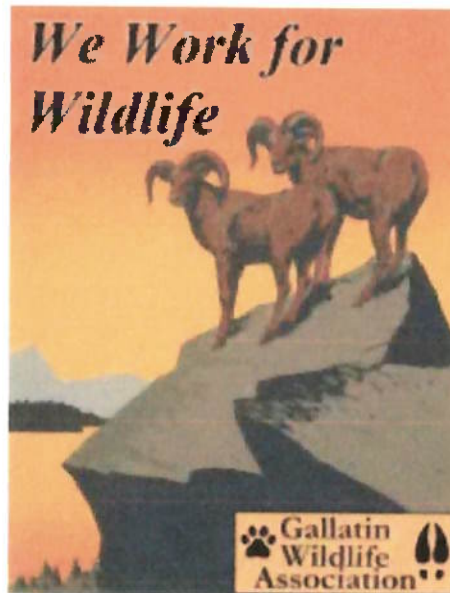




August 19, 2025

I am submitting objections to the Cooke City Fuels and Forest Health project.

I am submitting them as a board member of the above organization. In 8/2024 I entered comments . The comments were based on the groundtruthing and information done in 2024.

My objections now are based on 2025 groundtruthing and information that I consider of interest to the project.

The Gallatin Wildlife Association President will also submit objections.

Nancy Schultz
420 North 10th Ave.
Bozeman, Mt 59715
nancyanaconda@msn.com

Subject: Cooke City Fuels and Forest Health Objection

Michael Thom, District Ranger
Custer Gallatin National Forest
Gardiner Ranger District
PO Box 5,
Gardiner, MT 59030

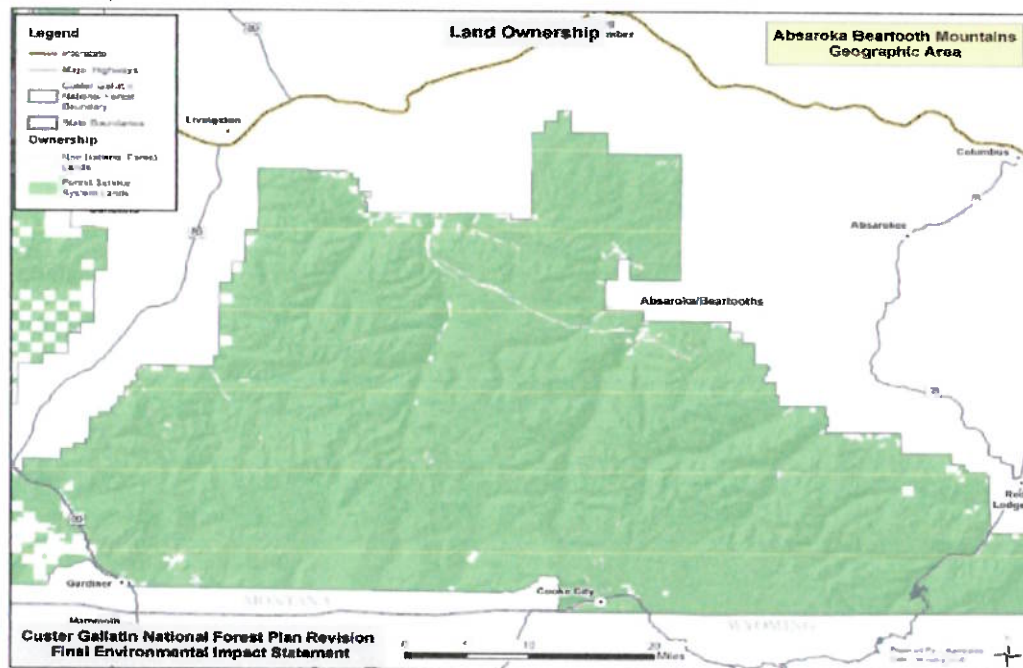
Jamie Fisher
USDA FS
10 E Babcock
Bozeman, MT 59715

Dear District Ranger Thom and Ms Fisher

In 2024, the Gardiner Ranger District of the Custer Gallatin National Forest announced their scoping notice for a proposed hazardous fuels reduction project near the communities of Cooke City and Silver Gate, Montana. This project is being promoted on two fronts. The first: is to increase firefighter and public safety within the wildland urban interface (WUI) and the second: to address wildfire crisis strategies on the natural landscape. The latter of which is to reduce wildfire risks and improve forest resilience.

We went back to the area on June 29, 2025 to look further at the project elements. We look forward to the USFWS biological opinion on the listed species and their science of the effects of the project on the species.

