

**From:** [FS-r4 b-t info](#)  
**To:** [Radue, Mariah - FS, WY](#)  
**Subject:** FW: WWW Mail: Objection to JHMR Recreation Enhancement Project  
**Date:** Wednesday, February 28, 2024 1:01:48 PM

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-----Original Message-----

**From:** [REDACTED]  
**Sent:** Thursday, February 15, 2024 12:06 PM  
**To:** FS-r4 b-t info <SM.FS.r4\_b-t\_info@usda.gov>  
**Subject:** WWW Mail: Objection to JHMR Recreation Enhancement Project

To: Todd Stiles, District Ranger, Jackson Ranger District

From: Dr. Jesse A. Logan, USDA Forest Service, Rocky Mountain Research Station (retired)

Date: February 15, 2024

Subject: Objection to Draft Decision Notice and Finding of No Significant Impact: Jackson Hole Mountain Resort Recreation Enhancement Project – 2023. And in particular, those findings pertaining removal of whitebark pine.

Relevant background: From 1999 to 2006 I was a Research Scientist and Project Leader for the Forest Service, Rocky Mountain Research Station. During that time, my main research interest and expertise was the disturbance ecology of whitebark pine.

My response to this decision:

- How is this legal? This decision makes a joke of the Endangered Species Act. Either a species is protected, or it isn't. In my opinion, you don't go killing 400 individuals of a protected species. This decision is asking for a lawsuit. As detailed in the Federal Register / Vol.87, No 240, "Malicious damage or destruction of the species on any area under Federal jurisdiction," is prohibited. There are exceptions from prohibitions listed in the same document, but I see no mention of ski area or other development.
- The basic premise for this decision is a classic Red Herring argument. The relevant question is not, does this action "influence population dynamics on a range-wide or species-level scale," but, "Is this action detrimental to the ecology of a designated threatened species?" Almost no individual act is detrimental on a range-wide or species scale. Rather, Threats come from a combination of factors and the accumulation of individual acts. Removing 400 trees in a mature whitebark forest is a significant contribution to death by a thousand cuts for a threatened species.
- Spatial scale is ignored in the Decision. The proposed action will not only impact the local stand of whitebark pines but also has the potential for significant regional impact. Clark's nutcrackers provide an efficient long-range dispersal mechanism for whitebark seeds, and significantly they cache seeds in critical habitats that may be far removed from the stand of origin. Of significance is caching seeds on wind-swept ridges above treeline for subsequent retrieval in winter when forested habitats are covered by several feet of snow. Not only do these birds cache seeds where they are available to them in winter, but in habitats critical for a species threatened by a warming climate.
- Mitigation activities of the resort used by the FS to support this decision are inadequate. Planting, "1,000 seedlings" of unknown and unlikely survival, and in any case that will not begin producing seeds for at least 50 years, does little to justify the removal of 400 trees from a healthy, functioning ecosystem that is currently producing seeds for nutcrackers to plant. Verbenone has a checkered history of protecting trees, and spraying must be repeated regularly. How long will these trees be sprayed and verbenone packets replaced? Fifty years, or 10, or 1, or until it is no longer economically feasible. All the activities listed in Plant Species of Special

Concern (p. 18, Attachment 2) are laudable, but none, individually or in combination, justify the destruction of 400 healthy, whitebarks including seedlings, saplings, and an undetermined number of seed-producing trees. In particular, protecting, "Four whitebark pine " when up to 400 will be removed is disingenuous reasoning, at best.

I appreciate the opportunity to comment on the proposed Jackson Hole Mountain Resort Recreation Enhancement Project, but the deadline for objection should be after the US Fish & Wildlife has a chance to evaluate the impact on whitebark, and the potential violation of Threatened species designation. As of Feb. 15th, I am not aware of any such comment by USF&W.

I have not been able to find any reference to the proposed action by JHMR, nor do I find any way to submit an objection on either the Bridger-Teton webpage or the Jackson Ranger District web pages. This is an important enough issue that public comment should be facilitated.

I hope my comments will be seriously considered.

Sincerely  
Jesse A. Logan