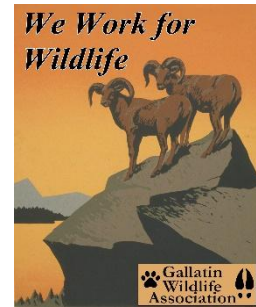


**GALLATIN WILDLIFE
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April 21, 2026

Madison Ranger District

Re: "South Tobacco Roots Vegetation Management Project"

Attn: Joshua Connors
5 Forest Service Road
Ennis, MT 59729

Dear District Ranger Connors:

The Gallatin Wildlife Association submitted comments concerning the South Tobacco Root Vegetation Management Project on May 2, 2024. The April 15, 2026, pronouncement by the Beaverhead Deerlodge National Forest (BDNF) is once again asking for the public's participation in the submission of comments for the very same project. We understand the rationality for the repeat. In April 2024, the agency (BDNF) wanted the project paused for the completion of a Forest Plan Amendment for Canada lynx Habitat Management, which was completed in November of 2025.

As stated on page 9 of this Draft Environmental Assessment (DEA), it was also stated that nearby wildfires changed the conditions on the ground in 2025 giving thought that an "updated analysis was warranted". GWA understands and accepts this new reality. But we must complain and voice opposition to the reduction of the comment period. In 2024, the public was provided a 30-day comment period, but at this time, the public is provided only 7-days.

We realize the obvious that there has been a change in administration, but with that change, there appears to have been an attempt to circumvent the public process. The short time window of seven (7) days to allow comments is unconscionable. There isn't any way the public can absorb, organize thoughts, and make a reasonable product providing the time frame that is allotted.

We understand that the 36 CFR 220 NEPA regs were superseded by the Secretary of Agriculture's determination, that an emergency situation exists as defined

under the Infrastructure Investment and Jobs Act (IIJA). We also understand all of this was spearheaded under the current President's Administration Executive Order 14225. None-the-less, depriving the public the right to freely engage on matters pertaining to public lands is undemocratic and against the rights of those trying to exist and live in a free society.

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.

Compositional Comments:

Outside of the issue of the minimalistic comment period, GWA would like to note a few additional comments when compiling and comparing our comments to those of 2024. We did notice one change, a positive one relating to the lack of a "Table of Contents" or an outline within the DEA in 2024. While it was troublesome and quite cumbersome in 2024, this year's DEA rectified that problem, making the detailed analysis more workable and usable. We want to thank BDNF for the improvement.

The second compositional comment pertains to the NEPA requirements of number of alternatives. Once again, this DEA has only two alternatives: the "proposed action" and the "no action" alternative. Even though NEPA does not require a minimum number of alternatives to be present, it does require a No Action and Proposed Action, which is what we have here. But this is only what is required, not a minimum standard. According to our understanding and the reference provided¹, NEPA states the following.

"NEPA requires that federal agencies consider a "reasonable range" of alternatives."

Further down in that context:

"How many alternatives should be analyzed for an EIS or an EA? Long story short: there is no specific requirement. At a minimum, an agency must carry forward one action alternative and the no-action alternative. Typically, agencies are "more comfortable" carrying forward at least two action alternatives, if for no other reason than to appease their own counsel! But courts do not define a "numerical limit" on the number of alternatives that must be considered. Per the Council on Environmental

Quality (CEQ) guidance, “what constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case.”

It is unfortunate that the court system has allowed the two required options to become sufficient in meeting the criteria of NEPA, thereby preordaining the minimal number of alternatives at two. That in and of itself violates the intent of NEPA of what is required – a reasonable range of alternatives.

Project Area:

On page 3 of the DEA, the project area is described as such.

“The project area encompasses about 31,354 acres in the southern Tobacco Roots Landscape, approximately 4.5 miles east of Sheridan, 5.5 miles west of McAllister, 6.7 miles northwest of Ennis, and 7.7 miles north of Virginia City, Montana.”

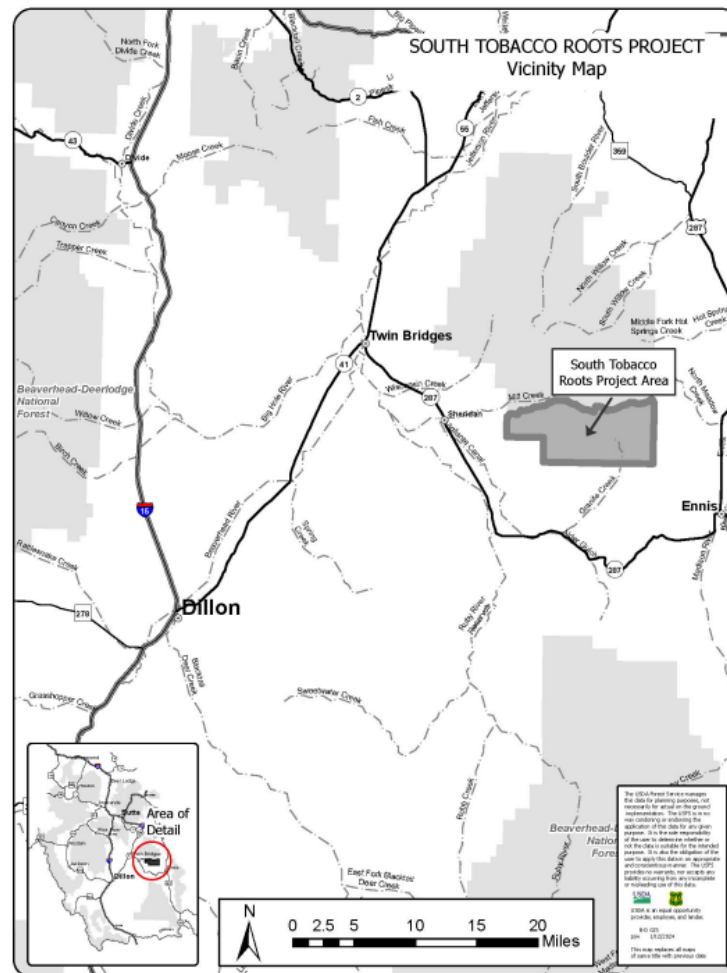


Figure 1. Vicinity map of the South Tobacco Roots Vegetation Management project.

