

Bridger Teton National Forest
Jackson and Blackrock Ranger Districts
PO Box 1689
Jackson, WY 83001



RE: Shadow Mountain Habitat Enhancement Project

We appreciate the opportunity to comment on this project. Overall, the Jackson Hole Conservation Alliance supports fuels reductions treatments close to values at risk. We also recognize that in certain contexts, fire mitigation activities can negatively impact habitat quality and/or disrupt important natural processes.

The lack of detail in the scoping letter left many unanswered questions that we will pose below. We hope to see these questions answered as the project details come into focus.

Questions / concerns with the project:

- 1) Location, size, and timing of the various treatments (mechanical, rx fire) – without this information it is hard to evaluate the project. We generally support fuels treatments adjacent to communities or values at risk, but have a harder time justifying this type of active management further away from values.
- 2) Tree selection for mechanical treatments – We are concerned about the numerous references to removal of “dead or dying trees” and/or “snags.” These can be important habitat features when they are large complex trees and should be retained when possible. We understand the value of thinning a dense lodgepole pine stand that is already self-thinning. The only non-native pest or pathogen mentioned in the scoping report is white pine blister rust – and these spores would only be on white-pines, which make up a very small proportion of the trees in the project area. We understand the need to remove hazardous trees close to roads, but much of the project area is not close to a road. Dead trees are important habitat and nutrients in the forest. Please ensure that when possible, large legacy snags will be retained for wildlife and when feasible, dead trees will be left for their ecological value.
- 3) Commercial treatment - We have concerns that the trees needed for a viable commercial treatment would not be the same trees that would be removed for optimal fuel reduction and habitat retention. The impacts, including skid tails, soils compaction, and loss of nutrients and functional forest should be accounted for. The extent and volume of commercial harvest should also be reported.
- 4) Temporary roads - We generally don't support new roads in the forest and have concerns about the impacts. We know Shadow mountain is a high use recreation area and we have concerns about the creation of temporary roads that will be difficult or impossible to restore because people will unknowingly start to use them.

Again, thank you for the opportunity to comment. We look forward to your response. Please feel free to reach out if you have any questions

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Krasnow", with a long horizontal flourish extending to the right.

Kevin Krasnow, Ph.D.
Conservation Director
Jackson Hole Conservation Alliance
kevin@jhalliance.org