

3B. RECREATION

SCOPE OF ANALYSIS

The study area for this recreation analysis incorporates areas currently receiving non-guided and guided backcountry skiing in the Jackson area. The analysis is primarily focused on the areas of NFS lands currently permitted to JHMR for guided backcountry operations (i.e., the Rock Springs-Jensen Canyon, Teton Pass, and Phillips Canyon/Ski Lake areas). Issues related to the backcountry experience, including safety, are addressed as they relate to the overall quality of the recreational experience afforded to all individuals utilizing the backcountry.

EXISTING CONDITIONS

Existing Backcountry Guiding Services on the BTNF

National Forest policy and individual forest land and resource management plans provide direction regarding outfitter and guide operations on NFS lands. National direction recognizes outfitter guides as valuable recreation service providers who help the agency meet its public service mission by providing services that the Forest Service otherwise could not. While outfitting and guiding contributes a small fraction of the total visitor days experienced across the United States on NFS lands, the services provided are important to visitors and the Forest Service, nonetheless.

There are currently 12 backcountry guide services operating on the Jackson Ranger District, each permitted under separate, although in some cases physically overlapping, OG SUPs. Each of these backcountry guiding services operates in the Teton Pass area, which includes portions of the Black Canyon, Triple Direct, Phillips Ridge, and Phillips Canyon and Ski Lakes areas. Only two of the backcountry guide services – JHMR and the American Avalanche Institute (AAI) – operate in the Rock Springs-Jensen Canyon area in addition to the Teton Pass area. In total, the Jackson Ranger District has authorized the 12 guide services 6,041 service days within their respective permit areas within the study area.

Brief descriptions of the some other outfitter and guide operations permitted to utilize Teton Pass and the Rock Springs-Jensen Canyon area are provided below.¹ These descriptions are provided in order to identify similarities and differences among the commercial outfitter and guides that operate on overlapping terrain on the Teton Range.

The 12 outfitter and guide services that are permitted to operate on the Jackson Ranger District offer services which include a variety of outdoor recreation activities.

¹ This list is not exhaustive.

National Outdoor Leadership School (NOLS)

NOLS provides a wide range of educational courses for outdoor recreational activities on the BTNF and CTNF, specifically the Teton Pass area. NOLS offers two backcountry skiing programs: 17 years of age and over (14 day course) and 25 years of age and over (12 day course). Also, NOLS offers a backcountry snowboarding experience, which is a 14 day course.

Exum Mountain Guides

Exum Mountain Guides works in association with JHMR and Rendezvous to offer group and private avalanche training, Alpine and Nordic tours, and ski/snowboard descents in the Teton Range. The private backcountry ski tours travel through Mail Cabin Creek, Mount Oliver and the Teton east-side canyon. Avalanche training through Exum is offered, depending on the level and duration of training sought. Prices are dependent upon the type of activity, group size and skills possessed.

Prescott College

Prescott College offers an Adventure Education course, which is part of the Resident Degree Program where courses utilize public lands managed by the Forest Service and Bureau of Land Management. A backcountry skiing course is offered as part of a regular college semester. This adventure course instructs students on outdoor recreation activities and wildlife.

Rendezvous Backcountry Tours

Rendezvous Backcountry Tours offers winter and summer recreation activities, including hiking, backpacking experiences, hut tours, skiing day trips, and winter camping for Alpine touring, telemark skiing, snowboarding, and cross-country skiing.

Hole Hiking Experience

Hole Hiking Experience provides an educational experience on the CTNF and BTNF involving snowshoeing and cross-country skiing with a biologist guide. Clients follow animal tracks and examine different aspects of winter ecology.

Yostmark Backcountry Tours

Yostmark Backcountry Tours offers backcountry skiing, as well as safety and avalanche tours in the Grand Targhee, Teton Pass, and Teton Valley areas. Prices for backcountry skiing tours and avalanche training on Teton Pass depend upon the level of training and length of the course.

Jackson Hole Ski Club

Jackson Hole Ski Club's primary goal is assisting junior skiers in pursuing training and competition opportunities in Alpine, Nordic and snowboarding activities.

Jackson Hole Mountain Guides

Jackson Hole Mountain Guides (JHMG) snow school emphasizes the fundamentals of safe winter travel in steep Alpine terrain. Clients learn how to ascend and descend snow with and without crampons, how to self arrest, and various techniques for building anchors and placing protection in snow. Courses are designed as prerequisites for those who lack equivalent experience and desire to climb many of the early season snow and ice routes in the Tetons. JHMG offers a full line of avalanche safety classes from introductory classes for backcountry skiers, to professional level instruction for guides, ski area professionals and outdoor educators.

