

Data Submitted (UTC 11): 8/8/2025 6:00:00 AM

First name: Barbara

Last name: Pitman

Organization:

Title:

Comments: Please see the attached file for my comments.

To: The Beartooth Ranger District, Custer Gallatin National Forest, regarding the Burnt Mountain Project:

Thank you for the opportunity to provide comments on the Burnt Mountain Project. It is important for the public to be informed of and provide input about timber and fuels projects on the Beartooth District, especially projects in highly used and visible areas.

The following comments reference sections in the project's Comment Period document:

Introduction

* Page 1 states [ldquo]Old growth and large trees will be retained as appropriate[hellip][rdquo] When I worked on the Beartooth District, Ponderosa Pine was called a [ldquo]Rare Element[rdquo] due to its uniqueness and low acreage compared to other conifer species. Thus, all Ponderosa Pine need to be retained, especially larger trees. Ponderosa Pine trees, especially those in the Palisades Trail area, provide a unique habitat that[rsquo]s uncommon in the Beartooth Mountains.

Purpose and Need

* Item 1 states [ldquo]The project area is directly adjacent to[hellip]Red Lodge, Montana and the Red Lodge Mountain Ski Resort[hellip][rdquo] The North Units area is about 4 to 8 miles from the Ski Area and about 8 to 12 miles from the town of Red Lodge, is therefore not directly adjacent to either location. Thus the referenced Purpose and Need statement is misleading.

* Item 2 states [ldquo]There is a need to[hellip]increase the representation of seral species and the seedling/sapling (0-5 inches dbh) age class[hellip][rdquo] Since part of the Project[rsquo]s Purpose and Need is to improve resilience to fire, why increase the small age classes when they are more prone to fire than larger sizes such as mature Douglas Fir and Ponderosa Pine?

Public Involvement

* I feel that the public was not sufficiently informed about the Burnt Mountain Project. I read the Carbon County News every week and never saw an article or notice about the project. Nor was a notice posted in the Red Lodge Post Office. I am aware of the project and the public comment period only because of information sent to me by friends. A project such as this one that will significantly alter viewshed, recreational experience, and wildlife habitat needs collaboration with the public during the planning stages. When and how was notification of the project provided to the public? Was a Collaborative group involved in the planning process, and if so, how?

Proposed Action

* Page 4, Coppice cut with leave trees in aspen: As with Ponderosa Pine, aspen is another species that was called a [ldquo]Rare Element[rdquo] when I worked on the District. The designation made sense due to its uniqueness, low acreage compared to conifer species, and importance to migratory bird species and other wildlife. Facilitating aspen regeneration is a beneficial aspect of the Project.

* There are cottonwood trees in Units 6F and 5F, and I think in 25AT as well. Cottonwood trees on the District, including in the North Units area, have been dying out for many, many years, so please retain all cottonwoods.

Non-Native Invasive Species

* Item 9: Noxious weeds can quickly become established in and spread out from sites where vegetation has been disturbed. Once they become established, weeds can be hard to eradicate. A current example is Spotted Knapweed along the west end of the Palisades Trail and spreading uphill across an open hillside to the edge of the timber. Given the Forest Service[rsquo]s recent funding and personnel cuts, how will weed prevention, monitoring and treatment be assured and accomplished? A plan and funding mechanism addressing potential weed issues needs to be in place before project implementation begins.

Wildlife

* Item 19 Raptor Nests: When were the most recent surveys for Goshawks conducted, what were the results of those surveys, and how will nests and nest stands be protected? Surveys need to be conducted in Goshawk habitat before implementation begins so that nest locations are known. Goshawks are a Montana Species of Concern, nests have been documented in the project area in past years, and I expect Goshawks to still nest in the project area. There needs to be a no-cutting buffer around each nest to protect nests from disturbance and to avoid disturbance of the young birds until they are independent from the parents.

* Item 19 Raptor Nests: Great Gray Owls are a Montana Potential Species of Concern. They have nested in the North Units area in past years and I expect them to still be nesting in the project area. As with Goshawk nests, there needs to be a no-cutting buffer around each Great Gray Owl nest to protect nests from disturbance and to avoid disturbance of the young birds until they are independent from the parents.

