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Comments: February 24, 2026

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RE: Objection to the Final Environmental Assessment and Draft Decision Notice and Finding of No Significant Impact for the Lower Portneuf Cooperative Vegetation Management Project.

This objection is filed on behalf of Yellowstone to Uintas Connection. We are a 501c3 organization working to protect and restore wildlife habitat, migration corridors and populations. This proposed decision is a threat to those values.

We submitted scoping comments and additional comments for the EA on April 24th, 2025 that addressed the following concerns:

The following points outline significant concerns regarding the proposed project, which must be addressed to ensure compliance with environmental laws and to protect our natural resources:

Need for Comprehensive Environmental Impact Statement (EIS):

The project's scope is likely to have significant individual and cumulative impacts on the environment, necessitating a full EIS to assess these implications comprehensively.

Failure to Comply with Regulatory Requirements:

The National Environmental Policy Act (NEPA) mandates that federal agencies, such as the Forest Service, must evaluate a range of alternatives in the planning and decision-making process for projects that may significantly impact the environment. This is a critical component of NEPA because it ensures that agencies consider various options, which can include:

- 1.No Action Alternative: This option examines the potential environmental impact if the proposed action were not implemented.
- 2.Action Alternatives: These are variations of the proposed project, which may differ in scale, design, or location. Each alternative should be assessed for its environmental, social, and economic impacts.
- 3.Best Management Practices: Alternatives may incorporate practices that minimize impacts to the environment while meeting project objectives.
- 4.Mitigation Measures: This includes strategies that could be employed to lessen the adverse effects of the proposed action.

By evaluating multiple alternatives, the Forest Service can make more informed decisions, engage stakeholders, and comply with NEPA's requirements to analyze the potential impacts on the environment and public resources. The EA does not provide Alternative options for the project. The EA does not clearly disclose how the project complies with the Caribou-Targhee National Forest Plan. Specifically, it must address past, present, and

reasonably foreseeable logging, grazing, and road-building activities within the project area.

Biodiversity and Habitat Concerns:

The potential threat posed by noxious weeds is downplayed in the EA. It is crucial to disclose the current levels of noxious weed infestations and how the project may exacerbate these issues, including a clear strategy for managing them. The EA lacks a thorough assessment of how the project will impact essential habitats for species such as mule deer, elk, and Canada Lynx. The claims made about wildlife habitat enhancement are not substantiated with scientific evidence.

Fire Management and Climate Change:

The assertion that thinning will reduce fire risk contradicts extensive research indicating that such practices can actually increase fire intensity. The EA must address the health impacts of prescribed burns, which could lead to significant air quality issues and associated healthcare costs.

Cultural and Historical Resource Management:

The EA fails to adequately address the need for consultation regarding cultural and historical resources, violating the National Historic Preservation Act. Proper surveys of cultural sites must be conducted before any project decisions are finalized.

Road Management and Wildlife Security:

The proposed increase in road densities raises serious concerns about the security of wildlife habitats, particularly for vulnerable species like grizzly bears and Canada lynx. The EA must provide analyses regarding how these changes will affect wildlife movement and habitat viability.

Transparency and Public Involvement:

The EA lacks sufficient public involvement and transparency. Important information regarding the ecological impacts of the project and the decision-making process must be accessible to the public to ensure informed commentary and participation.

Conclusion

The Environmental Assessment for the Lower Portneuf Cooperative Vegetation Management Project does not adequately address the concerns outlined above. We urge the Forest Service to consider these objections seriously and to undertake a full EIS, ensuring compliance with all relevant environmental laws and protecting the integrity of our natural resources.

Thank you for your time and consideration.

Sincerely,

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