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First name: Colin

Last name: Cooney

Organization: Trout Unlimited

Title: Montana Representative

Comments: Please see the attached comments from Trout Unlimited.

Thank you.

Mary Erickson

Custer Gallatin Forest Supervisor

RE: Red Lodge Mountain Fuels Project

Ms. Erickson,

Please accept comments on the proposed Red Lodge Mountain Fuels Project from Trout Unlimited (TU) on the Beartooth Ranger District of the Custer Gallatin National Forest. We appreciate the opportunity to participate in this process. Trout Unlimited represents more than 300,000 members and supporters across the country. Montana Trout Unlimited represents the organization's 4,200 members and 13 TU chapters in Montana. TU's and MTU's mission are to conserve, protect and restore coldwater fisheries and their watersheds.

#### Overview

The Beartooth Ranger District proposes this project to reduce wildfire behavior in the vicinity of Red Lodge Mountain Ski Area by reducing tree densities and forest surface fuels on 2,100 acres within a 6,200-acre area through commercial harvest, small tree treatments such as chipping and cutting/piling, and prescribed fire. The purpose for treatment is to reduce the risk of high-intensity wildfire within and adjacent to Red Lodge Mountain Ski area, reduce the risk of high-intensity wildfire adjacent to the community of Red Lodge and surrounding developments, provide a safer environment to conduct wildfire suppression operations, and provide more suppression options to wildfire managers.

#### Watershed and Aquatics

TU agrees with logging and timber harvest in a way that contributes to ecological and economic sustainability and in a way that reduces wildfire risk. However, logging and other forest treatments must be done in a way that protects the watersheds and streams in the treatment areas. Parts of the project lay at the headwaters of Willow Creek and the Brushy Fork Willow, which still have pure Yellowstone cutthroat trout. Both Willow Creek and Brushy Fork Willow Creek suffer excessive fine sediment loads as well. TU would recommend that any proposed action take the surrounding watershed, creeks and streams into consideration and considers the Montana Stream Management Zone laws and rules to protect these areas. Stream Management Zones act as a buffer strip that provides necessary water quality protection, critical fish and wildlife habitat, and actively regulates high flood flows. Improper timber harvesting in the SMZ can cause erosion and water quality problems and degrade its integrity. (<http://dnrc.mt.gov/divisions/forestry/docs/assistance/practices/smzfullcopy.pdf>)

## Conclusion

We appreciate the opportunity to offer our recommendations and comments. We will continue to participate in the planning process moving forward.

Sincerely,

Colin Cooney

Montana Representative Trout Unlimited