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August 13, 2025

Subject: Objections to Cooke City Fuels and Forest Health Project
Record of Decision and Final Environmental Assessment

Forest Supervisor Matthew Jedra
USDA Forest Service 10
E. Babcock St., Bozeman,
MT 59715

Dear Forest Supervisor Matthew Jedra:

The Gallatin Wildlife Association submitted comments on the Cooke City Fuels and Forest Health Project on August 7, 2024, barely over one year ago. We understand that a decision notice was released this summer with a "Finding of No Significant Impact" (FONSI). That decision was published in the Bozeman Daily Chronicle on July 11, 2025, thereby also announcing the beginning of a 45-day Objection process. GWA would like to participate in that process.

Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501(c)(3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

The Gallatin Wildlife Association (GWA) was acknowledged twice within the Final Environmental Assessment (FEA) that the Custer Gallatin National Forest (CGNF) received our submission of comments. However, we also noticed that in Appendix 5 of the FEA, references and quotes from individuals and other NGOs were used to address issues among the Draft EA. GWA did not get any notice or mention in this arena, leaving us to believe that either our comments were not

read, or the agency felt our comments were not worthy of attention. In fact, in reading Appendix 5 if we do so correctly, CGNF believes our comments were not worth considering. Based upon that attention or lack thereof, GWA feels we have a greater right than most to Object to this project as proposed.

GWA has significant problems with this project in that we have not seen any proof that work is warranted. We have countless pictures proving otherwise that fuel reduction work is unnecessary and would be harmful to the wildlife that is contained within the project area. Our primary objection is based on multiple facets of the project, but primarily our concern for wildlife and their respective habitat is fundamental. The loss of biodiversity overall, that encompassing both flora and fauna, should be enough to refute the notion that there is a finding of no significant impact.

The other Objection is based upon the role of climate change, carbon sequestration, and wildfire. There is an obvious relationship among these three dynamic forces upon the landscape. Man's intrusion to these natural processes has only made the relationship more fragile and more tenuous. It is time to bring these antiquated beliefs to a close. The only way to solve the Forest Service problem is not to cut down more trees. The time for those oversimplifications is over. GWA objects to this project interfering with the role of climate change, carbon sequestration, and wildfire.

GWA Objects Over the Harm to Endangered/Threatened Species:

Our original comments centralized on three species listed on the ESA program of endangered or threatened species: Canada lynx, grizzly bear, and wolverine. We see no indication that threats to these species should be minimized, yet that is what we see in the original preliminary assessment. We see several assumptions being made that have do not have the science to reinforce those assumptions. It is long past time for such naivety. **GWA must object based upon effects this project would most likely effect endangered species.**

Canada lynx:

On page 52 of the Final Environmental Assessment (FEA), there was this statement pertaining to Canada lynx.

> *"Approximately 32 percent of the Beartooth Plateau lynx analysis unit and 63 percent of the project area is in designated Canada lynx critical habitat".*

This is just too significant to ignore. Further on, there are the following statements.

> *"Overall, the proposed action would decrease potential lynx foraging habitat (Primary Constituent Element 1a) in critical habitat by approximately 896 acres. This effect is*

temporary, as vegetation would recover over time to again provide foraging habitat. An indirect effect of forest thinning in the Cooke City Recreation Emphasis Area is that additional areas may be accessible to recreationists. This could lead to an increase in snow compaction in the project area.

Potential denning habitat (Primary Constituent Element 1c) would be reduced by approximately 1,022 acres. This effect is also temporary, as remaining forest would continue to be impacted by insects and disease".

Both of these claims are just stunning, stunning that the harm is obvious, but Custer Gallatin National Forest (CGNF) can still claim that there is a "*finding of no significant impact"*? In trying to minimize the harm by assuming the effects are temporary is an insult to our intelligence. Even though they may be in our lifetime, not so much in the lifetime of the species. We do not know the cumulative impact that these types of disruptions have over time in their world. Yet for Canada lynx, we have seen the results of these actions even in our lifetime.

We would like to refer CGNF to our former comments on Canada lynx during our submitted comments on the Beaverhead Deerlodge National Forest Canada lynx management plan.

