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Organization:

Title:

Comments: I first started skiing in the Chestnut Mountain area in the late 1990's while living in Bozeman. It's a great area with wonderful views, easy winter access from I-90 and Bozeman and a variety of lower angle trails, meadows and glades. I continue to enjoy the area as a relatively quick stop from the I-90 corridor for mountain biking, hiking, cross-country skiing, and backcountry skiing. I am concerned that this project is not adequately considering and mitigating potential effects to non-motorized recreation use.

Regarding the proposed Goose Creek fuel reduction project, please consider and mitigate for the following issues:

- 1) Windthrow of retained trees: I am concerned that the proposed fuel reduction project will open up forested areas on the Chestnut Mountain ridgeline to that point that excessive windthrow will create a future mess of down fuels. Windthrow will exacerbate the fuel hazard/fire risk, impede non-motorized recreation access, increase trail maintenance needs and costs, and increase the need for follow-up fuel treatments and related costs. Windthrow potential could be mitigated by thinning to reduced crown spacing in wind-exposed ridgetop areas and retaining large and health trees. Windthrow effects could be further mitigated by planning and budgeting for follow-on cleanup to deal with potential future fuel accumulations.
- 2) Maintaining and enhancing backcountry and cross ski opportunities: Fuel breaks should be designed to connect to existing meadow openings to improve and enhance downhill and uphill ski routes.
- 3) Use existing openings and rock outcrops as fuel breaks. Don't just buffer the existing trails and roads on a map using GIS software. Get out on the ground and lay out fuel breaks that will achieve project objectives while benefitting non-motorized recreation users. There are numerous existing rock-outcrops and open areas on the west side of Chestnut Mountain that serve as natural fuel breaks - fuel treatment units should be located to connect to such existing rock outcrops and open areas, not just follow trails and roads as an office-based GIS exercise.
- 4) Opening tree canopy along the Chestnut Mountain ridge line could increase the ability for snowmobiles to access new areas that were previously heavily forested. Such future snowmobile use could reduce opportunities for winter non-motorized users seeking solitude and untracked snow. This could be mitigated by designating some some treated areas as closed to snowmobile use and/or leaving non-treated "pinch-points" along the ridge to impede snowmobile access.
- 5) Temporary roads open new areas to motorized use during summer and winter seasons. The proposed action provides little to no detail as to what/where/how temporary roads will be used and reclaimed. Where will temporary roads be located? Will temporary roads be closed or open to public motorized use during project implementation? How will temporary roads be reclaimed and closed upon project completion? Can or should some temporary roads be retained to enhance recreation opportunities?
- 6) What is the proposed timeframe for project implementation? Will cut materials be immediately burned or chipped?
- 7) If cut materials are not immediately removed, burned or chipped, what is the potential for causing insect and disease infestations due to presence of cut tree boles remaining on the landscape? Insect and disease concerns could be mitigated by removing large diameter cut materials as soon as possible.
- 8) Road use and log hauling: If commercial logging equipment is used, will the main Goose Creek road need BMP drainage and surfacing improvements for hauling? Will Goose Creek road be temporarily closed or restricted to public use?
- 9) Existing trails and ski routes should be protected by ensuring that hand piles, skid trails and temporary roads are not placed directly over trails/routes. The Forest Service should commit to immediately repair any project-related damages to roads and trails.
- 10) There are numerous historic timber harvest units in the Goose Creek area. Some of these former harvest units could benefit from pre-commercial thinning to enhance forest health and follow the original silvicultural

prescriptions. Rather than cutting through areas of intact non-managed forest, fuel reduction in previous harvest units should be considered and utilized to create and enhance fuel breaks and improve forest health.

11) While the scoping document indicates that this project will be categorically excluded from extensive NEPA analysis/disclosure, the project still needs to comply with NFMA and the Custer Gallatin Forest Plan. Specifically, please evaluate and disclose how project activities will comply with Forest Plan winter and summer recreation goals, objectives, standards and guidelines and disclose potential effects to recreation use.