The Purpose, Needs, and Objectives of the Project:

The Beaverhead Deerlodge National Forest (BDNF) has determined that the current vegetation condition class on the southern end of the Tobacco Root Range has departed from historic conditions across the landscape. In the 2024 DEA, it was said that this determination was made using Landfire geospatial data as well as the usage of evaluations and mapping from the wildland urban face.

In this year's 2026 DEA, it states the following project aims on page 7.

“The South Tobacco Root Vegetation Management project aims to improve overall forest health and resilience by moving the project area to desired conditions identified in the Forest Plan. These include:

- Ecological processes, which affect the chemical, physical, and biological components of the aquatic and terrestrial ecosystems and fully support designated beneficial uses, are present and functioning to provide the diversity of forest, shrub land, grassland, riparian, and aquatic communities;*
- Conditions for self-sustaining or viable populations of native and desired non-native plant and animal species are supported within the natural capability of the ecosystem; and*
- Natural disturbance processes are recognized and accepted as essential to the health of ecological communities at various spatial scales. Fire is allowed to play its natural role where appropriate and desired. Life, investments, and valuable resources are protected using the full range of responses to wildland fire.*

GWA views these aims important to the overall health of the landscape and resources; however, it is the application of the objectives below where GWA has pause and asks the U.S. Forest Service to change their paradigm as we move ahead into the 21st century. When we made comparison with the 2024 DEA, the 2026 DEA lists only two (needs) for the project as compared to the three in 2024. The needs listed are the following.

Objective 1 - Reduce Wildfire Risk

“Reduce the potential of wildfire on NFS lands spreading to adjacent private and public lands and resources as identified by the Madison County Community Wildfire Protection Plan (CWPP).”

Objective 2 – Manage Timber Stands

“Where lands suitable for timber production occur within the project area, bring to, and continue to manage stands in a condition that meets the Forest Plan.”

These objectives have corrupted the U.S. Forest Service over generations, and we say that because of the growing close relationship with the timber industry over the middle to end of the 20th century. But to be fair in our history, much of this relationship has developed over time because of interference from the political, corporate, and individual need for financial gain from public land at little to very little expense. GWA understands the need to reduce wildfire risks, but again to be fair, society needs to look at other alternatives rather than timber extraction. Society needs to review the miscues in forest management, miscues that have allowed our forests to become in the condition that many have complained about today.

Change in Forest Service Paradigm:

GWA has long been advocating for a different approach in terms of forest management, one that protects and sees value in mature and old-growth forests. Our organization has long been advocating for the USFS to change their paradigm of their overall management of our Nation's forests. Not to focus on "getting the cut out" but on protecting our existing forests to help defend off the negative effects from climate change, a change that is already here.

Nationally, the Biden Administration announced a new plan to conserve global forests at the COP26 meeting in November 2021. Shortly thereafter on April 22, 2022, President Biden took executive action to inventory and conserve mature and old growth forests on federal lands. That inventory was released last year with a proposed Draft Environmental Impact Statement (DEIS) scheduled to be released this coming summer for public comment. Simply given the name, National Old-Growth Amendment (NOGA), the amendment will be proposing a series of alternatives of how to manage old growth forests across our Nation. GWA wants to know, how does this project take those Presidential actions into account? How are they being reflected in this project?

Unfortunately, those days seem to be gone now, as we find ourselves under a new administration. However, that should not deter us from a better goal, a better purpose in forest management. GWA sees the value of our forests in more intrinsic terms rather than in terms of financial value. Utilizing our forests as a lumber reserve is an inefficient and outdated mechanism for our society compared to the alternative of utilizing them for carbon sequestration, biodiversity, preserving them for ecological sustainability for other resources like clean air, water, and maintaining the cycle of our planetary gases.

GWA contends that these functions and the multi-purpose rationale of our forests are far more important to our society than the dollars to be had by utilizing our forests as a lumber yard resource.

Emergency Situation Determination:

Decisional changes by the current Administration as they declared a forest emergency on 112,646,000 acres of Forest Service land warranted a new discussion in the 2026 DEA. That change necessitates a few more comments on our part in addition to what we've already discussed above. The bullet points on page 9 under the Emergency Situation Determination of the DEA are actually quite invasive to the landscape and in many ways, we view them in opposition to the aims mentioned above and those found on page 7 of the DEA. How does the U.S. Forest Service walk this tightrope it finds itself?

GWA views many of these steps intrusive and destructive to the landscape and in many ways the antithesis of the aims listed above.

- *Reduce wildland fire risk to communities, critical infrastructure, or key ecological values;*
- *Reduce hazardous fuels by removing or modifying vegetation to lower the risk of wildfires;*
- *Reduce the density of fire-dependent forests;*
- *Reduce hazardous fuels to help make wildfire response, as well as ingress or egress, safer and more effective;*
- *Support the durability and resilience of forests and grasslands;*
- *Salvage of dead or dying trees;*
- *Use commercial and non-commercial sanitation harvest of trees to control insects or disease, including trees already infested with insects or disease; and*
- *Restoration of water sources or infrastructure.*

The paragraph under Emergency Situation Determination mentions two fires in 2025 which occurred on the Beaverhead Deerlodge National Forest. In reading the context of these fires, the DEA explains the Bivens Creek fire burned approximately 2,126 acres or 6.8% of the 31,354-acre project area. The DEA reports on page 22 that none of the proposed treatment areas were burned. The other fire was the Cloudrest fire, a fire which occurred in the western Tobacco Root Mountains, but outside the project area.

It was reported that both fires burned through the lynx analysis unit (LAU TR-03) and some portions of LAU TR-02.