"It was brought out in our research during the USFWS's Final Recovery Plan that the agency had planned to reduce the amount of available habitat for Canada lynx in SSA Unit 5 by 88%[1]. Such is reported by Mike Koshmrl of the WyoFile.com on Dec. 3, 2024".

> *"the U.S. Fish and Wildlife Service has classified 9,146 square miles of the Yellowstone area as critical lynx habitat for the past decade. Last week, the federal agency proposed a revision, tentatively slashing critical habitat in the region to 1,121 square miles — an 88% cut. Federal officials cite leaps in lynx habitat science as their rationale".*

Why do we think this is? Perhaps, just perhaps it is because the CGNF and other forests surrounding Yellowstone National Park and others within the Greater Yellowstone Ecosystem are minimizing the effect and impacts of land-use management plans that degrade the habitat. GWA cannot stress enough that perhaps the more current and greatest threat to Canada lynx is that of habitat fragmentation and habitat loss.

We refer to the following link to this fact. There is science, actual science that bears this out. It is a known fact. CGNF should know this without GWA bringing it to your attention. The following was from the website known as BigCatFacts[2]. The title of this factorial page is "*Challenges Facing Lynxes: Poaching and Habitat Losses"*.

"One of the most critical problems is habitat fragmentation, which is confining the current lynx population to gradually disappearing environments. This fragmentation, induced primarily by logging activities, has thrown these resilient cats into a grim state of affairs. What exacerbates this loss and fragmentation even further is the added threat of features such as dams and other water management structures. Similarly, the presence of lynx and its successful survival can be drastically affected by variations in temperature. As the world's thermostat continues to rise, protecting habitats at higher elevations is becoming increasingly crucial, as lynx need cooler climates to prosper".

Grizzly bear:

Our same concern lies with cumulative and actual project impacts with grizzly bears. On page 56 of the FEA, there is this statement.

"The project area lies in three grizzly bear subunits in the primary conservation area of the Greater Yellowstone Ecosystem and provides year-round habitat for grizzly bears. Implementation of proposed activities could lead to temporary disturbance of grizzly bears.

Most activities are proposed in grizzly bear denning habitat but would not be implemented during the denning or spring den emergence periods. Proposed temporary roads would impact a small amount of secure habitat but levels would remain above baseline in all three affected subunits and return to pre-project levels upon rehabilitation of temporary roads. Considering all potential impacts from proposed activities and cumulative effects, it is unlikely that the project would have adverse effects to grizzly bears. Consultation with the U.S. Fish and Wildlife Service for grizzly bears will be completed on proposed activities before the decision is finalized for the project".

To say that it is unlikely that this project would have adverse effects on grizzly bears is an assumption. We have entered a phase where our wildlife's welfare cannot be made on assumptions.

On page 58 of the FEA is this statement.

"About three quarters of vegetation treatments are proposed in potential grizzly bear denning habitat. Around half a mile of temporary road is also proposed in potential denning habitat. However, proposed activities would not be implemented during the grizzly bear denning period or the spring den emergence period. Therefore, project activities would not lead to disturbance to grizzly bears in potential denning habitat during these important times".

Again, an assumption is being made that project activities would not lead to disturbance to grizzly bears. But roads will be in place, and who knows how that impact alone will affect grizzly bears even if proposed activities wouldn't be implemented during the denning season. These ground disturbances could very well have long-term impacts after the project is gone, especially in secure habitat settings.

Further on:

> *Non-commercial vegetation treatment is proposed in 260 acres of secure habitat. This includes 188 acres of fuels treatment and 73 acres of whitebark pine enhancement. The proposed project includes the construction and use of four short temporary roads totaling 0.8 miles. Three of these temporary roads (0.6 miles) would be constructed in the Lamar 1 subunit and the fourth (0.2 miles) in the Crandall 1 subunit.*

Further on page 59:

> *Many activities have caused and continue to cause disturbance to grizzly bears within the affected subunits. These include non-motorized and motorized recreation, vegetation management, road maintenance and use, trail maintenance, utility maintenance, prescribed fire, wildfire suppression, and human activities associated with mines. All these activities are expected to continue in the future. The illegal use of closed roads and the creation of illegal routes is likely to continue across the analysis area in the future. These illegal activities have the potential to disturb individual bears, reduce bear use of nearby habitat, or increase the risk of bears being shot maliciously or due to mistaken identity. The Forest will continue to monitor closure devices and take corrective actions to reduce impacts to grizzly bears.*

GWA sees no positive action here that would benefit the grizzly bear. We see negative impact after impact and as we stated in our original comments on this project in August 2024, we see these impacts added onto the other 998 cuts. These cumulative actions cause habitat fragmentation, loss, and disturbance to a secure habitat, all having a negative impact upon our wildlife. When will our federal agencies admit to this?

