

## Comments on Cooke City Fuels Project August 25,2025

I'm offering a few comments, as a retired USFS employee, forester, district ranger and deputy forest supervisor, on this project. I have also wintered in Cooke City for the last 6 years.

Timber markets/Economics: Is there a market for the commercial harvest? Is the only purchaser the mill at Livingston? Can the wood be hauled through the Park? It's hard to imagine finding the money for all the non-commercial treatments. How would you prioritize treatment? Treatments of all sorts are more expensive near infrastructure and communities. I think fire mitigation is effective close to homes but isn't effective if private owners don't complete similar treatments. Again, can you prioritize treatments to get the most benefit for community. Effective treatment for community versus targeting acres.

Project need: I think the need to reduce fire intensity, keep fire out of the WUI, increase fire control probability is demonstrated pretty well in the document. I do wonder if fuel treatments will dry out Spruce Fir sites. That was my observation from logging this type of site in Wyoming. It's good to see you did fire modeling.

Strained Logic: A lot was written about forest health and resiliency especially regarding whitebark Pine and reducing fire intolerant species. I don't think you made a good case for any of this. It was stated that pine beetle risk would remain about the same, blister rust would remain or perhaps get worse, and species mix will remain what it is. What fire resistant species are there in this area? Whitebark is maybe intermediate in terms of tolerance? There is not an ecological reason for the whitebark treatments, which makes me think your document would be a lot simpler and more easy to understand if you simply said we are doing a fuels project that will produce some marketable wood. In my Forest Service career, I was involved with many timber project appeals and lawsuits. It taught me to keep the documents simple. Forest health, resilience, ecosystem health goals lead the decision maker to strained arguments that just get you tripped up in court.

Whitebark Pine Treatments: Why so many acres when you don't know the efficacy of the treatments. You did a whitebark treatment in this area 10 or

so years ago. Did it work? Why are you silent on this? If it showed signs of success, show us some photos. Could you drop the mechanical treatments? You recognize that some damage to trees will occur. Given the questionable benefit to health, why not forget mechanical treatment in whitebark if it only creates more problems? You state the whitebark treatments are designed to improve health and are “not primarily targeted for fuel reduction”. It seems to me that keeping fire out of the crowns of the white bark makes more sense than any other arguments.

US Fish and Wildlife consultation: What is status of consultation? You must have some knowledge of what they are thinking regarding whitebark treatment and impact on lynx habitat.

Inventoried Roadless: I think you explained consistency with the roadless rule fairly well until you said “individual larger trees may be removed based on forest health and to ensure future growth and establishment of the stand.” This statement seems inconsistent with the rule. But then, maybe the roadless rule no longer applies. If that’s the case, don’t do sloppy work in roadless or you will lose whatever community support you have.

Snowmachines: Thinning the forest will create new access for snow machines. You won’t mitigate this with signs. Newer machine technology is getting people to places they should not be. I have observed both snowmobiles and snow bikes encroach in wilderness.

Community Support: Does the community support this. Could you start small and demonstrate success? I did a lot of small projects in the Missoula area to gain support. How will you encourage private owners to do fuel treatments? Will you treat acres adjacent to landowners that don’t support treatment of any kind?

Thanks for opportunity to comment

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