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Comments: Bear Palmer Project #68985 involves timber removal of several thousand acres in the Davis Creek, Eagle Creek, Bear Creek, and Palmer Creeks of the Custer Gallatin National Forest. I do not support this project and believe it needs to be reassessed for validity, feasibility, and legality.

The Bear Palmer area is a commonly used area for recreation by locals throughout each season, it is critical wildlife habitat for wintering ungulates, carnivores including grizzly bears and wolverines, and sensitive bird species including great gray owl and northern goshawks.

The science and justifications for the logging project presented by the USFS are faulty. The USFS discusses tree diseases as a reason to remove trees, when nearly all of the diseases listed are naturally-occurring, native fungi and parasitic plants that have important roles to play in healthy ecosystems. Fungi and parasites and bacteria are not inherently bad and many have coevolved with the tree species of the Rocky Mountains for millennia, providing heterogeneity to the forest and increasing biodiversity. In contrast, the USFS does not address the high likelihood that nonnative, invasive plants, such as cheatgrass and toadflax which thrive in disturbed soils (particularly with road-cuts, logging, soil compaction, etc), will spread through the forest if logging occurs.

The USFS has stated that no new roads will be built for the project and are now rescinding that statement with eight miles of new roads planned.

The USFS uses wildfire as a scare-tactic, claiming that leaving the forest will eventually invite large-scale wildfires. There is little scientific evidence to support these claims. Anecdotes about forest planning decisions promoting more-intensive fires are greatly exaggerated and not proven scientifically. Most forest experience fire intervals at longer time periods than the forest plans were/are in place. Areas in the Bear Palmer project include some old growth forests, which are becoming increasingly rare with development. But the Bear Palmer project does include, and are adjacent to, areas that were logged between 20 and 50 years ago. These are the areas with the densest stems per acre and very small dbh measurements. These areas, manufactured by the USFS years ago, are the areas most likely to develop into a crown fire in the event of a wildfire. Despite that, the USFS proposal creates more fire-prone areas that would turn into solid walls of lodgepole monoculture.

The financial cost of this project, in addition to the complete loss of community support for the USFS, far outweighs the small financial benefit to a few logging companies. I have lived in Gardiner for over 15 years, recreate on the forest, and want to see it maintained in its present state--a healthy ecosystem.

The Bear Palmer project should be stopped. I do not support it.