Table 9. Updated Canada Lynx Habitat Acres by LAU after Bivens Creek and Cloudrest Fires

LAU	Total Lynx Habitat Acres	Early Stand Initiation (percent of habitat)	Stand Initiation (percent of habitat)	Mature Multi-storied (percent of habitat)	Other (percent of habitat)
TR-02	19,255	908.87 (5%)	1,122.06 (6%)	5,769.40 (30%)	11,456.78 (60%)
TR-03	17,772	1,792.75 (10%)	550.63 (3%)	7,067.91 (40%)	8,361.34 (47%)

Proposed Vegetation Treatments:

Table 1. Summary of proposed vegetation treatments. All values are rounded to the nearest whole number.

Vegetation Management Activity	Acres	Units
Broadcast burning	12,420*	84
Clearcut	578	22
Commercial thin	321	8
Pre-commercial thin	1,165	58
Sanitation, salvage, and thin	275	17
Variable density thin	1,537	37

*Total broadcast burning acres includes 1,883 acres of follow-up treatment within commercial harvest units.

Table 1 shows the breakout of the varying proposed actions to be imposed upon the project area. We can see that the greatest amount of acreage treated is the proposed 12,420 acres to undergo broadcast burning, 3,850 acres of that would be directed toward sagebrush and grassland. GWA is highly suspicious of acts to burn sagebrush and grasses. In periods of drought and climate change, taking acts that would magnify and exacerbate the problem of the sagebrush ecosystem seems downright counterproductive.

Frequency of fire in the project region was not discussed in the DEA. This bit of information would have been a valuable piece of information to know before commenting. According to the US Fish and Wildlife Service (USFWS)², the frequency of wildfires in Montana could be on a reasonable timeframe of 35-40 years, but this frequency could be quite different depending upon location.

“Before the era of European colonization, low-intensity wildfires were frequent in this region of Montana, with fire occurring on average every 35 to 40 years. This high fire frequency regularly cleansed the boundary of sagebrush steppe and grasslands of young trees, restarting the clock of ecological succession while returning nutrients to the soil.”

Fire in sagebrush country can be quite variable according to location, elevation, and so many other ecological factors. According to a study by William Baker³, who is involved in the Ecology and Evolution program at the University of Wyoming at Laramie, fire frequency in sagebrush country in Colorado could have been between 82 and 143 years depending upon location and climate.

There is a point to be made that frequency in wildfire depends upon many factors and the health of the ecosystem is key in that regard. The cumulative effect of fire upon the sagebrush ecosystem in Montana is unknown. We say that knowing that fire does indeed kill sagebrush. In fact, George Wuerthner⁴ makes the following statement at the end of his article: *“No Such Thing as Frequent Fire in Sagebrush Ecosystems”*.

“Fire kills sagebrush. It doesn’t matter whether it is a fast or slow-moving, hot or intense sagebrush will be killed.”

Basically, all the points the DEA is making about the justifications to use fire and to conduct vegetative thinning, logging, and various treatments are not sufficient to overcome the natural rationale to not do these things.

There is a fallacy that a build-up of fuels has driven the severity of uncontrolled wildfires. Yet, it is not the fuels that are responsible for this increase and severity of wildfires, but weather conditions of wind, dry moisture, and hot weather. This is proven by the findings of the Center for Climate and Energy Solutions⁵.

“Research shows that changes in climate create warmer, drier conditions. Increased drought, and a longer fire season are boosting these increases in wildfire risk. For much of the U.S. West, projections show that an average annual 1 degree C temperature increase would increase the median burned area per year as much as 600 percent in some types of forests. In the Southeastern United States modeling suggests increased fire risk and a longer fire season, with at least a 30 percent increase from 2011 in the area burned by lightning-ignited wildfire by 2060.”

To further this line of thought, Chad Hanson⁶, an ecologist with the John Muir Project places the evidence before us this way.

“Proponents claim removing many or most of the trees, which they call “fuel,” is an effective fire management approach. But the Dixie Fire raced through many thousands of acres of these “thinned” forests before it razed much of Greenville.

Proponents of thinning often cite specific locations that burned lightly, but these selective examples do not reflect the broad base of scientific evidence. For example, following the Bootleg Fire in south-central Oregon earlier this year, a representative of The Nature Conservancy claimed that a combination of thinning of “small” trees and prescribed burning effectively curbed the fire. But the Conservancy also has a conflict of interest: For years, it has conducted extensive commercial logging operations in the Sycan Marsh “Preserve,” north of Beatty, Oregon, under the banner of thinning. Thousands of mature trees have been removed under an expansive definition of “small”: up to 21 inches in diameter. Weather is always the biggest factor in fire spread, and the Bootleg Fire began in particularly hot, dry, windy conditions. Even so, according to the Forest Service’s daily rate-of-spread maps, the Bootleg fire spread fastest through Conservancy lands with extensive recent forest management, mostly thinning.”

What GWA is saying is that there is much more to be said about the ecology of our forests and forest management. Snags and downed wood after fires, wind, etc., all play a vital role in establishing habitat for various species of wildlife. Vegetative thinning, logging, clearcutting are all harmful to the forests for these reasons, not to mention the disturbance to the soil biota and soil crust. Increased erosion, soil compaction, and invasive weeds are all part of disturbance to the ground cover, not to mention to the local weather conditions close to the ground.

Opening the tree canopy and removing and/or thinning surrounding ground cover will allow increased wind, more sun, and less humidity, making surrounding forests susceptible to fire.

Roads and Their Relation to Wildfire:

This segment will be brief because it is quite self-explanatory. One obvious flaw with these timber projects is the increased use and/or increased improvement of roadways needed to carry out the goals of the project. Whether they are temporary, reconstructed or not, these roads allow people, more people, to get back into the wildlands to a greater depth, to a greater degree than ever before. This is the problem, for according to the Pacific Biodiversity Institute⁷, 88% of all wildfires nationwide are caused by humans and of those human-caused wildfires, 95% of those occur within a half-mile of road, with over 90% of all wildfires occur within half-mile of a road.