American Avalanche Institute

AAI provides three levels of avalanche training courses. The Level I avalanche course presents basic information regarding weather, snowpack, and terrain, which contribute to avalanche hazard. The Level II, three-day avalanche course goes into more detail recording snowpit data. To complete the course, this data is used with storm data to compile a hazard forecast for a particular avalanche path. The Level III five-day mountain guides avalanche course emphasizes field work in the Tetons and is designed for guides working toward American Mountain Guides Association certification.

Table 3B-1 details commercial outfitter and guide operations on the Jackson Ranger District by annual service days and actual days used. As indicated in Table 3B-1, of the 12 outfitter and guide operations, only two – JHMR and AAI – have consistently utilized or exceeded² their permitted annual service days.

² Exceedances were authorized by the Jackson Ranger District on a case-by-case basis.

**Table 3B-1
Permitted Commercial Backcountry Skiing on the Jackson Ranger District**

Permittee	Authorized Annual Service Days	Annual Service Days Used in Permitted Areas				
		1999	2000	2001	2002	2003
NOLS CTNF	300	96	nr	nr	536	nr
NOLS BTNF	234	~19	~23	~58	24	41
Exum ^a	100	0	0	0	41	20
Prescott College	100	20	0	0	10	50
Powderhounds ^b	2,000	0	24	54	62	74
Hole Hiking Exp. CTNF	50	10	24	22	23	30
Hole Hiking Exp. BTNF	300	92	63	106	284	62
Yostmark	100	19	21	55	84	57
JH Ski Club	2,082 ^c	1,773	1,368	2,594	2,594	nr
JHMR	300 ^d	113	624 ^e	818 ^e	300	600 ^e
JH Mtn. Guides	75	nr	nr	nr	45	nr
AAI	400	423	395	581	388	329
Total	6,041	2,565	2,542	4,288	4,391	1,263

Source: Jackson Ranger District

nr = not reported

^a Exum purchased Sun Dog Tours in 2000; therefore, prior to 2000, service days shown were operated by Sun Dog Tours

^b Powderhounds purchased Rendezvous in 2001; therefore, prior to 2001, service days shown were operated by Rendezvous

^c JH Ski Club is authorized an unlimited number of service days at Teton Pass; although, 2,082 service days represents an average of service days used in 1999-2002

^d Up to 50 of these days may be used at Teton Pass

^e Indicates seasons in which authorized annual service days were exceeded with permission.

Between 1999 and 2003, actual use of authorized annual service days among the 12 outfitter and guide operations averaged 3,010, representing approximately 50 percent of the total 6,041 allocated. Of its authorized 300 annual service days, JHMR averaged 491 between 1999 and 2003 – a utilization rate of 164 percent. While JHMR’s *authorized* contribution to the combined annual service days among the 12 outfitter and guides is five percent (300 of 6,041), JHMR’s *actual percent use* for the same period averaged 16 percent (491 of 3,010). Discounting JHMR’s contribution to permitted and utilized annual service days on the Jackson Ranger District, the remaining 11 outfitter and guides averaged a 44 percent utilization rate between 1999 and 2003 (2,519 of 5,741).

Operated as a portion of their ski school, the JHMR guided backcountry service typically hosts groups ranging from six-to-eight clients per group. Fourteen backcountry guides are currently employed by JHMR, offering clients four different backcountry programs, ranging from half- to full-day trips, including a “Backcountry Experience” group instruction class. Each guest is required to carry an avalanche transceiver, shovel, probe pole and backpack. Instruction (commiserate with previous experience) is provided on how to utilize the different pieces of safety equipment. A guided trip in either the Rock Springs-Jensen Canyon or Teton Pass area typically involves descending one or multiple

drainages with different amounts of hiking (depending on conditions, the physical preparedness and desires of the guests) across slopes and along ridges to access specific areas.

