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Title: Managing Director
Comments: Please see attached comment letter.

April 25, 2025

Michael Thom
District Ranger
Custer Gallatin National Forest
Gardiner Ranger District
PO Box 5,
Gardiner, MT 59030

RE: Cooke City Fuels and Forest Health Project

Dear Mr. Thom,

Park County Environmental Council (PCEC) would like to thank the Custer Gallatin National Forest (CGNF) for the opportunity to provide our comments on the Cooke City Fuels and Forest Health Project.

PCEC serves as a local grassroots environmental group with more than 500 members and 2,300 supporters. We appreciate your time and consideration on this important matter. PCEC has worked to protect and preserve the vast natural resources of Park County, Montana, since 1990. We are a county-wide environmental group focusing on issues affecting Park County. PCEC works with residents to safeguard and advocate for the county's world-class rivers, diverse wildlife, landscapes, and outstanding natural beauty, while protecting the health and wellbeing of people who live and work here.

Initially formed by a small group of community members to advocate for wild places, wilderness and quality-of-life issues in Park County, PCEC has grown to cover numerous issues related to the Yellowstone River and its tributaries, public land management, land use and threats from development, while encouraging community engagement on these issues.

If we want to ensure that the Greater Yellowstone Ecosystem (GYE) continues to maintain its vital importance for wildlife, intact habitat, and ecological diversity for generations to come, as well as our reverence for wild places, we encourage the CGNF to manage the forest in a manner that can provide for protections that will make that a reality.

The GYE is home to some of the best, most diverse and intact wildlands in the Lower 48. It is still home to all the major species of mammals that were present on this continent prior to the arrival of Europeans, having long provided refuge for elk, bison, wolverine and grizzly (and room for the return of the wolf). Its wildlife migration corridors are extensive and still

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mostly intact. All of this is possible because it contains habitat that remains largely

unfragmented and still mostly intact in the 21st century.

After reviewing the Cooke City Fuels and Forest Health Project we would like to offer the following comments on the proposal.

Location

The Cooke City project is uniquely situated between two wilderness areas, adjacent to Yellowstone National Park, and bisected by the Beartooth Scenic Byway. This project will significantly impact tourism, a critical economic driver for the region. We commend the USFS for recognizing the importance of balancing ecological restoration with economic opportunities, such as timber jobs and improved recreation.

The project's proximity to residential areas necessitates careful consideration of potential impacts on private property, including increased risk of mudslides and noise pollution. We recommend specific design criteria to mitigate these impacts, such as limiting work hours and requiring dust abatement measures.

The project's impact on roadless areas is another critical concern. The USFS must provide a detailed analysis of how the proposed treatments will comply with the Roadless Rule, including an assessment of the potential impacts on roadless area characteristics.

Areas South of Highway 212: Potential Fire Refugia

We have significant concerns regarding the proposed forest health management in the areas south of Highway 212. We believe this area exhibits clear indicators of functioning as a fire refugia and warrants specific study before intervention, particularly with respect to commercial logging, or the use of heavy equipment. Our concerns are based on the following:

- They are situated along Soda Butte Creek, on north-facing slopes that retain significant moisture, providing crucial protection for the riparian area. Given the extensive efforts to restore Soda Butte Creek after mining impacts, logging activities could create erosion and introduce excessive sediments, undermining these restoration efforts.

- These forests border the North Absaroka Wilderness to the south, and likewise possess wilderness qualities-forming critical habitat connectivity and a seamless ecological transition between Silver Gate, Cooke City, and the wilderness to the south.

- Fuel reduction via heavy equipment and logging, even with selective and sensitive approaches, will likely create lasting negative impacts, including drying effects, that could paradoxically increase fire risk in the long term.

- Logging will elevate the risk of spreading invasive species, which are already present in the Cooke City area. Any ground disturbance will likely exacerbate this problem.

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PARK COUNTY ENVIRONMENTAL COUNCIL 2

Ultimately reducing species diversity with the potential of altering the current fire regime.

- Crucially, these forests survived the extensive 1988 fires that swept through the region. Reports indicate that these areas were too wet to burn even when the USFS attempted controlled burns as the wildfires approached. This history strongly suggests inherent fire resilience. This aligns with research indicating that areas with higher pre-fire live biomass and specific topographic features (north-facing slopes, moisture-retaining aspects) are more likely to function as fire refugia (Meigs et al., 2020 - <https://cdnsiencepub.com/doi/10.1139/cjfr-2019-0406>).

- A majority of the area south of Highway 212 are Inventoried Roadless Areas, which

would be negatively impacted by the incursion of logging, potentially leading to unauthorized road development and mechanized use.

This area forms a significant component of the viewshed for Cooke City and Silver Gate. Commercial logging and thinning operations will negatively impact this aesthetic value.