With that being said, on page 16 of the DEA, the following claims or expectations are elaborated concerning temporary and reconstructed roadways.

“Approximately 12.7 miles of temporary roads are needed to implement the treatments described above. Roads built for temporary use would be constructed to a minimal standard to provide access for harvesting equipment and hauling while minimizing impacts to soil and water resources. Temporary roads would be constructed on both existing and new road prisms. After use, temporary roads would be obliterated with the methods below, consistent with design criteria in Appendix C. Approximate temporary road locations were determined based on geospatial data, current system road locations, logging system requirements, and field reconnaissance.”

The list from the Abstract of the scientific journal *“The Potential Effects of Forest Roads on the Environment and Mitigating their Impacts”* by Kevin Boston⁸ provides an obvious assessment of environmental harm which is derived from the influx of roads on the natural landscape. One large impact not mentioned below in the copied text, yet is still described, is that of habitat fragmentation.

“Forest roads can cause a variety of impacts on local wildlife that may lead to extirpation: facilitating the spread of invasive organisms, causing death or harm by vehicle strikes, and changing the behavior of animals to their detriment. Roads create improved access to forests, which can increase predation rates from hunters. Animals may move to avoid traffic noise, increasing their vulnerability to predation by other animals. One of the most significant impacts of forest roads is on water quality, through both catastrophic and chronic sources of water pollution, primarily from sediment.”

In response to the premise that nearly 13 miles of these roads are temporary, the harm is still done regarding many of these impacts. Some of that harm can't be undone. The aftermath of road construction still rests upon the landscape.

The evidence is still there, and the wildlife may still feel the impact of that temporary disturbance for years to come.

The harm comes into play by the cumulative effect of roads and road densities and those cumulative effects will vary depending upon the species. These impacts may be hard to quantify upon a particular species, but it has been said and shown that accessibility, noise, and even impacts from linear disturbances can affect the mobility and movement of wildlife. An example of the science proving this theory is found in the scientific article “*Whose line is it anyway? Moose response to linear features*” by Finnegan, Laura⁹, et al. Within the Introduction, the following is stated.

“Linear features (roads, pipelines, seismic lines, powerlines, hydrolines, and railways) are some of the most pervasive disturbances across the boreal forest of Canada (Pasher et al., [2013](#)).”

“...the geographic footprint of linear features is small; however, as they are widespread (>600,000 km; Pasher et al., [2013](#)) and occur at high densities (up to 40 km/km²; Stern et al., [2018](#)), they have significant effects on forest fragmentation, contributing to 80% of forest edges (Pattison et al., [2016](#)). Linear features impact the distribution and abundance of lichens, nonvascular and vascular plants (Finnegan, MacNearney, et al., [2018](#); MacDonald et al., [2020](#)), as well as the distribution and movements of invertebrates and vertebrates (Machtans, [2006](#); Riva et al., [2018](#)). Notably, linear features have had significant effects on the distribution and movements of large boreal mammals (Dickie et al., [2020](#); Dyer et al., [2002](#); Finnegan, Pigeon, et al., [2018](#)), causing cascading impacts on predator-prey dynamics (DeMars & Boutin, [2018](#); Mumma et al., [2018](#)).”

Wildlife and the Applied Ecology:

On page 60 within the 2024 DEA, the following statement below could have been our overall synopsis of the project at that time. For it describes the impact, on certain key species of wildlife found in the project area as it pertains to wolverine, Canada lynx and grizzly bear.

“Habitat for wolverine, Canada lynx, and grizzly bear is expected to degrade in the short-term due to increased human presence and disturbance during project implementation within the Middle Mountain IRA. Whitebark pine is expected to slightly degrade where individuals are damaged during treatment implementation.”

The above quoted text is missing from the 2026 DEA as far as we can tell and we wonder why? Has the science or summation of science changed to the degree where that conclusion is not relevant?

This landscape, those lands adjacent to and in proximity to the Greater Yellowstone Ecosystem have already been fragmented across much of the region. This project does not attempt to alleviate that problem, even though according

to a statement on page 52, secure habitat for grizzly bears could be improved by 3.3% (1,875-acres) from the closure of Forest Service Road 71832. But for the most part, this project exacerbates fragmentation.

The Tobacco Root Range is considered an essential corridor for wildlife movement as wildlife move along the chain of the Northern Rocky Mountains, from the Greater Yellowstone Ecosystem (GYE) to the south to the Northern Continental Divide Ecosystem (NCDE) to the north. The mountain range is a necessary part of the connecting tissue between these two environmental ecosystems as many species transcend their normal occupational home. Normal migration patterns, forage, climate change and availability of territory are just some of the reasons why wildlife is on the move.

Increased fragmentation of wildlife habitat on public land is not a position that GWA can support. We believe the harm done to wildlife and their respective habitat cannot be justified in approving just another timber project, especially since timber projects have not been found to be the cure our society is looking for. Larger unfragmented landscapes are what several iconic species such as wolverine, grizzly bears, wolves, etc. are needing as they try to inhabit much of their historic range.

Canada lynx:

GWA did not comment on Canada lynx or their habitat in the 2024 DEA but will do so now as we have commented on the Forest Plan Canada lynx Amendment in 2025. Perhaps the following statement found on page 44 of the 2026 DEA best lays out the current thinking of Canada lynx and the potential of their existing habitat according to the U.S. Forest Service.

“While Canada lynx are not known in the South Tobacco Roots, it is possible that a transient individual may pass through the project area, however, they are not expected to stay long (two weeks or less).”

The following statement also found on page 44 of the 2026 DEA explains the efforts to monitor the species.

From 2020 to 2024 US Forest Service Rocky Mountain Research Station and BDNF employees conducted several winter mesocarnivore monitoring efforts forest-wide. Numerous surveys have been conducted in the South Tobacco Roots and Canada lynx were not detected.

