

October 2, 2015

Dale Deiter  
Jackson District Ranger  
Bridger-Teton National Forest  
PO Box 1689  
Jackson WY 83001

Submitted via email: [ddeiter@fs.fed.us](mailto:ddeiter@fs.fed.us)

Dear Dale,

Subject: Jackson Hole Conservation Alliance and Greater Yellowstone Coalition  
comments on Teton to Snake Fuels Management Project Draft Environmental Impact  
Statement

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Teton to Snake Fuels Management Project. Thank you also for the time that you and your staff have taken to discuss this project in detail and seek improvements. We appreciate your efforts in taking the time and energy to inform and educate us and the wider public about this proposed project. Below, we offer our comments on the project and we hope that you can find ways to constructively address our concerns.

As you know, the Jackson Hole Conservation Alliance (Alliance) represents over 2,000 constituents locally and works to protect the wildlife, wild lands and community character of Jackson Hole. Our work empowers the whole community to live in balance with nature. We strive to make sure that our public lands are managed in ways that respect wildlife and wild places.

The Greater Yellowstone Coalition (GYC) is an environmental advocacy organization formed in 1983 with the mission of "People protecting the lands, waters, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations." Our more than 40,000 supporters value the public lands and wildlife in this vast ecosystem of 20 million acres, including Grand Teton and Yellowstone National Parks and adjacent National Forests. Greater Yellowstone Coalition works to ensure that a thoughtful and holistic approach is taken to managing the natural resources in harmony with people and compatible development. We work to shape a future where wildlife populations maintain their full diversity and vitality, where ecological processes function on public lands with minimal intervention, where exceptional recreational opportunities abound for visitors and residents alike, and where communities can enjoy a healthy and diversified economy.

Overall, *we appreciate that in this project the Bridger-Teton National Forest (Forest) is*

*taking proactive measures to manage fire more naturally in the landscape while simultaneously working to protect homes and the lives of firefighters.*

Given predicted climate trends we recognize the increasing likelihood of fires on the landscape. However, *this need to manage fire must be balanced against the requirement for the forest to protect wildlife and wilderness, particular in the designated Palisades Wilderness Study Area (WSA) and Phillips and Munger Inventoried Roadless Areas (IRA).*

We recognize and appreciate the extent to which you have already gone in addressing our past comments (Alliance scoping comments dated March 29, 2013 and GYC comments dated March 29, 2013) and more general public concerns around this central issue. *We believe that the Forest could take certain additional steps to further improve the design of this project so that it ensures protection of wilderness character in the Palisades WSA and more generally helps protect wildlife and wild places within the project area.*

We agree with your recognition that the Forest has a legal obligation to maintain the wilderness character of the Palisades WSA. We believe that as stated on page 66 of the DEIS document, the Forest should ‘ensure the proposed treatments are the minimum “necessary”.’ Given this overriding concern, we offer several suggestions for ways to reduce treatments within the WSA and the IRA.

#### 1. Landowner participation in fuels treatments

Our first point relates to sharing the burden for fuels treatments more equitably between private landowners and the forest managers. We recognize that the project’s purpose and need has been revised to reflect a greater need to manage fire behavior and increase fire-fighter safety while reducing the emphasis on protecting homes and values in the Wildland Urban Interface (WUI). We appreciate this adaptation of your purpose and need in response to public comment. However, we feel that protecting homes and values is still undeniably one goal of this project. Given that, *we feel that the Forest can do more to increase the emphasis on treating areas near homes (defensible space, “firewise”) rather than areas far from homes.* Fire science clearly shows the greater value of home ignition zone treatments for protecting homes over treatments further away from structures. As an example, plot T-33 Red Top Unit 1, from the Mideast Emphasis Map appears relatively far (approximately 0.5 miles) from any homes or subdivisions. Secondly, burn unit PF-47 near Hog Island appears to be largely within the IRA and away from the subdivision. We ask the Forest to reconsider the need for these treatment plots in the final EIS.

More generally, *we believe that the Forest can step up efforts to educate, inform and encourage homeowners and subdivisions within the project area to take such*

*proactive “firewise” measures.* As an example, homeowners in the Hidden Hills subdivision have taken it upon themselves to treat areas on private property. We applaud such private initiatives and believe that the Forest and homeowners could work collaboratively on many more such projects. This could reduce the need for treatment in certain plots within the Palisades WSA while more effectively protecting homes near the Forest boundary.

These initiatives could leverage many existing local efforts coordinated by various partners in the Teton Area Wildlife Protection Committee. Further, various cost-share funding sources to support homeowners in such efforts are available from the Teton Conservation District and through state forestry and federal grants. We believe that homeowners have an obligation to share the burden for actions taken that ultimately serve to protect their homes.

There is also strong legal precedent for the forest to more strongly seek participation from private landowners on this project. In an analogous project where the Forest Service proposed timber harvest on Wilderness areas adjacent to private land for the protection of those private lands from fire and insects, that action was only permitted after the private landowners demonstrated their efforts on private land and did not place the burden solely on the forest. Please see *Sierra Club v. Lyng*, 663 F. Supp. 556, 560 (DDC 1987).