GWA questions the land-use designation that allows motorized use in secure habitat anyway. On page 60, there is this statement.

> *"All three subunits that intersect the project area currently have low levels of open motorized access route density and total motorized access route density, and high levels of secure habitat".*

With this being the case, why is there any motorized use that is being allowed in this vicinity of secure habitat?

> *"Existing motorized access conditions in the three affected subunits are providing habitat security for grizzly bears using the analysis area. However, the project area has very little secure habitat. This is due to the network of motorized routes in and around the towns of Cooke City and Silver Gate, including the Daisy and Lulu Pass roads that provide motorized access throughout the Cooke City Recreation Emphasis Area. Grizzly bears, especially females with cubs, may be avoiding most of the project area because of human activity, existing road densities, and the lack of secure habitat".*

GWA just must question the allowance of motorized use in secure habitat. The following statement found on page 61 is in and of itself chronic of the problem found in land-use and forest management designations along with the agencies that are charged with monitoring and protecting wildlife.

> *"Roads closed to public motorized use affect grizzly bears to a lesser extent than open roads. Illegal use of closed roads and user-created routes may disturb individual bears, reduce bear use of habitat on or near routes that are breached, or increase the risk of bears being shot maliciously or due to mistaken identity. Although illegal motorized use may impact individual bears, this illegal use is not frequent or chronic".*

It is language such as this that advocates of wildlife find irritating. The description of these actions sounds chronic, yet then you throw in a contrasting statement that illegal use is not frequent or chronic. Either the issue is disturbing wildlife, or it isn't, but you can't say the action is disturbing wildlife, and yet say it isn't chronic. You lose your credibility.

North American Wolverine:

The effect on wolverine is similar to that of the grizzly bear and Canada lynx. Page 61 is another example of how this project overlaps primary habitat for endangered species, this time that being for the wolverine.

> *"Most activities are proposed in areas of potential wolverine habitat where maternal/denning habitat overlaps with both primary and dispersal habitat. Proposed activities would not be implemented during the denning period, but vegetation treatments would impact the structure within stands that contribute to wolverine den sites".*

Page 62 and 63 respectively,

> *"Proposed vegetation treatment would remove structure from forest stands that could be used for den sites".*

> *"Mechanical treatment activities, increased vehicle traffic, temporary road construction, and other human activity may result in disturbance to wolverines in the project area".*

GWA won't continue down this road because to our organization, the harm is obvious, and it defies logic that the CGNF can state that there is a "*finding of no significant impact*". Sorry, we don't buy into this action and therefore we must object to the FONSI based upon the most likely potential effects upon endangered species and upon wildlife as a whole.

GWA has stated the science in prior comments. We don't see the need to do so again. They seemed to not be taken into consideration anyway, but we will point out the obvious in the FEA itself. Basically, we see the FEA has already done our

work for us by pointing out the obvious in what is wrong with the decision to move ahead with the Proposed Option. This is unfortunate, but not surprising.

GWA Objects Over the Use of Fuel Treatments to Manage Wildfire:

It is evident the concerns GWA laid out in our original comments in August of 2024 were not heard or just flat out ignored. Our rationale or justification for opposing this project has not changed and still holds true in these objections' comments.

As stated, the purpose of this project is to reduce the potential wildfire risk. This project and so many other vegetative treatments like it have become routine across our western forests. However, the treatment being pushed by politicians and many land-use management agencies is to log, thin, and/or utilize prescribed burning to curtail the buildup of forest fuels and maintain forest health. The first two of these treatments are basically a rendition of the same old prescriptions practiced across our country in the last century and a half. The difference? At that time, those actions weren't undertaken with the principle of reducing wildfire risk, they were undertaken with premise of getting the cut out. Now we use them today, but we have given those actions a new name.