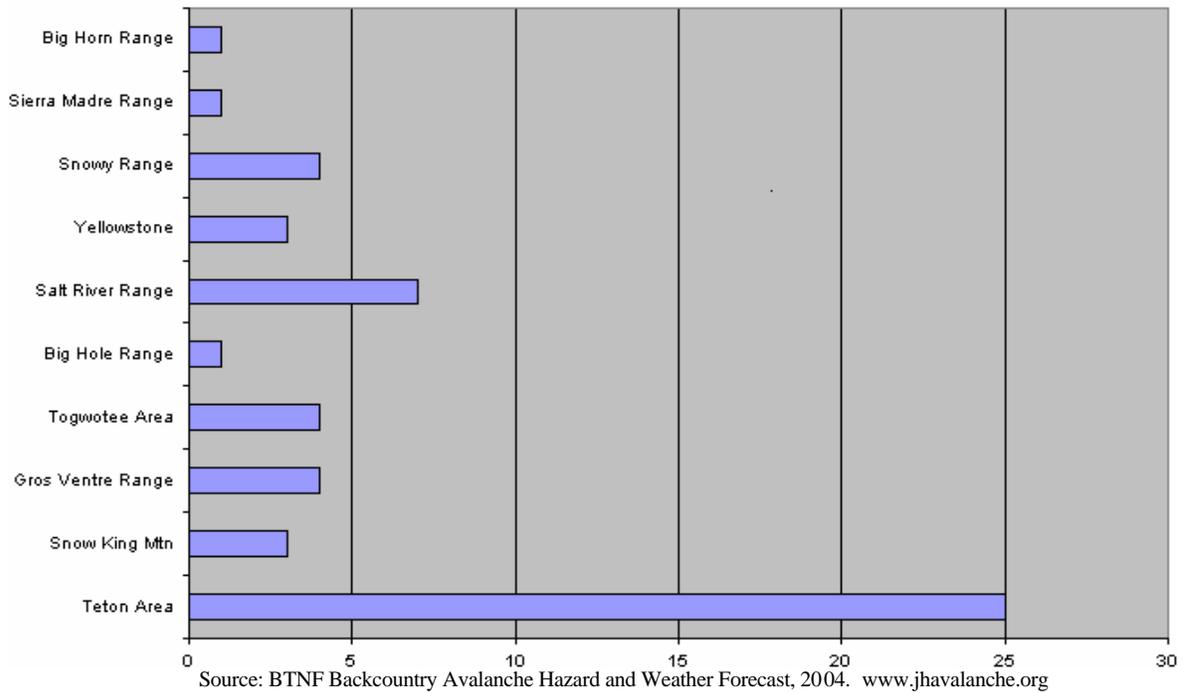
Safety in the Backcountry

Backcountry skiing is gaining popularity across the country as ski areas become more crowded, lift ticket/season pass prices increase, and technological advances in equipment make it easier and more affordable for the general population to participate. Backcountry skiing is enormously popular in the Jackson area. The expansive, diverse collection of off-piste terrain, particularly on Teton Pass, is renown to backcountry enthusiasts nationwide. However, the inherent potential for danger (e.g., avalanche, injury, route finding, weather, etc.) continually challenges backcountry skiers of all ability levels to come away with a safe and pleasurable experience. The risks that one assumes when entering any backcountry situation are very real. Help can be hours or sometime days away, and self-evacuation in the event of an emergency is often the only option when time is of the essence. With these factors in mind, personal experience, good decision making skills and trust in one's companions are essential components in being prepared for unpredictable snow conditions, terrain, changing weather, physical demands, and unforeseen circumstances in the backcountry. The backcountry is most appropriately utilized by those with the proper skills, judgment and equipment. The very qualities of the backcountry that distinguish it from developed skiing (e.g., solitude, snow conditions, the chance to "earn your turns," etc.), naturally attract people of all ability levels – including those who lack the proper skill and equipment.

As portrayed in the following charts, those who enter the backcountry assume very real risks – only a portion of which can be controlled/minimized with skills and equipment. Avalanche dangers are always a looming threat. Chart 3B-1 illustrates avalanche fatalities in various portions of Wyoming between 1911 and 2003. It is clear that avalanches are a legitimate issue of concern in the Teton area, as evidenced by the sheer number of historic fatalities compared to the remainder of the state.³