Geographic Area Maps – Absaroka Beartooth Mountains Geographic Area
Land Ownership



The Cooke City project is surrounded by wilderness and national park lands. Except for the Silver City/Cooke City area, the area is protected. The fact that the SC/CC area has been designated as Recreation Emphasis in the 2022 Custer Gallatin National Forest Plan final decision is a concern for us and all the listed species in that area.

We commented, and now we object to the project.

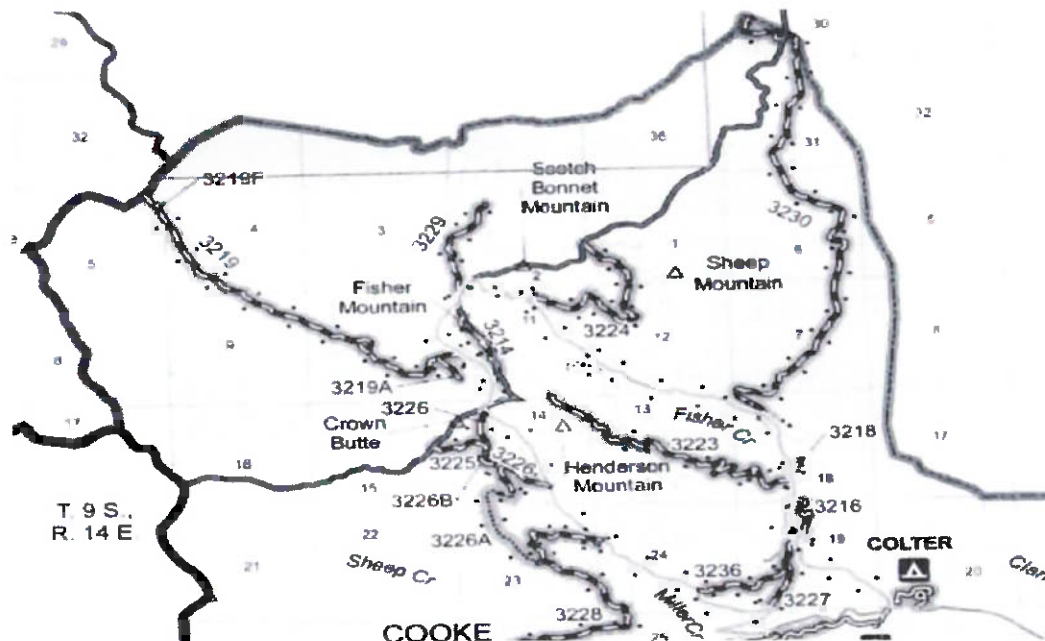
Table 1. Proposed action by treatment type

Method	Estimated Acres
Tractor (Ground Based) Harvest	288.4
Mechanical Fuels Treatment	3,180.5
Hand Fuels Treatment	224.1
Total Treatment Acres	3,693

If the purpose of this project is to reduce the potential wildfire risk, our observations on 6/30/2024 and 6/29/2025 showed the forests to not contain much risk.

Our groundtruthing photos and maps

In 2024 we started from Colter campground and went on 3230 to Lulu Pass. The picture shows Glenn Monahan walking on the road near the pass. As you can see, it is a major road. Road impacts on the grizzly are well known and do displace them. The roads are open 6/16-12/01. After that, snowmobiles take over.