Our understanding of forest and climate science has come a long way since then. We know these practices do little in mitigating climate change but exacerbate the effects of a warming world. They are not mitigative, they are cumulative in making an already warm climate warmer. Local and regional land-use management agencies seem to degrade or minimize the influence that local forest actions have on the global climate, failing to realize that old metaphor, death by a thousand cuts. To highlight this metaphor, GWA will reproduce some factual statements from the Climate Forests Coalition[3] and how they relate to our climate here at home.

- *"17.2 billion metric tons of carbon stored in U.S. federal forests. Federal forest protections are critical to safeguarding communities from the future impacts of climate change."*
- *"35 million metric tons of carbon sequestered from the atmosphere by federal forestlands. There is no other technology that can match forests for carbon removal at this scale."*
- *">95% Forest carbon is stored in forest ecosystem pools vs harvested wood products."*

We point out these facts for the basic reason that forests do a better job of sequestering carbon than those attempts to log, thin, or alter them. According to California State Parks website[4], our forests have far more value alive than being cut for alternative purposes.

"Undisturbed forests do the best job at sequestering carbon. Cutting down trees inevitably alters carbon storage, and releases carbon dioxide into the air as the wood decays. Twenty percent of greenhouse gas emissions come from deforestation and other forms of land use change."

This is contrary to the FEA and Scoping Notice as was stated on page 27 of that document. See below.

"However, over the long-term, management activities that are consistent with Forest Plan desired conditions are likely to increase carbon storage and reduce emissions by reducing disturbance risk and storing carbon in wood products, as well as recapturing carbon as forests regrow.

Specifically, harvesting and prescribed fire treatments will achieve a more resilient forest condition that maintains critical ecosystem functions into the future and will improve the ability of the Forest to maintain carbon stocks and enhance carbon uptake. The Forest as a whole is expected to remain a modest carbon sink when projects are implemented commensurate with Plan analysis (such as this Cooke City Project)."

GWA disagrees with that stated notion and with the belief that harvesting and fire treatments will achieve a more resilient forest. There is a great abundance of science stating otherwise. We have asked the question in past commentaries; how does an agency know if perhaps they are removing trees and vegetation that already has the greatest resistance to fire and disease? Once again, mankind is forcing himself into a natural process to determine what's healthy and what isn't. GWA is strongly against the insinuation that mankind knows better than nature itself as to the betterment of our native forests. This has not been addressed.

GWA will close on this one more piece of scientific evidence published in the scientific journal of Frontiers in Forests and Global Change. In the article entitled "*Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context*" by Kristina J. Bartowitz[5], et al., there is this lengthy statement found in the Abstract.

Climate change has intensified the scale of global wildfire impacts in recent decades. In order to reduce fire impacts, management policies are being proposed in the western United States to lower fire risk that focus on harvesting trees, including large-diameter trees. Many policies already do not include diameter limits and some recent policies have proposed diameter increases in fuel reduction strategies. While the primary goal is fire risk reduction, these policies have been interpreted as strategies that can be used to save trees from being killed by fire, thus preventing carbon emissions and feedbacks to climate warming. This interpretation has already resulted in cutting down trees that likely would have survived fire, resulting in forest carbon losses that are greater than if a wildfire had occurred. To help policymakers and managers avoid these unintended carbon consequences and to present carbon emission sources in the same context, we calculate western United States forest fire carbon emissions and compare them with harvest and fossil fuel emissions (FFE) over the same timeframe. We find that forest fire carbon emissions are on average only 6% of anthropogenic FFE

over the past decade. While wildfire occurrence and area burned have increased over the last three decades, per area fire emissions for extreme fire events are relatively constant. In contrast, harvest of mature trees releases a higher density of carbon emissions (e.g., per unit area) relative to wildfire (150–800%) because harvest causes a higher rate of tree mortality than wildfire. Our results show that increasing harvest of mature trees to save them from fire increases emissions rather than preventing them. Shown in context, our results demonstrate that reducing FFEs will do more for climate mitigation potential (and subsequent reduction of fire) than increasing extractive harvest to prevent fire emissions. On public lands, management aimed at less-intensive fuels reduction (such as removal of "ladder" fuels, i.e., shrubs and small-diameter trees) will help to balance reducing catastrophic fire and leave live mature trees on the landscape to continue carbon uptake.

