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Organization: Beartooth Alliance

Title: Chair

Comments:

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.

April 25, 2025

Gardiner Ranger District

805 Scott Street W

Gardiner, MT 59030

Re: Cooke City Fuels and Forest Health Project

Dear Gardiner Ranger District:

This comment period has come at a busy time for me. I have not been able to review the Environmental Assessment (EA) with my two fellow officers. Therefore, as chair, I take responsibility for these comments on behalf of the Beartooth Alliance organization and our 50 members. I respectfully request you consider the listed concerns of the Cooke City Fuels and Forest Health Project (CCF&FHP) and provide responses.

? Although 475 acres have been removed from the original CCF&FHP, the project still encompasses a vast and varied 3,218 acres, with seven varied treatment types within a 112 page document that the layperson was required to interpret without the aid of a public meeting. This is too large and confusing of a project for a citizen to respond to, within the 30 day comment period.

? I reached out to one of the listed Forest Service project contacts by email on Wednesday, March 26, 2025 and again on Friday, March, 28, 2025 and left two phone messages, requesting responses to questions concerning the CCF&FHP. I did not receive a response to my questions until 5:18 pm on April 3, 2025. If a listed Forest Service project contact goes on vacation when the comment period is released, at a minimum an out-of-office response should be connected to the person's voicemail and email or all correspondences should be forwarded to another individual present in the office, as time is ticking away to respond to the project within the given timeframe.

? The KMZ file was not made available until April 10, 2025, which is well into the comment period. As well, the Bannock Trail Terrain map was not made available until April 7, 2025.

? The KMZ files are confusing. No where is the below explained in the EA. Please explain why:

- o Non-Commercial Mechanical Units 79A, 83, 86, & 89 state Management Type Intermediate.
- o Units 5, 11, 12, 13, 15, 7, 82, 88, 106, 108, 109A, 76, 105A and possibly others, which are non-commercial, state either Management Type Intermediate or Timberstand Improvement.

? Including page numbers on the document would be convenient and more efficient, so reference can be made more easily to document statements.

? Provide assurance strict marking guidelines will be followed and enforced within commercial units and

mechanical units adjacent to non-mechanical units

- o include procedures and consequences

- ? Provide assurance community and homeowner outreach will be conducted two weeks prior to the commencement of work within a unit/

- ? state procedure and consequences

- ? There is no mention within the EA that maintaining mature standing forests is the best action for climate mitigation. The Environmental Analysis should focus on maintaining as many mature trees as possible.

No commercial logging should occur (Mildrexler, 2023; Ripple, 2024).

- o Beetle infestations are occurring at higher elevations due to a warming climate. The statement in the EA on page 69 that "minor short-term effects" will occur is not correct. The removal of trees will have a long-term effect and will directly increase carbon levels in our atmosphere, which will increase beetle infestations at higher elevations.

- ? No where within the draft Environmental Assessment is prescribed burning suggested as a treatment. 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).

- ? Planned mitigation of future winter activity conflicts between motorized and non-motorized recreation must be more substantial. 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 Increased signage and the statement that "vegetation could eventually grow back in areas that are treated" are not adequate solutions (p. 72).

- ? This was not fully addressed:

- o For units 41, 42, 44, 45, 51-53, 58, 63, 110 and all Units east of Woody Creek that are south of Hwy 212: focus EA on protecting the valley floor, without tractor logging or heavy mechanical work

- ? Units 34 & 110 are roadless areas, yet are receiving commercial logging treatments. This should be reduced to less impact.

- ? Units 34, 35, 42, 44, and 45 should not be commercial logging. These will be eyesoars to the community. The EA states impact to scenic views have been considered, yet these focal views from numerous hotels, restaurants, homes, and trail systems will be impacted.

- ? Both Units 34 & 35 and Units 42, 44, & 45 are trailhead locations for summer and winter tourist and resident recreation. Wildlife of all types-moose, bear, bison, mule deer, elk, grouse, foxes, wolves, various bird species...etc.-use these areas year-round.

- ? 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, will fall over.

- ? Units 37A, 39, 40, 98A and Units 37B, 38, 41, 98B, 112 should be considered a neighborhood grove with high scenic integrity and should be removed from the project.