While the DEA describes the evidence of Canada lynx as more transitory than anything else, there are two lynx analysis units (LAU) contained within the project area, TR-02 and TR-03. The following is stated on page 4 of the South Tobacco Root Wildlife Report of April 2, 2026.

"The South Tobacco Roots Project Area intersects 2 LAU's, TR-02 on the east side and TR-03 on the west side."..... The Bivens fire and Cloudrest fire burned through LAU TR-03 and some in TR-02 in 2025 (Figure 2 and 3). Only the Bivens fire was in the project area boundary. Fire did not impact any proposed units in this project.

GWA wants to be clear that we understand the impact of fire within the project area and within its boundary. GWA also wants to be clear that we have challenged in court the decision on the Canada lynx Forest Plan Amendment. We strongly disagree with the premise that it is "okay" to conduct logging or thinning operations within Canada lynx habitat on one hand, but then on the other, say to the public that the species habitat is sparse and not conducive to maintaining a Canada lynx population.

There needs to be a holistic and honest review of the history of Canada lynx and their habitat within the Greater Yellowstone Ecosystem (GYE) and compare that to the same conditions that exist today. To further explain, GWA will restate previous comments concerning Canada lynx and their habitat within the GYE.

"GWA has often stated in previous comments on previous proposed fuel reduction projects impacting Canada lynx habitat, the nature of the hypocrisy. Why in so many cases does the U.S. Forest Service (and other Federal agencies) state that the habitat for Canada lynx habitat is sparse and that the habitat of the Greater Yellowstone Ecosystem does not seem to support a robust population, yet on the other hand, the agencies are doing everything they can to undermine and/or fragment the Canada lynx habitat (that exists) even further?"

It is simply disingenuous to do so. That is never more true than in this project. You are literally negatively impacting the habitat of Canada lynx and trying to justify or whitewash the harm in doing so. GWA will add one more point to this argument, one that we made on the Beaverhead Deerlodge National Forest Canada lynx Management Plan last year on comments dated October 9, 2025.

"We obviously need assurances that forest fuel reduction projects, thinning projects or whatever terminology the U.S. Forest Service (USFS) wants to use, will not be undertaken on Canada lynx habitat. What assurances in your finding that this will be the case? From our previous June 29 comments.

GWA cannot stress enough that perhaps the more current and greatest threat to Canada lynx is that of habitat fragmentation and habitat loss. With this being the case, this is an issue that BDNF does have an inordinate amount of control over. This should be highlighted in this Forest Plan Amendment on Canada lynx for the BDNF. 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%¹⁰. 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.”

Undoubtedly, it is obvious to assume that part of that reduction is dependent upon landscapes within the BDNF. With that, we raise the following question. If this is the case, then why is the BDNF magnifying, exacerbating, and perpetuating the loss of Canada lynx habitat by the approval and authorization of timber projects? We need to look in the mirror and realize, that perhaps we are the problem and the reason for loss of Canada lynx habitat.

However, as we see in the 2026 DEA writeup, the following two statements. The first found on page 12 and the second found on page 42 stating that implementation of the Canada lynx Forest Plan Amendment is exempt from project treatments within WUI.

“Treatments in lynx habitat within the portion of the project that meet the HFRA part B definition of WUI are exempt from meeting Canada lynx management direct vegetation standards as part of the Northern Rockies Lynx Management Direction (NRLMD) (USFS 2007).”

Any areas that are a lynx habitat type that are currently in a structural stage that provides lynx foraging (i.e., supports moderate to high snowshoe hare densities) are excluded from treatment unless within the area defined as within the WUI as defined by 16 USC 6511(16)(b) and accordingly mapped for the project area.

GWA believes there should be more efforts with the WUI landscape to harden homes and infrastructure and less attention given on logging, thinning, or other vegetative treatments.

Grizzly bear:

As stated above, this project is purported to increase secure habitat for grizzly bears slightly by actions stated on page 52. Page 53 makes the following statement in regard to NFS Road Closure 71832.

“Removing the small segment of NFS Road No. 71832 would connect two previously disconnected blocks of secure habitat on the east side of the project area and expand available habitat within the large roadless area. This secure block now extends from near the southern boundary of the Forest and is intact through the entire spine of the Tobacco Root Mountains (See Figure 11 grizzly bear map, Appendix B). This is expected to increase the value of this habitat for grizzly bears should bears choose to move through this mountain range (Sells et al. 2023).”

GWA recommends this portion of the project be implemented regardless. Closure of any NFS road should be undertaken independently without trying to entice support from the public by connecting that action to less desired and needed projects such as vegetative treatments.

The next paragraph describes the negative impact of this particular project. It must also be said that just because a road is classified or designated to be temporary does not mean that it would not cause harm to the natural behavior or movement of grizzly bears.

“Secure habitat within the GBAUs would be temporarily impacted during implementation from building temporary roads and rerouting NFS Road No. 9611. Use of temporary roads in secure areas during implementation may displace grizzly bears. Temporary roads are scattered across the project area, and these temporary roads would be decommissioned following implementation. This is an impact of 98 acres during implementation or 0.1 percent (insignificant effect).”

The following examples below were obtained from the 2024 DEA. Semblance of these statements were also found in various constructs in the 2026 DEA. They still are the rationale for why we reject the proposed project.

- *“Changes in available cover are expected throughout the project area where actions are proposed, particularly in commercial timber harvest units where most of the cover for bears would be removed by thinning trees. This includes the effect of proposed openings greater than 40 acres.*
- *Hibernating grizzly bears can be easily aroused and have been known to exit dens when disturbed by seismic or mining activity, or other human activity. There are approximately 2,625 acres of modeled denning habitat within proposed treatment units. This accounts for approximately 8 percent of the modeled denning habitat within the analysis area. These areas would have commercial timber harvest or have disturbance near modeled habitat from noise such as aerial helicopter or drone use to implement broadcast burns.*
- *Generally, most commercial timber harvest would occur during summer, fall, and winter months and broadcast burning fire would occur in spring and fall. Fall is the only time where both may occur simultaneously and have the highest probability of bear disturbance in the analysis area.”*

As stated, this portion of the Tobacco Roots is directly in the path of grizzly bears, as well as other species, trying to gain connectivity to the north. The scenarios listed above would be in addition to the current conflicts and threats bears must face presently regarding their ability to move freely about upon the landscape. But this is the premise of our concern.