Those sections highlighted in yellow reinforce and reiterate the positions that GWA was stating above. While the clarification on page 9, 10 in Table 4 of the Scoping Notice provides the specificity of the actions to be taken within the project area, the USFS is talking about the harvest of trees that are 9" at DBH.

GWA would not necessarily classify these trees as young or ladder fuels. These would be mature trees, especially depending upon species. Between size and spacing criteria stated, GWA questions the veracity of the program as it is leaning more toward a logging program, than the thinning of underbrush being touted. We remain very skeptical in the project that it would adhere to the parameters about the removal of ladder fuels. What is being proposed in the FEA seems to contradict the science as stated above in the reference.

The above comments over the use of fuel reduction treatments to manage wildfire are nearly word for word from our previous comments. We believe we have the right to do so because our basic premise was not addressed. In viewing the FEA, not once did climate change get entered into the discussion. It was brought up 26 times in Appendix 5 by others, and only once in references. During Appendix 5, others mentioned climate change, but the CGNF's answer to the issue seems to be saying this is a fuels project. That or they diminish the issue altogether by saying the following as they did on page 119.

"The impacts of changing long-term weather events, emissions and rising temperatures can be found throughout individual resource analysis reports and the project record".

We know the U.S. Forest Service does not like to accept Objections based upon climate change. In a response to an individual bringing up the subject, the U.S. Forest Service replied, "*this is a fuel reduction project*". Message received - over an out. But to be blunt, this does nothing to address the issue. If anything, it ignores the issue of climate science. What the U.S. Forest Service is actually saying is that the agency is not prepared to address climate change in a real and substantial way because it is either not in their control or they don't have an official policy in how to deal with the issue.

But in some regards, climate change and their ability to at least mitigate this threat is in their control and they can do that by using the greatest gift our forest can provide, that of carbon sequestration; a natural process as a way to mitigate climate change. Instead, the U.S. Forest Service talks about silviculture approaches as in the Silviculture Report or Silviculture Effects Analysis.

What the U.S. Forest Service is saying is that they are going to use old silviculture approaches from the 20th century (if not earlier) to address 21st century problems. This is the problem and why we keep talking past each other. This is why GWA has been saying that the U.S. Forest Service needs to change their paradigm for land and forest management. The CGNF and the U.S. Forest Service cannot ignore the issue before us as these are forces of nature and they are all relatable. The removal of fuels or the increase of fuels on our National Forest System is a result of climate change and a result of bad U.S. Forest Service policy.

Summary:

Our objections to the Record of Decision and the Final Environmental Assessment are based upon two threats to our forests. The first described is the harm that will befall wildlife and/or their respective habitat, especially those of endangered and/or threatened species. All three species, Canada lynx, grizzly bear and North American wolverine are known to utilize the project area in some capacity during an individual species existence and the second is the use of vegetative treatments promoted to prevent wildfire upon the landscape. GWA has longed pronounced there is a better way.

The "finding of no significant impact" just isn't true. It is such an arrogant statement to make and one that most likely should be removed from use. Just because we think there won't be any significant impact noticeable to us, to the human species or our society, doesn't mean there won't be a huge negative impact on an individual of that species or the population of wildlife. And as we already know, it is these individual species that make up the population and distribution upon the landscape.

We (meaning society) are trying to view these ongoing projects from society's viewpoint rather than from the viewpoint of the effected species, whether it be flora or fauna. The FEA recounts numerous ways that this project would bring harm to at least the three species discussed here, those that are endangered or threatened. GWA believes that to discount the harm, and/or slough it off, or to minimize it in any way is a disservice to humanity as well as to the purpose and standards put in place to prevent degradation of our environment.

GWA could have continued our quotations of more statements from the FEA or ROD, but we feel our point has been made. There is no doubt that a *"finding of*

no significant impact" can be justified or defended. It is also clear that previous actions in the vicinity of Cooke City and the project area are having an impact upon endangered and threatened species and/or their habitat. There needs to be an increase in education and perhaps enforcement as to the use of illegal trails and behavior in these sensitive areas of wildlife. By not taking action is a sign of complicity as well as complacency.

