



WYOMING GAME AND FISH DEPARTMENT

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July 31, 2023

WER 0566.08

United States Department of Agriculture

Forest Service

Jackson Hole Mountain Resort Recreation Enhancements Project – 2023

Teton County

Todd Stiles

District Ranger

Bridger-Teton National Forest

Jackson Ranger District

25 Rosencrans Lane

P.O. Box 1689

Jackson, WY 83001

Dear Mr. Stiles,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed Jackson Hole Mountain Resort Recreation Enhancement Project at the Jackson Hole Mountain Resort (JHMR). The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The proposed project includes a number of developments to support year-round recreation at JHMR. Development activities with the highest probability to impact wildlife and wildlife habitat include the following:

- Expansion of summer recreation trails
- Additional via ferrata routes
- Fuels reduction
- Avalanche control

JHMR is a popular and well-developed area for outdoor recreation but also supports a thriving wildlife community. Moose, mule deer, black bear, grizzly bear and a number of nongame Wyoming Species of Greatest Conservation Need (SGCN) occupy JHMR. Recreation infrastructure continues to expand at JHMR and impacts to wildlife and wildlife habitat will occur. The Department reviewed and provided comments on JHMR's proposed expansion of summer recreation trails in 2015, at which time the proposal was to increase trails from 19 miles to 32.6

miles (a 72% increase). The total proposed new mileage if this project is approved would be an additional 9.8 miles, which would be a further increase of 30% totaling a 123% increase (23.4 miles of new trails) from pre-2015 trails. The Department supports relatively dense summer trail development within JHMR compared to other areas on Bridger-Teton National Forest (BTNF). However, we suggest that potential impacts to wildlife of this relatively significant expansion of summer trails are adequately evaluated and considered as the process develops.

Minimize Impacts to Moose – Moose are a SGCN and use JHMR and the surrounding landscape most importantly during the parturition season. Recent research from GPS-collared moose in Jackson has shown that six of 28 collared cows (~21%) gave birth within or close to JHMR from 2020-2023. There are likely additional un-collared moose giving birth in this area also. As such, we recommend the following:

- Avoid development activities during the primary parturition period of May 1 through June 20.

Minimize Impacts to Bighorn Sheep – The proposed via ferrata locations are within suitable bighorn sheep summer habitat. Bighorn sheep surveys have not been conducted within the boundary of JHMR and no collared sheep have used the areas targeted for development therefore degree and intensity of use is unknown. As construction of via ferrata and associated human activity will make these places unusable for bighorn sheep, the Department recommends pre-construction surveys to assess sheep use in the proposed development areas and consideration of data collected when assessing project-related impacts.

Minimize Probability of Dangerous Wildlife Encounters – As previously mentioned, moose, black bear, and grizzly bear occupy JHMR. The possibility of dangerous encounters between these species and recreational users will increase with the proposed expansion. The Department recommends the following to minimize the probability of such encounters:

- Design and develop summer trails to provide sight distance for people and wildlife
- Locate trails in areas away from bear food sources (i.e. berry-producing shrubs)

As grizzly bears continue to expand their range, the Department anticipates increasing observations in the general area of JHMR. The Department recommends that BTNF and WGFD staff work with JHMR to develop visitor education about wildlife and how to avoid conflicts.

Minimize Impacts to Nesting Raptors – The proposed via ferrata locations contain suitable habitat for cliff nesting raptors such as peregrine falcons. Via ferrata construction in close proximity to nest sites would likely result in permanent abandonment. The Department recommends pre-construction surveys prior to development to assess whether nesting raptors are present. If present, we recommend consultation with the U.S. Fish and Wildlife Service to ensure adequate protections are integrated into the development plan.

Minimize Impacts of Netting, Fencing, and Cables – The proposed development includes various fencing and netting, which may impact a variety of wildlife species. We provide the following considerations:

- The elevated walkway will be built of wood and netting and located in an aspen habitat, which may be used by a number of SGCN birds. The Department recommends using highly visible netting to reduce collision and entanglement risk to birds.
- Avoid using avalanche control fencing. Avalanche fencing is a movement barrier to wildlife and has caused moose and mule deer entanglement in Teton County, resulting in injury and death.
- Cables associated with avalanche control devices should be readily visible to birds and high enough to avoid impacting movement and entanglement risk to big game.

Minimize Out-of-Bounds Impacts to Wildlife and Wildlife Habitat – It is unclear from the provided information whether proposed avalanche control devices will primarily result in avalanches within the JHMR boundary or whether portions of triggered avalanches will extend beyond the boundary. Avalanches that extend beyond the boundary of JHMR may have unintended impacts to wildlife and wildlife habitat. The Department recommends careful consideration of avalanche extents and requests an adequate assessment of the potential impacts of those extents if appropriate. Department personnel welcome the opportunity to provide input and additional recommendations to minimize impacts to wildlife and wildlife habitat from avalanche mitigation activities.

Avoid Establishment and Spread of Noxious Weeds and Invasive Annual Grasses - Noxious weeds and invasive annual grasses (IAGs) can cause significant harm to the ecosystem when introduced. Ground disturbing activities can create an environment that facilitates establishment by unwanted plants. They significantly reduce the quality of wildlife habitat and their presence increases the probability of catastrophic wildfire. The potential economic impacts to the State of Wyoming are severe, and once these species become established, eradication is difficult and costly. Prevention of establishment remains the best way to keep Wyoming's habitats free of noxious weeds and IAGs. The Department acknowledges and supports the BTNF process and commitment to avoiding the establishment and spread of noxious weeds and IAGs.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Ross Crandall, Habitat Protection Biologist, at (307) 367-5615.

Sincerely,



Todd Stiles
July 31, 2023
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Will Schultz
Habitat Protection Supervisor

WS/rc/kgb

cc: U.S. Fish and Wildlife Service
Chris Wichmann, Wyoming Department of Agriculture