We’ve all heard the allegory “death by a thousand cuts”. This is exactly the scenario that the grizzly bear as well as most of our wildlife have been suffering for and through generations. It is the continuation and the cumulation of timber projects, recreational use, grazing and development upon the landscape that so concerns our organization and members. The grizzly bear is simply running out of secure habitat and the other necessary habitat to roam freely unmolested by man upon the landscape.

It is the cumulative effects of loss, loss of so many factors necessary for life that have taken a toll upon the bear's behavior, population, and density. This is our concern. The largest threat about the Yellowstone grizzly bear is without connectivity, the bear is in danger of becoming an isolated species. The bear's genetic diversity and health is in the balance, and instead of solving that problem, we tend to exacerbate the threat by reducing the likelihood of connectivity.

There is one more highly dysfunctional basic premise that the U.S. Forest Service uses to define secure habitat. On page 51 of the 2026 DEA, there is the following statement.

“Grizzly bear secure habitat is defined as areas more than 500 meters from an open motorized access route and must be greater than 10 acres in size (Interagency Grizzly Bear Committee (IGBC) 1998).”

GWA challenges this criterion used for grizzly bear secure habitat as being woefully insufficient for the protection of the bear. We must ask, what is the science behind such a determination? GWA had challenged this very premise in our litigation effort on the South Plateau Timber Project on the Custer Gallatin National Forest.

This is proven in summary judgement in the United States District Court for the District of Montana, Missoula Division¹¹; Lead Case No. 9:23-cv-110-M-DLC-KLD filed May 16, 2024.

“The agency defines secure habitat as areas greater than 10 acres in size that are more than 500 meters way from open or gated motorized routes. FS41078-9; FS5403. This is commonly referred to as the “1998 baseline.” FS5376. In effect, the Forest Plan standards that incorporate the 1998 baseline are required to reach and maintain secure habitat at levels that existed in 1998. FS5376.

However, the Forest Service and FWS determined that for three subunits on the Forest, the 1998 baseline secure habitat levels were not sufficient to protect the grizzly bears. FS18476-18477; FS5201. For these subunits, the Forest Plan sets baseline levels at full implementation of the 2007 Gallatin National Forest Travel Plan which requires a higher rate of secure habitat than the 1998 baseline”.

In other words, there is not a scientific justification for that criteria. We, the general public, were also not made aware of the proposed road locations to determine road density or the impact on secure habitat. Roadways are, as in many species, one of the most threatening forms of habitat fragmentation and habitat loss on the landscape. It increases human/bear conflicts, threatens secure habitat, threatens food supplies and denning opportunities. It also threatens the ability for the bear to move freely upon the landscape.

Wolverine:

The wolverine, a species recently listed by the USFWS as a threatened species under the Endangered Species Act of 1973, is a species believed to transgress or inhabit the project area in some capacity. Even though the action taken was long overdue, the action does not immediately relieve the species from harm or danger. The species still must fight through dangers of trapping, habitat loss, and threats from climate change.

In reference to comments under the No Action Alternative on page 60 of the 2024 DEA, the following statement was made.

"In the long-term grizzly bear and wolverine habitat would continue to be affected by the presence and use of motorized routes for the foreseeable future."

GWA finds no such reference in the 2026 DEA. Instead, there is this statement found on page 55 of the 2026 DEA.

"A wolverine could use all available habitats in the analysis area and be able to disperse within and outside of the project area. No disturbance effects to wolverine are expected."

Why the disconnect? Again, there seems to have been rewriting of some conclusions or summaries of the conditions on the ground. Certain conditions as written have a more optimistic slant to them than some statements of the DEA of 2024. GWA would like to know why?

The 2026 DEA does acknowledge the existence of habitat within the Tobacco Root Mountains. On page 45, there is this statement.

"There is available habitat for the wolverine throughout the project area and important habitat features such as prey to forage, maternal habitat, solitude, and high elevation snow. Wolverines occupy a variety of habitats, especially habitat in high alpine patches at low densities where they disperse into suitable areas (Inman et al. 2012). Year-round habitat for the wolverine is found at high elevations centered near the tree line in conifer forests, rocky alpine habitat above tree line, cirque basins, and avalanche chutes that have food sources (FWS 2023)."

GWA made the following comment above concerning grizzly bears.

"Closure of any NFS road should be undertaken independently without trying to entice support from the public by connecting that action to less desired and needed projects such as vegetative treatments."

That same sentiment applies here toward the wolverine as well. On page 55, there is the following statement.

“Numerous road closures, most specifically the obliteration of road 71832 would reduce human activity in mapped maternal habitat, increasing the potential value of these habitats to wolverine should individuals travel through the analysis area.”

GWA reaffirms our position as it pertains to the wolverine –

“Closure of any NFS road should be undertaken independently without trying to entice support from the public by connecting that action to less desired and needed projects such as vegetative treatments.”

Under the sub-paragraphs of “Habitats” and “Dispersal and Connectivity” within the DEA on page 55, statements are made that this project would have insignificant effects on the wolverine and their respective habitat or would be highly unlikely. Yet, we see no proof or rationale for that decision. The DEA does state that at either rate, the habitat for the wolverine is expected to degrade, yet how does this project prevent or mitigate that from happening?

GWA recommends the obliteration of road 71832 be undertaken independently of any action pertaining to the vegetative treatments. The DEA recommends such action, and we concur.

GWA questions the differences of determination between 2024 and 2026 DEA.

On page 83 of the 2024 DEA, the following statement is made:

“The proposed action may have short term effects to habitat and individual grizzly bears, Canada lynx, wolverines, and greater sage-grouse.”