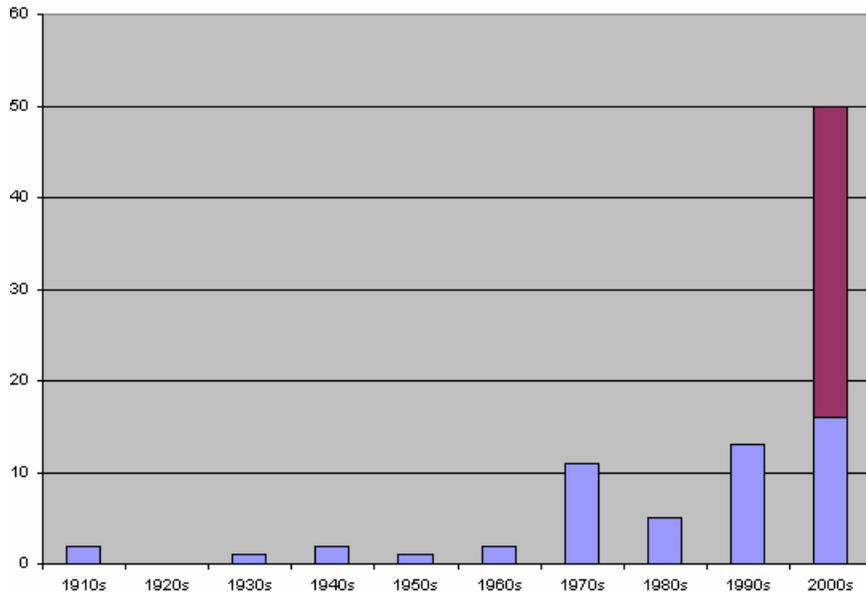
³ It is assumed that the Teton area has had a higher number of avalanche fatalities due to higher levels of backcountry skiing as compared to other areas in Wyoming.

**Chart 3B-1
Wyoming Avalanche Fatalities by Area
1911 Through 2003**



As indicated in Chart 3B-2, avalanche fatalities in Wyoming have steadily increased over the past century, presumably as backcountry use has increased, and are projected to rise as backcountry skiing continues to gain popularity.

**Chart 3B-2
Wyoming Avalanche Fatalities by Decade**



Source: BTNF Backcountry Avalanche Hazard and Weather Forecast, 2004. www.jhavalanche.org
 Blue = Actual
 Red = Projected

Teton County Search and Rescue (TCSAR) is a non-profit organization providing search and rescue services, free of charge, to anyone in need. An incident⁴ summary, specific to skiing and snowboarding in Teton County is provided in Table 3B-2.

**Table 3B-2
Teton County Search and Rescue
Backcountry Skiing and Snowboarding Incident Summary**

	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	Total	Avg/Yr
Skier	1	0	0	3	3	0	2	6	4	5	24	2.4
Snowboarder	0	1	1	0	0	0	2	3	0	2	9	0.9

Source: Teton County Search and Rescue, 2003.

While non-guided backcountry use far exceeds guided use in the Jackson area, the 12 backcountry guide services currently in operation offer an option for those who lack backcountry skills and/or are unfamiliar with local topography. As noted, prior to venturing into the backcountry, JHMR guides brief guests about their upcoming excursion. This includes discussions regarding gear, terrain, tour organization, transceiver use, backcountry etiquette and emergency procedures. Route selection is based on daily avalanche ratings, continual snowpack stability evaluations, and judgment based on group dynamics. Clothing is always a consideration and guides make determinations on routes based on each client's gear. At a minimum, gear carried by

⁴ An incident is defined as a full team callout.

guides includes: transceiver, shovel, probe and probe poles, snow study kit, first aid kit, two-way communication radio, space bag or tarp and extra food and clothing.

Avalanche safety and rescue is of utmost importance. While it is not possible to eliminate all forms of risk in the backcountry, guides are well trained in how to minimize avalanche dangers and what to do if caught in an avalanche. Rescue procedures have been established, which includes notifying the JHMR Ski Patrol.

Although it is not the ski area's direct responsibility, JHMR Ski Patrol responds to 95 percent of injuries reported in the Rock Springs-Jensen Canyon area. In the 2003/2004 season, the Ski Patrol responded to 18 backcountry injuries (none of these were related to JHMR guided backcountry clients). Injuries ranged from minor abrasions/lacerations, to broken bones and knee injuries. The Ski Patrol maintains a sled and other emergency gear on the ridge between Green River and Rock Springs to aid in emergency response. No search and rescue operations requiring TCSAR involvement were conducted in the Rock Springs-Jensen Canyon area during the 2003/2004 winter season.

Jackson Hole Mountain Resort Backcountry Guiding

JHMR's backcountry guiding program primarily caters to lift-served Alpine skiers seeking an alternative experience for a portion (usually one day) of their time spent in the Jackson area. Guests attracted to the JHMR guiding services are typically individuals who are not familiar with the surrounding terrain, are relatively inexperienced in safe backcountry travel, and/or do not possess the proper equipment. This clientele tends to be mutually exclusive of the guest seeking a more traditional backcountry experience requiring climbing/hiking who patronize the other outfitter guides permitted in the Jackson area.

Rock Springs-Jensen Canyon Area

As detailed within the Land and Resource Management Plan of the BTNF, the entire Rock Springs-Jensen Canyon area is managed for non-motorized recreation in order to provide a "quiet, almost primitive" recreation experience.⁵ As noted in Chapter 1, during the 1999/2000 season, the Jackson Ranger District authorized an open-boundary policy for the JHMR operational boundary. This allows the general skiing public access to the adjacent backcountry via a series of designated access points located along the ski area's operational boundary (refer to figures 1-2 and 2-1).

