



August 22, 2025

Submitted Electronically

Chad Hudson  
Forest Supervisor  
Bridger-Teton National Forest  
P.O. Box 1888  
Jackson, WY 83001

**Re: Jackson Hole Mountain Resort Comments on Draft Forest Plan Assessment**

Dear Forest Supervisor Hudson:

Jackson Hole Mountain Resort (JHMR) respectfully submits the following comments on the Draft Assessment for the Bridger-Teton National Forest (Bridger-Teton) Plan Revision. We appreciate the extensive work and public engagement undertaken to prepare the Draft Assessment and value our long-standing partnership with the Forest Service in providing world-class recreation on the Bridger-Teton.

Since opening in 1965, JHMR has served as a steward of National Forest System lands under a special use permit, providing exceptional recreation that the Forest Service cannot provide alone, under managed conditions that safeguard the natural environment. Over six decades, millions of visitors have experienced the Bridger-Teton through JHMR, often as their only direct interaction with these public lands. We take this role seriously and look forward to continued collaboration with the Forest Service and stakeholders throughout the Forest Plan revision process. We appreciate the opportunity to comment on the Draft Assessment and request that the Forest Service take the following comments under consideration.

1. The Final Assessment should specifically identify developed recreation, including permitted four-season mountain resorts, as one of the Bridger-Teton's distinctive roles and contributions.

The Draft Assessment acknowledges that the Forest Plan for each specific National Forest should reflect that Forest's "distinctive roles and contributions to the local area, region, and Nation, and the roles for which the plan area is best suited, considering the Agency's mission, the unit's unique capabilities, and the resources and management of other lands in the vicinity." 36 C.F.R. § 219.2(b)(1). The Draft Assessment identifies four categories of distinctive roles and contributions for the Bridger-Teton: "water and snow, wildlife and fish, wildlands and dispersed recreation, and cultural heritage." Draft Assessment at 4. JHMR requests that the Final Assessment add to this list and include, and specifically identify,

developed recreation, including recreation at permitted four-season mountain resorts, as one of the Bridger-Teton's distinctive roles and contributions.

The developed recreation opportunities provided at JHMR represent a material contribution to the Bridger-Teton, and in turn, a material contribution of the Bridger-Teton to the local area, region, and Nation. As the Draft Assessment recognizes, “[r]ecreation is the primary way people connect with the Bridger-Teton and it is a vital thread in the fabric of society.” Supplemental Assessment at 297. The Bridger-Teton hosts nearly 2.2 million visitors each year. Draft Assessment at 37. JHMR and the two other permitted mountain resorts on the Bridger-Teton host a material portion of those visitors, with upwards of “52 percent of national forest visits in the forest occur[ing] at developed day use sites (e.g. mountain resorts).” Supplemental Assessment at 314. For many public visitors, their experience at JHMR is their only experience on the public lands of the Bridger-Teton.

The developed recreation opportunities at JHMR are a cornerstone of the recreation opportunities on the Bridger-Teton. JHMR has operated as a developed mountain resort since 1965. The resort provides opportunities for a broad cross-section of the public to enjoy and experience the public lands on the Bridger-Teton. JHMR's world-famous tram, for example, provides visitors with access to unparalleled views of the Tetons, accessible to members of the public that could not otherwise experience a similar vantage point. Draft Assessment at 44 (listing JHMR tram as notable viewpoint on the Bridger-Teton).

JHMR and the other permitted mountain resorts on the Bridger-Teton also provide the Forest with unique and important benefits. JHMR, Snow King, and White Pine provide a portal to access the Forest with suitable physical and management infrastructure to accommodate visitor demand (parking/transportation, trails, sanitary facilities, trail maintenance, noxious weed management programs, fuels management, avalanche hazard reduction, etc.). Snowmaking at ski areas helps support natural snowmelt and hydrological cycles, with minimal consumptive use, in an era of climate change. JHMR helps support unique forest health, vegetation management, research, and other initiatives due to the infrastructure the resorts have developed (lifts, trails, roads, utilities, etc.) and the labor resources employed at no cost to the Bridger-Teton.

