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First name: Marie

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Organization:

Title:

Comments: Marie Carpenter

August 11, 2024

Gardiner Ranger District 805 Scott Street W Gardiner, MT 59030

Re: Cooke City Fuels and Forest Health Project

Dear Gardiner Ranger District:

Thank you for the opportunity to comment on the Cooke City Fuels and Forest Health Project. I am a member of the Beartooth Alliance and do share the concerns that were raised in their letter to you regarding this project. I do have a few additional concerns that I would like to express regarding the Cooke City Fuels and Forest Health Project.

I request that the following points of concern are specifically addressed:

- Reconsider the Tractor (Ground Based) Harvest. The plan calls for 288 acres of logging, with three of the treatment areas focused in Silver Gate. This plan elevates commercial logging interests ahead of the interests of the community and protection of local wildlife habitat.
- Unit 36 is highly valued by the local community for its aesthetic and environmental importance. As someone who frequently walks and hikes in this area, I appreciate how the dense tree canopy keeps the forest cool, even on the hottest summer days. Commercial logging and thinning would expose this area to direct sunlight, making it hotter and drier, which contradicts the project's goal of preventing wildfires.
- Disturbance to the ground in Unit 36 via Tractor Logging would significantly alter its natural state, leading to potential soil erosion, water quality degradation, and disruption of wildlife habitats.

I urge the USFS to adopt the No Action Alternative (Alternative A) over the current plan for a commercial tractor (ground based) harvest especially for the areas surrounding Silver Gate, including Unit 36.

- Reconsider plan for inclusion of Commercial Harvest. The plan calls for the removal of Lodgepole pine trees greater than or equal to 6 inches in diameter and the removal of Douglas-fir, Engelmann spruce, and Subalpine fir trees greater than or equal to 7 inches in diameter.
- Larger trees play a crucial role in maintaining the ecological stability of forests, providing habitat for wildlife, and contributing to carbon sequestration.
- The use of heavy machinery can cause significant soil compaction, increased runoff, and long-term damage to the forest floor.
- Commercial logging, particularly of larger trees, undermines the forest's resilience and its ability to recover from disturbances.
- Recent studies and expert opinions suggest that logging, especially of larger trees, may not significantly reduce fire severity.
- The USDA Forest Service's draft guidance emphasizes the importance of preserving old-growth and mature forests for their resilience to climate change.
- Forest management practices should focus on selective thinning of smaller, more fire-prone trees to reduce fuel loads without compromising the integrity of the forest ecosystem.

- Insufficient Evidence of Fire Mitigation. The plan for removing larger trees via commercial harvest also runs counter to the latest thinking on wildfire management.
- Recent studies and expert opinions suggest that logging, especially of larger trees, may not significantly reduce fire severity and can sometimes increase the risk of fire by opening up the canopy and allowing more sunlight and wind to dry out forest fuels.
- The USDA Forest Service's draft guidance on old-growth and mature forests highlights the importance of preserving these ecosystems for their resilience to climate change and natural disturbances.
- Additionally, a letter from over 200 scientists, including fire ecologists, emphasizes that logging and removal of large trees do not effectively mitigate wildfire risks and can be detrimental to forest health.
- The Cooke City Fuels and Forest Health Project should prioritize alternative fire mitigation strategies that have been shown to be more effective, such as creating defensible space around structures, implementing prescribed burns, and enhancing community preparedness programs. These approaches can reduce wildfire risks while preserving the ecological and scenic values of the forest.

- Provide a plan for repopulating blister rust-resistant whitebark pines.
- The current plan simply removes all other trees within 5 to 30 feet of existing whitebark pine. If the health of this species is truly a driver of this project, more proactive effort should be taken to encourage new trees in the cleared areas.

- A national restoration strategy for whitebark pines is currently being developed, with contributions from the Greater Yellowstone Whitebark Pine Subcommittee. As of June 2024, this strategy was nearing finalization (nps.gov). I recommend that the USFS review and adhere to the guidelines set forth by this committee, rather than simply clear-cutting the forest surrounding individual whitebark pine trees.

- Consider increased usage of alternative campsites and enforce campfire safety protocols. As pointed out in the letter from the Beartooth Alliance, many tourists are already 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.

- The closure of Soda Butte Campground and the disturbance of areas normally used by dispersed campers could significantly increase the number of vehicles using this pullout for overnight camping.

- As usage grows and human waste accumulates, I urge the USFS to install pit toilets at this location.

- Additionally, there is evidence of campfires at this site by vehicle campers. I recommend that the USFS provide signage on proper campfire safety and strictly enforce these protocols to prevent a potential wildfire, which could have devastating consequences for the community.

In conclusion, while proactive forest management is necessary, it is essential to adopt practices that protect and preserve our natural resources. I urge the Forest Service to reconsider the current proposal and explore more sustainable and effective forest management strategies.

Thank you for your attention to this matter and I look forward to ongoing discussions regarding these issues.

Sincerely,

Marie Carpenter