⁵ USDA Forest Service, 1990. Map for Alternative F – Selected Alternative

Photo 3B-1
Lower Rock Springs Access Point



Source: USDA Forest Service - Jackson Ranger District

The Lower Rock Springs access point is depicted above. At each of JHMR's three access points along the Rock Springs area, guests are confronted with four pieces of information:

1. An updated daily avalanche rating (Low through Extreme).
2. A BTNF Backcountry Avalanche Report.
3. A cautionary statement indicating that the guest is leaving the Jackson Hole Mountain Resort Ski Area boundary and that "This is your decision point."
4. A warning declaring "When you pass beyond this ski area boundary you are leaving the area of ski patrol services including avalanche hazard reduction measures and trail grooming. You are entering a high risk area which has many hazards including, but not limited to, avalanches, cliffs and hidden obstacles. You are at risk from these natural hazards. You are responsible for your decisions and actions, your own rescue and the cost of your rescue, and you waive all claims for your injury. Your lift ticket further defines your responsibilities."

At each access point, each skier must physically open, and pass through, a gate to access the backcountry.

Prior to the open-boundary policy, JHMR guides were only authorized to conduct guided backcountry trips when the avalanche danger was rated “Low” for the Teton Range. Once the open-boundary policy was instituted, it was apparent that there was a substantial latent demand for both guided and non-guided backcountry skiing in the Rock Springs-Jensen Canyon area.

Since the 1999/2000 season, JHMR has requested, and received (with the exception of 2002), permission to conduct additional service days beyond the 300 specified in the OG SUP (refer to Table 3B-1). JHMR averaged 491 annual service days between the 1998/99 and 2002/03 seasons; only a small fraction of these days occurred in the Teton Pass area. The highest use over the past five seasons was 818 service days (273 percent of their authorized 300) which occurred during the 2000/01 season.

Non-guided annual utilization of the Rock Springs-Jensen Canyon area is difficult to ascertain. Reliable, accurate forms of monitoring movement through each of the access points, including infrared counters and sign-in sheets, have been attempted by JHMR and the Forest Service with varying results. However, monitoring during the 2002/03 season produced a complete and reliable data set. Utilization of the Rock Springs-Jensen Canyon area has historically been tracked only through use of the Upper and Lower Rock Springs access points. In the 2000, estimates⁶ of daily movement through the upper and lower access points were 16 and 98, respectively. In 2002/03, average daily movement through the upper and lower access points was 53 and 151, respectively. Seasonal use totals were calculated by multiplying the daily total averages by seven days per week, then by 16 weeks per season. Based on the above daily use estimates, in 2003, the total guided and non-guided visitation in the Rock Springs-Jensen Canyon areas was estimated at 22,848 backcountry skiers. It is acknowledged that this estimate is very conservative due to unreliable monitoring methods, and particularly since all use of the ‘Why Not’ access point has not been estimated or included in the total estimated use. For comparison purposes, the estimated non-guided use of the Rock Springs-Jensen Canyon area across a typical 16 week use season equates to an average of approximately 204 skiers per day.

JHMR and AAI are the only two guide groups operating in the Rock Springs-Jensen Canyon area. AAI utilizes this area to conduct avalanche safety training courses and is currently authorized to utilize 400 service days within the Rock Springs-Jensen Canyon area as compared to JHMR’s 300 service days. Table 3B-3 provides seasonal utilization of both the Rock Springs-Jensen Canyon area and Teton Pass by JHMR and AAI. Except for the 1995/96 and 2001/02 seasons, the Forest Service did not differentiate between permitted utilization at the Rock Springs-Jensen Canyon area and Teton Pass. However,

⁶ Backcountry access point data for 2000 was limited to March and April, whereas 2003 data was collected between January and April.

this table is valuable because it indicates what maximum utilization of the Rock Springs-Jensen Canyon area would be if all annual service days were used there, and underscores the effects of guided utilization of the Rock Springs-Jensen Canyon area. During 2003, JHMR's guided use accounted for approximately 2.6 percent of the estimated total annual use in the Rock Springs-Jensen Canyon area. As detailed in Table 3B-3, JHMR's actual utilization of their OG SUP has averaged 491 service days per season over the past five winters – accounting for the approved exceedances. Based on a 16 week use season, this equates to an average of approximately five guided guests per day.

