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Title:
Comments: I would like to file an objection to (36 CFR 218.8(d)): Jackson Hole Mountain Resort Recreation Enhancements Project - 2023 - #64355.

As a concerned citizen, not an expert, this project is difficult to analyze without extensive time for review. I also know there are limitations in commenting at this stage of the process. I found the maps hard to follow, especially the impact areas, and the names of the locations (not being a skier) are mostly new to me. Therefore, I provide what comments I can regarding the following:
*The loss of 400 "threatened" Whitebark pines.
*Cumulative impacts on the vegetation - including species may be locally or regionally rare.
*Proposal of what appears to be a new trail from the top of Rendezvous down to Rock Springs Loop jct with the main access road - again illegible maps.

Objection to the loss of listed "Threatened" plant species: Whitebark Pine Pinus albicaulis - The potential loss of up to 400 trees is unnecessary and can cause long-term if not irreversible impacts on the population. The Cirrus Consulting report states that the proposed project has a "likely an adverse effect." This is despite earlier comments in the 2017 report on what the JHMR is doing to support the genetically important individual trees and the reduction of pine bark beetles.

In my research of the species, impacts can include reduction of its mutualistic species: Clark's Nutcracker; the loss of genetic diversity essential to the resistance to the white pine blister rust and mountain bark beetles that are currently devastating the population; protection of the watershed by both living and dead trees at high elevations; and loss of small potentially disease resistant seedlings that take over 60 years to provide a viable seed crop to feed future Nutcrackers, grizzly and black bears, red squirrels, and other wildlife. The proposed amenities of skiing, snowboarding, walking, biking, and scenic viewpoints should not alter the critical population of these trees. The Forest Service should be protecting the trees. JHMR says they are trying to enhance visitation in the summer-they are proposing mostly mountain bike trails and climb route….not the appreciation of the biodiversity of the area.

Furthermore, I want to address past and future cumulative impacts upon the natural flora. The 2017 JHMR Environmental Assessment states under 1.7.1 that four Forest Service Region 4 species; 8 Wyoming Species of Special Concern, and 2 BTNF MIS would be affected. There have been some talented botanists who have worked in the area (Delmatier reports 2014, 2016, 2017); however, it is unclear if Delmatier's "review" of the BA of 2023 assessment included a site visits. Much has occurred on the top of Rendezvous Mountain in the past 7 years.

As a botanist, I have been taking the tram to the summit of Rendezvous Mountain over the last 13 years, often hiking down along the upper access road, around the Rock Springs Loop, and investigating the Cody Bowl. I have also hiked down the road and side trail to the Cirque trail to the Bridger Gondola. Often, I lead botany trips for Teton Plants, a chapter of the Wyoming Native Plant Society. I have over the years compiled a list of species, relative frequency, and photos of many of the plants.

Over this time, I have noticed a distinct loss of the native flora due to trampling, road widening and grading, and to the new platforms for scenic viewing, as well trenching for utilities. Much more is proposed. These disturbances not only diminish populations of locally rare species, but also reduce the visitor experience of enjoying the multitude of colorful, unusual-if not rare--flowers along the access road and hiking trails. The past and proposed work-around Corbet's Cabin and vicinity for example--makes scars upon the slopes that are not

easily repaired due to the high elevation, slopes, and soils. The native subalpine and alpine plants are tricky to germinate and slow to grow.
Many visitors and locals alike take the tram to the summit as they could not otherwise have access to such a high elevation habitat. They are often very curious when they see me looking at and taking photos of the plants and ask questions, often exclaiming how beautiful the flowers are. Other visitors are oblivious and just trample over the diminutive plants on shortcuts. They don't know that many of the mat-forming alpine plants take decades to produce plants only a few inches across. The JHMR has not provided sufficient stewardship of these resources through education, signage, or well designed and maintained trail routes. The proposed construction just adds to the eyesores being displayed on the mountain side.

The Forest Service should require much more diligence by the JHMR to protect this botanical natural resource, which in turn provides sustenance to small mammals - pocket gophers, marmots, pika; pollinators-many bees and butterflies; birds - including Clark's nutcrackers and rosy finches. All of these critters provide enjoyment to the visitor.

If not done in the past year or two, a full botanical inventory of proposed project areas needs to be conducted regularly (every 10 days) over the course of at least two years before the work begins. Some species have been highlighted in the 2017 report and apparently there is a floristic report every other year; however, regular visits are essential to observe many of the rarer plants listed, as well as changes in the variety and density of more common species over time.

Ideally, a seasoned botanist would conduct targeted searches every 10 days from snow off to first frost. Many of the milkvetches (Astragalus ssp.) and brassicas/mustards (Lesquerellas, Physaris, Draba, etc) are difficult to find and identify to species and subspecies, not to mention sedges (Carex sp.). They are easy to overlook and don't necessary bloom each year or produce the fruits necessary for precise ID. There are other unusual and beautiful plants I haven't seen elsewhere: primroses (Primula parryii) and Ligularia amplectans around Cody Bowl, not to mention the extremely slow growing Moss Campions. I have only seen Angelica rosea along the Cirque trail next to a rare stand of Physaria didymocarpa. All this is to say that there may well be more rare species that have been overlooked to-date.

Furthermore, opportunities for the average hiker/visitor to see unusual and beautiful alpine and subalpine plants are diminishing. A visitor doesn't need to know the name of all these plants to enjoy them.

The vegetative management proposal is insufficient. The Cirrus Report discusses the minimization of soil disturbance and the use incorporating chipped slash back into the soils. However, many of the higher elevation (>9,000') sites do not rehabilitate/restore easily. Genetically adapted seed of these small alpine/subalpine plants is not easy to collect, especially in sufficient quantity; germination requirements vary greatly-such plant seed is often lucky to germinate, especially if soils are greatly altered-adding slash and such may be the wrong approach. Many of these plants are especially adapted to rocky limestone soils. And these plants are naturally slow to grow. As noted in the 2017 report, non-native species are often used for erosion control. Invasive species often overwhelm the slow growing native vegetation in disturbed sites.

At lower elevations of the mountain, proposed wetland reconfigurations and restoration is also extremely problematic. Hydrology is key along with soils. Germination and coverage by mountain species are slow. Using other non-native cover crops to avoid erosion complicates native plant restoration. It is best not to disturb such areas at all. The JHMR should reduce its proposed new trail construction and other infrastructure impacts. Let the mountain continue to be a challenge for skiers-a market of distinction.

These are just a few comments based on an overview of the documents provided by the USFS. In summary:
1.The work proposed will leave scars upon the landscape potentially for years.
2.The loss of potentially 400 whitebark pines for the sake of recreational amenities is unacceptable

3.Restoration of alpine/subalpine vegetation, as well as wetlands, is not at all easy and subject to failure.
4.Already there are notable cumulative impacts on wildflowers from increased visitation due to lack of guidance and control by JHMR. They're displays are shrinking
5.Populations of regionally rare species are threatened by direct loss due to lack of surveys and increased projects without supervision.
6.The JHMR and USFS needs to consider visitors' nature experience of this readily accessible recreation area.

Thank you for considering these comments.