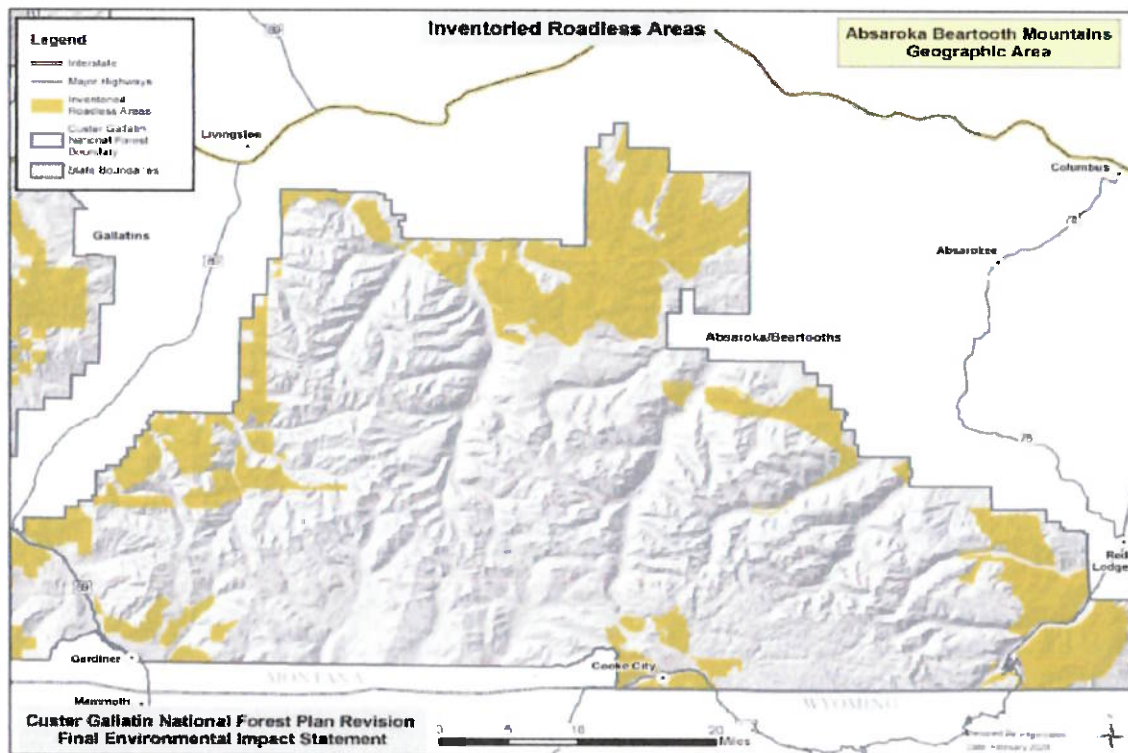


Road 3220 by Lulu Pass

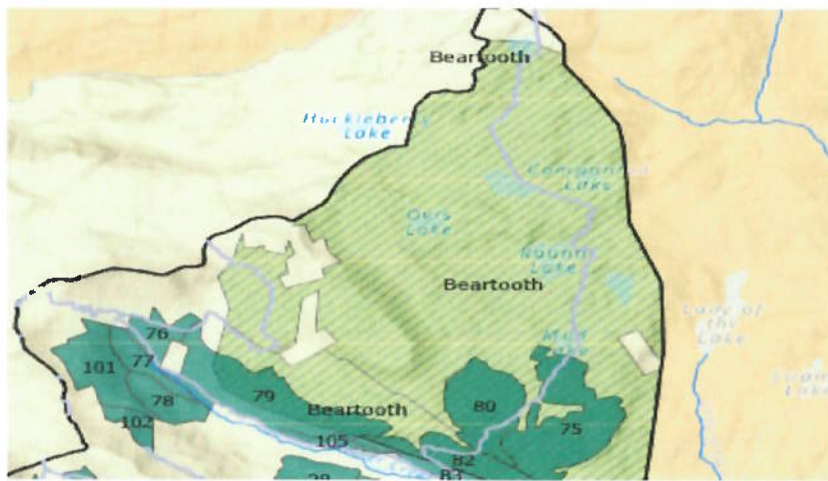
Inventoried Roadless Areas –object to logging in IRAs

The following map shows the area with Inventoried Roadless Area designation.