**Table 3B-3
Actual Annual Service Days Utilized by JHMR and AAI**

	1994/95	1995/96	1996/97	1997/98	1998/99	1999/00	2000/01	2001/02	2002/03
JHMR	297	153 ^a	175	190	113	624	818	300 ^b	600
AAI	146	201	340	501	423	395	581	388	329
<i>Total</i>	<i>443</i>	<i>354</i>	<i>515</i>	<i>691</i>	<i>536</i>	<i>1,019</i>	<i>1,399</i>	<i>688</i>	<i>929</i>

Source: USDA Forest Service, 2004

^a Six days were utilized at Teton Pass.

^b 14 days were utilized at Teton Pass.

Teton Pass

As with the Rock Springs-Jensen Canyon area, an accurate portrait of historic utilization of Teton Pass for backcountry skiing is difficult to ascertain. Teton Pass utilization totals are based on vehicular data collected by the Forest Service between 1994 and 2003. Data includes vehicle counts from the Teton Pass, Old Pass Road, and Phillips/Ski Lake parking areas on an average seasonal basis (January through April).

Estimated annual utilization for the Teton Pass area is provided in Table 3B-4. This data is based on certain assumptions following vehicle counts at each parking area: weekly vehicle counts were calculated by multiplying the weekday average by five and the weekend average by two. The weekly total was then multiplied by 16 (the average number of weeks per season⁷). This total was then multiplied by the average parking lot turnover rate of two vehicles per day. This seasonal vehicle total was then multiplied by the average vehicle occupancy of 2.5 individuals per vehicle.

⁷ Average number of weeks per season was derived from Jackson Ranger District parking data collected from January to April, which was the longest data set in a given year.

**Table 3B-4
Teton Pass Area Estimated Annual Utilization**

	1994/95	1995/96	1996/97	1997/98	1998/99	1999/00	2000/01	2001/02	2002/03
Phillips/Ski Lake	1,736	3,640	1,680	1,736	2,408	1,288	2,296	2,464	1,904
Teton Pass	8,344	10,304	8,176	10,640	12,320	5,768	9,464	10,808	13,608
Old Pass Road	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3,024	2,128
Total	10,080	13,944	9,856	12,376	14,728	7,056	11,760	16,160	17,640

Source: Jackson Ranger District 10/11/03
N/A = Not available

Thus, estimated *average* annual utilization of Teton Pass between 1994/95 and 2002/03 is 12,622.⁸

The 12 backcountry guide services operating within the Teton Pass area combine for a total of 5,791⁹ *authorized* annual service days. JHMR's current OG SUP allows up to 50 service days on Teton Pass, which, if fully utilized, represents approximately 0.9 percent of *authorized* annual service days.

Historic data pertaining to JHMR's actual utilized service days does not consistently differentiate between service days used in the Rock Springs-Jensen Canyon area and those utilized on Teton Pass. Only two seasons of data were available which indicate that in 1995/96 and 2001/02, JHMR used approximately six and 14 of their allocated service days on Teton Pass respectively.

⁸ It is assumed that this includes outfitter and guides with the exception of JHMR, as JHMR uses a shuttle bus to transport its guests.

⁹ The total authorized annual service days listed in Table 3B-1 includes 300 service days authorized to JHMR. At Teton Pass, JHMR is authorized 50 service days; therefore, the total authorized service days for all OG services is 250 less than the total listed in Table 3B-1.

ENVIRONMENTAL CONSEQUENCES

Direct and Indirect Effects

Assumptions Common to all Alternatives

Two assumptions are common across all three alternatives:

- 1) Teton Pass and the Rock Springs-Jensen Canyon will experience increased utilization for backcountry skiing as interest in the sport heightens. This is due to population increases in Teton County, technological advances in equipment and greater interest in seeking alternative forms of winter recreation.
- 2) Existing and increased utilization rates of these areas will perpetuate existing backcountry safety issues, potentially increasing the occurrence of self-assisted evacuations and organized search and rescue responses.

Alternative 1 – No Action

Under the No Action Alternative, the OG SUP would not be renewed. Thus, 11 outfitter and guides would remain in operation on Teton Pass, with one – AAI – continuing to operate within the Rock Springs-Jensen Canyon area. Combined annual service days allocated to the remaining 11 outfitter and guide operations would total 5,741. Although JHMR has historically averaged the highest utilization rate of all 12 outfitter and guide backcountry skiing operations on the Jackson Ranger District, it has contributed only nominally to total annual use at Teton Pass and in the Rock Springs-Jensen Canyon area.