The Supplemental Assessment Information specifically acknowledges the importance of managing the ever-increasing popularity in recreation activities on the Bridger-Teton, including skiing, and the need for updated recreation management direction to meet the changing demands on the Forest. Supplemental Assessment at 328-30. The Bridger-Teton's permitted mountain resorts, including JHMR, play a critical role in the management of recreation on the Forest by:

- a. Accommodating high, concentrated user numbers on a relatively tiny portion of the Forest.

- b. Providing the investment to maintain sufficient infrastructure and staffing when Forest Service budgets and personnel are diminished.
- c. Adding to the social and economic integrity of the community through job and income generation, both directly through resort hiring and revenues and indirectly through increased demand for accommodation, dining, equipment, and services.
- d. Accomplishing all of this with minimized ecological impact due to intensive environmental review and regulation.

The Final Assessment should recognize the important and distinct contribution of permitted four-season mountain resorts to the Bridger-Teton. The world-class recreation opportunities provided at JHMR and other developed recreation sites on the Bridger-Teton support the Forest's distinct role in and contribution to the National Forest System, and they play a critical role in recreation management on the Forest. The Final Assessment should recognize this.

JHMR requests that the Final Assessment specifically identify developed recreation, including recreation at permitted four-season mountain resorts, as one of the Bridger-Teton's distinctive roles and contributions.

2. The Forest Service should adopt a mountain resort specific land management designation that applies to the lands included in the JHMR special use permit area, and to lands identified for inclusion in the permit area in JHMR's accepted Master Development Plan.

The lands at JHMR have been managed for developed recreation as a mountain resort for sixty years. Snow King has operated on the Bridger-Teton since 1936 and White Pine since 1940. As explained in Section 1, JHMR and the other permitted mountain resorts on the Bridger-Teton host the vast majority of winter recreation visitor-days and a growing percentage of summer recreation visitor-days to the Bridger-Teton each year. And they do so on limited acreage under managed conditions that minimize impacts to the larger forest environment. *See* Supplemental Assessment at 31 (noting increased impacts of dispersed recreation). The Draft Assessment identifies that the total acreage of the Bridger-Teton managed as Special-Use Recreation Areas under the 1990 Forest Plan as only 0.2% of the Forest. *Id.* at 17. And only 0.1% of the Bridger-Teton is currently classified as concentrated development designed for high use (Recreation Opportunity Spectrum - ROS Urban), which includes JHMR, Snow King, and White Pine. *Id.* at 307.

The significant history and the unique and important contribution of permitted mountain resorts to the Bridger-Teton provides the context for the Bridger-Teton lands included within each resort's special use permit area, and subject to the accepted Master Development Plan (MDP).

Under the current Forest Plan, JHMR is subject to the planning direction under Desired Future Condition (DFC) 9B, Special Use Recreation Areas. The management emphasis for this designation “is on summer home groups, concession operations, ski areas, lodges, and group camps, and other privately operated sites on National Forest System lands and retention of selected sites for future opportunities.” 1990 BTNF Plan at 306. JHMR is also subject to the general Forest Plan goals 1.1(f) to “provide areas for alpine skiing and commercial ski and snowmobile operation” and 2.2(a) to “retain, improve, and add developed sites.” *Id.* at 140, 143.

The current Forest Plan direction has worked, and efforts by JHMR, in coordination and partnership with the Forest Service, have helped implement this direction. The Revised Forest Plan, however, should more specifically recognize the unique management goals, objectives, and conditions of the three developed mountain resorts on the Bridger-Teton, including JHMR, and adopt a mountain resort specific management designation that applies to these areas.