Given the significant ecological benefits provided by the north-facing slopes south of Cooke City, their demonstrated resilience to the 1988 fires, and their potential function as fire refugia, we strongly recommend that the USFS prioritize their protection and conduct thorough studies to understand their refugia characteristics before considering any fuel reduction treatments involving commercial logging or heavy mechanical equipment. This would include all north facing sections south of 212; 37A, 37B, 98A, 98B, 117, 38, 29, 40, 41, 42, 44, 45, 99A, 113A, 113B, 99A, 47, 48, 49, 50, 55A, 55B. We believe that less impactful mitigation measures, if deemed necessary after proper study, should be prioritized in this sensitive area to maintain canopy cover, soil function, species diversity, and water-holding capacity, ensuring the long-term health and resilience of the forest ecosystem.

If such study is beyond the scope and budget of the CGNF, we can only recommend that no fuels reduction activities take place in the units listed above. If that is not feasible, we can only recommend utilizing hand treatments with respect to fuel reductions in the units south of Highway 212 as the only acceptable means of treatment to keep impacts to a minimum. Mechanical treatments and commercial logging are not in keeping with the existing ecological functioning of these forests currently.

The proposed regeneration harvest via commercial clear-cutting with residual on approximately 20 acres within Section 45 is not recommended. We suggest removing this unit from the project.

The primary stated need for the project is reducing hazardous fuels threatening Cooke City and Silver Gate, immediately adjacent to Highway 212. While the EA analyzes impacts across the entire project area, resources should be concentrated where the risk to human life and property is highest - the WUI directly surrounding the communities. Treatments further south of the highway, while potentially contributing to landscape-level fuel reduction, address a less immediate threat compared to the WUI itself. Focusing efforts north of the highway would achieve the core WUI protection goal while minimizing disturbance in the

PARK COUNTY ENVIRONMENTAL COUNCIL 3

broader landscape to the south, which contains critical wildlife habitat and the Soda Butte Creek riparian area.

Areas south of the highway may encompass specific recreational settings, visually sensitive slopes visible from key viewpoints, or watersheds where minimizing disturbance (especially from mechanical treatments listed for southern units like 15, 82, 83, 86, 88) would be preferable if the primary WUI protection goal can be met by focusing efforts elsewhere.

Wildlife and Ecological Effects

In addition to these concerns we want to address the potential impacts of the Cooke City fuels reduction project on wildlife habitat, water quality, and overall ecosystem health. While we understand the need to reduce high severity wildfire risk and enhance habitat for whitebark pine, it is essential to incorporate more rigorous measures to prevent negative impact to species of concern, effective restoration of commercial/mechanically treated area (including new road removal) and revegetation implementation to mitigate against invasive species and maintain healthy soil metrics.

These forests provide critical habitat for threatened and endangered species like grizzly bears, Canada lynx and wolverine. For an area that already receives plenty of human

pressure year round, additional impacts from logging will only have a net detrimental impact on these species, as well as many others this habitat serves.

Concentrating treatments north of the highway could avoid or further minimize impacts identified in the southern portion. For instance, significant portions of the project area south of the highway are designated Canada Lynx Critical Habitat. While the EA determined the project was "not likely to adversely affect" lynx or destroy/adversely modify critical habitat overall, avoiding treatments in the southern units would eliminate any potential impact on lynx foraging or denning habitat in that specific geography.

The cumulative effect of these disturbances and habitat alterations could have long-lasting negative impacts on the grizzly bear population in the Greater Yellowstone Ecosystem. The project area is located within the primary conservation area for the Greater Yellowstone Ecosystem, making it a critical habitat for these bears. Any adverse effects on the habitat or the bears' behavior within this area could have significant consequences for the species' conservation.

The USFS hasn't addressed how they will prevent soil erosion and maintain or improve soil moisture content and water-holding capacity. It is essential to measure these parameters before, during, and after the project to assess the effectiveness of mitigation measures. Healthy soils are critical for forest health and overall ecosystem resilience.

Monitoring

Additionally, long-term monitoring with specific measures and methods identified with measurable management outcomes is crucial to assess the effectiveness of restoration
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PARK COUNTY ENVIRONMENTAL COUNCIL 4

efforts and make necessary adjustments. We urge the USFS to develop a comprehensive monitoring plan that includes clear goals, indicators, and reporting requirements.

Whitebark Pine

To effectively protect whitebark pine and associated species, a comprehensive pre-project inventory and assessment of sensitive species and habitats, including whitebark pine stands, is essential. This information will inform the development of targeted protection measures and enable the avoidance of critical habitats. A robust monitoring plan, incorporating clear benchmarks for triggering restoration activities and whitebark pine enhancement actions, is essential for tracking project outcomes and facilitating adaptive management.

