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First name: ILONA
Last name: POPPER
Organization:
Title:
Comments: name is Ilona Popper. I am a resident of Gardiner, Montana, a former resident of Jardine, and a member of Bear Creek Council.

I OPPOSE ANY LOGGING IN THE PROPOSED BEAR-PALMER PROJECT.

In the name of "forest health," the USFS will be deforesting a recovering forest, primarily in the service of a one-time timber sale. Nothing will regenerate from that money: it is a dead as a clear cut. It will go into coffers in Washington, DC, far from the rich replenishing of the Bear-Palmer-Jardine forest, far from here where the trees and WE live. The trees will be gone, the life forms they feed, and our water and air will suffer for it.

1.The forest, which I consider home, has been in the process of trying to heal from the assaults of repeated logging. You can see this when you visit:

Last summer was terribly dry, for an area known for comparatively wet summers. My skin burned from hot dry winds. I would find relief in the Jardine (Bear-Palmer/Custer-Gallatin) forest. I'd park my car and begin my walk at the "Welcome" cemetery, named for the prominent Welcome family gravestone. Friends of mine are buried there. When I lived in Jardine for 12 years, I walked nearly daily from my home to this place and back.

I know the roads and the woods well and this place is home to me.

I live north of Gardiner now and during this droughty and fiery summer, it was a shock when I arrived at the Jardine forest. As soon as I entered, I felt a gentle humidity on my skin. If I stepped off the road, I could feel a spongy layer under my feet. The shade held the moisture; it's not surprising that it would prevent the evaporation and wind that scoured the sage brush steppe the characterizes Gardiner. But I was surprised at how much healthier the trees were-not as stressed by drought.

2.USFS assurances that they will erase roads and handle weeds rings hollow-because they haven't done it before. It may not be doable to erase the fallout from logging, especially the clear cuts required for lodgepole. On promises like these, the USFS has shown they cannot be trusted. This forest was compromised with years of logging and it is showing resilience but it needs to be left alone.

Every time, I walk the Bear Creek Rd. towards Timber and Bear Camps, I can see the effects of logging. Anyone can see the logging roads that were supposed to disappear still scar the forest and divide the mosses. Anyone can compare the mature stands of Doug fir to the areas, still sprinkled with stumps, where the Doug firs are spread out. One of the FS employees said Doug fir "prefers a parkland (open) habitat." I am not convinced, as I have seen many mature Doug fir forests that create a shady, rather dense forest, not "parkland." The weeds released from logging have altered our wildflower species.

3.Unfortunately, the USFS, like many agencies, lags behind in the science of forest health. A great deal of new research has changed our understanding of what a healthy forest does and is.

The forest plans for instance do not mention mycelium layers, a vast and complex network of fungi that biologists now know are vital networks. There is no mention of the way they allow nutrient exchange and hormonal communication between trees and other plants. The destruction of the soil, removal of trees, rather than letting them decompose, and post-logging weed control would damage that crucial layer. Why can't we accept that we are still learning? Let's not destroy what we do not fully understand.

4.The USFS also lags behind in the science of fire prevention.
For instance, thinning does not reliably prevent fires:

"Chad Hanson, a research ecologist, an author and the co-founder of the John Muir project, [calls] into question the amount state and federal governments spend on suppression.

He went on to say that studies by the U.S. Forest Service regarding forest density are flawed, saying money currently being spent on suppression and many fire mitigation practices would be better spent on hardening homes against fire.
'Pretty much everything that we've been told about fire in our forests is incorrect, scientifically," Hanson said. 'And it's not just some loose theory.'

…The density question is fundamentally a disagreement over forestry practices. The general idea among those in support of logging and thinning to reduce fire risk is that suppression practices on wildfires in the United States have led to forests that are too dense. They say there used to be many small intensity fires in the nation's forests and that thinning and prescribed burns will replicate this natural process.

…In practice, prescribed burns often cut down small trees and brush, which is known as mechanical thinning, which are then put into small piles and burned.

And Hanson says that the assumption all American forests had frequent, low-intensity fires is fundamentally incorrect and that federal research left out information contrary to that.

'They omitted and didn't mention massive amounts of data that showed that historical forests were really variable,' Hanson said. 'There were open forests, for sure, but there were also a lot of really, really dense forests, a lot of forests in between. This really simplistic notion that the forests were all open and park-like at low density, is not even remotely accurate based on the science and that's not a contested notion.' ('Evidence for widespread changes in the structure, composition, and fire regimes of western North American forests.')

...Under Federal laws, the Forest Service can sell trees on public lands to private logging companies and keep most of the revenue generated from those timber sales for its own budget, using the money to pay staff and buy new equipment,' Hanson writes in his 2021 book, Smokescreen. This creates a powerful perverse financial incentive for Forest Service staff to ignore wildlife and recreational impacts and emphasize industrial logging.

'It's important to note,' Hanson said, 'that the Forest Service is in charge of managing the nation's forests, not necessarily protecting trees.

We'll do all these logging operations, we'll call it thinning and fuel reduction, with a wink and a nod, and it will tell communities it'll stop the fire from reaching the towns,' Hanson said. 'And that is a dangerous lie, because that's not what's happening. The fires are blowing right through those thin areas.'"
From "State on Hook for up to $70 million in Fire Suppression Costs this Season," by Jordan Hansen, Daily Montanan, November 21, 2025.

5.The proposed logging project is rolling right over the fact that this is grizzly, wolverine, and Canada lynx habitat. It is ignoring ESA requirements. It will destroy migratory bird habitat and disrupt one of the greatest yearly elk migrations in North America.

Ironically, I learned more about the diminishing wolverine and lynx populations years ago when I volunteered for the Gardiner Ranger District USFS office. I worked for Dan Tyers and Jeremy Zimmer. I joined a great team who know more biology and were younger than me. We snowshoed and snowmobiled into those woods,

studying snowshoe hare (lynx food) and checking on the wolverine trap. Now there is evidence of more wolverine sightings in the area.

Grizzlies den up in this forest and harvest crucial pine nuts and other foods before they do. (Ask Becky Johnson where those dens lie.)

Of migratory birds, Sara Johnson of Native Ecosystems Council writes:

"Prescribed fire doing preventing stand replacement fire is immediate massive loss of wildlife habitat. It prevents stand replacement fire, which is a huge benefit to wildlife. An important component of old growth forests are "snags" which are standing dead trees. Far from being useless, some 42 species of birds and 10 mammal species use snags for nesting, roosting, and feeding. When the snags fall, they continue to provide valuable benefits including water retention on the forest floor.

Logging [will] remove all of these snags….The science clearly shows that all of these at-risk species are highly sensitive to logging due to the loss of hiding cover for nesting and fledged young, thermal cover to ameliorate the effects of severe weather, and production of the conifer seeds that provide significant forage…Yet, there are no requirements in the Custer Gallatin Forest Plan to provide well-distributed old growth and forested snag habitat for any of these at-risk birds, in violation of the Forest Service's 2012 planning rule." Missoula Current, January 8, 2026.

There are many other reasons I oppose this logging project, including the "temporary" roads, which so often remain permanent; the loss of our major recreation area-for locals and tourists-adjacent to Yellowstone National Park, but also providing large wild land camping spots that accommodate horses; the loss of beautiful hiking; the fact that the Jardine Rd. was not built for the sort of logging trucks that would degrade it further and create a mess and ruin our local tourism industry.

The loss of this special place would be profound.
Thank you for this opportunity to comment.

Ilona Popper