Data Submitted (UTC 11): 5/31/2025 5:33:33 AM
First name: Ben
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Organization:
Title:
Comments: Dear USFS,

The emergency action management plan proposed for the South Cottonwood drainage is based on misconceptions in wildfire regimes and could pose detriments to wildlife that utilize the area. Under the Proposed Action section of the scoping document, it is stated that fire behavior arises from a combination of fuels, climate, and topography-the first of those being the only manageable component. However, just because active forest management is one of the Forest Service's primary tools in reducing fire risk, doesn't mean this technique is applicable to every scenario. A growing body of wildfire research has suggested that aridity and high winds amplify the possibility of large-scale, high severity burns regardless of fuel thinning (Bradley et al., 2016; Calkin et al., 2023). In fact, activities associated with thinning can worsen the issue by drying out underlying soils and allowing wider dispersal by reducing stand density. Further, the value of the South Cottonwood drainage to critical species such as grizzly bears, wolverines, whitebark pine trees, and the federally protected Canada lynx creates a demand for holistic and intensive analysis of environmental impacts.

The proposed action in South Cottonwood has received little press coverage; extending the comment period further would allow more opportunities for members of the community-concerned with the recreational value or ecological health of the landscape-to provide input.

As the USFS continues their efforts analyzing how best to navigate the challenges facing this region-a microcosm of those broadly facing the American West-I feel strategies within the home ignition zone should be explored. Calkin et al. (2023) describe this as the area within 100 feet of the home.

I am grateful to the Forest Service for acknowledging voices within the Gallatin community in addressing future landscape management practices. I hope that those reviewing this comment will take its sentiments to heart and may consider allowing opportunities for more to provide their input by extending the comment period.

Best,

Ben Churchwell

Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? Ecosphere 7(10): e01492. 10.1002/ecs2.1492

Calkin, D.E., Barrett, K., Cohen, J.D., Finney, M.A., Pyne, S.J., and Quarles, S.L. (co-authored by U.S. Forest Service). 2023. Wildland-urban fire disasters aren't actually a wildfire problem. Proceedings of the National Academy of Sciences of the United States of America. 120: e2315797120.