Inventoried Roadless Areas

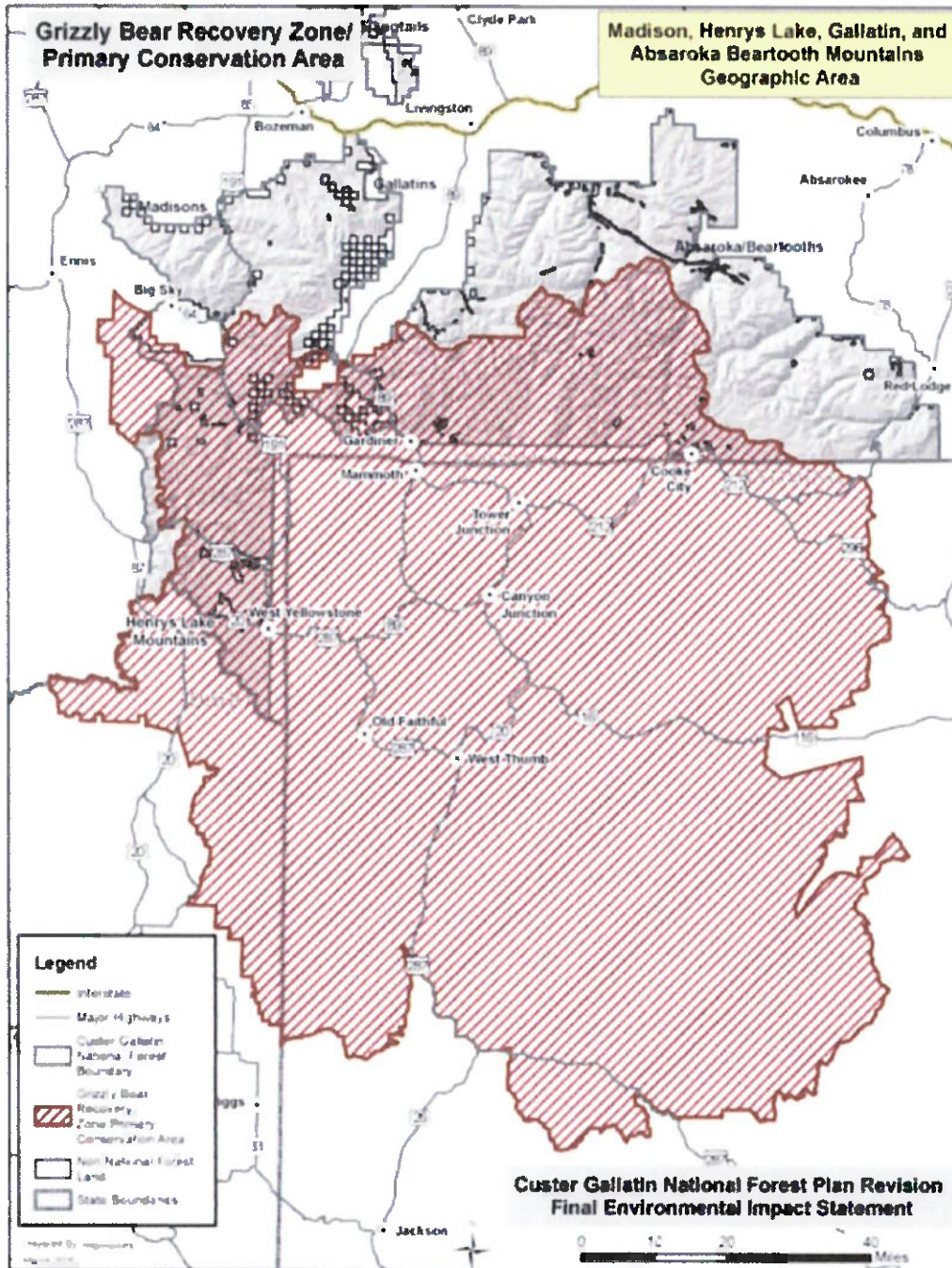


The map below shows one of the vegetation projects in the IRA. How this change in land designation has been allowed, I don't understand. The IRA designation has not been rescinded by Congress, so should still be upheld. This map is one of the vegetation treatments is not the only IRA lands that are affected in the Cooke City project.



The habitat classification change by the forest service from IRA, will be negatively affect wildlife. One species, the Grizzly Bear, has the area listed as a primary conservation area in the map below.

Grizzly Bear Recovery Zone



There are other listed species in the area, the Canada Lynx which uses the area and an FWP study cited the area as moderate habitat with important connectivity from Wy and YNP. 4/2024 MT Lynx Report Monitoring.

Lynx –object to project that reduces critical habitat

“All timber harvest treatment units within Canada lynx foraging habitat are also within the wildland urban interface surrounding Cooke City as defined by the Healthy Forest Restoration Act4 Section 101(16)(B) (Figure 8). The proposed action will temporarily reduce Canada lynx critical habitat, specifically foraging habitat by approximately 896 acres and denning”

Connectivity-object to the project that will impact connectivity, especially listed species

The following EIS statement map shows the results of connectivity analysis. This area is important for wildlife connectivity that connects the best wildlife epicenter in the lower 48, YNP, to the north, east, west and south to the Rockies Ecosystem. This area is incredibly important, made more so by the wilderness areas and YNP that surround it. As you can also see, the other districts in the CGNF have nowhere near the connectivity importance.

