

## Jackson Hole Conservation Alliance Greater Yellowstone Coalition

January 14, 2011

District Ranger Dale Deiter  
Bridger-Teton National Forest  
P.O. Box 1689  
Jackson, Wyoming 83001

Re: Teton to Snake Fuels Management Project Scoping  
Submitted by email/Hard copy hand delivered

Dear Mr. Deiter:

The proposed Teton to Snake Fuels Management project is an extensive effort to modify the landscape in order to protect private property outside of Forest Service boundaries. The Jackson Hole Conservation Alliance and Greater Yellowstone Coalition submit our concerns about the impacts this lengthy and sizeable proposal will have on our wildlife, habitat, soils, water, and the Palisades Wilderness Study Area. Our organizations appreciate being able to use information for these comments offered by Ann Harvey of Wilson.

The Jackson Hole Conservation Alliance is a grassroots nonprofit, which recently celebrated its 30-year anniversary as the valley's oldest, most influential and only locally based environmental advocacy organization. The Alliance is dedicated to responsible land stewardship in Jackson Hole, Wyoming, to ensure that human activities are in harmony with the area's irreplaceable wildlife, scenic and other natural resources.

The Greater Yellowstone Coalition has advocated for more than 27 years for the protection of lands, waters and wildlife throughout the Greater Yellowstone Ecosystem. The lands in and adjacent to the proposed project area are critical to ecosystem functions in Jackson Hole and are used and valued by our members and supporters.

The scale and potential impacts of this project require an Environmental Impact Statement rather than an Environmental Assessment. The size, period of time involved, and the number of species and range of habitats within the project area indicate a need to look more closely at this proposal. We suggest that a more comprehensive EIS be pursued instead of the less rigorous EA. There should be a range of alternatives beyond the agency's preferred alternative and the No Action Alternative. The length of time for this project will require ongoing monitoring on all aspects for the duration of the project. Decisions made now should not be the basis of actions to be taken 10 years from now.

We regret that pre-scoping did not allow more public input to provide progressive iterations refining the locations and treatments to be considered in the proposal. In absence of this more definitive proposal we offer these concerns and suggestions:

There have been many discussions on how to address the potential for wildfire to spread beyond Forest Service lands onto private lands in the valley and of the expense to prevent loss of property when this happens. This project takes extraordinary measures to protect these assets beyond FS boundaries, and proposes methods that might not, in fact, diminish the threat to private lands. Wildfire ignition and spread is more directly related to climate and drought conditions than to fuel load, or specifically, the presence of dead trees as a result of whitebark pine beetles. Your study should look more carefully at the purpose and need of this action to ensure that the efforts are appropriately directed and the results will effectively meet those needs. Does current scientific research support the premise this project is based upon? Does this kind of manipulation of the landscape protect the properties targeted? Is our current definition of natural fire regimes in fact accurate?

As mentioned above, the lack of earlier input has resulted in a more general proposal that we believe should contain more detail in regard to the anticipated outcomes of these fire and mechanical methods. Has there been discussion on how extensive thinning will be? Appropriate size and age of stands to be retained? How will the many streams

within the area be incorporated into the plan? Old growth stands? How are aspen stands evaluated? Do areas of trees affected by bark beetles contribute to more intense fires? Where are the specific areas that will have commercial logging? Where are roads and accesses to be located? There are various other questions that should be asked about the appearance and functionality of the landscape at the conclusion of this process.

The most obvious impact is the amount and degree of work to be done within either the Palisades Wilderness Study Area or the inventoried roadless areas. As strong proponents of the Wilderness Preservation System, the prospect of violating this act is difficult to condone. The Wyoming Wilderness Act mandated the Forest Service to administer the WSA “so as to maintain its presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System.” In the 2006 ruling on the High Mountain Heli-Skiing case in the WSA, the court stated unequivocally, “...Congress has directed the Forest Service to maintain the 1984 wilderness character of the area. That is the primary duty of the Forest Service, and it must guide all decisions as the first and foremost standard of review for any proposed action.”

Your study should address this in regard to need and alternatives to this illegal action and should not jeopardize the possibility of the Palisades being designated Wilderness. Mechanical treatments could be confined to the immediate areas around homes and the Forest Service could work in cooperation with local and regional fire management agencies to educate landowners about the importance of fireproofing their homes and property. The hundreds of WSA acres that will be thinned, pruned, cut, lopped, piled and/or burned under this plan were not manipulated by such means in 1984. How can the FS reconcile this mechanical “treatment” of hundreds of acres with its mandate to preserve the wilderness character that existed in 1984? The study should look at any action that will provide unauthorized access to roadless areas, which is 26 percent of the project, and should include methods that eliminate that possibility. Commercial logging should not be considered for these areas. Any temporary roads constructed for this project should be used for as brief a period as possible and immediately revegetated.

The environmental impacts to wildlife and habitat need to be evaluated and monitored during and after the proposed actions. Soils, sensitive plant species and species of special concern, owls and raptors, threatened and endangered species, Management Indicator Species, understory and adjacent vegetation, streams and wildlife, particularly lynx, are some issues that should be assessed for impacts by fire, equipment, change in soil moisture, stream temperature, erosion, sedimentation, habitat needs for various species, and other factors that could diminish the functionality and sustainability of the area.

Our organizations, representing thousands of local, regional and national members, believe that this project needs to be considered in light of the abundant and diverse wildlife and habitats that exist and the need to maintain this healthy ecosystem to ensure their viability.

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