Our fear is that this type of inaction by the U.S. Forest Service will only compound itself due to lack of funding and manpower. And now in these perilous times, that inaction has only become worse. To say these conditions have already been described as having negative impacts on wildlife and their habitat, but then state these conditions aren't chronic is not helpful.

GWA also finds it interesting that in the second paragraph of the Decision Notice, there is this statement.

> *"As with most of the western United States, over 100-years of successful wildfire suppression has led to an increased amount of fuel on National Forest System lands. In addition, forested stands have become homogenous and even-aged. These conditions have resulted in forested stands that are susceptible to high-severity wildfires".*

Really, can both be true? Saying there has been 100 years of successful fire suppression on one hand, but then say it has led to an increased amount of fuel production making our forests *"homogenous and even-aged, now the forests are susceptible to high-severity wildfires"* is conflicting and confusing. Perhaps both can be true, but wouldn't one then question the policy? Perhaps there is a better policy that can be implemented upon the landscape, one without having the side effects. Because now, we must recognize these conditions have compounded and exacerbated the planet with several threats. Both are focused in our comments, the loss of biodiversity and climate change.

GWA objects to the old silvicultural techniques of the past in this 21st century. Out of curiosity, we did a little digging on the defining of silviculture. We found an interesting statement mentioned on the website SFA Silviculture[6] listed below.

https://www.sfasilviculture.com/index.php/textbook/1-1-introduction-silviculture-and-definitions

Here it states the following on Chapter 1.1 Introduction: Silviculture and Definitions.

> *"Silviculture is the art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands to meet the diverse needs and values of landowners and society on a sustainable basis (Adams et al. 1994). It*

is often described as the tending of a forest or the growing of trees. Essentially silviculture is a discipline concerned with meeting human needs by manipulating a forest. Because forests typically require long time periods to grow, silviculture usually relies on management of ecosystems that closely mimic those found in nature. For this reason silviculture is often described as applied forest ecology".

What you see here is the basic problem. It is the manipulation of a forest for societal gain and/or benefit. This was not the intended use of the preservation of our forests back in 1891 under the Forest Reserve Act. Realizing our society and politics have come a long way since then, we can see how the timber industry has crept into the institution the agency and how our society has allowed the original intent and purpose of the U.S. Forest Service become corrupted over time.

The one justification that we have not discussed, the one that is driving this project, is the fire policy based upon the Wildland Urban Interface. If there is such a demand or desire to prevent damage to communities from wildfire, then we suggest a better approach, that described in the text below.

Home Hardening:

Before we close out comments on our objections, GWA believes there are better approaches to the protection of homes and societal infrastructure. If this is the real concern of this project, then GWA would be remiss if we didn't point out that there are better options available. Better in terms of being less expensive and better in terms of being less destructive to our forest ecosystem. To continually employ actions that are destructive to the forest ecology is irresponsible, especially when other alternatives exist. We must provide an alternative to the madness that is being oversold to the public. Society must be informed that fuel reduction treatments don't work to the degree they're being touted.

Home hardening is the responsible option that each individual homeowner can do and should do on their own. There is help, however. There are plenty of options and sources available to the public whereby they can learn about programs and funding availability. Specifically, the Gallatin County Emergency Management office is urging residents to reduce their own property's wildfire risk. NBC News reports the following by Bryanna Carroll[7] on an online post.

"Ahead of the 2025 fire season in Montana, officials with Gallatin County Emergency Management are urging residents to take action to reduce their property's wildfire risk.

"It's urgent for everybody that lives in the county here," said Gallatin County Emergency Management chief Patrick Lonergan".

Further on:

> *"To help homeowners keep their property safe, Gallatin County is offering free risk assessments. They also have funding available through their Wildfire Mitigation Program, which homeowners can apply for to help offset the costs of fire mitigation work."*

Residents in the Wildland Urban Interface (WUI) have an obligation to harden their homes and other structures and not rely on subsidized wildfire actions by the federal or state government. Using federal funding to support unwise home development on private land near public property should not become the responsibility of the federal government. We will leave this topic with one more link for private homeowners.

https://www.mtfireinfo.org/pages/homepreparedness

There is even science in support of this approach. Laura Lundquist[8] of the Missoula Current reported in a Feb. 7, 2024, article the following story.