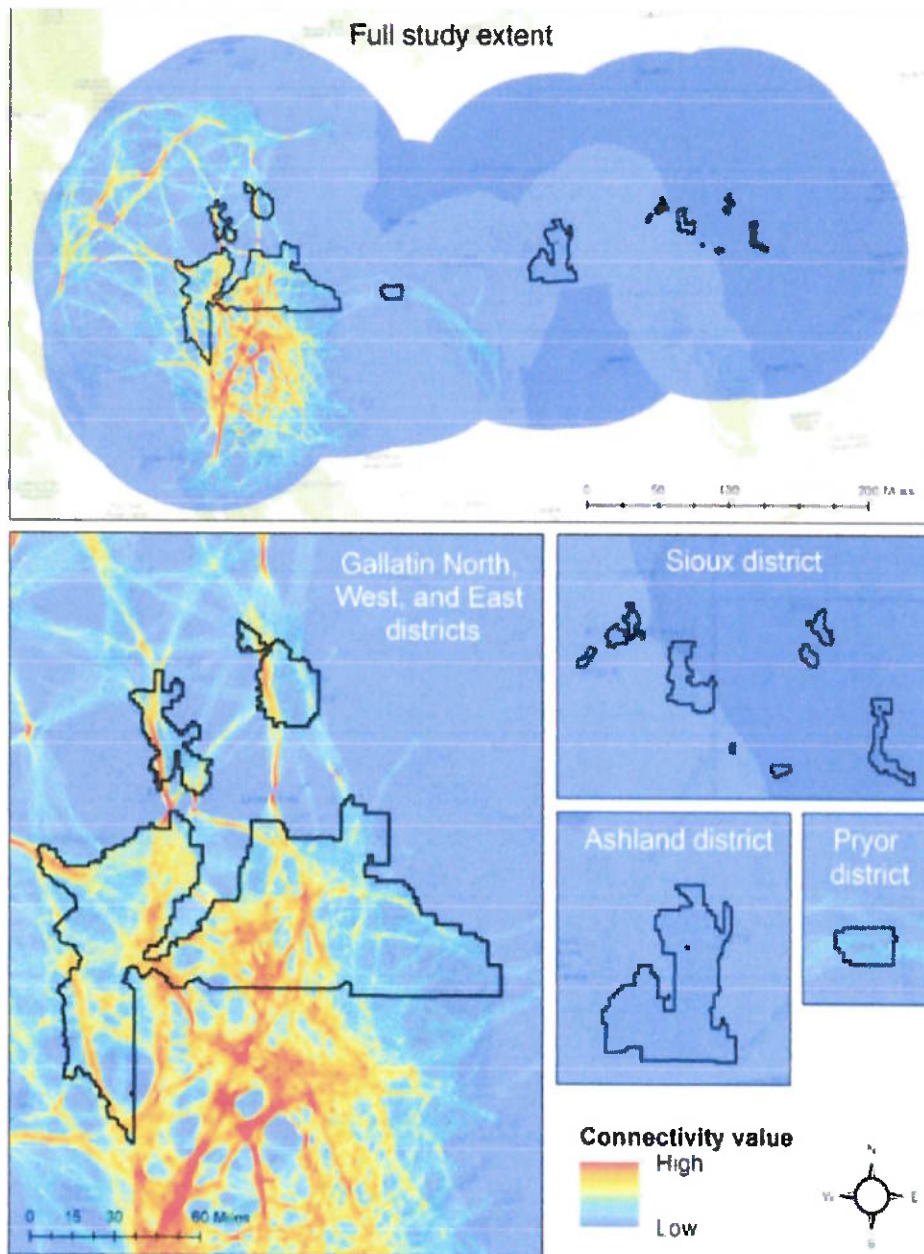


Figure 12. Results of connectivity analysis for the “large forest specialist” generic species, assuming near-optimal movement behavior. Results are shown for the full study extent (top panel) and in greater detail for national forest units. Warmer colors represent landscape pixels predicted to have greater value for promoting connectivity of large forest specialists across the study extent.

Custer Gallatin Nation Forest classification-Recreation Emphasis-object of land use classification and impacts to listed species

The whole Cooke City area has been reclassified Recreation Emphasis in the Custer Gallatin Final Plan of 2022. How the forest service chose to classify the area recreation emphasis when there are ESA listed species in the area is an area of concern and legal interpretation.

Plan Components–Cooke City Winter Recreation Emphasis Area (CCREA)

Desired Conditions (AB-DC-CCREA)

- 01** Outfitter and guiding opportunities facilitate winter use and emphasize avalanche safety.

Goals (AB-GO-CCREA)

- 01** The Custer Gallatin Nation Forest works with the community of Cooke City to achieve a national and international destination for winter recreation.
- 02** The Custer Gallatin Nation Forest seeks partnerships for sustainable operation of the groomed snowmobile trail system of this recreation emphasis area.

