lake. While backcountry skiing, I have had close calls with snowmobiles while tree skiing. In February of 2021, eight snowmobilers were rescued at Granite Lake, which is well-within the wilderness boundary. Despite having snowmobiled in the area four or five times, one rider stated “they had no idea where they were entering was illegal” (see appendix for news article). Signage does not work. Forest service patrols are not present. New openings created by fuels treatments will invite winter and summer motorized recreationists to misuse the areas.
- Prior to the start of any approved work within a treatment unit funds must be secured to monitor the spread of non-indigenous plant species for a minimum of 5 years following treatments. This concern was not addressed.
 - o Non-indigenous plant species begin at disturbances to the landscape, especially human-disturbed sites, such as fire treatment areas (Rew et al., 2006). The presence of noxious weeds within and surrounding the treatment sites is known. Houndstongue and thistle are present in Units 34 & 35. Houndstongue, thistle, and knapweed are in and around Unit 13. Freshly opened areas to motorized and non-motorized travel will bring people, pets, and motorized vehicles, all of which transport invasive species, which will take hold within the newly disturbed treatment units.
- The project encompasses a vast and varied 3,218 acres, with seven different treatment types. This project is too large. Funding to complete this project is not stated nor is a timeline of completion provided.

- The forest service has not been transparent as to how this project will be funded. There are over 3,000 acres that are not commercially harvested, yet intense silviculture treatments will be conducted with machinery and by hand within steep and remote terrain. A new logging-worthy bridge was installed in July of 2025 on upper Woody Creek. This bridge leads to nothing except mature tree stands on forest service land. What is the forest service's intent? Included in the Appendix are photos of the new bridge.
 - There is real concern work could begin and abruptly end, without work being completed within treatment units. Unfinished work would leave hazardous slash debris and piles throughout popular winter recreation areas for backcountry skiing and snowmobiling.
 - No timeline for the completion of the project is provided. The small Cooke City-Silver Gate community and wildlife could be impacted by noise, heavy equipment, dust, and closures for 10-15 years. All of which negatively impacts tourism, which the community is dependent on.
- The Final Environmental Assessment does not properly address the benefit of maintaining as many trees as possible. No commercial logging should occur. The Regeneration Harvest treatments leave only 10 percent of the regrowth from the 1988 fires, which only adds carbon to the atmosphere. These trees have just reached a maturity to have become carbon sinks and the project will remove them with new trees that will not become carbon sinks for 20 plus years. This new growth needs to be managed with prescribed burns, which is not a treatment in this project (Mildrexler, 2023; Ripple, 2024).
- The best climate adaptation efforts to create a more fire resilient landscape use a mixture of thinning and prescribed burning (Churchill, 2022; Cansler, 2022; Johnston, 2021). Commercial logging will require prescribed burns and thinning within 10-20 years of completed logging to address regenerative growth and maintain effectiveness of the original treatment Units (Churchill, 2022). Wind events continue to increase in the area. Single mature trees remaining on the landscape, without the support of the grove protection the trees grew in fall over. The silviculture treatments that occurred at Reef Creek in Wyoming along Chief Joseph Highway are an example of the significant amount of live-standing trees that will fall post treatment.
- Photos of before and after treatments in the Final Environmental Assessment do not match. The locations of the before and after photos are different; therefore, comparisons cannot be accurately made. The Final Environmental Assessment has not corrected this error, nor does the document show all treatment types.
 - This concern has never been addressed. No public meetings were organized outside of the first meeting in July 2024, before citizens had a chance to review the scoping document or were allowed access to KMZ files of the intended project.
- The concern that dead-standing Whitebark pine trees will remain on the landscape has not been addressed. At the July 2024 field trip meeting with the forest service, attendees were told whitebark pine trees, deadstanding or alive, could not be removed, since they are listed as threatened species under the U.S. Environmental Species Act. Yet, the response provided to Beartooth Alliance's concern of dead-standing and live-standing whitebarks being removed, the FEA response is the following:
 - *Dead trees with diameter at breast height larger than 8 or 9 inches would be retained on the landscape. Smaller trees may need to be removed to meet fuels objectives. Research on whitebark pine and its response to various silvicultural and fuels treatments is not comprehensive nor is it always consistent. This is not surprising given the wide range of the species and its ecological settings as well as the fact that it has only begun to be studied relatively recently unlike other commercial tree species. In the absence of such research, standard silvicultural practices which have a long history of research behind them are the resource best used to develop treatments (p. 117).*
 - Whitebark pines with a breast height diameter of 8-9 inches and larger are rare. Therefore, the conclusion made is that most dead-standing whitebark pine trees will be removed. This is unacceptable.
 - Units with Whitebark pine trees should be entirely removed from the project until current science-based data can be provided that indicates treatments will definitively benefit one

of the healthiest whitebark regions remaining within the Greater Yellowstone System. The FEA provides unconvincing information regarding its suggestions of treatments for whitebark pine areas. On pages 31-32, the FEA uses the words “speculative, unknown, unclear, not all damage may be preventable” when referring to suggested whitebark pine treatments. Whitebark pine areas are too important to risk inconclusive treatments.

- Please refer to comments provided by Jesse Logan for additional, in depth analysis of the impacts of this project on whitebark pine and recommendations.
- The planting of blister-rust resistant whitebark pine seedlings should be incorporated into the project.
- The following has never been addressed. This is the third mention of the concern. Misuse at this site continues.
 - On a daily basis, from May-October, tourists are camping in their personal vehicles at the large orientation site (signage pullout) on the southside of Hwy 212, just east of the northeast entrance to Yellowstone National Park. Piles of unburied human feces and soiled toilet paper can be found within the first 200’ of the Forest Service land nearest to this heavily used pullout. The proposed project will cause temporary closure of Soda Butte Campground and eliminate use of Forest Service areas typically used by dispersed campers. A permanent pit toilet needs to be installed at this site or at a minimum a porta potty be placed here, throughout the duration of any project work. The EA states recreationists will be displaced due to campground closures and treatments taking place on Forest Service Roads. Therefore, it is even more imperative for this situation to be addressed.

The Beartooth Alliance members and supporters have a strong interest in management decisions that impact the local National Forest adjacent to our community, homes, and businesses, as well as the Greater Yellowstone Ecosystem. At this time, the Cooke City Fuels and Forest Health Project appears to use the cover of fire protection to create a logging and timber sale program. The Forest Service’s unsubstantiated responses to the legitimate concerns of local residents have deteriorated the trust and relations between the Forest Service and community stakeholders. Beartooth Alliance objects to the Cooke City Fuels and Forest Health Project.

Sincerely,



Lara Belice
Chair, Beartooth Alliance

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APPENDIX

Upper Woody Creek Bridge completed July 2025



Widening of road to upper Woody Creek Bridge

