

Data Submitted (UTC 11): 7/22/2024 4:00:00 AM

First name: Colin

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Organization:

Title:

Comments: Custer Gallatin National Forests

Gardiner Ranger District

PO Box 5

Gardiner, MT 59030

Attn: Jennifer O'Connor Card

July 22, 2024

Re: Cooke City Fuels and Forest Health Project

To Whom it May Concern:

I am writing on behalf of the Wessells family, which owns and has resided seasonally in Silver Gate since 1985.

The purpose of this letter is to comment on and object to the Cooke City Fuels and Forest Health Project as currently proposed.

The Gardiner Ranger District has rightly considered the risk of a potential forest fire to property and public safety in the Silver Gate - Cooke City area and we commend it for doing so. However, we believe there are significant concerns associated with this project that have not been appropriately addressed by the Comments Packet.

First, we object to this project based on several concerns specific to mechanical logging on tracts 37 and 111, which are directly adjacent or in close proximity to our property.

1. Elevated risk of property damage due to rock / mudslides. Over the past fifteen years, acute heavy rain on the north slope of Republic Mountain has resulted in rock / mudslides that have impacted both Bannock Trail and private property. The events that we have personally observed have occurred during and immediately after acute heavy rain in summer months and do not appear to be correlated with seasonal runoff. There may have been other rock/mudslide events as well. Two specific examples are minor property damage to the land and structures at 110 Bannock Trail, as well as the need to plow/regrade the Bannock Trail itself approximately 100 yards east of 35 Bannock Trail. Mechanical logging on tracts 37 and/or 111 would result in a substantial loss of vegetation that would normally provide "friction" during a rock/mudslide event, resulting in an increased risk of damage to private property and obstruction to Bannock Trail.

2. The Bannock Trail is not maintained for approximately 1 mile west of Cooke City. From Silver Gate, for most passenger and commercial vehicles the Bannock Trail is a dead end with a single access point. Obstruction of the Bannock Trail, either by logging equipment and vehicles during the execution of the proposed project, or by a rock/mudslide event would eliminate the only outlet route for residents. This is not only an inconvenience, but also a danger to residents who may suffer a medical emergency or another urgent need to exit the Bannock Trail to Silver Gate.

3. The section of the Bannock Trail between Silver Gate and tracts 37 and 111 is single-lane with limited visibility. Many families with children walk and bike this section of road during the summer months. Truck and equipment traffic in this setting poses a safety risk to pedestrian and bicycle traffic.

4. The Comment Packet does not appear to provide a specific justification for tracts 37 and 111 in consideration of their topography. Those tracts are located on a steep north-facing slope at the base of ~2500 vertical feet of terrain. Even in the summer months, those tracts are in shadow for several daylight hours in the morning and evening. This results in cooler temperatures and wetter soil than the conditions found on many other tracts in this project. In the absence of analytical data indicating elevated fire risk, such as water content testing of vegetation tissue samples, the inclusion of tracts 37 and 111, as well as other project tracts on similar terrain should be reconsidered.

Second, we object to this project based on concerns about this project more generally:

5. This project risks adversely impacting local wildlife in ways that are relevant to the local economy. Mammalian species that are known to drive local tourism and permitted hunting activities, such as grizzly and black bears, wolves, moose, and bighorn sheep are regularly observed in the affected tracts. A local decrease in wildlife activity due to project activities may negatively impact local tourism-based businesses. For example, the Silver Gate Store explicitly markets local wildlife sightings, as do other local businesses. Considering the majority of local economic activity is tourism, the potential negative impacts of this project on local businesses must be carefully considered. On a seasonal basis, permitted hunting activities in the Daisy/Lulu Pass area also drive the local economy, and the impacts of this project on relevant species should also be considered.

6. The project plan does not appear to include a systematic reforestation plan. While the Comment Packet emphasizes the intent to preserve existing endangered Whitebark Pine, that species is rare or even absent from many of the lower-elevation tracts in the Republic Mountain and Reef areas. The effects of deforestation in the Silver Gate - Cooke City area are well established in the aftermath of the 1988 Yellowstone Fire, which burned through the forest on the north side of highway 212. Those south facing slopes have gradually recovered in the subsequent 36 years, but the result is an effective monoculture of Lodgepole Pine. The area affected by the fire is effectively devoid of other native conifer species including Whitebark Pine, Engelman Spruce, and Subalpine Fir.

At best, the proposed project is likely to drive a similar result: replacement of a diverse forest in which there are four competing native conifer species with a forest in which one species, Lodgepole Pine, dominates. There is also a material probability that this project results in an even worse outcome: a persistent loss of forested land for decades. The project plan does not appear to include any re-seeding activities analogous to what naturally occurred after the 1988 fire. The germination rates in the project tracts may therefore be expected to be extraordinarily low, and there is no reason to believe the affected tracts would recover as quickly as the areas affected by the 1988 fire.

For this reason, we strongly encourage the project organizers to consider widespread re-seeding of the affected tracts with a blend of native conifer species including the endangered Whitebark Pine.

Unfortunately, members of our household are not available to participate in the public sessions scheduled for July 22 and 23. If Forest Service staff has any questions regarding our concerns, please do not hesitate to contact me.

Sincerely,

Colin Wessells