And on Table 42 on page 85 of the 2024 DEA, the table highlights the following summations.

Table 42. Threatened species and critical habitat effects determinations.

Determination	Species and Critical Habitat
No effect	Bull Trout, Bull Trout designated critical habitat
May affect and is likely to adversely affect	Grizzly bear, Canada lynx and North American wolverine, whitebark pine

Yet according to Table 12 on page 56 of the 2026 DEA, there is the following summation concerning species standing.

Table 12: Endangered Species Act Listed Wildlife Species Determinations.

Species	Status	Determination
Grizzly bear (<i>Ursus arctos horribilis</i>)	Threatened	May affect, not likely to adversely affect
Canada lynx (<i>Lynx canadensis</i>)	Threatened	May affect, not likely to adversely affect
North American wolverine (<i>Gulo gulo luscus</i>)	Threatened	May affect, not likely to adversely affect

Notice the difference in standing/determination. Why the change from “*likely to adversely affect*” to “*not likely to adversely affect*”? The conflicting message that grizzly bears as well as the wolverine may be adversely affected seems to contradict the underlying theme of the 2026 DEA. GWA has been down this road before with various projects utilizing these terms of determination and is convinced that the vagueness of terms is part of the problem. The U.S. Forest Service appears to want to err on the side of optimism, that all will be well. GWA does not have that optimism because the science cannot take into account the human factor of ineptitude and corruption. That has been a source of frustration for this organization, and we suspect many others as well. Agencies continue to go down this path of the unknown and make false assumptions, and that is not the best applied science.

Carbon Sequestration:

GWA has long had a policy of allowing a forest to be a forest. As historians and scientists can tell, forests have done fairly well without management from man throughout the ages. It has only been the colonization of North America since the philosophy has arisen that our forests need managing. And perhaps that was true to a degree when our society placed so much demand on harvesting that particular resource. But we know so much more now than what we did. We know our forests provide a greater purpose, and that our forests can help to mitigate climate change. And one way they do that is through the sequestering of carbon.

Under the Carbon Summary paragraph in the 2024 DEA, it was stated several times that the project would be inconsequential or insignificant in terms of the release of carbon. But all forest and/or vegetative projects appear to be the same, they discount the carbon footprint as being insignificant on the world stage, downplaying the effect or role this or any other project action would have on mitigating climate change. Again, we would like to remind the USFS, there is such a thing as a cumulative effect.

Again, we noticed that this 2026 DEA does not mention carbon sequestration. In fact, it barely mentions climate change. It mentions climate-induced disturbances only twice. Perhaps the discussion of climate change and carbon

sequestration is in another document, but due to the lack of time for review, the subject matter should be brought forth in the main document since it plays such a critical mass in the future on the landscape. The following quotes below provides an example of the difference in tone from the previous DEA of 2024.

On page 83, the following statistics are relayed to the public in the 2024 DEA.

“The proposed action would affect approximately 4,047 hectares or 10,000 acres of forestland, which is 0.3 percent of the total forestland. This equates to the proposed action affecting 538,890 Mg C of carbon on the forest, or 0.3 percent of total carbon from forestland.

Differences in effects to carbon stocks and emissions between the alternatives are negligible because: the project area represents 0.7 percent of total forestland managed by the Beaverhead-Deerlodge National Forest, changes in carbon emissions from the proposed action would occur over several years; and annual effects to forest carbon stocks and emissions from the proposed action would be insignificant when compared to the no action alternative due to the scale of the project in the context of the greater land management unit. All alternatives are therefore discussed together.”

The tendency to minimize effects to the global atmosphere from local projects is a failure to understand how our little corner of the world is related to a much larger picture. Again, the analogy of “death by a thousand cuts” truly applies in this scenario.

According to the Climate Forests Coalition¹² website, the following statistics need reporting.

- There are 17.2 billion metric tons of carbon stored in U.S. federal forests.
- There are 35 million metric tons of carbon being sequestered from the atmosphere by federal forestlands.
- 95% of forest carbon is stored in forest ecosystem pools vs. harvested wood products.

GWA understands that “yes”, we realize the small nature of the project in terms of the totality of carbon stored and to be released when compared to the global impact, but that is no reason not to do our part, the forest’s part, in mitigating climate change. This forest, like many in the state, has a role to play in mitigating a warming world.

To put it bluntly, and according to the Climate Forest Coalition, the following statement is made.

“Forests offer the single most powerful and effective way to remove carbon from our atmosphere. Mature and forests and big trees are the natural champions of carbon sequestration, storing carbon for decades, if not centuries. They are a low-cost resource that continues to grow as we all benefit from the services they provide, including clear air, clean water, habitat for wildlife, a haven for biodiversity and myriad options for recreation.”

GWA does not believe the project is worth the effort to be taken. This is especially true when the following statement, listed below, is taken into consideration.

Economics Summary:

It is interesting to compare the facts and statements (on many subjects) from the 2024 DEA with the current 2026 DEA. But here as well, some minor differences appear in discussing the economics between the two. On page 84 in the 2024 DEA, the paragraph talks about the social and economic benefits of this project on a local scale. Yet according to the efficiency analysis as stated below, there is a negative benefit.

“A financial efficiency analysis showed that the proposed activities would result in a viable timber sale that would provide approximately 44,937 CCF of timber, with a present net value of about -\$1.4 million for the timber harvest and required design criteria.”

The summary goes on to say the following:

“When accounting for all project activities both related to the sale of timber, broadcast burning, and other proposed activities, the present net value of the project is -\$1.6 million.”

It was estimated in 2024, this project would result in an estimated 35 jobs and contribute 1.5 million each year to the life of the project.

In the 2026 DEA, there is the following report on page 74.

The financial efficiency analysis found that the project has a present net value of -\$1.9 million for all project activity analyzed under the decision. This could be considered a lower bound for financial feasibility, as not all activities are required, and some may only be conducted if they are deemed to be the best use of available resources, given budget and personnel constraints.