* Item 21 Public motorized use: Given that some people operate motorized vehicles on routes that are closed to public motorized use, what on-the-ground measures will be taken to prevent unauthorized use of temporary or administrative roads? Other human use, including mountain biking, can also potentially occur on temporary roads and disturb wildlife. What on-the-ground measures will be taken to prevent such use of temporary roads?

* Item 22 Moose Winter Range: For units identified during implementation, will a biologist be on site to identify appropriate retention patches?

* Item 23 Big Game Winter Range: This section states that units will be identified during analysis (makes sense) or implementation. Units need to be identified before implementation since disturbance could happen during implementation.

* Connectivity and hiding cover: Wildlife habitat connectivity and hiding cover across the landscape between the North and South Units has already been significantly reduced by clearcutting on State and private lands. This change in forest cover is evident when comparing satellite imagery taken 10 to 12 years ago with more recent imagery. Connectivity and hiding cover will likely be further reduced by the Red Lodge Mountain Fuels Project. Additional timber removal, especially clearcuts, will add to cumulative adverse effects. How are the cumulative effects of the loss of habitat connectivity and hiding cover being addressed, reduced, and/or mitigated?

* I feel that the proposed road building and mechanized commercial treatment are not appropriate for Treatment Units 27AT, 27T and 28T. The proposed road is shown as temporary. However, temporary roads are temporary

in name only because their footprint can remain on the landscape for decades, facilitating human use that can disturb wildlife and spread noxious weeds. The popular Palisades Trail goes through or is adjacent to these three units. The Trail has already facilitated introduction and spread of Spotted Knapweed, a noxious species that was absent in the area before the trail was built. Also, a no-dogs seasonal restriction in place on the Palisades Trail for protection of big game during winter and calving/fawning season shows that the area is very important for wildlife. The road would go through habitat that currently provides hiding cover, protecting wildlife from disturbance by trail users. Road building, road use, and commercial thinning activities would cause disturbance and reduce or remove hiding cover that the area currently provides. Non-commercial thinning and/or prescribed fire without new road-building would be more appropriate methods for thinning in this area because they would cause less disturbance to wildlife and to trail users, be less likely to spread noxious weeds, yet still achieve the project's purpose and need.

* Has a Programmatic Biological Assessment (BA) been completed to assess potential impacts to Federally listed grizzly bears, Canada lynx, and lynx critical habitat? Which Programmatic BA criteria are being used to justify analyzing the project's effects on these species and habitat through the Categorical Exclusion process?

Forest Vegetation

Item 29: This section specifies that Ponderosa Pine larger than 3" will be cut. As previously mentioned, Ponderosa Pine is uncommon in the Beartooth Mountains and was classified in past years as a "Rare Element" on the Beartooth District. The "Rare Element" designation is the main reason why the Greater Red Lodge Area Landscape Assessment (GRLA) project initially excluded Ponderosa Pine harvest. Ponderosa Pine cutting was later added to the GRLA project, however, and is carried over into the Burnt Mountain Project. This species, being unique and uncommon on the District, should not be cut at all. In addition, it provides a Palisades Trail hiking and birding experience not easily accessible elsewhere on the District. It also provides a unique visual experience plus shade for trail users. Please do not cut any Ponderosa Pine, especially in the Palisades Trail area.

Recreation

The North Units Red Lodge Creek area provides opportunity to explore the front country without the large numbers of people often encountered on trails close to Red Lodge. I rarely see anyone else when hiking in the Red Lodge Creek area. The sizable acreage of proposed treatments, especially clearcuts and commercial thinning, concentrated in a relatively small geographic area will negatively alter the unique recreation experience, scenery, and wildlife habitat far into the future.

Soils

Item 51: I have concerns about such large burn pile sizes, especially ones with footprints over 800 square feet. I've noticed many times over the years that invasive weeds, including cheatgrass and non-native thistle, often become established on large burn pile sites to the exclusion of native grasses and forbs. I've also noticed that Red Lodge Mountain Ski Area builds small burn piles when implementing their thinning projects. Fires from burned small piles appear less damaging to soils and the native seed bank than hotter burning large piles. Red Lodge Mountain's small burn pile sites close to ski run road became un-noticeable and revegetated with native plants within a couple of years after burning. Please consider making more and smaller

burn piles instead of fewer large piles.

Thank you again for the opportunity to comment on the Burnt Mountain Project. I hope that my comments and suggestions will be seriously considered, and that answers to my questions will be provided.

Sincerely,

Barbara Pitman