Data Submitted (UTC 11): 10/25/2022 7:59:47 PM First name: Nancy Last name: Ostlie Organization: Great Old Broads For Wilderness Title: Volunteer Leader Comments: The following are notes I took from a field

Comments: The following are notes I took from a field trip to the south Plateau project on Monday Oct. 17. At the end, I have some questions:

We started the tour at a landing area (convergence of skid trails) in an area thinned in 2019. The Purchaser (logging operator) whole-tree-yarded (pulled trees with feller buncher) which the vast majority of South Plateau treatment will be. The skid trails are 'slashed' with residual material. Any ruts from the equipment get repaired. This is commercial thinning, not a regeneration harvest, to promote well being of 'leave trees'. They expect the 'leave trees' to be blown down, which is good to create downed woody debris for soils and habitat. The goal in this area was 30 foot 'bole to bole' to reduce fuel loading. The primary recreational use in the area is hunting. It is not interesting for hiking, etc., having been clearcut in the past and with mostly just one age-class of trees. Q. will the treatments displace the elk? A. The elk come back as soon as the logging machines are gone. This may have been hiding cover but now would be forage for elk. Pine marten are displaced.

Paul Ticus (sp?), silviculturalist, says this thinning will lessen the likelihood of pine beetle and spruce budworm, and introduce patchiness, which is good. They leave the 'healthiest' trees, the 'biggest and best'. I questioned that since very large trees were on the ground and only smaller trees were standing. I asked how they know which trees are genetically stronger (to withstand fire, disease) and he said it is not a matter of tree genetics. Mike Mease of Buffalo Field Campaign and I expressed concerns that thinning will dry out the area making it more susceptible to burning under extreme weather conditions (drought, high winds). Wendy Urie summarized three reasons for the project: 1- to decrease insect and disease infestation; 2- to do commercial harvest; and 3- to reduce fuels in the WUI or Fuels Priority Area. I described the Gallatin County WUI map and said it appears that the entire county is labelled WUI except for the urban areas, and the group replied that while there had been a recent update to the document, they acknowledged that fire risk within 1/2 mile of structures was the real concern, and that the plan for the project was sort of a "soup", suggesting that some ingredients for the project were [approximate?].

The second area we visited was in the Mosquito Gulch area, which is planned for thinning with an average of 20 +/- 5 feet bole-to-bole. They will leave the 'best trees'. It appeared very even age class, a monoculture of lodgepole pine with little understory vegetation. Bob Lindstrom asked how many million board feet of timber will be cut: 83 mbf. He wanted to estimate number of truckloads and the value, but the group of FS employees did not have a number ready. They spoke of gross value and net value after road cuts, etc. and said two mills are interested, Sun Lumber and another. The 99% lodgepole with little diversity will be used for studs and post-and-pole lumber. After this intermediate harvest, when the rest of the stand reaches 80 years old, they will clearcut, which is called a regeneration harvest. I asked why we would do any clearcutting, and they referred to the 80-100 year lifespan of lodgepole. I said I didn't get the logic though I understand the lodgepole lifespan.

They talked about closure of the temporary roads they will cut. They said they utilized existing roads to the greatest extent possible to limit new roadbuilding. We were looking at an old road that had been decommissioned, with a berm created about 50' in. I questioned whether the agency tracks effectiveness of road closures, which are commonly ignored in many areas of the state, saying that the flat terrain would allow motorized vehicles to simply drive around berms, etc. They acknowledged this was a potential problem and said they have gotten more successful lately with road closures. I cited the impact of roads on grizzly habitat and asked why they would be doing any project in this area adjacent to YNP in grizzly and lynx (and wolverine) habitat. I commented that our priorities are clearly wrong to be producing timber in such a critical habitat area....

The wildlife biologist said grizzlies use this area only early in the season. There was discussion about scenic integrity objectives and whether the management area would be visible from the Short Line trail, the newly paved

railroad route running from West Yellowstone to the Continental Divide. There will be some impact. There was discussion about decommissioning some roads (478) to shift motorized use out of the riparian corridor and over to the road we were on. The native dwarf Mistletoe was mentioned and we asked if it has benefits for wildlife and why it would be targeted. The mistletoe infestations limit tree growth. On this soil/habitat type, cold moist, they want to retain 80 live trees per ten acres. No prescribed burning is planned in lodgepole area.

3. Spruce budworms mostly impact the tender tips of new spruce growth and don't kill many of the trees. In the mid 1950s the USFS sprayed many forests to kill spruce budworms and the birds were decimated. If spruce budworms can be destructive, why worry about them in a monoculture forest of lodgepoles?

<sup>1.</sup> Thoughts: 80-100 year life span of lodgepole. Don't know where that comes from, except that the rate of wood production/per acre may decline in about that time. As I recall, the average age of lodgepole stands that burned in the big Yellowstone burn was 200 years. Moreover, this strategy intends to maintain the area in, mostly monotypic, lodgepole pine. What tree species will come into the understory in the 2nd 100 years. Would there ever be any really big trees in the whole area?

<sup>2.</sup> Grizzlies "only use the area early in the season". What season? Spring, a very important season for bears, especially sows with cubs. Anyway, Does the "fact" that bears use the area mostly, or even only, in one season make the area unimportant as part of the year-round habitat for bears?