Here the DEA reports the following:

The economic impact analysis found that the project would contribute about 40 jobs and \$1.7 million in labor income on an average annual basis during project implementation.

In both cases, the DEA reports there would be a loss from the timber sale even though the 2026 DEA has bumped up its positive undertaking. Taking a loss from a timber sale is not a wise investment and there is such a thing as a cost-benefit ratio.

These trees and the accompanied forests are worth more in carbon storage to mitigate climate change than the financial benefits to the local economy. The carbon storage, the biodiversity, habitat for wildlife, the clean air and water availability, and the protection of the watershed are worth far more than the finances attributed to this project.

There is widespread knowledge that the US Forest Service does not practice wise management in their timber sales. According to an Overview of below-cost timber sales dated July 21, 2004, the Congressional Research Service¹³ states the following:

“The USDA Forest Service (FS) sells some timber at prices that are less than the agency expenses to administer the timber program. These below-cost timber sales have been debated by Congress sporadically for more than two decades, but no policy to address the issue has been adopted legislatively or administratively. Part of the debate over below-cost timber sales has been about their relative frequency. At the direction of Congress, the FS developed a system for reporting the financial and economic results of timber sales.”

“The issue is what, if anything, Congress and the Administration should do about below-cost timber sales. Some argue that no action is warranted, because the fiscal concern is merely a tool being used to reduce timber sale levels. Others are concerned about the net cost to taxpayers, about the environmental damages that result from some timber sales, or about alleged “subsidies” to timber companies.”

The above paragraph states GWA’s concern. Are these timber sales worth the effort placed into them? We would like to see the cost-benefit analysis done with the inclusion of the irreparable harm done to the environment included in that analysis. But how do you put a price tag on the harm to the environment in terms of carbon sequestration, lost wildlife habitat, lost biodiversity. But it is exactly that type of analysis that needs to be made.

Conclusion:

To be blunt and honest in our assessment of this project, the value gained is not worth the harm lost to the ecological community. GWA understands that agencies and politicians are trying to be proactive, understanding the fact that wildfire entering and burning into the wildland urban interface would devastate homes and place people’s lives at risk. But there are better answers and solutions to those worries, and it involves better zoning and land-use management practices by all agencies in the beginning.

Just because individuals or wealthy landowners would like to visualize their homes nestled in the woods taking advantage of spending time in American forests, within that interface, does not mean the American taxpayer has to suffer financial harm to their pocketbook by restoring their home when those fires do break out. Nor should landowners feel they have the freedom to allow harm to come to the ecological community and the resources contained therein.

Yet, GWA believes that many of these smaller version timber projects are not solely based upon the fear of wildfire, but as an excuse to harvest timber. Most recently, the Southern Environmental Law Center¹⁴ (SELC) published the following article on their website entitled *Groundbreaking lawsuit takes aim at U.S. Forest Service's 'timber targets'*. The following statements from their February 29, 2024, published article.

"Timber targets are not just goals or benchmarks—they are mandatory requirements that drive agency decision-making. Internal Forest Service documents obtained by SELC through the Freedom of Information Act show just how much pressure timber targets put on Forest Service staff."

In internal emails, staff from Forest Service Region 8 – which includes the Southern Appalachian Mountains and other parts of the South – explained that timber volume is "is always at the forefront of the decision makers thought process" and achieving timber targets is the region's "#1 priority." Other regions have said the same."

It is this policy, a policy of forest mismanagement, that has been the forerunner of many of our bad forestry practices today. It is this policy, in addition to selling America's resources at a financial loss, that has lost the trust from much of the public. This is a form of exploitation that our forestry resources cannot endure.

Homeowners have a responsibility to fire-proof or fire-manage their home. It is not up to the American taxpayer to bail them out, and neither should our forests suffer harm in the process. There are plenty of tips and information online and to show good faith, we will present one here.

https://firefightersonyourside.org/blog/defensiblespace?gad_source=1&gclid=CjwKCAjwrcKxBhBMEiwAIVF8rKkg8V0J6L2H6xx72Q0bmXb5_cL_A4mdUuO_upmhi0dkybJhpWN-DxoC7OgQAvD_BwE

With all that being said, there are ecological and environmental rationales as to why this project should not be implemented. The biological and behavior interruptions to the issue of connectivity for many large mammal species who depend upon the need to migrate, to move about freely on the large landscape, cannot be minimized. The additional landscape which will undergo intentional habitat fragmentation cannot be justified.

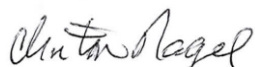
GWA does not support the Proposed Action. We do not support the actions of burning sagebrush, clearcutting, vegetative thinning, or temporary road construction. We view all these activities as harmful to the forest biodiversity and integrity and to the wildlife connectivity which is so critical to large predatory species and others. GWA does support the road closure of NFS road 71832. These types of actions should be independent of timber projects as they improve and provide increasingly secure habitat for grizzly bears as well as other species.

GWA's positioning on timber projects is that they are more harmful than helpful to the ideology of a healthy forest. Thinning and logging a forest increases the release of carbon to the atmosphere as well as damaging the soil biome and watershed protection. The removal of snags and deadwood deprive certain species, birds and insects of their favorite and preferred habitat, a habitat that is the foundation of other higher order of species to thrive.

There is much more that GWA could comment on, but time has taken its toll on our availability to do so. In the meantime, we urge the USFS to change their emphasis on wildfire management. Urge homeowners to modernize their infrastructure and homes with modern technology and let the forest be a forest. Strive for biodiversity, forest integrity, and carbon sequestration in the agency's mission and premise. It is time to change the world's thinking about how we can protect our climate and biodiversity.

NOTE: We question the greater sense of positivity in this DEA compared to that of the 2024 DEA, positivity in terms of the lack of negative impacts upon those species listed under the ESA. This is very odd and GWA does not see the reason for that optimism. However, the timing and the change in administration during this timeframe makes us very skeptical of potential political interference.

Sincerely,

A handwritten signature in cursive script that reads "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association

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