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First name: Dave
Last name: Sollitt
Organization: Jackson Hole Conservation Alliance
Title: Executive Director
Comments:
JACKSON HOLE CONSERVATION ALLIANCE
P.O. Box 2728
Jackson, Wyo. 83001
(307) 733-9417
www.jhalliance.org

July 28, 2023

To Whom It May Concern:

RE: Jackson Hole Mountain Resort Recreation Enhancements Project - 2023 #64355

This letter will provide public comment related to the above mentioned proposal of the Jackson Hole Mountain Resort (JHMR).

These comments reflect the position of the Jackson Hole Conservation Alliance, a 501c3 conservation organization in Jackson, WY.

The Alliance recognizes the JHMR's desire to improve the skiing experience at the resort. We support that goal, but have concerns about the cutting of whitebark pine, a federally listed threatened species under the endangered species act, and other valuable tree species in these projects. We also have concerns about the amount of disturbed ground and increased human recreation created by these projects and the impact to wildlife habitat, permeability, connectivity, and opportunity for invasive species that this creates.

These projects, combined, create over 70 acres of disturbance - almost entirely with heavy equipment such as excavators, dozers, pneumatic rock drills, spider hoes, tracked drills, trail dozers, fellers, masticators, tacked bobcats, and rock blasting equipment. Over half of these acres (37.19 acres) will be new disturbance on the ground. We have concerns about the loss of habitat, connectivity, permeability, and the opportunity for invasive species that could be created by this development.

One project in particular that we oppose is the proposal to fill in a wetland in order to widen Werner Trail. Wetlands are incredibly valuable habitat features for wildlife, supporting an array of biological diversity. We oppose filling wetlands in order to widen a ski run.

We also have particular concerns with development, disturbance, or increased recreation that may negatively impact the imperiled whitebark pine population in the Tetons. These trees live to be thousands of years old, provide critical food sources for grizzlies - whose range has expanded south into new habitat, including JHMR geography - and other wildlife, and are currently being decimated by pine beetles and the invasive white pine blister rust. This species was listed as Threatened through the Endangered Species Act in 2022. The habitat for whitebark pine is often on cliffs, rocks, or other inhospitable sites where they have less competition from other trees. These are the same sites that might be favored by a via ferrata climb at the resort - setting up a conflict between recreation and whitebark pines.

The Alliance has significant concerns about increased development and human activity in some of the last best

remaining habitat for whitebark pine in the Tetons. No direct or indirect adverse impacts to whitebark pines should result from any of these resort projects.

We also have concerns about invasive species proliferation after these disturbances. Very little information is given about how sites will be rehabilitated, and the Alliance wants to ensure that multi-year invasive species monitoring and treatment are a part of any restoration plan on disturbed ground.

Overall, the Alliance is concerned about adverse impacts to the wildlife habitat, connectivity, and permeability in the USFS land within the resort boundary as well as those lands in adjacent areas accessible to recreators at the JHMR.

Those concerns include:

Disruption or destruction of whitebark pine growing areas anywhere these projects are planned; either through changes to the terrain through grading, forest thinning, or other processes that would impact whitebark pine growth or regeneration in any way.

Any level of grading, roads, fencing/barriers, or other adjustments to the terrain that would impact wildlife permeability within the resort or at the boundaries of the resort leading to USFS lands outside the resort.

Disruption of sensitive wildlife habitat either through direct development activities or indirectly through increased human recreation presence or noise.

Recreational activities and facilities which would disrupt wildlife and/or cause a loss of habitat, especially concerning the Teton bighorn sheep herd.

Additional events (e.g. concerts) that might result from this infrastructure improvement that would adversely impact important wildlife habitat through noise and increased human activity.

We would oppose any elements of the plan creating the above-mentioned impacts and would request denial or mitigation of any project that generated these impacts.

Sincerely,

David Sollitt
Executive Director

Kevin Krasnow, PhD
Conservation Director