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January 8, 2026

***Re: Granite Moccasin Project***

Submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68919>

To Whom It May Concern:

Footloose Montana submits this comment in opposition to the proposed Granite Moccasin Project, a large-scale burning and logging project that would affect a 68,000 acres area near Glacier National Park, along the Middle Fork Flathead River, including the Wild and Scenic River corridor, roadless lands, and proposed Wilderness areas.

Footloose Montana is a Montana-based wildlife advocacy organization dedicated to ending trapping and to protecting wild animals from other assaults, habitat destruction and exploitation on public lands through science-based education and bold advocacy. The Granite Moccasin project poses serious and unjustified risks to wild animals and intact ecosystems with particularly grave implications for grizzly bears and other disturbance-sensitive species.

We view the Granite Moccasin Project as emblematic of a broader and deeply troubling pattern: The normalization of industrial-scale habitat disruption in ecologically critical landscapes under the guise of 'wildfire and infrastructure risk reduction and forest health.' Proposed actions would include: Commercial timber harvests; road building, maintenance and management to facilitate timber harvests; noncommercial thinning; post-harvest fuels reduction activities; and whitebark pine restoration. Actions would impact roadless lands along the river corridor, which is within core grizzly bear habitat, and include the construction of 7.6 miles of new roads that are actually permanent, not temporary, simply to be closed after the logging. Actual 'temporary' roads to be reclaimed afterwards measure 0.75 miles (PA at 9). Access created by roads is a major source of mortality for grizzly bears. Roads also provide access to humans who are responsible for 84% of all wildfires (Balch J. et al. 2017).

**Grizzly bears are exceptionally vulnerable to habitat fragmentation, road density, and human disturbance.** Actions included in the Granite Moccasin Project would:

- severely compromise secure habitat—areas with low road density and minimal human access—which are essential for grizzly bear survival, reproduction, and population connectivity (Mattson, D. J., 1993, Mace, R. D., et al., 1996).
- predictably reduce habitat security, and thus displace bears from foraging and movement along corridors;
- increase the risk of human–bear conflict, which remains a leading cause of grizzly bear mortality outside protected areas (Schwartz, C. C., et al. (2010).
- lead to increased sediment accumulations especially in the Pinnacle Creek watershed, where a 1993 Forest Service Environmental Impact Statement concluded that existing roads had increased sediment yield to that creek by nearly 12-fold and that “Roads will continue to generate sediment indefinitely unless they are restored to a pre-road condition” (Hammer, K. 2026).

Wild animals do not recognize administrative boundaries. Impacts to grizzly bears and other wild animals outside Glacier National Park would likely directly affect the park’s bear and other wild animal populations as well. Federal agencies have a heightened responsibility to ensure that management actions on adjacent lands do not externalize harm onto national parks and their wildlife.

**Cumulative Impacts Are Being Underestimated or Ignored**

Under the requirement of the National Environmental Policy Act (NEPA), the Forest Service must take a hard look at cumulative impacts, not just the effects of a single project in isolation (40 C.F.R. § 1508.7 (Cumulative impacts). Consequently, the Forest Service should put the Granite Moccasin Project within the context of multiple and cumulative stressors of ongoing fuel and timber projects, continuously expanding road networks and motorized recreation (e.g., for hunters and trappers), an increasing human population and development, and climate-driven stressors affecting food availability and habitat stability for many wild animals.

Large carnivore science is unequivocal: it is cumulative disturbance, not just one project, that drives displacement, population stress, and mortality (Ripple, W. J., et al., 2014). Failure to meaningfully assess these cumulative effects renders any NEPA analysis legally and scientifically deficient (*Kleppe v. Sierra Club*, 427 U.S. 390, 1976) and does not reflect holistic ecosystem management.

**Climate, Carbon, and Ecological Integrity**

Mature and intact forests provide critical carbon storage, thermal refuge, hydrological regulation, and habitat for wild animals. Logging such forests releases stored carbon and can increase long-term fire risk by altering forest structure and microclimates (Law, B. E., et al., 2018). Also,

protecting intact forests near protected areas is increasingly recognized as a cornerstone of climate mitigation and biodiversity conservation (IPBES, 2019). Treating these landscapes as expendable fuel loads is inconsistent with modern climate science and precautionary land stewardship.

### **Use of Outdated Fire Risk Management**

Where does the Forest Service provide evidence for its assumption that forest “treatment” will reduce the risk of a large-scale fire and benefit the protection of buildings and infrastructure? Rationales like these are especially dubious given a multitude of studies that show the opposite, e.g.:

1. A meta-analysis of wildlife studies has shown that fire severity was higher in areas with “active forest management” compared to areas off limits to logging, like wilderness and roadless lands (Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016).
2. The Forest Service’s own research has shown that fuel removal more than 100 feet from any structure provides no additional benefit (Cohen, 1999).
3. Other research shows that most wildfires occur within a few hundred feet of roads (EarthJustice, 2024).

In conclusion, we urge the Forest Service to reject the Granite Moccasin Project in its current form and to adopt a precautionary, wildlife-centered approach consistent with science, law, and ethical stewardship. Alternative actions should be evaluated such as closing roads and using fire-proof materials to protect existing buildings and infrastructure.

At a minimum, we ask that you complete your 2022 Forest Plan amendment and clarify what types of activities are allowed and not allowed in areas to be added to the National Wilderness Preservation System, and prepare an in-depth Draft Environmental Impact Statement, and make it available for 90 days to the public for review.

Thank you for your consideration,

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