- o Additionally, residents who live adjacent to and below these Units have repeatedly expressed concerns that harvesting any trees on steep mountainous terrain along the southside of Highway 212 will increase property and road damage due to mudslide and avalanche-prone locations.

- o These are north-aspect moisture rich, healthy old-growth stands that are fire refugia areas (Rogean, 2018).

- ? Photos of before and after treatments in the EA do not match. The locations of the before and after photos are of different locations; therefore, comparisons cannot be accurately made. As well, not all treatment photos are provided.

- o Please provide appropriate photos or present the images at an in-person public meeting.

- ? Provide assurance that dead-standing Whitebark pine trees will remain on the landscape.
- ? Units with Whitebark pine trees should be removed from the project until substantive 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 EA provides unconvincing information regarding its suggestions of treatments for whitebark pine areas. On pages 30-31, the EA uses the words "speculative, unknown, unclear, not all damage may be preventable" when referring to suggested whitebark pine treatments for the CCFH&FP.
- o 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.
- o To mitigate whitebark losses, the Confederated Salish& Kootenai Tribes are planting whitebark pine seedlings that have genetic resistance to white pine blister-rust. Glacier National Park, Yellowstone National Park, and Teton National Park have implemented similar programs with success.
- ? Prior to the start of any approved work within a Unit, secure funds to monitor the spread of noxious weeds for a minimum of 5 years following treatments.
- o Page 99 of document Section INV3 states treatment and monitoring will occur only if funding is secured. This is not acceptable, as the presence of noxious weeds within the treatment sites is known, and the ease of spreading noxious weeds to disturbed sites is well documented.
- ? Assurance all temporary project signage, plastic flags, flagging tape, unused project materials, and trash will be removed from all units.
- o state procedures and consequences
- ? 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.
- o 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 above points of concern are the issues found unaddressed, missing, or are described without clarity in the CCF&FHP EA. 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, further information and refinement of the Cooke City Fuels and Forest Health Project is requested. Lastly, we would appreciate in-person meetings to continue to build trust and community relations between the Forest Service and community stakeholders before any treatments would be conducted.

Sincerely,

Lara Belice

Chair, Beartooth Alliance

References Cited:

Cansler, C.A., Kane, V.R., Bartl-Geller, B.N., Povak, N.A., Churchill, D.C., Hessburg, P.F., Lutz, J.A., Kane, J.T., Larson, A.J., 2022. Previous wildfires and management treatments moderate subsequent fire severity. *For. Ecol. Manage.*, 119764. <https://doi.org/10.1016/j.foreco.2021.119764>

Churchill, D.J., Jeronimo, S.M.A., Hessburg, P.F., Cansler, C.A., Povak, N.A., Kane, V.R., et al. (2022). Post-fire landscape evaluations in Eastern Washington, USA: assessing the work of contemporary wildfires. *Forest Ecology and Management*, 504, 119796. <https://doi.org/10.1016/j.foreco.2021.119796>

Johnston, J.D., Olszewski, J.H., Miller, B.A., Schmidt, M.R., Vernon, M.J., Ellsworth, L. M., 2021. Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest. *For. Ecol. Manage.* 501, 119674. <https://doi.org/10.1016/j.foreco.2021.119674>

Mildrexler DJ, Berner LT, Law BE, Birdsey RA, Moomaw WR. 2023. Protect large trees for climate mitigation, biodiversity, and forest resilience.. *Conservation Science and Practice*. | DOI: <https://doi.org/10.1111/csp2.12944>

Ripple, W.J., C. Wolf, J.W. Gregg, J. Rockström, M.E. Mann, N. Oreskes, T. M. Lenton, S. Rahmstorf, T.M. Newsome, C.

Xu, J.-C. Svenning, C.C. Pereira, B.E. Law, T.W. Crowther. 2024. The 2024 state of the climate report: Perilous times on planet Earth. *Bioscience*, 2024, bia087 | DOI: <https://doi.org/10.1093/biosci/bia087>

Rogeeau, M.-P., Barber, Q.E. & Parisien, M.-A. (2018). Effect of topography on persistent fire refugia of the Canadian Rocky Mountains. *Forests*, 9, 285. DOI: <https://doi.org/10.3390/f9060285>