

Echo Miller

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To

Bridger Teton National Forest
P.O. Box 1689
Jackson, WY 83001
Attention: Jackson District Ranger Todd Stiles
RE: JHMR Recreation Enhancements Project-2023

Dear Todd:

It recently came to my attention that the Jackson Hole Mountain Resort is proposing extensive changes to its mountain master development plan. First, I am very disappointed that the legal notification was made in the Casper Star Tribune, but no notification was made in any local papers. I understand that JHMR did what was legally required, but the lack of effort to involve the immediate community does not show good faith. In general, I am extremely concerned about both the negative environmental impacts and the negative impacts on Jackson Hole's worldwide reputation as a ski area with incomparable terrain. The amount of drilling, blasting, and tree clearing that the resort is planning are the kinds of changes that would permanently alter the topography of the ski area and consequently the skiing experience for which we are known. These changes to the Forest Service land will result in cascading effects on the wildlife and adjacent lands/owners. Although trees can be replanted, rock cannot be unblasted and habitat reconstruction is difficult, especially in our rapidly changing climate. I would strongly encourage the Forest Service not to approve any changes that require permanently and dramatically altering the existing mountainous terrain. Below, I will offer more specific comments on each of the proposed projects based on my experience of living and working in Jackson for over 20 years and of working at JHMR as a ski instructor.

1. Sublette Chair Replacement

The request is for either a high-speed detachable four- or six-place chair. Please limit JHMR to only a four-place chair. This is in keeping with the recent upgrade of the Thunder Chair.

2. Alta Chutes

These runs do not need to be altered so that they are more usable. JHMR does not offer any explanation as to why these expert runs should be altered, but other expert runs do not need to be altered. It begs the question as to whether the resort will submit an eighth revision requesting permission to blast the remainder of the upper mountain expert terrain in order to make it more user-friendly. It is unclear how widening these chutes will make them more skiable in low snow conditions. In fact, attracting more skiers to these chutes in low snow conditions will make them less user-friendly. Adding skiers will increase the danger and likelihood of accidents. There are only a handful of true chutes and double-black terrain at JHMR. This terrain attracts skiers from around the country and the world to improve and hone their skiing skills. It would be a shame to destroy this legacy of Jackson

Hole. (Also, the disturbance area is listed as “negligible”. How is there “negligible” disturbance with the use of pneumatic rock drills, spider hoes, chainsaws, etc. to remove rocks and trees.)

3. North Hoback Woods

The desire is to provide groomable egress out of the Hobacks. The Hobacks are already VERY clearly labeled as being for expert skiers only and as an area that is not only ungroomed, but also an area in which hazards are not marked. I am not convinced that a groomed egress through the North Hoback Woods would have the desired outcome, as it has been my observation that many skiers do not realize that they are in over their skill level until they are well below this area. This is probably due to the fact that the snow conditions generally deteriorate with decreasing elevation. Furthermore, the North Hoback Woods has some of the only expert-level tree skiing on the mountain. To cut a groomed swathe through this area would potentially destroy this terrain but certainly increase the incidence of collisions due to people suddenly appearing out of the trees and onto a groomed run. We already see such problems in the tree skiing areas under the Bridger Gondola.

4. Upper Sundance Run Realignment

A number of trees have already been removed from this area, and this has resulted in an area that is wind-scoured. This is a big part of why it is difficult to groom. I would suspect that additional tree removal will only exacerbate this problem. In addition, this is a very crowded area—there are skiers disembarking from two lifts (the Bridger Gondola and the Marmot Chair), there are people sightseeing from the restaurant, and there are paragliders (on nice weather days). In addition, there are skiers going in multiple directions—to the north toward the Casper area, down the fall-line to the bottom of the mountain, and to the south toward the Thunder area. Removing even more granite and more trees than have already been removed over the years will not change these dynamics. Therefore, more thought should be given as to whether or not, or to what extent this area of the mountain should be unalterably changed.

5. Slalom Run Upgrade

A significant amount of regrading should not be necessary here, but the addition of snowmaking would allow this run to be better utilized. This should increase overall safety by dispersing skiers among more runs as they ski to the bottom of the mountain during high-use times.

