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Comments: Thank you for giving us the opportunity to comment on the Cooke City Fuels and Forest Health Project.

We do understand the importance of reducing fuel loadings within the Wildland Urban Interface. However, we have several concerns that were either insufficiently or not at all addressed in the provided comment packet.

- 1) The proposed action is insufficiently described. Units for commercial harvest were visible on the included maps, but the nature of the specific commercial treatment was not disclosed. Units 41,42,44 and 45 are all close to our home and adjacent property. However, we can not tell whether the proposed treatment is regeneration harvest, group tree selection or an intermediate harvest. The effects of these treatments would be very different from each other.
- 2) We question the use of regeneration harvest as a fuel treatment. Removing the majority of trees from a site will result in regeneration of the same species that are present today, with comparably high fuel loadings 10 or 20 years down the road. Perhaps a high elevation site like Cooke City is not a suitable location for timber production?
- 3) We do not understand the purpose and logic for the Intermediate tree thinning. Removing trees greater than 6 or 7 inches (depending on species) appears to be targeting the overstory, with potential damage to all the smaller trees. Such a treatment seems to be designed to maximize timber sale volume. The only trees left will be of smaller diameter, this appears contrary to the stated goal of forest restoration and decreasing fire severity and intensity.
- 4) Preliminary effects do not address the potential for soil erosion. The south-facing slopes below Mt Republic already experience mudslides after rain events. In addition, there is a potential of significant lead contamination of soils adjacent to the Great Republic Smelter site. The site itself and adjacent private lands were cleaned up nearly 20 years ago. However, soil contamination likely extends to the east of the site and may include areas proposed for commercial harvest. One potential remedy would be winter harvest over snow, which would reduce soil disturbance and the potential for mudslides.
- 5) Finally, we have significant concerns about the effects of fuel treatments on off-road ATV use and snowmobiling. Cooke City offers tremendous opportunities for motorized recreation. Unfortunately, not all guests are considerate to residents. We share the concern of many of our neighbors that opening the forest adjacent to roads will encourage more off-roading. This would result in unofficial trails, erosion, resource damage, noise pollution and a potential increase of motorized vehicles crossing wilderness boundaries.

On a positive note, we do appreciate that the majority of commercial treatments are group tree selections. We acknowledge the difficulty of designing functional treatments for these subalpine forest and believe that group tree selection provides a good compromise between opening up the forest canopy and maintaining some of the older forest structure.

We are looking forward to further discussions of the above issues.

Gary and Sabine Brown