The 2002 Forest Plan for the White River National Forest (WRNF) provides a good example.<sup>1</sup> The WRNF Plan allocates ski areas to Management Area 8.25 (Ski Areas – Existing and Potential). The WRNF Plan describes that “[s]ki areas provide winter sports activities and other intensively managed outdoor recreation opportunities for large numbers of national and international visitors in highly developed settings.” 2002 WRNF Plan at 3-80. The 2002 WRNF Plan identifies desired conditions and standards and guidelines that are specific to the development and operation of facilities, trails, and infrastructure in areas being managed as mountain resorts to provide developed four-season recreation. *E.g., Id.* at 3-80 (“Recreational uses are intensively managed during the summer and winter seasons. Appropriate facilities are those that are directly related to the operation and support of skiing activities.”). The Bridger-Teton Forest Plan should follow the approach established in the 2002 WRNF Plan.

A developed mountain resort is a unique land use within the landscape that merits an individual land management allocation in the Forest Plan. A mountain resort, unlike other Bridger-Teton lands, is subject to four-season operation as a developed recreation site with unique goals, objectives, conditions, and management requirements. People, activity, infrastructure, and uses occur within the permitted area that do not occur on other Forest lands outside the permit area. Hundreds of thousands of annual recreation visits occur on the proportionally limited amount of permitted lands at JHMR under managed conditions that uphold the environment.

Stemming from the recreational value, permitted mountain resorts like JHMR contribute significantly to the social and economic integrity of the surrounding communities. As recognized in the Draft Assessment, recreation activity generates the most jobs (56%) and is the largest economic driver with 81% of special use receipts from the Forest. Supplemental Assessment

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<sup>1</sup> Available at <https://www.fs.usda.gov/r02/whiteriver/planning/forest-plan/white-river-national-forest-plan>.

Information at 208 and 296. These resorts generate substantial employment opportunities, both directly through resort operations and indirectly through lodging, dining, retail, and other services. They also stimulate local economies by attracting national and international visitors, thereby supporting community resilience. Recognizing these contributions within a dedicated land management designation ensures the Forest Plan reflects the full scope of benefits provided by mountain resorts.

The Forest Service has consistently recognized the unique role and important partnership provided by permitted ski areas.<sup>2</sup> Mountain resorts are not simply another form of recreation available on the Bridger-Teton. They are a unique and important form with significant contributions to the social and economic vitality of the community, and as such they warrant different planning and management direction.

The Bridger-Teton should identify and adopt a mountain resort specific land management designation given the specific and unique uses that occur at these areas. This will allow the Bridger-Teton to further adopt standards and guidelines specific to the land management designation. Doing so is good policy, and in the public interest, because it allows the Bridger-Teton to be intentional about how, exactly, mountain resort uses will occur. It allows the Bridger-Teton to identify and adopt a Forest Plan land management designation specific to mountain resorts, and associated goals, objectives, desired conditions, and standards and guidelines, all of which allows the agency to identify the controlled and managed conditions that allow mountain resorts to deliver outstanding public recreation on a relatively small amount of land.

These are some of the policy reasons that tip sharply in favor of adopting mountain resort specific Forest Plan provisions (a land management designation and accompanying goals, objectives, standards, and guidelines). JHMR accordingly requests that the Revised Forest Plan adopt a mountain resort specific management designation that applies to the lands included in the JHMR special use permit area, and to lands identified for inclusion in the permit area in JHMR's accepted MDP.<sup>3</sup>

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<sup>2</sup> See, e.g., Vicki Christiansen, Forest Service Chief. Remarks at National Ski Area Association/Forest Service Summit Lake Tahoe, CA (Jan. 14, 2020), *available at* <https://www.fs.usda.gov/speeches/ski-areas-strengthening-our-partnership>.

<sup>3</sup> This request includes the approximately 620 acres of terrain, contiguous to JHMR's southern boundary, that has been identified for inclusion in the permit area in JHMR's accepted MDP since 2004. This terrain is managed under the current Forest Plan as DFC 9B, Special Use Areas. JHMR requests that this terrain, and all terrain within its accepted MDP, be included within a mountain resort specific management designation in the Revised Forest Plan. The fact that the area is also designated as an Inventoried Roadless Area (IRA) under the 2001 Roadless Rule should not prevent the area from being managed for mountain resort use under the Forest Plan. Ski area development and management is allowed within an IRA under the 2001 Roadless Rule. See 66 Fed. Reg. 3244, 3258 (Jan. 12, 2001).