6. Gros Ventre Run Upgrade

With regard to regrading in these zones, I would think that additional backfill, as opposed to blasting and removing material, would make more sense, since the steep areas are generally due to the transition from crossing a flat road and back onto high angle terrain.

7. Werner Trail Widening

Can this depression be filled with snow, rather than filling in a wetland? There is extensive snowmaking in this area.

8. Lower Ashley Ridge Upgrade

As with Slalom, upgrading this run so that it is more easily/regularly utilized would increase skier safety during mid-day and the end of the day when most skiers are exiting the mountain simultaneously on only a few runs.

9. Grand Run Upgrade

If this is the area of the “Egg Roll” adjacent Tower 3, then widening the choke point would potentially make this area safer. However, this is also an area that is wind-scoured, so the addition of fencing might also be necessary so that it will hold snow.

10. Gondola Base Area Access Traverse

If this is to compensate for the loss of use of existing traverses due to new commercial development, then it would seem to be necessary (although poor planning). However, if this is to add new use to accommodate new commercial development, this would seem to be the responsibility of the developers, not JHMR.

11. Togwotee Pass Traverse Realignment

Realignment of the South Pass Traverse has been beneficial. This would likely be a similarly positive improvement.

12. Cirque Traverse Upgrade

Is there a way to minimize tree removal and still increase ski patrol safety?

13. Stash Park Upgrades

Any new features should maintain the aesthetic of the current structures and the ways that they blend into the surrounding terrain. Again, tree removal should be minimized.

14. Terrain Parks Summer Grading

Contouring terrain so that less snow is required for features has obvious environmental benefits with respect to the water and energy usage required for snow making. Some of this area already appears to be contoured for mountain bike trails in the summer. Therefore thought should be given to which features are desired and how they best fit into the existing framework of both summer biking and winter skiing.

15. Union Pass Traverse Snowmaking

This does not seem as necessary as other proposed snowmaking projects. If there is not snow on this traverse, then there is not enough snow to ski the Hobacks and Lower Faces; therefore, low snow conditions also mean minimal (or no) skier traffic. Less snow is required to keep a traverse open than to keep ungroomed runs open. The skier traffic that would be utilizing this traverse in low snow conditions (when the Hobacks and Lower Faces are typically closed) are the homeowners who live below the Union Pass and Moose Creek chairlifts. There is existing bus service to provide them with a means to get home if they are unable to ski home. In addition, JHMR currently owns and operates a number of mobile snow making machines. With all of the proposed permanent snow making, many of these machines will no longer be as heavily utilized and could instead be used for this traverse when necessary.

16. Sublette Patrol Station

Can a patrol station be incorporated into the new Sublette lift (if it is approved)? Would this combination lessen construction impacts and/or reduce potential avalanche protection measures?

17. Bear Flats Café Expansion

While it is nice to have a place on the upper mountain where skiers can warm themselves or get a quick snack, this facility has not been utilized for a number of years. In fact, during the nearly 25 years that I have taught at the mountain, I can only remember one or two years when it was open. Difficulties include the lack of utilities and lack of staff. Since this location is in a heavily trafficked and very busy skier area (multiple runs merging and the base of a chairlift), it is not clear that the proposed expansion makes sense (adding more crowding to an already congested area and taking away space for those crowds to disperse). Also, when there is no running water or electricity and everything will need to be transported via snowcat, how much food service is reasonable? In short, some expansion probably makes sense, but room for over 100 seats does not. Also, since JHMR already struggles to staff its existing food service operations and regularly opens on-mountain options late in the season and closes them early in the season, it seems likely that this would be built but not operated.

18. Rendezvous Lodge Addition

There is high demand at this facility and JHMR struggles to service existing needs.

19. Rendezvous Event Site Upgrade

Impermeable surfaces should be minimized, as they are very environmentally unfriendly (runoff tends to cause more erosion and less water soaks into the ground). What is an enclosure to be utilized as a “focal point”? I would think that the views of the valley and surrounding mountains would be enough of a focal point. Any regrading should not adversely affect winter skiing.

