



The Beartooth Alliance is a non-partisan organization of citizens - based in the Cooke City area of Montana - who are committed to influencing environmental and social issues affecting their quality of life. By anticipating problems, providing information and directing resources, the Alliance can ensure the welfare and vitality of the area. Our members and supporters come from all walks of life and have deep roots in our community. The Alliance brings people who love this region together to find ways to protect and enhance our unique mountain environment.

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. We appreciate the forward thinking and efforts of the Gardiner Ranger District to lessen the occurrence of fires that threaten our community, as well as to provide firefighters safer access to protect our community and the limited evacuation routes in the area.

Summer is an extremely busy time of year for our community. The scope of the proposed project is expansive, affecting much of the public land ownership within our local area. The Forest Service should not expect residents to become experts on this complex of a project within the truncated comment period, to be considered permissible stakeholders. The limited comment period, combining both the scoping period and the draft Environmental Analysis, which also included the Forest Service Field Trip event and Forest Service community meeting held well within this comment period, has stressed residents and caused damage to our small-town relationships.

On behalf of the Beartooth Alliance organization and our more than 45 members and supporters in Montana, we respectfully request you consider the following comments and concerns to the proposed Cooke City Fuels and Forest Health Project and provide responses.

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

- Use *current* management strategies that include local, geographically relevant information and the best available recent science (2021 to present), including Indigenous knowledge to provide detailed analyses, objectives and goals for each USFS identified Unit, with clarity on specific work to be completed
 - The current scoping notice is vague, with no clarity on specific work to be completed—group selection vs. regeneration harvest...etc.—within each unit.
 - The current proposed action cites dated references (majority are dated 2000-2009).
- The Environmental Analysis should focus on maintaining as many mature trees as possible.
 - Include new science, which shows mature standing forests sequester carbon dioxide; forest fuel reduction and logging release more carbon into the atmosphere than forest fires
- Assurance each unit will be evaluated individually, by all specialists, including the U.S. Fish & Wildlife Service, and considerations made accordingly to each site as a collective knowledge group
 - allow the public to review notes made by all project specialists on a specific unit, when requested
- Assurance strict marking guidelines will be followed and enforced within commercial units
 - include procedures and consequences

- Provide detailed maps—*of the entire project area*—that are accessible to all residents that show existing houses, labeled trails, topographic lines, roads and drainages ...etc. in relation to each proposed unit, so the community can better understand the boundaries of each unit in relationship to the terrain, property lines, and recreation areas
 - Only a small section of the project is shown in detail.
 - This map detail was not made available to the public until July 29, 2024, which is less than two weeks from the comment period end date.
 - KMZ files are not accessible to all residents.
 - The majority of local summer residents are 70-80+ years old.
- Clearly define what is considered to be “old growth” per species within the proposed units
 - [New Forest Service guidance for old growth management](#) is currently being drafted; therefore, analysis should not continue until this most current management plan is released
- Assurance community and homeowner outreach will be conducted two weeks prior to the commencement of work within a unit
 - state procedure and consequences
- Identify and specify historic washout zones
 - state plan to prevent increased flow due to project work and removal of material
- Existing avalanche runout zones to be treated as is specified for riparian zones within the project
- Planned mitigation of future winter activity conflicts between motorized and non-motorized recreation
 - Historically, because of the density of the forest within the Woody Creek and Republic Creek drainages (Units 42, 44, 45, 99, 113), non-motorized use has dominated the area; however, project plans to open up the spacing between dense stands of trees will permit motorized use and potentially invite increased misuse of non-motorized areas
 - state plan to mitigate increased motorized use, procedure and consequences
- For units 42, 44, 45, 51-53, 58, 63, 110 and all Units east of Woody Creek that are south of Hwy 212: focus Environmental Analysis on protecting the valley floor, without tractor logging or heavy mechanical work
 - start fuel reduction at valley floor, feathering trees out to natural forest density
- Units 36-41 and Units 98, 111, and 112 to be considered a neighborhood grove with high scenic integrity
 - Provide consideration for removing these units entirely from plan, as these are north-aspect moisture rich, healthy old-growth stands
- Assurance dead-standing Whitebark pine trees will remain on the landscape
- Units with Whitebark pine trees should be removed from the project until substantive current science-based data can be provided
 - [Current Whitebark pine research](#), conducted over a decade-long study, indicates no significant increase in Whitebark health when daylighting techniques were used.
 - Whitebark pine areas are too fragile of an ecosystem to risk damaging by mechanical techniques
- Secure funds prior to the start of any approved work to prevent the spread of noxious weeds for a minimum of 3 years, following the completion of work within a unit
- Assurance all temporary project signage, plastic flags, flagging tape, unused project materials, and trash will be removed from all units
 - state procedures and consequences
- On a daily basis, from May-October, tourists are 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. Piles of unburied human feces and soiled toilet paper can be found within the first 200’ of the Forest Service land nearest to this heavily used pullout. The proposed project will cause temporary closure of Soda Butte Campground and eliminate use of Forest Service areas typically used by dispersed campers. We request a permanent pit toilet installed at this site or at a minimum a porta potty be placed here, throughout the duration of any project work.

The above points of concern are the issues we find missing and are described without clarity in the current project proposal. The Beartooth Alliance members and supporters have a strong interest in management decisions that impact the local National Forest adjacent to our community, homes, and businesses. At this time, we request further information regarding the Cooke City Fuels and Forest Health Project and further time to comment on the information provided, so we may better assess the impact this project may have on all aspects of our lives.

We appreciate your consideration of our concerns and welcome continued dialogue around each.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Lara Belice', with a stylized, cursive-like flourish.

Lara Belice
Chair, Beartooth Alliance