



May 30, 2025

Matthew Jedra
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Custer Gallatin National Forest
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Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=67535>

Comments on Hyalite Cottonwood Hazardous Fuels Reduction Project, Scoping Document

Dear Mr. Jedra,

The Gallatin Forest Partnership (GFP) submits these comments on the Custer Gallatin National Forest (CGNF) Hyalite Cottonwood Hazardous Fuels Reduction Project Scoping Document (Scoping).

Beginning in 2016, the Gallatin Forest Partnership developed a collaborative proposal that laid out a vision of management for the Gallatin and Madison Ranges. The proposal maintains existing recreation opportunities in the Gallatin Range, while limiting new development, meaning future generations can explore the same wild spaces that we enjoy today. This proposal was reviewed during the Custer Gallatin National Forest Plan update and was largely incorporated into the 2022 Forest Plan. The GFP is now building on this success by working to advance legislation that would codify the proposal and secure permanent protections for the Gallatin and Madison Ranges. This legislation is called the Greater Yellowstone Conservation and Recreation Act (GYCRA), and we are currently working with our Montana delegation to seek sponsorship for the bill.

Given its centrist vision, the GFP has garnered broad support from the communities of Big Sky, Bozeman, and Livingston, including over 2,500 endorsements from businesses and individuals. Current active members of the GFP include Montana Backcountry Hunters and Anglers, Southwest Montana Mountain Bike Association, Livingston Bike Club, Winter Wildlands Alliance, Big Sky Adventures and Tours, Wild Montana, Greater Yellowstone Coalition, The Wilderness Society, Gallatin Valley Backcountry Horsemen, and Mountain Mamas.

Both the GFP proposal and our GYCRA legislation overlap with the project area included in this Scoping. Specifically, our legislation would create a designation area called the Hyalite Watershed Protection and Recreation Area. Our management recommendations and goals for this designation area include the following:

Vegetation Management

- “To protect the Hyalite and Bozeman Creek watershed(s) to ensure a clean and reliable municipal water source for the City of Bozeman.”¹

¹ Gallatin Forest Partnership, Gallatin Forest Partnership Agreement (2018), 11.

- “Active vegetation management can occur outside of the WSA and inventoried roadless areas to address watershed health and wildfire hazards. Within the WSA and inventoried roadless areas prescribed fire can be used for active vegetation management.”²

It is our understanding that the project, as currently scoped, does not conflict with our recommendations for this area regarding vegetation management and in concept, would be appropriate for the front country portion of this area. However, we would appreciate greater environmental analysis, insight into how the treatments will be done, and analysis of how the project will account for other important aspects of the current Forest Plan. Per the Forest Plan, this project takes place in a Recreation Emphasis Area and therefore warrants greater consideration of impacts to recreation and opportunities for enhancement. Being home to a number of important species and contributing to habitat connectivity between the Gallatin Range and wildlands to the north, wildlife value within this area also needs further analysis.

Recreation:

Our recommendations and legislation for the Hyalite Watershed Protection and Recreation Area call for connectors and loop-trails to be developed within the project area included in Scoping:

- “Investments in new trail development to create better connections and loop opportunities could be made in the parts of the watershed that are outside of the Wilderness Study Area. Trails should be maintained throughout the Recreation Area.”³

While we recognize that the objective of this project is fuels reduction, we ask that you assess whether any temporary roads could later be decommissioned into trails that are linked into the existing trail system. This is in line with our agreement and the GYCRA legislation, and would be a relatively easy way of improving the existing trails system for the CGNF. Given the importance of this area for recreation—it was designated as a Recreation Emphasis Area in the forest plan and our proposed designation emphasizes recreation as well—we also ask that you include project design criteria to minimize impacts on any existing recreation infrastructure in the project area. This existing infrastructure includes numerous Forest Service system trails (including groomed cross-country ski trails), a campground, and several trailheads.

Wildlife:

For the Hyalite Watershed Protection and Recreation Area, we recommend that National Forest lands be managed for stable and resilient wildlife populations. We recommend:

- “Maintaining and enhancing the current high-quality habitat and connections that ensures the diversity and abundance of wildlife species in the Gallatin and Madison Ranges. This includes identifying high value habitats like winter range and migration routes as well as working with partners to gather data and educate the public about safe recreation in important wildlife habitats.”⁴

To this end, we expect that this project will be implemented in a manner that creates a net-positive benefit for wildlife. We ask that you work with Montana Fish Wildlife and Parks to identify wildlife impacts and opportunities, create opportunities for continued habitat connectivity, develop project design criteria to minimize human-wildlife conflict, and that work not occur during sensitive times of

² Gallatin Forest Partnership, Gallatin Forest Partnership Agreement (2018), 12.

³ Gallatin Forest Partnership, Gallatin Forest Partnership Agreement (2018), 13.

⁴ Gallatin Forest Partnership, Gallatin Forest Partnership Agreement (2018), 7.

year or in important habitats. This project is taking place in an area important for grizzly bears and lynx, so we request that this project account for and minimize impacts to these species in particular. Furthermore, we ask that as your staff and contractors design and implement this project, you use this opportunity to gather data on human and wildlife activity in the project area.

We were surprised and disappointed that the Forest Service did not fully inform the public of this comment opportunity through a press release or hold any public meetings. We are also alarmed to see that this will be the only public comment period for this project, and feel this is inappropriate and shortsighted. Fuel reduction projects are improved with public participation and actions that limit that participation are not in the best interest of the agency's goals or our communities. Hyalite and South Cottonwood are important recreational resources to the community, and the public deserves more information and opportunities for meaningful engagement, so that this project can actually improve safety and produce public benefit. Public engagement is also necessary to build understanding within the public of the value of prescribed fire and fuels projects like this, so that this and future projects can be successful. As the NEPA process moves forward, we hope there will be more direct opportunity for public input, specifically public meetings, a field tour, and additional comment periods. Recently, public meetings were held on both the Helena-Lewis and Clark National Forest, and the Lolo National Forest for fuels reduction projects, so additional public engagement is possible even under current Agency policies.

The Gallatin Forest Partnership recognizes the need for fuels projects in this area and that is reflected in the vegetation management recommendations we have established in our agreement and legislation. However, we also encourage the Forest Service to consider how this project can serve multiple values—enhancing watershed protection, reducing wildfire risk, supporting wildlife habitat and improving recreational access — all of which must be informed by robust, earnest community engagement. Thank you for the opportunity to provide input, and for your continued efforts to steward these cherished landscapes for current and future generations.

Sincerely,

The Gallatin Forest Partnership

Denise Wade, Big Sky Adventures and Tours
Erin Steva & Sally Schrank, Greater Yellowstone Coalition
Robin Barker, Livingston Bike Club
Caleb Teigen, Montana Backcountry Hunters and Anglers
Erin Benedict, Mountain Mamas
Ian Jones & Adam Oliver, Southwest Montana Mountain Bike Association
Kathryn Eklund & Barb Cestero, The Wilderness Society
Zach Angstead, Wild Montana
Hilary Eisen, Winter Wildlands Alliance