By proactively identifying and addressing potential impacts, the USFS can significantly enhance project effectiveness and minimize negative consequences. This approach will ensure that management decisions are data-driven and responsive to changing conditions, ultimately benefiting whitebark pine populations and overall ecosystem health.

We currently have some concerns that thinning and other proposed treatments might actually lead to greater negative impacts to whitebark stands in the Cooke City area.

Whitebark is a great survivor, but not a good competitor. An unintended consequence of thinning could actually open the door to increased competition from other species, like lodgepole.

Whitebark is currently migrating to higher elevations in response to global warming. The currently proposed treatments will likely create disturbances that will have negative impacts in the short-term, while doing little for the health of the trees in the long-term, as there is a good chance that the existing whitebark stands will be greatly diminished in the next 50-100 years because of climate change.

We encourage a greater sensitivity and selectivity within the scope of this project around whitebark pine. The Cooke City Fuels Reduction and Whitebark Pine Enhancement Project has the potential to be a model for landscape-scale restoration. Implementing these

recommendations will maximize the project's impact on whitebark pine populations and contribute significantly to the long-term health and resilience of high-elevation ecosystems. Creating favorable conditions for whitebark pine regeneration is crucial for long-term species persistence. Although there is more to be done for the Whitebark enhancement aspect of this project:

- ? The project should integrate with the existing regional cone collection program delineated by seed zones. This ensures genetic diversity and local adaptation in planting stock.

- ? Prioritize collecting cones from putatively blister rust-resistant trees identified through established programs like the Northern Rocky Mountain and Intermountain Regions Genetic Restoration Program.

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- ? Align seed procurement plans with the project to ensure sufficient blister rust-resistant seeds are available for post-treatment planting.

- ? Utilize existing data on genetic diversity and blister rust resistance to guide planting locations and maximize restoration success.

- ? Establish a long-term monitoring program to assess the effectiveness of whitebark pine restoration efforts and inform future management strategies.

- ? Partner with agencies like the National Park Service, Bureau of Land Management, and Canadian counterparts to leverage expertise and resources for regional restoration efforts.

- ? Contribute data and findings from the Cooke City project to inform and improve regional whitebark pine restoration strategies.

Please refer to comments provided by Jesse Logan for additional, in depth analysis of the impacts of this project on whitebark pine.

Invasive Species

In addition, stringent prevention and mitigation measures for invasive species are crucial. Strict inspection regimes for equipment entering and exiting the project area are essential to prevent the spread of invasive seeds and propagules. Requiring equipment decontamination between project sites and imposing fines for non-compliance would significantly reduce the risk of introducing new invasive species. Careful consideration of commercial harvest and mechanical treatments should be given to minimize disturbance and potential spread of invasive species.

We urge the USFS to consider the cumulative impacts of this project with other planned activities in the area. Alternative approaches should decrease commercial harvest and mechanical thinning, such as prescribed burning or hand thinning with mastication and/or slashpile/burns.

Climate Change/ Weather Pattern Changes

The USFS must also address the potential impacts of climate change/weather pattern changes, such as increased drought and extreme weather events, on the project area and develop strategies to mitigate these risks.

It is of the utmost importance that decisions utilize the best available data to date and that this data is referenced appropriately for future analysis. Decisions need to consider the impacts that prolonged stress and shocks have on ecosystems, many that are still not known to us.

Management practices aimed at maintaining historical forest conditions may not be suitable for these rapidly evolving ecosystems. A more effective long-term strategy for forest management in the face of climate change may involve prioritizing resilience.

Maintaining biodiversity within forest ecosystems can enhance their ability to withstand

adapted to local conditions could also be more beneficial than intensive management practices that may not be suited to future climate conditions. Ultimately, adapting forest management strategies to anticipate and accommodate the impacts of climate change, rather than relying solely on traditional methods like logging and thinning, is crucial for long-term forest health and carbon sequestration. Therefore, we recommend that the USFS take a conservative approach when assessing the potential impacts of climate change. The GYCC is an interagency committee that could potentially be a resource in this regard.

Tribal Consultation

Additionally, we strongly recommend that the USFS engage with surrounding Indigenous Nations to incorporate traditional ecological knowledge and perspectives into the project planning and implementation. By fostering a collaborative relationship with these communities, the USFS can gain valuable insights and ensure that the project respects cultural and resiliency values.

Conclusion

By incorporating these considerations, the USFS can develop a project that effectively reduces wildfire risk while protecting the environment, supporting the local community, and addressing the challenges posed by climate change.

Although many attempts have been made to address concerns in the previous comment provided during the scoping period, we still can only recommend Alternative A, No Action particularly for the areas south of Highway 212 that warrant further study as potential fire refugia.

Sincerely,
Max Hjortsberg
Managing Director