*Specifically, we ask the forest to provide complete analyses in the Final EIS of impacts to wilderness character if treatments were located partially on private lands and shared between forest and private.* Based on these analyses, specific subdivisions can then be more strongly recruited to participate in sharing in fuels treatments on both public and private land. Further, our organizations would be delighted to work with your office and support, as appropriate, such shared efforts.

## 2. Defining acceptable risk

As stated in your DEIS, defining what is the minimum necessary fuels treatment comes down to a determination of “acceptable risk.” As captured, in table 21 (page 52) of the DEIS, both alternative 2 and alternative 3 meet the purpose and need of the project, while having vastly different effects on the indicators (modeled fire behavior, areas of reduced snag density or aspen perpetuation). For instance, the table suggests that a reduction in crown fire potential of 12% in the threat zone meets the purpose and need. We ask whether a smaller reduction of this crown fire potential, say to 8%, would still meet your purpose and need, while simultaneously reducing the need for certain treatments within the WSA or IRA. We recognize that there is likely some subjectivity in determining these thresholds of acceptable risk as it relates to project purpose and need. Based on this, *we ask if further analyses of acceptable risk in terms of lowering these indicator thresholds would help identify ways of reducing the size of treatment plots within the WSA, and consequently*

*reduce the short-term impacts on wilderness quality.*

### 3. Need for re-treatment

We recognize that certain areas within the project area have already received fuels treatment over 10 years ago. It appears that certain areas require re-treatment. *We ask if whether on-ground surveys may suggest that some of these areas may in fact not require treatment.* We would be grateful if you could revisit whether there is in fact a need to treat these plots. In addition, given this need for re-treating past plots what does the Forest believe will be the need to retreat, say 10 years from now, the currently proposed treatment plots? *We ask if the Forest could provide further analyses of the cumulative impacts of the need for continued treatment of these proposed plots?*

### 4. Analysis of wilderness quality impacts

Analyses on page 70 and 73 seem to imply that because of baseline conditions in 1984 when about 400 acres were logged the Forest Service feels that they can treat 400 acres today and still maintain wilderness quality. For instance on page 73 the DEIS states “In terms of the natural quality, alternative 3 would mechanically treat fewer acres compared to treated acres that existed in 1984.”

We are skeptical of this line of analyses. Instead, *we ask the Forest to focus more directly on analyzing what extent of treatments within the WSA can be undertaken today without detracting from the wilderness quality*, as defined along the dimensions that you have already articulated so well in that same section of the DEIS. These refer to qualities of untrammelled, natural, undeveloped, and opportunities for solitude or primitive and unconfined recreation. Drawing upon the indicators on page 62 of the DEIS, how would treating 391 acres mechanically in the WSA affect the “presently existing wilderness quality” (issue indicator 1d) relative to treating fewer acres within the WSA?

In addition to the above suggestions for reducing treatments within the WSA and IRA, we offer more general comments on the project.

### 5. Monitoring project impacts

Given the generally uncertain state of fire science and the value and effects of fuels treatments (Cochrane et al 2013, JFSP Research Reports), *we believe that this project should be accompanied by a robust monitoring plan.* Cost-benefit analysis of both economic and ecological values involved in this project could modify future need for treatment within this WSA. Implementing this monitoring plan may provide further information both locally and regionally for the impacts of fuels treatments. Further, given the possibility of the need for future re-treatments of the currently treated plots a robust monitoring program is essential so we can learn if these proposed treatments work adequately.

6. Standards to prevent invasive species and protect wildlife

As part of the design of the project, *we believe the Forest should put in place strong measures to prevent the spread of invasive species, post-treatment.* This should include considerations including but not limited to possible Off-Highway Vehicles (OHV) use of fire control lines. We urge the Forest to consider coordinating mapping and treatment of weeds with Teton County Weed and Pest.

We also appreciate the analyses and design features that the Forest to put in place to ensure protection of wildlife and habitat. We strongly support such measures and hope that you continue to place a high value on such design features.

7. Design features to limit illegal OHV use and unintended recreation impacts

The EIS should evaluate the potential increase of recreation use throughout the project area as a result of construction of temporary firelines and forest thinning. This may include illegal OHV use, firewood collection and dispersed camping. Given the potential impacts of user created roads and the proximity to other motor vehicle routes in the Mosquito Creek and Fall Creek drainages, we would recommend that the Forest Service develop an alternative that further analyzes the possible increased human access both legal and illegal. Through forest thinning areas may become more desirable for backcountry gladed skiing or open enough to operate over-snow vehicles. These two uses could occur at the detriment to wildlife use of these areas in winter. Consideration of including the area in winter-range closures would minimize these impacts.

In summary, we offer these comments suggesting ways that we can continue to protect wildlife, habitat, and wilderness character by minimizing the project treatment to the minimum necessary and sharing the burden equitably on private and public lands.

Please do not hesitate to contact us if you have any further questions. We are thankful to you and your staff for taking the time and effort to talk with us about this project and look forward to this continued dialog as we try to arrive at the final decision.

Sincerely,



Siva Sundaresan  
Conservation Director,  
Jackson Hole Conservation Alliance  
PO Box 2728  
Jackson WY



Chris Colligan  
Wildlife Program Coordinator  
Greater Yellowstone Coalition  
P.O. Box 4857  
Jackson, Wyoming 83001