> *In mid-December, six researchers published a paper in the Proceedings of the National Academy of Sciences journal warning that communities across the nation, but particularly those in the West, aren't prepared to survive an urban conflagration such as the one that devastated Lahaina, Hawaii, in August.*
>
> *The paper, titled "Wildland-urban fire disasters aren't actually a wildfire problem," points out that, since 2016, communities from Lahaina to Gatlinburg, Tenn., that have lost hundred of homes to fires have certain things in common: the fires occurred under extreme weather conditions - high winds and persistent drought - and most of the structures weren't fire-resistant.*
>
> *"These problem fires were defined as an issue of wildfires that involved houses. In reality, they are urban fires initiated by wildfires. That's an important distinction - and one that has big repercussions for how we prepare ourselves for future fires," the authors wrote.*
>
> *The authors included three researchers from the Forest Science and Fire Sciences laboratories of the U.S. Forest Service Rocky Mountain Research Station in Missoula and one from Headwaters Economics in Bozeman.*

We will close out our comments and strongly urge the U.S. Forest Service change strategy of their application for wildfire prevention. There is other science that points in a different and better direction. We will conclude by quoting Ric Bailey's[9] article in the Seattle Times dated June 15, 2023. **Ric Bailey** is a former U.S. Forest Service wildland firefighter living in Winthrop, WA who has, since 2014, twice been ordered to evacuate his home due to approaching wildfires.

"Let's just say that the runaway train of massive U.S. Forest Service logging projects needs to be derailed. An increasing body of science is telling us these do not reduce wildfire risk, and can even make fires worse……

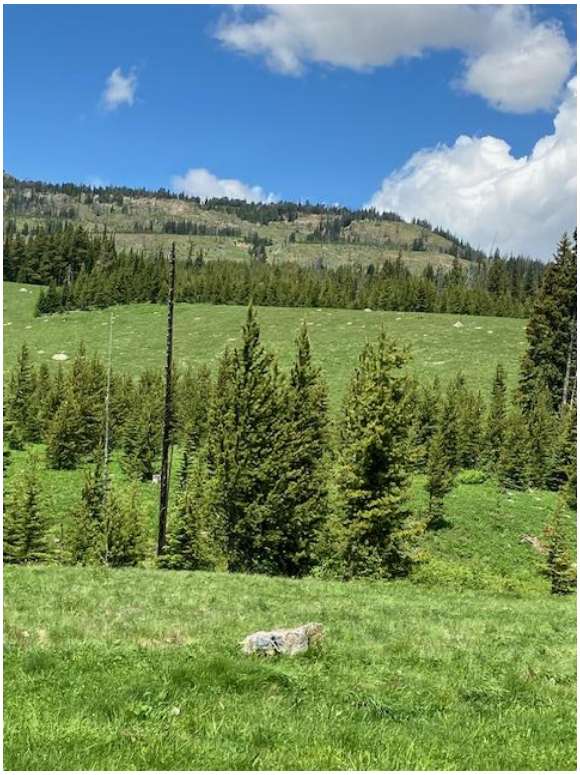
Essentially, the federal government is telling us it can control nature with chain saws and bulldozers. That illogic aside, climate change has unraveled the entire equation: how it will affect forests and fire cannot be predicted. But we do know that removing more carbon-storing trees will only make it worse".