3. The Forest Service should avoid adopting standards or guidelines that create incompatible management overlays for the mountain resort lands included in the JHMR special use permit area and accepted MDP.

The Revised Forest Plan should reflect the important and unique role of JHMR and the other permitted mountain resorts on the Bridger-Teton through the adoption of a mountain resort specific management designation. Further, the Bridger-Teton should also avoid adopting standards or guidelines that create incompatible management overlays for mountain resort lands.

In a recent project-level decision, the Bridger-Teton acknowledged that over the last sixty years the infrastructure development for alpine skiing and diverse, all-season outdoor recreation at JHMR “define[s] the context of the permit area.”<sup>4</sup> The statement appropriately acknowledges that management decisions at JHMR and the other developed mountain resorts on the Forest do not happen on a blank slate. Nonetheless, in that same decision, the Forest Service was required to respond to objections and reconcile whether the proposed projects were consistent with three Forest-wide standards for watershed management that are not compatible with development within the boundaries of an existing, developed mountain resort. *See* 2023 FONSI at 14-16 (addressing consistency with the Recreation Riparian Area Standard, Natural Drainage Channel Standard, and Streambank Vegetation Standard under the 1990 Forest Plan). The current Forest Plan standard for Old Growth has similarly caused confusion and delay in past environmental reviews at JHMR. The Draft Assessment acknowledges the need for this standard to be revised. Supplemental Assessment at 223. In doing so, JHMR requests that the Bridger-Teton consider the feasibility and desirability of applying this and other standards and guidelines to mountain resorts.

The above Forest-wide standards provide examples of the issues that can arise from the adoption of standards and guidelines that create incompatible management overlays on permitted lands in mountain resorts. The Revised Forest Plan should avoid and not invite this type of potential management conflict.

JHMR requests that the Revised Forest Plan reflect the important and unique role of JHMR and the other permitted mountain resorts on the Bridger-Teton, and the history of development and operation that defines the context for these lands and avoid adopting standards or guidelines that create incompatible management overlays for mountain resort lands.

4. JHMR looks forward to its continued partnership with the Forest Service in facilitating data collection and analysis to help the development of species-protective, feasible, and implementable design criteria, guidelines, and survey protocols for SCC.

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<sup>4</sup> Decision Notice and FONSI, JHMR Recreation Enhancement Projects – 2023, at 13 (“2023 FONSI”), available at <https://www.fs.usda.gov/r04/bridger-teton/projects/64355>.

The list of potential Species of Conservation Concern (SCC) includes high-alpine plants and terrestrial species, including the Black Rosy Finch, that occur in alpine habitats and have been observed at JHMR. JHMR's existing infrastructure provides ready access to these alpine areas and has enabled a cooperative partnership between the Forest Service and JHMR to support survey work, data gathering, and analysis of these species. JHMR looks forward to its continued partnership with the Forest Service in facilitating data collection and analysis and to coordinating with the Forest Service on reasonable, species-protective, feasible, and implementable design criteria, guidelines, and survey protocols for the final SCC included in the Forest Plan.

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JHMR appreciates the significant effort of the Planning Team in preparing the Draft Assessment. It is thoughtful and comprehensive and will help support the Forest Plan revision process. JHMR submits these comments with the goal of supporting its partnership with the Forest Service and respectfully requests that the Forest Service take its comments under consideration in development of the Final Assessment and the Bridger-Teton Forest Plan. JHMR looks forward to participating in the next steps of the Forest Plan revision process.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'JJ Markman', written over a horizontal line.

JJ Markman  
Jackson Hole Mountain Resort  
Director of Resort Development

cc: Doug Pierini, Jackson Hole Mountain Resort