Groundtruthing Conditions

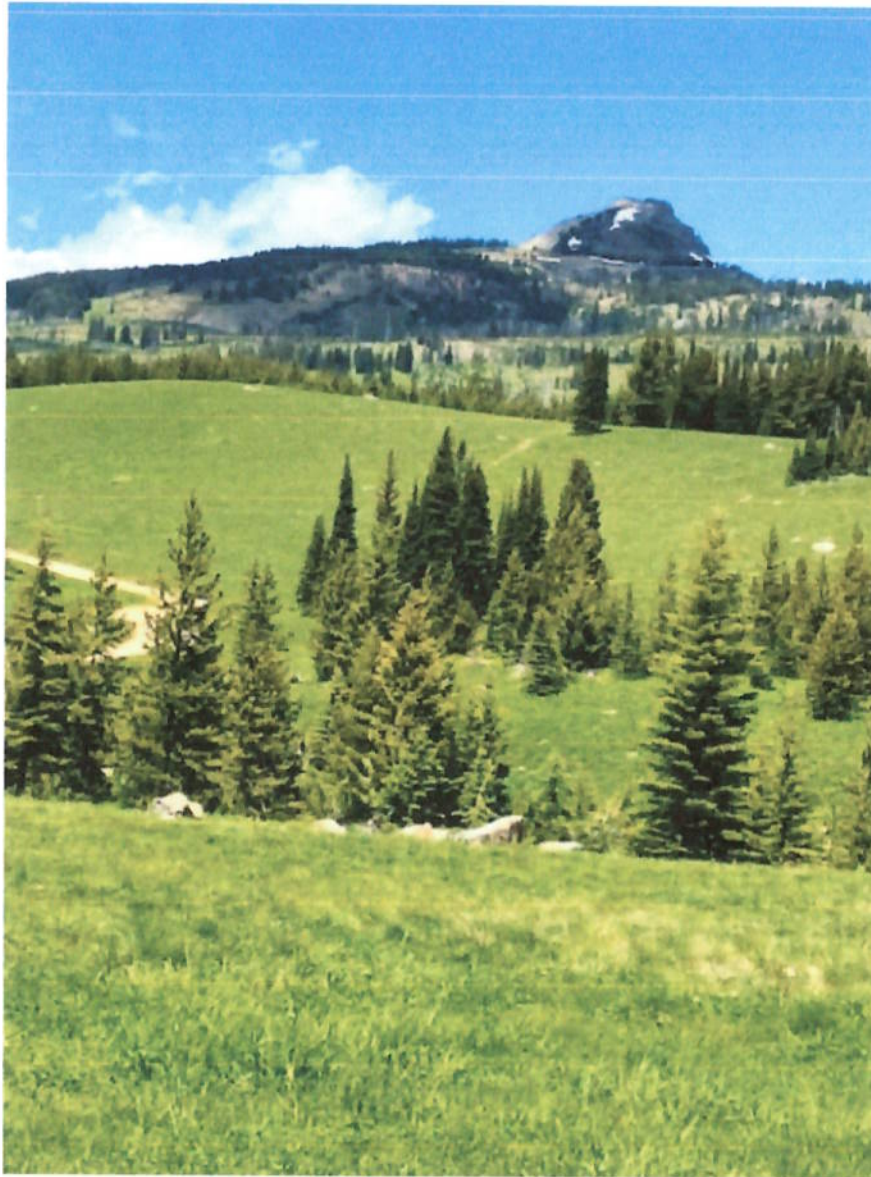
In 2025 we went up 3216 and into T 9S, R14 E #18 and went to the middle of 18. At that point I photographed around me. My focus was to evaluate the area for conditions of the Cooke City forest project. Following are pictures and comments.



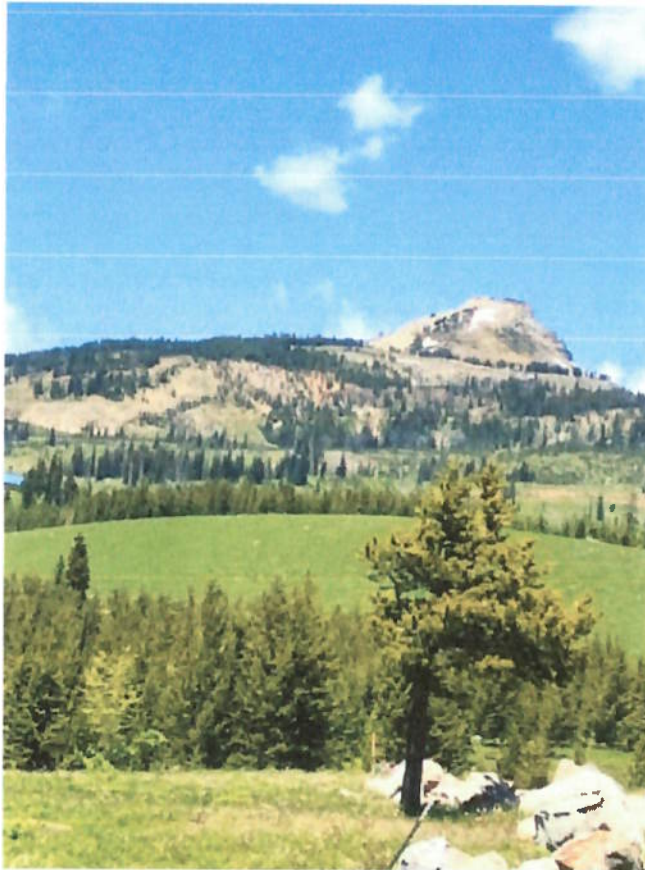
Picture 1 is where I started taking picture and stayed, moving in a circle.



Picture 2 shows a snag, probably the 1988 fire.