While selection of this alternative would remove some of the use from these heavily utilized areas, selection of Alternative 1 likely does not have potential to greatly affect (i.e., improve) the backcountry experience in these areas but could incrementally exacerbate safety issues. With an estimated annual contribution of only two percent of the total annual use in the Rock Springs-Jensen Canyon area, elimination of JHMR guiding activities in these areas would be negligible in terms of providing additional opportunities for solitude and adventure for other non-guided backcountry users.

Because JHMR's historical contribution to utilization of Teton Pass is so small, it is not considered likely that the elimination of JHMR guided use on Teton Pass would noticeably improve the experience for non-guided users of Teton Pass. However, some members of the backcountry skiing community may construe this to be a benefit to their recreational experience. It is conceivable that the remaining 11 outfitter guides would absorb a portion of JHMR's existing guided clientele thereby transferring guided use from the Rock Springs-Jensen Canyon area to Teton Pass as the remaining outfitter and guides seek to utilize a larger portion of their authorized service days.

Alternative 2 – The Proposed Action

The high demand for guided backcountry skiing offered by JHMR is apparent by examining JHMR's annual utilization of its permitted 300 service days over the past five seasons (refer to Table 3B-1). By increasing JHMR's authorized annual service days from 300 to 900, the Proposed Action responds to demonstrated demand for enhanced backcountry guiding services in the Jackson Hole area and addresses backcountry safety issues by increasing the opportunity for guided skiing experiences.

The Proposed Action would modify and decrease JHMR's OG SUP from 4,020 acres to 3,998 acres. Because the maximum 900 annual service days for the JHMR OG SUP are considered sufficient to meet current and future demand (during the five-year duration of the reissued OG SUP), the Forest Service would not consider requests for additional service days within the term of the new five-year OG SUP. While the Proposed Action will not solve the persistent problem of unskilled people entering the backcountry, JHMR's enhanced guiding services could help ameliorate the situation by providing additional, professional oversight for unprepared/unskilled skiers who might otherwise venture into the backcountry alone.

Rock Springs-Jensen Canyon

With the exception of increasing annual service days from 300 to 900, nothing about the Rock Springs-Jensen Canyon area is proposed to change – boundaries would remain as they currently are and access points would stay in their existing locations. As detailed in Table 3B-3, JHMR's actual utilization of their OG SUP has averaged 491 service days per season over the past five winters – accounting for the approved exceedances. While the maximum annual service days authorized under the new five-year OG SUP would increase from 300 to 900, the maximum use levels could be expected to increase by approximately 83 percent (from an average of 491 per season to 900).

This increase in annual service days available to JHMR would equate to an average increase in use of approximately three skiers per day (1.4 percent) throughout the 16 week season. Given this area's historically high utilization (approximately 22,848 for the 2002/03 season), this increase is considered inconsequential and is not likely to adversely affect the overall backcountry experience.

Teton Pass

A boundary modification is proposed for the Teton Pass portion of the OG SUP, but no change in annual service days is proposed. The portion of the existing OG SUP which lies to the west of Teton Pass (on the CTNF) would be removed and the permitted use areas on the eastern side of the Pass would be enlarged to include the lower portions of Black Canyon and Triple Direct, including run-outs to the bottom of the Pass at Old Pass Road/Trail Creek Trailhead (refer to Figure 2-2). Overall, the Teton Pass/Black Canyon permit area is proposed to increase by approximately 554 acres going from 1,096 acres under the current permit to 1,650 acres proposed.

Additionally, the 778 acres within the OG SUP that exist to the north of Highway 22 in the Phillips Canyon/Ski Lake areas would be reduced by 576 acres to approximately 202 acres. In total, the revised Teton Pass permitted guiding area would be reduced in size by approximately 22 acres.

Concentrating the JHMR guiding operations on the eastern side of Teton Pass would serve three primary goals: 1) this terrain is considered more appropriate for JHMR's clientele; 2) it would shift some use away from the popular Edelweiss area on the west side of the Pass; and 3) extending the OG SUP area to the bottom of the Pass would allow JHMR to offer more than "yo-yo" skiing to its clients (i.e., clients could ski the entire vertical extent of the Pass instead of repeat hiking/skiing currently required to remain within the OG SUP).

In light of historic and anticipated high use levels at Teton Pass (*average* use over the past nine seasons was 12,622 non-guided skiers annually, 789 per week, or roughly 113 per day), JHMR's maximum of 50 annual service days would continue to equate to an average of approximately three skiers per week, or roughly 0.4 skier per day over the course of the 16 week season (assuming that JHMR fully utilizes all 50 of their allocated service days at Teton Pass). However, as the Existing Conditions section portrays, JHMR has historically not utilized its allotted 50 annual service days at Teton Pass. Therefore, JHMR's current and potential future contribution to backcountry use at Teton Pass is considered to be negligible in light of the overall use of the area.

