

May 30, 2025

District Ranger
3710 Fallon Street
Suite C, Bozeman, MT 59718

Dear District Ranger;

Thank you for this opportunity to comment. Please accept these additional comments from me on behalf of the Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish, and the Center for Biological Diversity on the proposed Hyalite Cottonwood Hazardous Fuels Reduction Project.

The EA does not adequately explain why an emergency is justified for this project. Please explain why the emergency is justified. Do not do so is a violation of NEPA. The EA also does not demonstrate that the project complies with the Forest Plan. One of the requirements for declaring an Emergency is the Forest Plan and all other laws must be followed.

Please demonstrate that the WUI complies with the definition of the WUI found in the Healthy Forest Restoration Act.

Has the Custer Gallatin National Forest removed or altered any lynx analysis units (LAUs) in the Bozeman Ranger District?

The Revised Forest Plan violates the 2012 NFMA Planning Rule and/or NEPA. The old growth provisions in the Revised Forest Plan, which fail to set enforceable numeric minimum percentages of old growth retention for the Forest, and at the same time allow significant commercial logging in old growth while still labeling it as “old growth” post-logging, lack ecological integrity, including lacking appropriate elements to ensure function and connectivity of old growth forest for the rare terrestrial wildlife community of old growth dependent wildlife species, and therefore the Revised Forest Plan violates the NFMA planning regulations, NFMA, and the APA.

Furthermore, there is no adequate cumulative effects analysis in the Revised Forest Plan EIS regarding the impact on old growth dependent wildlife species across the Forest from this new, piecemeal, project-by-project, death by a thousand cuts approach to old growth forest management. Without a Forest-wide cumulative effects analysis of how old growth logging will impact old-growth dependent wildlife species, the Forest Service cannot demonstrate that its Forest Plan complies with NEPA or the NFMA planning rule mandate that the Forest

Plan maintains or restore the “rare terrestrial animal community” of old growth dependent wildlife species.

Please see the attached paper by Baker et al. 2023. This landmark study found a pattern of "Falsification of the Scientific Record" in government-funded wildfire studies.

Dr. Baker’s paper is the best available science. Please explain why this project is not following the best available science. The Draft Decision Notice is in violation of NEPA.

Thank you for your attention to these concerns.

Sincerely yours,

Mike Garrity

Alliance for the Wild Rockies

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And on behalf of:

Sara Johnson Native Ecosystems Council P.O. Box 125
Willow Creek, MT 59760

and for

Steve Kelly

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And for

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