A main road open 6/16-12/01



picture 4 same area •

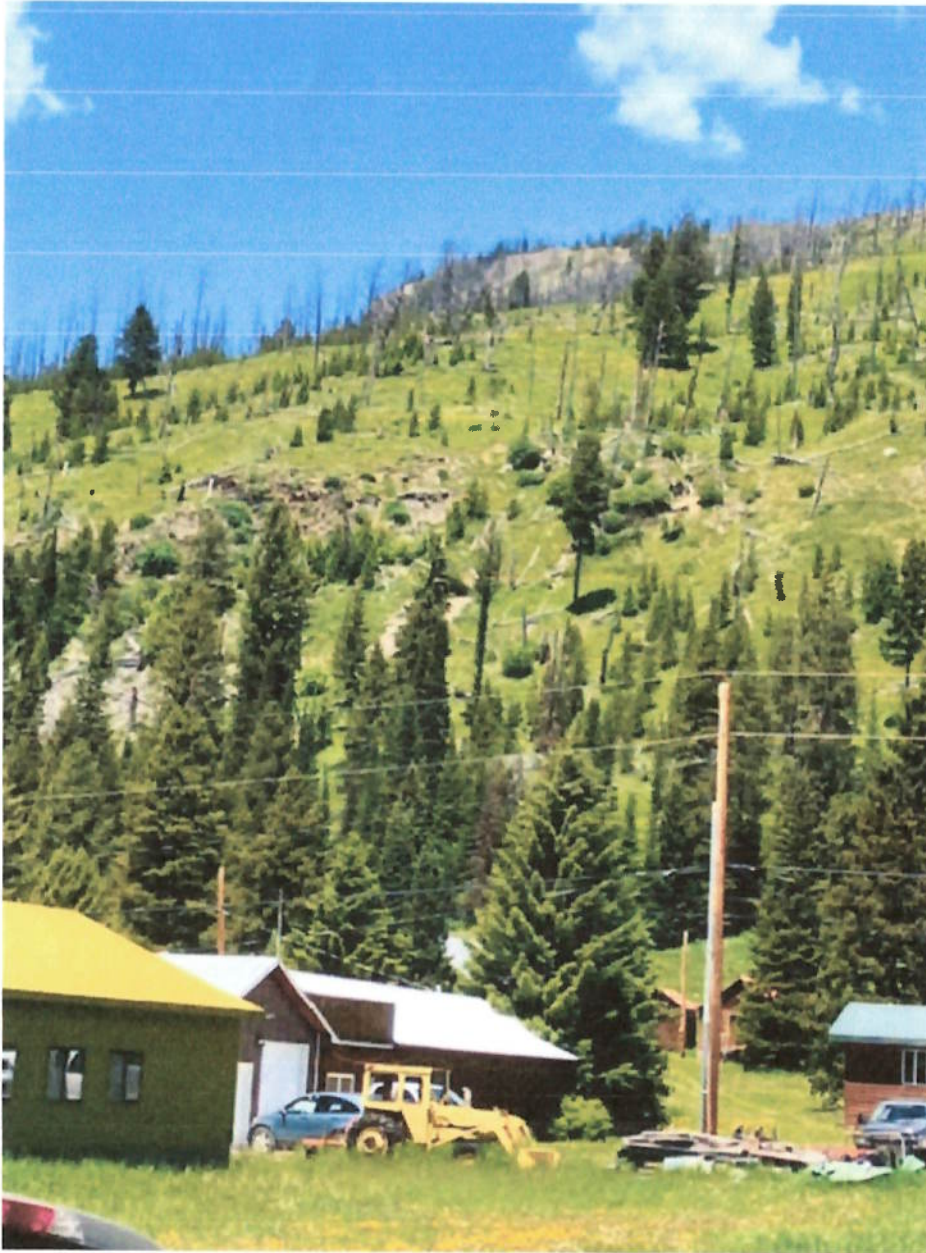
” The need to improve stand resilience to wildfires by retaining or increasing the proportion of fire-resistant species and modifying stand structure (FW-OBJ-FIRE-02 and FW-OBJ-FVEG-0”

These objectives are not explained; what are fire resistant species and what is modifying stand structure besides cutting it down?

