

Data Submitted (UTC 11): 6/2/2026 5:53:40 AM

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Comments: June 1, 2026

Custer Gallatin National Forest

ATTN: Bear Palmer #68985

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Submitted online at:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=68985&eType=EmailBlastContent&eld=1ad06d0d-4bbd-427a-a267-2e3d1ee68a75>

To Whom it May Concern,

On behalf of the National Parks Conservation Association (NPCA), we appreciate the opportunity to submit the following comments on the Bear Palmer Forest Health Project (USFS Project #68985).

BACKGROUND

Since 1919, NPCA has worked to protect and enhance our National Park System, working together with our over 1.9 million members and supporters to preserve our nation's natural, historical, and cultural heritage for present and future generations. NPCA has a long history of advocating for Yellowstone National Park and its wildlife, both in the park and on adjacent public lands, including on National Forest lands. We have a longstanding interest in the health of public lands adjacent to Yellowstone National Park, and we appreciate the opportunity to engage on this proposal.

On April 10, 2026, the Custer Gallatin National Forest (USFS) released a Preliminary Effects Document examining impacts from a forest thinning and logging project on 4,401 acres of National Forest Service land surrounding the community of Jardine, on the northern border of Yellowstone National Park. The project calls for 2,126 acres of commercial logging, including 824 acres of clearcutting, 802 acres of commercial thinning, and 500 acres of group tree removals. An additional 2,275 acres are designated for non-commercial treatments, including 1,440 acres of hand-thinning, 565 acres of small-tree thinning, and 260 acres of prescribed fire burns. This project is being fast-tracked as an emergency action under the 2021 Infrastructure Investment and Jobs Act.

We recognize that wildfire risk in the Jardine area is a genuine concern, and we support the Forest Service's commitment to community safety. However, NPCA has significant concerns about whether this project, as currently designed, will effectively reduce wildfire risk for the community and whether it adequately accounts for the exceptional ecological values of this landscape.

WILDFIRE RISK

NPCA shares the goal of protecting the community of Jardine and the surrounding forest from catastrophic wildfire. However, we urge the Forest Service to carefully examine the fire science underlying this proposal. We are concerned that treatments of this scale and type may not deliver the fire risk reduction the project promises and could in some cases worsen conditions for fire behavior.

The Bear Palmer project area sits within a landscape that is already experiencing measurable impacts from

climate change - including rising temperatures, reduced snowpack, earlier spring runoff, and longer, more severe fire seasons. These trends are projected to intensify across the Greater Yellowstone region in the coming decades. In this context, the Forest Service's management choices carry significant long-term consequences.

Intact mature and old-growth forests are more resilient to the effects of climate change. Closed canopies moderate temperature extremes, retain moisture, and support the diverse understory conditions that help forests recover from disturbance. Fragmenting and opening the forest at this scale may reduce, rather than enhance, its long-term climate resilience.

If the primary goal of the Bear Palmer project is to protect the lives and homes of Jardine residents, the most effective and cost-efficient path forward is to invest directly in that community. Research consistently shows that home hardening is the single most effective strategy for reducing home loss in wildfire events. Similarly, hand thinning of vegetation in the residential areas of the project, done collaboratively with residents, can meaningfully reduce the risk of fire reaching structures without the ecological costs of commercial logging.

NPCA strongly encourages the Forest Service to partner with Jardine residents, Park County, and relevant state and federal programs to develop a robust community wildfire preparedness plan that prioritizes these targeted, proven approaches. Investing federal time and resources in direct engagement with the people who live and work in the community will do more to protect lives and property than commercial timber operations miles from the nearest home.

INVENTORIED ROADLESS AREA

Yellowstone National Park is one of America's most treasured public lands, and the Bear Palmer project area forms part of its broader ecological context. NPCA is particularly concerned about the proposed treatment within the North Absaroka Inventoried Roadless Area. Roadless areas provide some of the highest-quality wildlife habitat and watershed protection on the National Forest System. We strongly urge the Forest Service to demonstrate why treatments within the roadless area are necessary and cannot be achieved through less impactful alternatives.

WILDLIFE

The project area provides critical habitat for many species, including Endangered Species Act protected species, including Canada lynx, grizzly bears, wolverines, and whitebark pine. Road building, clear cutting and industrial activity in the project area will adversely affect endangered species. We encourage the USFS to consider non-industrial treatments to serve the community and protect critical wildlife habitat.

ECONOMIC VALUES

The communities of Gardiner and Jardine have tourism dependent economies. The preliminary economic analysis fails to recognize the distinct, recreation-driven economies of Gardiner, Jardine, and broader Park County. In 2024, non-resident tourism brought \$294.4 million into Park County. Data from the University of Montana's Institute for Tourism and Recreation Research shows that day hiking (44%) and wildlife watching (30%) are primary economic drivers in Park County. Proposing commercial logging directly along popular trailheads and campgrounds risks recreational closures that will harm local businesses including restaurants, grocery stores, and guiding services. With active logging projects potentially spanning up to 10 years, local roads, public safety, and tourist retention could be compromised. Additionally, economic drivers like hunting, fishing, wildlife viewing, and outdoor recreation depend on an intact and functioning landscape.

PUBLIC PROCESS

NPCA appreciates the Gardiner Ranger District staff for the thoughtful and transparent process they have conducted to date and respectfully requests that the Forest Service ensure a full and transparent public participation process as this project moves forward. The decision to host community meetings in Gardiner, to release a preliminary effects document for public review, and to actively engage residents, conservation organizations, and other stakeholders reflects a genuine commitment to inclusive land management.

We recognize that the staff of the Gardiner Ranger District care deeply about this landscape and the communities they serve, and we appreciate the openness and professionalism with which they have approached this process. It is precisely because we share the goal of a healthy, resilient forest and a safe, thriving community that we urge the District to carefully weigh the concerns raised in these comments as the project moves toward a final decision.

NPCA looks forward to continued engagement on this project and remains committed to working collaboratively with the Forest Service toward outcomes that protect both community safety and the ecological and climate values of this irreplaceable landscape.

Respectfully submitted,

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