Alternative 3

Alternative 3 would eliminate the 50 annual service days authorized to JHMR for use at Teton Pass. The OG SUP area would be reduced to 2,146 acres encompassing the Rock Springs-Jensen Canyon area. This alternative was developed in response to public sentiment expressed during the scoping period, which indicated that Teton Pass is currently over-utilized. However, this analysis indicates that JHMR's annual contribution to backcountry use at Teton Pass has been, and would continue to be, negligible in light of overall utilization of the area (refer to the quantification of use provided above). The elimination of JHMR's guided use of the Teton Pass area may slightly decrease overall use levels. However, it is conceivable that a small portion of their existing guided clientele would turn to other permitted guides operating on Teton Pass, thereby slightly increasing the actual utilization of the remaining guiding services at Teton Pass. While the elimination of JHMR guiding atop Teton Pass would be imperceptible in terms of overall use levels at Teton Pass, some members of the backcountry skiing community may construe this to be a benefit to their recreational experience. Similar to the Proposed Action, Alternative 3 addresses backcountry safety issues, but only at the Rock Springs-Jensen Canyon area. All other components of this alternative are identical to the Proposed Action.

Cumulative Effects

Three past, present or reasonably foreseeable future actions have been identified in this recreation analysis.

As stated in the Existing Conditions section and again in the discussion of direct/indirect effects, general backcountry use of Teton Range is anticipated to increase in the future. That increased use, both guided and non-guided, has potential to further affect the backcountry experience for enthusiasts of all abilities. However, guided backcountry use within permitted areas on the Teton Range represents a small fraction of overall use, and is not considered to present a consequential or quantifiable effect to enjoyment of the backcountry. In the future, the Forest Service may explore options for addressing backcountry use, safety and enjoyment. These options may include reassessing permitted outfitter and guide operations; however, no options are developed sufficiently to consider in a cumulative context.

Each of the 12 outfitter and guide operations that are authorized to guide at Teton Pass and/or in the Rock Springs-Jensen Canyon area may seek renewal of their OG SUPs in the future. While the Existing Conditions section and the discussion of direct/indirect effects section discuss the 11 other guiding operations' historic use of the area further, site-specific NEPA analyses will need to be conducted to re-authorize each of their services on the Teton Range as individual permits come up for renewal.

As of publication of this EA, the Jackson Ranger District is also analyzing the potential direct, indirect and cumulative effects of reissuing a five-year OG SUP to High Mountain Heli-Skiing (HMH), which expired in April 2003. The effects of this permit re-authorization are analyzed and disclosed in a Draft Environmental Impact Statement (DEIS),¹⁰ which was made public in December 2003. A portion of HMH's OG SUP area extends northeast from Phillips Canyon to the JHMR Ski Area SUP boundary and has historically overlapped with the Rock Springs-Jensen Canyon portion of JHMR's OG SUP. However, when HMH operates in this area they tend to use terrain located far enough south (i.e., near Jensen Canyon) that they encounter few skiers that have entered the backcountry through JHMR's access points.

In addition to the No Action Alternative, which would remove heli-skiing as a recreational opportunity on the BTNF and CTNF, three action alternatives are analyzed in the HMH DEIS. Currently, the Forest Service's preferred alternative is Alternative C, which would authorize 1,000 annual service days to HMH and would remove identified crucial big game winter ranges on the BTNF and CTNF from its OG SUP. This alternative also responds to existing recreational conflicts by removing three areas from HMH's OG SUP that are popular for backcountry skiing, including the Rock Springs-No Name area. Under Alternative C, the terrain utilized by HMH would be limited to Jensen Canyon and areas south, and thus HMH and JHMR would continue to have overlapping

¹⁰ USDA Forest Service, 2003

OG SUPs (within the Jensen Canyon area). The HMM DEIS discusses potential to other recreationists, including those in the Rock Springs-Jensen Canyon area, primarily from the perspectives of noise disruption and competition for untracked powder – both of which have potential to affect the backcountry experience. Although it is acknowledged that the Rock Springs-Jensen Canyon area has historically been rarely utilized by HMM, selection of Alternative C would improve the recreational experience for backcountry skiers in this area by removing a small portion of potential utilization and eliminating the infrequent noise that accompanies heli-skiing. A Final EIS and record of decision are forthcoming.