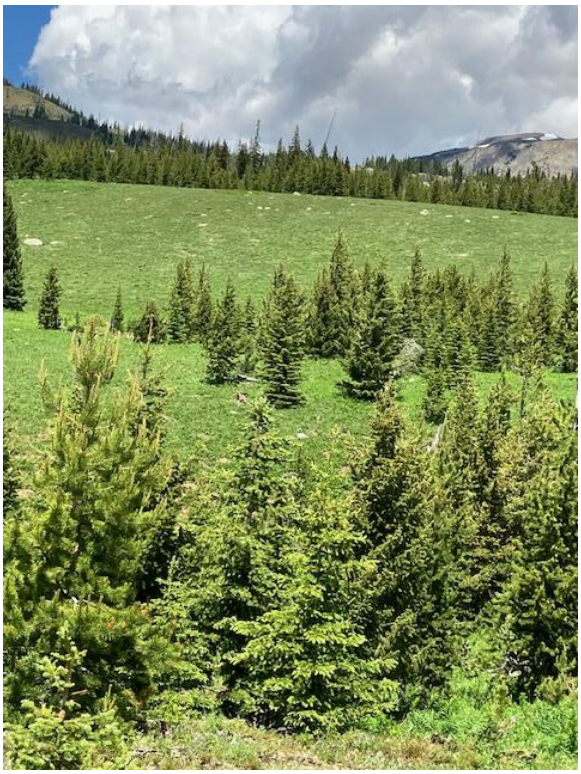
For these and the following reasons, GWA objects to the Cooke City Fuel Reduction Project. The following pictures taken by Nancy Schultz and Glenn Monahan of GWA organization highlight the project area as relayed to this author. This indicates a lack of need for forest or vegetative treatments.

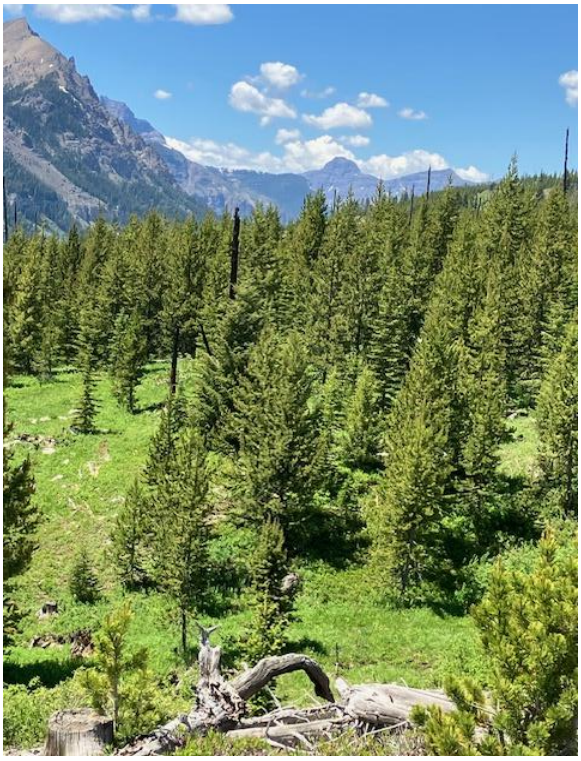
Sincerely,

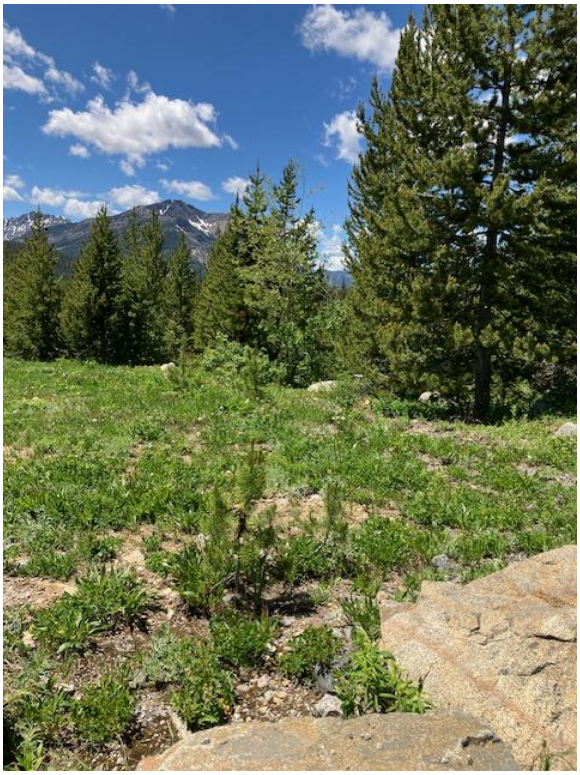
Clinton Nagel

Clinton Nagel, President
Gallatin Wildlife Association









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