20. Casper Event Site

Casper needs to be more than just another event site. It is heavily used in the winter, but it is not an efficient facility, nor can it handle existing capacity. Any upgrades to Casper as an event site need to include re-constructing the restaurant so that it can provide more and better service to current customers. As with the Rendezvous site, impermeable surfaces should be minimized and grading should not create hazards for skiers in the winter.

21. Paradise Lost Multi-Use Trail

Hiking Trails seem to be one of the more minimally invasive actions that JHMR proposes. It would be interesting to have some data regarding how much current trails are utilized, and, hence the need for more trails.

22. Wildflower Spur Hiking Trail

This would seem to be contingent upon the approval of items #4 and #6. Would this trail be re-naturalized after the projects or become part of the greater trail network?

23. Elk Alley Hiking Trail

See my comments for item #22.

24. Wildflower -Solitude Access Hiking Trail

It seems that there should be walking/hiking access to Solitude, but why is this proposed in conjunction with item #28. Could the two projects be combined such that there is both hiking access and educational/interpretative components in one project?

25. Far Drift Multi-Use Trail

It is unclear why JHMR references biking options from the top of the tram in this development plan. To my knowledge, bikes are not allowed on the tram, and only hiking is allowed on the current trails. Is the purpose of this trail to introduce bicycles to the upper mountain? I do think that hiking on trails is a better experience than hiking on maintenance roads.

26. Jackson Woods Downhill Trail

It seems like a good idea to have separate downhill biking and hiking trails. Again, the question is how utilized/crowded are the current downhill trails. Is the construction proposed simply to promote a bigger bike park or is there a need for expansion based on current use?

27. Beaver Tooth/Ashley Downhill Trail

See my comments for item #26. Additionally, this area is a wetlands (or at least extremely marshy) and would therefore require significant mitigation efforts, which are not referenced in the development plan.

28. Elevated Walkway

See my comments for item #24. Why an elevated walkway vs. an on-the-ground trail? Could the two components be mixed? How would such a walkway affect the skiing trail and skier safety in the winter?

29. Ball Track

Who would honestly drop a ball down a maze and then walk next to the maze to watch the ball roll, much less pay to do so? Where else has this been done?

30. Summit Viewing Platform

I would rather see more thought put into how to better utilize existing flat areas and topography to help people enjoy a mountain experience, perhaps by adding more signage, short trails, permeable pavers, existing rock formations, etc. Man-made structures, even though they are removable, still take a toll on the environment. I guess the question is what is better suited for the actual traffic and its affect on erosion, plant growth, and trash.

31. Via Ferrata Additional Routes and Repelling [sic] Stations

This activity seems to much more in line with a mountain experience than chasing balls down a maze. Furthermore, much like hiking and skiing, climbing is a typical mountain activity.

32. Fuels Reduction at Wildland-Urban Interface

I would think that the removal of dead trees is already mandated, or at least approved, by existing fire safety regulations. If not, it certainly makes sense to remove dead trees. However, if this encroaching interface is due to new construction in areas bordering the resort, then tree trimming and other fire-wise action would seem to be the responsibility of the homeowners.

33. Explosives Trolleys

Enhancing Ski Patrol safety and/or making their job easier seems to be a good use of resources.

34. Avalanche Exploders

The existing avalanche exploders in this area have helped the ski patrol do their job more safely and effectively.

35. Avalanche Control Fencing

Can avalanche protection, construction of the top terminal for the Sublette Chair, and construction of a patrol shack be combined into one design? I would strongly suggest that the Forest Service work with JHMR to find the safest possible location for the top terminal and the patrol shack. I would also like to think that a cohesive design would be less intrusive (and more efficient) than separate, piece-meal projects. Picking a spot and then trying to make it safe will only increase the amount of environmental degradation to the mountain.

In closing, I would like to reiterate that during this time of ever increasing climate uncertainty, everything possible should be done to reduce harm and impact. Some projects will obviously promote the safety of both resort employees and guests or will enhance their experiences. However, those experiences should not be artificially manipulated to make the mountains what they are not nor should they encourage people to act outside their skill/knowledge level.

Sincerely,

Echo Miller

July 29, 2023