

Data Submitted (UTC 11): 3/29/2024 6:00:00 AM
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Comments: Our comments and attachments

March 28, 2024

Tanner Shuler, Silviculturist USDA Forest Service

Wind River Ranger District 1403 West Ramshorn

PO Box 186

Dubois, WY, 82513

Re: Green Union Project Mr. Tanner:

This Emergency Action is not an emergency in that the forested areas you plan to treat range in distance from Dubois, the community you claim to be protecting, from 3 to 23 miles. The intervening vegetation appears to be shrub/grassland. Even if you treat this area, your Scoping Letter and EA admit fires can still occur. As we have observed across the West, past logging and treatments have been unable to stop high intensity fires driven by climate. This is clearly a logging and ecosystem manipulation project under the guise of wildfire protection and "restoration". There is no justification for the need to "restore" or otherwise treat and log this area.

We are included in prior comments submitted on March 27 2024 by the Alliance for the Wild Rockies, Center for Biological Diversity, Council on Wildlife and Fish, Native Ecosystems Council, Wildlands Defense, and Yellowstone to Uintas Connection. These comments focus on Canada lynx and your failure to consider the current best available science relied upon by the Fish and Wildlife Service and recently by the Caribou Targhee NF in Region 4. We have attached the Olson et al 2021 (Footnote 1) publication showing their regional model for lynx suitable habitat. It was based on 16 variables that affect lynx habitat.

The narrative in your proposal appears to cling to snowshoe hares as the only food source for lynx, yet the science that is fundamental to listing lynx notes that as you consider these southern forests, habitat selection varies from the pure boreal in Canada to Doug fir, spruce, lodgepole. I would add also that we regularly observe snowshoe hares at our wildlife preserve in SE Idaho. They use a varied cover of mixed conifer, and forage nocturnally thru the adjacent aspen or sagebrush into the riparian area where they forage. As the literature notes, they also use other mammals and birds as prey, particularly red squirrels. And, common sense would also dictate, that like any predator from coyotes, foxes, wolves to lynx, they eat grouse, mice, voles, jackrabbits, cottontails, and other prey they can find. You must provide survey data for snowshoe hares demonstrating their population in the project area and Ranger District. Similarly, a summary of all lynx observations and surveys for the Shoshone NF should be provided. This should include all reliable and verified records over time. You should also analyze the density of trapping, areas being trapped, and animals trapped in the Shoshone National Forest. Our recent search of trapping records for bobcats revealed up to 800,000 trap days in Wyoming. No matter how

you cut it, by the time all manner of traps and animals trapped are considered, this activity could be like the Berlin Wall for lynx in your area as well as others. It needs a full analysis.

Over the last year, I have discussed lynx status and habitat with the Fish and Wildlife Service lynx team. I have attached our 2023 comments on the current Species Status Assessment and the recently issued Draft Lynx Recovery Plan. These documents review the science, regulatory failures, and our analysis using mapping are incorporated herein and are part of these comments which you must address or respond to. Those points are not repeated herein.

We have analyzed the Olson modeled habitat in the Greater Yellowstone Area's National Parks and National Forests as well as the Ranger Districts. Figure 1 is reproduced from their paper. Figure 2 shows these Ranger Districts as ranked by the Olson Model. Higher values represent greater suitability for lynx, while the lower values are important for connectivity. The Wind River Ranger District is one of the higher ranked Ranger Districts in the Olson model for the Greater Yellowstone Area. Figure 3 illustrates the Olson Model with the project is overlaid. Here, the lighter colors represent the lynx habitat of higher suitability. Clearly, the project lies within the habitat with the highest suitability. We used the link (Footnote 2) to Google Earth provided in the project webpage to overlay the project units over the terrain and the Olson model.

The EA (p34): "The Wind River/Dunoir Lynx Analysis Unit (LAU #12) is 140,365 acres in size and contains 82 percent (115,608 acres) designated critical habitat. The Warm Springs Lynx Analysis Unit (LAU #13) is 89,558 acres in size, of which 74 percent (66,327 acres) is designated critical habitat. The entirety of the action area is within designated critical habitat, as are all proposed vegetation treatments."

EA (p36): "For example, in the 10-year period from 2021-2022, 368 acres (0.5 percent) of lynx habitat in LAU #12 and 351 acres (0.8 percent) of lynx habitat in LAU #13 was regenerated by timber harvest activities."

EA (p37): "The acreage of proposed treatments within designated critical

habitat represents 0.8 percent and 7.2 percent of the total designated critical habitat within LAU #12 and LAU #13, respectively. Therefore, effects are limited when considered at the scale of the lynx analysis unit and are not expected to result in deleterious effects to the physical and biological features of designated critical habitat."

EA (p38): "The acreage of proposed treatments within designated critical

habitat represents 0.8 percent and 7.2 percent of the total designated critical habitat within LAU #12 and LAU #13, respectively. Therefore, effects are limited when considered at the scale of the lynx analysis unit and are not expected to result in deleterious effects to the physical and biological features of designated critical habitat." The problem with this is that the acreages of each vegetation or forest cover type is not analyzed for each of these LAUs. The LAUs may not contain 100% high value lynx habitat, so this project could be affecting a much greater percentage of suitable habitat.

From the maps we provided in Figures 1 - 3, this project may only occupy a small percent of the LAUs, but those LAUs may have a small area of suitable lynx habitat. The project could eliminate a significant area of high value habitat. We calculated the amount of suitable habitat within the project footprint. Within the project footprint, we found 94.3% of the area was in the two highest categories of lynx habitat suitability based on the Olson Model and therefore is not suitable for this project.

In addition to revisiting this issue as we have here, the analysis should:

1. Characterize the cover type, species, age classes of the trees present. This should be available from your stand exams. It should consider the adjacency of aspen, sagebrush, conifer, riparian as complexes that snowshoe hares require. It is not sufficient to only rely on dense conifer.
2. Provide analysis of snowshoe hare surveys. Have they been done? Where? Provide results to show where they reside and how the project will affect the vegetation complexes they require.
3. Because other species such as red squirrels, grouse, other rabbits, and small mammals are lynx prey, please provide the results and analyses of surveys for these animals.

We have also attached a Freedom of Information Act request for data in order to better analyze the project elements.

Sincerely,

John Carter

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Footnotes:

1 Olson et al. 2021. Improved prediction of Canada lynx distribution through regional model transferability and data efficiency. Ecology and Evolution 11:1667 - 1690.

2 Green_Union_EA_proposed_units_with_labels.kmz

Attachments:

Ecology and Evolution - 2021 - Olson.pdf

Comments on the FWS 2022 Species Status Assessment for Canada lynx

Comments on the current FWS Draft Recovery Plan for Canada lynx

Freedom of Information Act Request