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Organization:

Title:

Comments: District Ranger Mike Thom,

I am writing to comment on the Cooke City Fuels and Forest Health Proposal #57361 issued on July 12, 2024.

First, I would like to point out that this proposal was released without any public scoping or community input.

Secondly, we were not aware of this plan until shortly before a field trip and meeting in Silver Gate on July 22.

This actually gave us only 23 days to research current science on fire risks and mitigation in our predominantly mature spruce-fir-lodgepole forests and to try to understand the nature of your proposed actions. Your initial maps were entirely inadequate to determine locations of specific "treatment" plots, not even showing the Bannock Trail along which the majority of affected homeowners live. Following multiple requests to your Custer-Gallatin NF offices, we eventually received maps which could show sufficient detail for us to have an idea of actual treatment area boundaries.

This project encompasses so many plots in so many areas that it is impossible to support full-scale approval. As it stands, this plan would do far more harm than good. I support the NO ACTION alternative from this Cooke City Proposal #57361. A heavily modified plan, which eliminates logging and limits thinning along the Bannock Trail, would be a much more acceptable approach. The following comments will be address some specific geographic units in this plan:

#### Units 34 and 35

Commercial logging proposed for units 34 and 35 might have a potential positive effect in improving fire safety for businesses and residences along the north side of highway 212. The forest north of Highway 212 is south-facing and considerably drier and more fire-prone than the shady forest to the south of the highway. This could potentially benefit from the commercial logging proposed upwind (west) of the small business center of Silver Gate.

#### Unit 36 Units 37-40, 111, 112

The 32 acre plot of unit 36 lies between or upslope of residences along the Bannock Trail, and is slated for commercial logging. Units 37-40 are upslope of residences and private land along the Bannock Trail. The forest here is mature/old growth Englemann Spruce, Subalpine Fir, and Lodgepole Pine. These units in this valley (36-40,111,112) are deeply shaded by high mountains to the south, and exhibit no evidence of fire ever (as supported by the fire history mapping done by Yellowstone NP). At our meetings on July 22, your USFS employees acknowledged that there was no evidence of fire here. Unit 36 is planned for commercial logging, which would remove much of the canopy, dry out the currently moist ground, and destabilize the soil. Proposed mechanically thinning along the Bannock (units 37-40, 111, 112) would be uphill of numerous houses. This will also destabilize the soil and increase mud slides during wet periods, like June snowmelt. As is, we experience some mudslides on our dirt road (Bannock Trail) annually, including one in the center of unit 36. Logging and thinning may make this much worse.

Previously, with a few neighbors, we spent some years working with our local Park County commissioners to replace 3 bridges and improve our road surface on the Bannock Trail. Working with our commissioners was always a pleasure, and we now have new bridges and a road that is in better condition than it had been in twenty years! A major failure of your plan is to ignore damage to this road, to not include any provision for its repair and restoration, and to leave a damaged road for the taxpayers of Park County, MT to fix after you depart. My wife and I are opposed to the actions proposed for units 36-40, 111 and 112.

The USFS claims that their objective is to improve safety for residents and fire-fighters. One action that would help achieve that is to restore the continuity of our road for normal vehicles between Cooke City and Silver Gate.

A portion of the road is now washed out from our great flood of 2022. Currently, there is only one way to escape from either end of this road, should that be necessary. This plan would not address two-way escape safety.

The plan will take many years to complete, perhaps up to 15(USFS). Currently, one of the great pleasures of living here is the remarkable quiet. In May and June, the valley fills with gentle bird song. In winter, one can hear moose browsing on Shepherdia bushes. Our quiet will be shattered by chainsaws, logging trucks, and heavy machinery for many years, should this plan be implemented. Constant noise would diminish our lives greatly. Logging will dramatically reduce the quality of recreational walking along the Bannock Trail.

There is increasing scientific support for the realization that thinning or logging small areas has little value in reducing fire risk in regions of low fire frequency. The mature forests along the Bannock are fire resilient. This mature spruce/fir/lodgepole is not prone to fuel-driven events, but only to the rarity of a wind-driven crown fire. Even in the cataclysmic burns of 1988 in Yellowstone, mature spruce/fir did not burn. When attempts were made to start back-burns locally in 1988, they quickly burned out of control on the north side of highway 212. Significantly, concurrent attempts failed to ignite back-burn on the south side of the forest, where units 36-41 are.

In a 2018 letter to Congress, more than 200 scientists questioned fuel reduction strategy. To quote from the scientists' letter: "Thinning is most often proposed to reduce fire risk and lower fire intensity.... However, as the climate changes, most of our fires will occur during extreme fire-weather - high winds and temperatures, low humidity, low vegetation moisture. These fires, like the ones burning in the West this summer, will affect large landscapes, regardless of thinning, and, in some cases, burn hundreds or thousands of acres in just a few days."

This old-growth spruce-fir-lodgepole forest serves as an extension of Yellowstone for the wildlife of this region. It provides us with trail and country-road walking, and makes the area quite attractive to visitors. Grizzly Bears, black bears, moose, pine martens, weasels, numerous bird species, and many other native wild animals breed and live in the valley along the Bannock Trail. Clark's Nutcrackers store seeds in the very forests you propose to log or thin. These wild creatures utilize this corridor as a continuation of Yellowstone National Park directly to the west. Your planned activities along the Bannock in the six units mentioned above would significantly disrupt their lives and reduce their habitat.

Nationally, the US Forest Service has new guidelines for the management of old growth and mature forests, with an emphasis on conservation. It is premature and inappropriate for this plan to be implemented without incorporating recent national guidelines for preservation of our increasingly rare mature and old growth forests. Significantly, the mature forests in this plan adjoin the ecologically vital protected lands of Yellowstone National Park, and are even more valuable because of that natural connection. It is vital that these rare wildlife-filled forests along the Bannock be preserved as an ecological companion to Yellowstone. I strongly support NO ACTION for units 36-40, 111 and 112, as they all contain significant stands of mature or old-growth forest.

In our meetings on July 26, you stated that this project would not pay for itself, and would require federal funding for implementation. We believe this project to be a poor use of taxpayer dollars, and that tax dollars would be much better spent by the USFS in more fire-prone communities.

To the animals, this forest is just an eastern park of their Yellowstone home. They wander freely through our valley, just as they do in the great national park less than one mile away. The grizzly bears, nutcrackers, moose, pine martens and countless other wild creatures know how lush, verdant, rich and wild this Bannock Road valley is. They use it as an uninterrupted extension of their Yellowstone. In May this year, a Grizzly sow walked past our place with her two small cubs. In June, a cow moose gave birth to her calf less than a hundred yards away. Three-toed woodpeckers, yellow-rumped warblers, and other winged creatures successfully tend their nests close to our house. Each June morning the dawn call of a Swainson's thrush filled the air. In fall, Clark's Nutcrackers store their seeds under our trees. Soon, these sights and sounds may be replaced by the roar of logging machinery. A place as wild as can be lived in will be diminished for the rest of our lives. To implement

your proposal, which reads like a logging project in disguise, would break my heart.