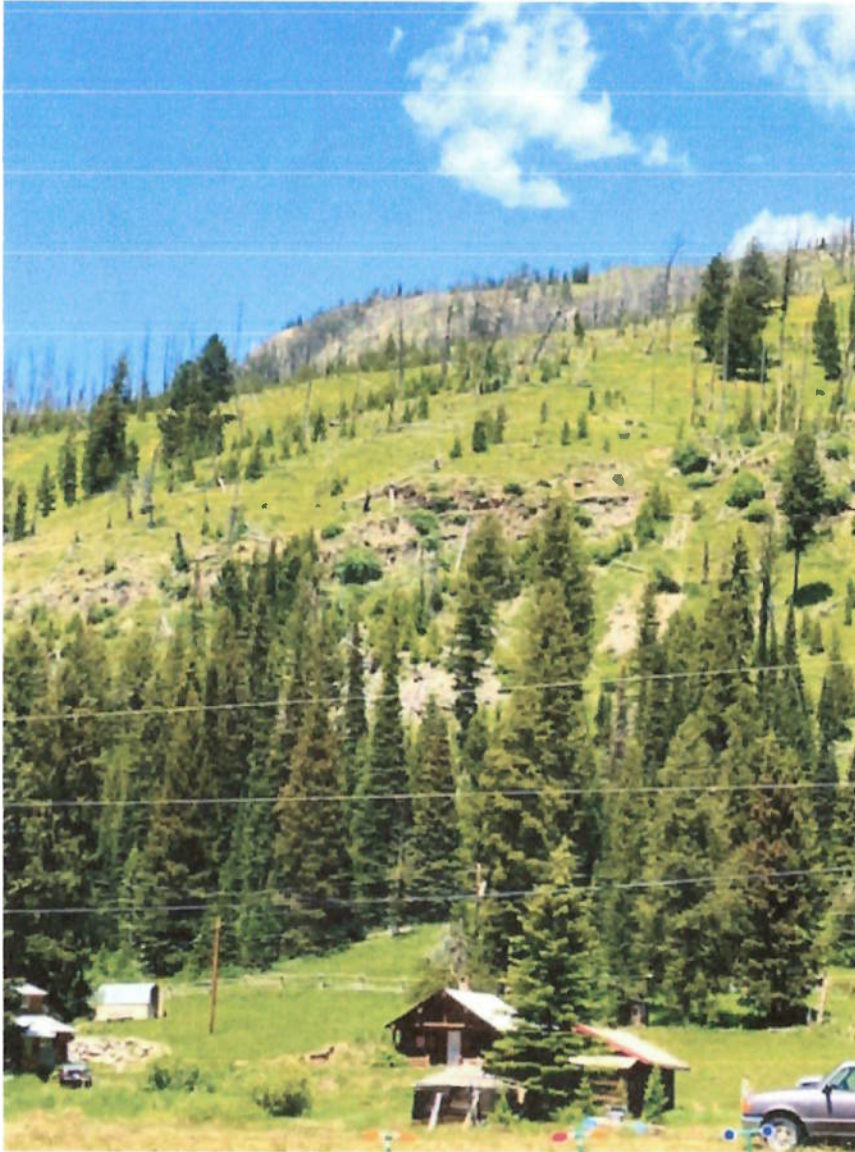
The pictures I took do not show a forest that needs to have the species and stand structure adjustments.

“In addition to the proposed action, I considered the no action alternative. This option would not involve any fuels or vegetation treatments, allowing current forest conditions to persist without intervention; forest health would continue to decline as the insect and disease in the area continued to increase and create further impacts. Over time, forest health would likely continue to decline due to ongoing stressors, contributing to an accumulation of hazardous fuels. Without proactive management, the risk of a large, high-intensity wildfire would increase, threatening nearby structures, private lands, and resources of value. The no action alternative would not reduce the amount or alter the distribution of hazardous forest”

I visited the area in 2024 and 2025 and did not see forest decline, accumulation of hazardous fuels and the risk of a high intensity wildfire.



picture 5 taken from the main street of Cooke City looking north



picture 6 from main street to the In pictures 5 and 6 is described as in the WUI area and needs forest treatment, it appears that there could be far less costly fixes like home hardening and bury the electric lines.

“The primary purposes of this project are to improve public and firefighter safety by reducing fire intensity adjacent to the Cooke City and Silver Gate communities, reducing the likelihood of wildland fire entering the wildland urban interface (WUI)2,”

The fire impact, probably 1988, is evident in the background.

I visited the area in 2024 and 2025 and did not see forest decline, accumulation of hazardous fuels and the risk of a high intensity wildfire.

White Bark Pine

“The cutting of generally small diameter timber is needed to implement the proposed fuel reduction and whitebark pine enhancement.”

This action should be minimal and only remove about a 5 foot or less circle around an individual white bark. The Cooke City area is of minimal value for growing success based on my observations.

I have been observing WBP in the Beartooths for years. I took observations this year and wrote notes from the Island Lake area down to Cooke City. Island Lake is 9600'. At that elevation WBP shows good growth of all ages, many young 18"-23", they were healthy and numerous. WBP gradually lost dominance and visibility as we descended from 9600' to 7570'. The forest became a spruce/lodgepole. I question the feasibility of a WBP project when Cooke City is at 7600'.

I look forward to the USFWS biological opinion on the listed species and the effects of the proposed project on them.

Please notify me of the publication.

I am submitting these comments on behalf of Gallatin Wildlife Association and Nancy Schultz. Both entered comments in 2024.

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