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Shoshone National Forest c/o Tanner Shuler

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Submitted Electronically

RE: Comment on the Environmental Assessment for the Green Union Project

Dear Tanner,

The Greater Yellowstone Coalition (GYC) appreciates the opportunity to provide comments on the draft Environmental Assessment (EA) for the Green Union Project on the Shoshone National Forest. Long-standing issues stemming from legacy timber harvesting practices, insect and disease epidemics, and fire suppression have culminated in stand conditions that necessitate action from the forest, specifically along the wildland-urban interface in the Dunoir Fireshed. GYC appreciates that a lack of action in this area would leave it vulnerable to high-intensity fires likely to imperil habitat conditions and hydrological function in this watershed, and that fire intensity and frequency is only expected to increase in the coming years and decades. GYC cautiously supports the Proposed Action as laid out in the EA while encouraging the Shoshone to carefully consider road alignment and decommissioning that maximizes distance from waterways, minimizes crossings, and facilitates effective post-project closures to motorized use. We also encourage the Shoshone to incorporate the best available info regarding bear habitat usage in light of the various treatment types authorized across the project.

GYC is a regional conservation organization with offices in Montana, Idaho, and Wyoming and over 90,000 supporters across the country. Our mission is to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem now and for future generations. GYC's supporters include people who care deeply about intact landscapes, healthy wildlife populations, and clean, abundant water resources. GYC works with diverse stakeholders and resource managers to ensure that our public lands are managed for the continuation of ecological services in a changing world.

The 2016 Lava Mountain fire showcased how high-intensity burn events can impact forests compromised by fire

suppression, disease, and legacy silvicultural activities. Much of the Dunoir Fireshed remains at a high risk for catastrophic wildfire, and GYC understands the risk such events would pose to habitat, hydrologic function, and human safety and infrastructure in the project area. A high-intensity fire could push the watershed past key functional thresholds and alter runoff and sediment transport processes to the detriment of aquatic habitat and wildlife, and pre-emptive treatment now increases the likelihood that future burns will be less damaging to overall watershed function. To that end, GYC appreciates how the Shoshone has altered project treatments from the original scoping to favor techniques promoting onsite water and sediment retention. While catastrophic fire poses the greater long-term risk to watershed function, it's important to minimize equivalent clearcut area while conducting thinning with the Green Union project. Focusing on alternative treatment types (e.g., salvage and sanitation) instead of clearcutting is a strategy that we support.

Similarly, GYC supports the intent of the project design features as laid out in Appendix B of the EA. Careful consideration of road alignments and keeping stream crossings to a minimum will be essential for minimizing adverse project impacts to hydrologic function and the riverine habitat within the project area. Given the accelerated timelines associated with emergency projects, it's more imperative than ever that the forest carefully and deliberately considers how it is constructing the temporary access roads for the project.

Equally important are post-project decommissioning efforts being successful - it is well documented that decommissioned roads are susceptible to legacy impacts to waterways, especially if the rehabilitation and revegetation efforts prove unsuccessful. GYC points out that many roads that are technically closed on the Shoshone still receive non-authorized motorized traffic and encourages road alignments that facilitate easy and effective post-project closures. Keeping motorists off of decommissioned roadways is essential not only for sedimentation and hydrologic concerns, but to ensure the continued security that roadless habitat provides for threatened species such as Grizzly Bears (Ursus arctos horribilis) and Lynx (Lynx canadensis).

In conclusion, GYC supports the careful and considered implementation of the Proposed Action within this EA and looks forward to supporting the Shoshone National Forest's mission to steward and protect the Greater Yellowstone ecosystem from climate- and fire-driven risks. Thank you for the opportunity to comment.

Sincerely,

Erin Welty

Senior Wyoming Conservation Associate

Greater Yellowstone Coalition