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Title:

Comments: I have to take issue to with the use of the emergency actions provision. There is no urgent need when the probability of a fire is 1% or less in any given year. The Gallatin County Community Wildfire Protection Plan recommends only to "research" "sustainable approaches for a county wide fuels reduction program to support the communities in intermix areas along the Bridger, Gallatin and Madison Ranges". To reduce private losses in the WUI, it recommends to, "Expand implementation of Fire Adapted Community Programs for communities in WUI interface and intermix areas with high fire exposure such as Bridger Canyon, Bozeman Pass, Bear Canyon, Clarkston, Big Sky and West Yellowstone". Bozeman and other towns are not mentioned.

This emergency action also severely restricts public participation by allowing only 1 comment period, and reducing the amount of time we the people have to consider alternatives. The use of the emergency actions provision is unwarranted, and interferes with the right of citizens to participate.

While forest fuel reduction projects can reduce the severity of wildfires, active forest management will not prevent large wildfires under extreme fire weather conditions. This suggests the project may be a waste of time. Because the project treatments open up the forest, the increased airflow and loss of shade will dry the forest even more, possibly increasing the severity of a fire, which runs counter to your stated goal. Additionally, since both canyons are oriented in a southeast to northwest direction, they are orthogonal to the prevailing winds, which may reduce the likelihood of an out-of-control fire. This argues against the need for the project.

Concerns about the Wildland Urban Interface around Bozeman may be exaggerated. The Gallatin County Community Wildfire Protection Plan shows a low relative wildfire hazard north of the project area. Though 81% of the project area is in the Gallatin County WUI, the county has the most liberally defined WUI, including all areas with structure density greater than zero, and a 40 acre radius around structures. A more conservative definition, such as used in the Code of Federal Regulations, would obviously reduce the size of the current overly generous WUI. Also, there is a tendency to think that urban sprawl will continue, and further populate the WUI, but a backlash against urban sprawl has developed, and it may eventually become a thing of the past.

When you cut trees, you remove living matter needed to combat climate change. Fire may remove that living matter, but it may not happen for 100 years or more. So you are asking us to sacrifice 100 years or more of a natural CO2 absorber, to possibly reduce the severity or size of a wildfire that has a 1% or less probability of happening in any given year. This is not a time to be cutting trees, this is a time to be planting trees. The time for this project has passed. We have a new priority going forward, and we cannot afford to make any more mistakes. This project should be abandoned, and we should start thinking about ways to save trees.

Thank you for your time.