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First name: Nancy

Last name: Ostlie

Organization:

Title:

Comments: Dear Amanda,

If there is anything I can possibly do to stop this bad proposal, I will be doing it.

I first became aware of it during a Custer Gallatin Working Group meeting, where certain participants in that collaborative broke into laughter among themselves as the project was 'named' with 'Cottonwood' in the title. Barb Cestero and Hilary Eisen among others seemed delighted at the apparent irony that the project might be named after a local law firm who has done a lot to stop unwise logging projects in Montana. Having learned first hand in the past decade that these two individuals and their organizations represent the interests of right-leaning (Trumpist) political forces, which would in their extreme position advocate selling off public lands to private interests, I am particularly determined to thwart this terrible proposal. I resent the 'anti-science' bias of the current administration, the leader of which has said "I love the uneducated."

First of all, the subject lands in this proposal all should be designated Wilderness under the 1964 Wilderness Act, and the SB 393 that designated the Hyalite Porcupine Buffalo Horn Wilderness Study Area. Although the Custer Gallatin National Forest Supervisor made the ill-advised decision in 2020 to approve a Forest Plan direction that would dissolve these WSA protections, and chop up Wilderness-quality roadless lands for non-conforming recreation and forest management uses (i.e., mechanized, motorized use and logging), I believe that the decision was illegal for several reasons. One reason has to do with the 2011 legal decision faulting the FS for allowing non-conforming uses in the WSA. That decision was side-stepped at best, or ignored by the former Supervisor. (I have notes of her explanation of the FS response to that court order, from a personal phone call with her.) Another reason has to do with what I would say was a violation of FACA in originating, funding, directing and adopting the conclusions of a group calling itself the Gallatin Community Collaborative, and following, the Gallatin Forest Partnership.

Second, I have participated in meetings since 2019 and earlier of the Montana Forest Action Advisory Council, chaired by former Regional Supervisor Leanne Marten and former DNRC director John Tubbs and his staff. In those meetings, a faulty model identified about 5 million acres in Montana for 'priority' logging. The model was noted as faulty, and as a placeholder or proxy, it would be replaced by a better model. I analyzed their documents and asked public questions in their meetings. I noted that factors used in determining Priority logging areas included "proximity to sawmill". This belies the fact that the MTFA Plan was simply a made-up process to submit 'something' to the federal government in order to get the money the feds were offering for logging. (Most of the people present were logging industry reps or county commissioners who sought timber jobs in their districts.) The factors which might have given weight to preservation of old growth trees, sensitive species, our iconic wildlife including grizzly bears, elk hiding cover and other ecosystem values were not considered. I further read all of the comments on the Final Plan, and saw that the so-called conservation groups like Greater Yellowstone Coalition (Darcie Warden) rubber stamped the plan approval, but in fact wrote in their comments that the plan and model was seriously faulty, and that "we can't log our way out of the fire problem."

At a session break at a MT FAAC meeting in Missoula in ((I believe) January 2020, I spoke with a key participant in the meetings. I asked Tom DeLuca, then Dean of Forestry at University of Montana, two questions. First, I asked "Are you the only scientist in this room [of 50 participants]? He said "Yes, the only PhD." Then I asked whether this advisory planning effort was driven purely by politics, by executive orders given by Donald Trump, who after touring burn sites in California, exclaimed that we need to 'rake our Forests like they do in Finland' to prevent wildfires. At the time I showed Tom a printed article from the Washington Post that documented facts surrounding that Trump visit and the following Executive Order. Tom DeLuca replied to me, "You are exactly right."

I later told this story to Mary Erickson, who wrote to Tom (then in Corvallis OR) if this story were true. He replied to Mary, obfuscating the truth, saying that he knew I had good intentions, and there may have been some miscommunication.

(Exact notes of these events and conversations taken at the time are available.)

Thus, I know the background politics of the drive to increase forest "management" or logging nationwide, and that this drive has nothing to do with scientific consensus.

Third, although I am not a scientist, but trained as a journalist, I have read extensively about fire science and climate science, in my free time, as a volunteer, never paid. And it is clear to me that the idea of cutting down forests is suitable only to the CEO's of timber companies and their financial backers, as well as right-wing Republican trumplers who have been educated by the culture wars in our society to reject science, believing in vain that they will become rich by supporting a rich charlatan president.

My fourth concern is in the details of your plan, which rely on the faulty document, Gallatin County Community Wildfire Protection Plan. The scoping document says "About 81% of the project area is part of the Wildland Urban Interface identified in the Gallatin County Community Wildfire Protection Plan." I have examined this plan and read all of it in past years, and learned some disturbing facts: the Plan was only implemented as a 'first draft' and contained disclaimers that the Plan needed to be more completely written. I will be reviewing the details of that Plan once again in preparation for my opposition to this bad project. I recall that most of Gallatin County was designated "WUI" without any application of commonly-accepted boundaries, such as 200 feet from a structure, or at most 1/2 mile from infrastructure. The negative impacts of logging in the backcountry most certainly outweigh any purported protection to our community. I plan to cite extensive research that shows that logging actually dries out healthy forests, subjecting them to greater wind penetration, so that in extreme weather (drought and high winds), treated forestlands actually are in greater risk of catastrophic burning than they would be if left standing in moist, healthy conditions.

Finally, today I want to ask for clarification on whether any public comments will be considered at all, because as I read in your documents, ""The Forest has sought

and received approval for an Emergency Action Determination under the Infrastructure Investment and

Jobs Act, which means that this project would not be subject to the administrative review process at 36

CFR 218.

[sect] 218.21 Emergency situations.

(a) Authority. The Chief and the Associate Chief of the Forest Service are authorized to make the determination that an emergency situation exists as defined in this section.

(b) Emergency situation definition. A situation on National Forest System (NFS) lands for which immediate implementation of a decision is necessary to achieve one or more of the following: Relief from hazards threatening human health and safety; mitigation of threats to natural resources on NFS or adjacent lands; avoiding a loss of commodity value sufficient to jeopardize the agency's ability to accomplish project objectives directly related to resource protection or restoration.

(c) Determination. The determination that an emergency situation exists shall be based on an examination of the relevant information. During the consideration by the Chief or Associate Chief, additional information may be requested from the responsible official. The determination that an emergency situation does or does not exist is not subject to administrative review under this part.

(d) Implementation. When it is determined that an emergency situation exists with respect to all or part of the proposed project or activity, the proposed action shall not be subject to the predecisional objection process and implementation may proceed as follows:

(1) Immediately after notification (see 36 CFR 220.7(d)) when the decision is documented in a Decision Notice (DN).

(2) Immediately after complying with the timeframes and publication requirements described in 40 CFR 1506.10(b)(2) when the decision is documented in a Record of Decision (ROD).

(e) Notification. The responsible official shall identify any emergency situation determination made for a project or activity in the notification of the decision (see 36 CFR 220.5(g) and 220.7(d)).

I hope this letter will be logged in as on-the-record public comment. If it is not, being simply in an email to you Amanda, I will excerpt the content and include it in official comments for the record.

I look forward to clarification as to whether any public comment will be considered at any stage, given the Emergency Action Determination.