



PO Box 8884, Missoula, MT 59807 • www.footloosemontana.org
406-544-5727 • anja@footloosemontana.org

March 12, 2026

Sharon Scott, Project Lead, Tri-Forest Sustained-Yield Unit
Matt Jedra, Supervisor of the Custer-Gallatin NF
Alfred Watson, Supervisor of the Beaverhead-Deerlodge NF

Subject: Draft Montana Tri-Forest Federal Sustained-Yield Unit Management Plan

Submitted to: SM.TriForestSYU@usda.gov; sharon.a.scott@usda.gov;
matthew.jedra@usda.gov; alfred.watson@usda.gov

Dear Ms. Scott, Mr. Jedra and Mr. Watson:

On behalf of Footloose Montana and our thousands of supporters, we write to express our strong opposition to the proposed large-scale logging project affecting the Custer–Gallatin, Beaverhead–Deerlodge, and Helena–Lewis & Clark National Forests.

Montana’s national forests are among the most ecologically significant landscapes in the United States. These forests support complex ecosystems that provide critical habitat for grizzly bears, wolves, lynx, wolverines, elk, moose, migratory birds, and countless other species. They also play an essential role in maintaining water quality, storing carbon, regulating climate, and providing opportunities for recreation and solitude on public lands.

This management plan draws its primary objectives from three major forest plans. Instead of using the specific plan for each forest, a unified approach is adopted to speed up logging activities to fully exploit our forests, circumvent the Endangered Species Act (ESA) and prevent public review and participation in the process. This and the sheer scale of the proposed logging—a minimum of 350 million board feet over ten years across 925,024 acres—raises significant concerns regarding sustainability, ecological integrity, and the U.S. Forest Service’s public trust responsibilities. The plan prioritizes timber extraction above all else, jeopardizing public forests for the profit of private timber companies while putting both wildlife and the public at risk.

Wildlife

The proposed logging zones intersect numerous grizzly bear corridors linking the Greater Yellowstone and Northern Continental Divide ecosystems, but the plan fails to address any concerns about wild animals, the residents of the three forests. Montana's national forests serve as critical habitat and movement corridors for numerous species of conservation concern. Particularly troubling is the foreseeable impacts on species such as grizzly bears, Canada lynx, and wolverines—all protected under the ESA—who depend on intact forest landscapes and secure habitat. Large-scale logging, road construction, associated human activity fragment and degrade habitats, displace wildlife, reduce reproductive success, and increase mortality risks for many species, especially large carnivores. Modern ecological science strongly emphasizes the importance of large, connected landscapes for the survival of many wildlife species and for greater biodiversity.

The Northern Rockies remain one of the last regions in the contiguous United States where wide-ranging species such as grizzly bears, wolverines, lynx and wolves can still maintain viable populations across large landscapes. Maintaining habitat connectivity among national forests is therefore critical.

Furthermore, the forests affected by this proposal contain significant roadless areas that provide some of the most important remaining habitat for wildlife in the region. Specifically, roadless areas serve as core habitat for sensitive species, wildlife movement corridors, and refugia from increasing human disturbance. Any proposal that increases road density or timber extraction within or adjacent to roadless areas must be carefully scrutinized for their impacts on wildlife and to ensure compliance with the Roadless Rule and to prevent degradation of these ecologically valuable landscapes, the homes of many wild animals. Along with the vast majority of citizens and organizations we vigorously oppose rescinding the Roadless Rule. Most fires are caused by humans, and more roads mean more fires in remote areas with low-grade, unusable timber. More roads mean erosion and destruction of critical watersheds, and poaching.

Climate and Ecosystem Resilience

Intact forests play a crucial role in climate regulation and ecosystem stability. They're crucial to store large amounts of carbon, regulate watershed function and provide resilience against drought and wildfire. This proposal does not consider the fact that the forests east of the Continental Divide in Montana are higher and drier than the forests west of the Divide. When logged, they may come back very slowly or perhaps not at all given the threat of climate change. As the snowpack melts off earlier on the exposed mountainsides, streams would dry up quickly. Large, mature forests provide irreplaceable ecological 'services' that cannot be replicated through massive timber extraction. Any proposal involving extensive logging across multiple national

forests must carefully evaluate the long-term ecosystem and climate implications of removing these carbon-rich ecosystems.

Sustainability – For whom?

Despite its claim to be ‘sustainable,’ there is nothing sustainable about this proposal, instead, its one-time yield and plunder done by the timber industry. The proposal blatantly prioritizes industrial timber extraction at a landscape scale that will undermine the ecological resilience of these forests. Logging across nearly one million acres is not a minor management action; it represents a sweeping destruction that will likely fundamentally alter forest structure, wildlife habitat, and watershed stability across multiple national forests. Forest ecosystems operate on time scales measured in centuries, yet there are no immediate or long-term considerations for the health of ecosystems, fish and wildlife. The sheer scale of this proposal is unacceptable as it prioritizes corporate greed and profit interests over long-term ecosystem health and biodiversity. While the timber industry gets a boost, wildlife and the public lose.

Public lands belong to all Americans, and their management must balance multiple values, including biodiversity, ecosystem health, recreation, cultural resources, and climate resilience. Any management program of this magnitude must demonstrate clearly that it will protect these values rather than diminish them, clearly, this proposal does the latter.

Requested Actions:

Footloose Montana respectfully requests that the Forest Service:

1. Prove that there is an actual necessity for this large-scale logging project, especially considering Chiara Cipriano, Public Affairs Officer for the Helena-Lewis and Clark National Forest, who recently remarked, “...we are already producing more timber than the levels outlined in this plan...” (The Montana Standard, March 12, 2026). This statement appears to contradict the supposed ‘need’ for such extensive logging.
1. Fully complies with the requirements of several governing statutes and regulations, including the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), and the Roadless Area Conservation Rule (do not rescind it).
2. Conduct a comprehensive Environmental Impact Statement that fully evaluates cumulative impacts across all affected forests.
3. Analyze alternatives that prioritize ecological restoration and wildlife protection rather than large-scale timber extraction.
4. Incorporate the best available wildlife science regarding habitat connectivity and fragmentation and climate science regarding its impacts on wildlife and forest ecology.
5. Prioritize strategies that enhance ecosystem resilience, protect wildlife habitat, reduce road densities where appropriate, and maintain the ecological integrity of Montana’s forests.

Until such analysis is completed, the proposed large-scale logging program must be rejected and not proceed.

Sincerely,

Anja Heister

Anja Heister, PhD
Co-founder and Executive Director of Footloose Montan