

RESPONSE TO COMMENTS

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The following comments are presented verbatim as raised specifically in response to the May 2004 Jackson Hole Mountain Resort Guided Backcountry Skiing Environmental Assessment, or have been paraphrased in order to illustrate representative, repetitive comments.

SAFETY

- 1. Guiding uneducated skiers on Teton Pass is unsafe and will further increase pressure on the traditional ski runs, possibly causing people who are seeking untracked snow to make unwise decisions in dangerous avalanche terrain.**

As stated in the EA, the Teton Pass area receives extremely high use by dispersed backcountry skiers, the overwhelming majority of which utilize it on a non-guided basis. Therefore, utilization of this area is expected to increase irrespective of approval of JHMR's OG SUP.

There would be no increase in permitted annual service days at Teton Pass generated by JHMR as a result of the re-issuance of the OG SUP. Total annual service days at Teton Pass would continue to be capped at 50 for JHMR, thus no further pressure on backcountry skiing would be attributable to JHMR.

Safety is of utmost importance to JHMR guides. A discussion of gear, route selection and organization relevant to group dynamics is offered in section 3B of the EA.

- 2. Guided parties on Teton Pass are only in good hands during their day of guiding, but they may return to hike on their own to replicate their guided experience for free. It is inevitable that inexperienced and ill-prepared skiers venturing into the backcountry will require search and rescue assistance.**

JHMR's operations on Teton Pass are not proposed to change as a result of this proposal. As with all outfitter and guide services, JHMR is obligated to provide its clientele with the appropriate equipment and supervision necessary to safely enjoy the backcountry *at that time*. While some outfitter and guides offer instructional and certification programs to equip people with necessary skills to enjoy the backcountry on their own, JHMR offers no such service and does not proclaim to leave clients with these skills. The unfortunate reality is that people will inevitably enter the backcountry without proper experience or gear. The point of providing a guide service is to minimize the inherent risks of entering unfamiliar backcountry areas and to assist those who are ill-prepared or inexperienced.

Outfitter and guide operations can accept no responsibility when it comes to individuals exercising poor decision making skills and personal safety when on their own.

TETON PASS

- 3. The EA states that since the open boundary policy was established, JHMR has annually requested additional service days and these have been granted. What is to prevent them from requesting additional service days on Teton Pass if they continue to use their 50 days every season?**

The increases in total annual service days historically requested by JHMR have been for guiding operations in the Rock Springs – Jensen Canyon areas. As detailed in the EA, JHMR has not previously requested nor would they be granted any increase in annual service days for the Teton Pass area. Total JHMR guided use at Teton pass would continue to be limited to a total of 50 service days annually. This limit will be enforced by the Forest Service for the duration of the five year SUP, and no extensions would be granted.

- 4. Teton Pass and JHMR should remain completely independent of each other. Teton Pass should not be commercialized – it is sacred ground to backcountry skiers.**

Comment Noted. The Forest Service acknowledges that Teton Pass is highly valued by local and regional skiers for the unique recreational opportunities it affords. Many people visit this area for many different reasons; this fact has not been overlooked. Commercial use in the Teton Pass area has occurred for decades.

The OG SUP issued to JHMR is consistent with Agency-wide direction found in Chapter 2720 of the Forest Service Manual pertaining to Special Use Management.

- 5. How does JHMR justify their need for a permit on Teton Pass when they already have a permit for the Rock Springs-Jensen Canyon area?**

JHMR has conducted outfitter guide operations at Teton Pass since 1981. However, the resort has never utilized the full 50 annual service days allocated under the permit in any one season. While the majority of JHMR's guiding operations occur in the Rock Springs-Jensen Canyon area, the resort values having the opportunity to guide at Teton Pass.

- 6. The Teton Pass area is overcrowded. Not only is parking a problem, but trails are overrun with skiers and snowboarders, and the area is experiencing more pollution. Selecting the Proposed Action will exacerbate these problems.**

Teton Pass has emerged as an extremely popular and important destination for backcountry skiers. The Forest Service acknowledges that there are real and perceived issues surrounding use and management of this area. However, these issues are beyond the scope of this analysis, which focuses on JHMR's contribution to guided use of Teton Pass. The recreation analysis provided in the EA indicates that reissuing the OG SUP to JHMR will not exacerbate problems related to use, congestion and parking at Teton Pass. As detailed in the EA (page 3-26), JHMR's maximum of 50 annual service days per season would continue to equate to an average of approximately three skiers per week, or roughly 0.4 skiers per day over the course of the 16 week season. Furthermore, the Selected Alternative will not permit JHMR to park vehicles atop Teton Pass.

7. The current amount of traffic, trash, human and canine excrement on the Trail Creek Road are significant and should be addressed in this assessment.

This analysis focuses on JHMR's contribution to guided backcountry use of Teton Pass. Traffic, trash and sanitation on Trail Creek Road from general use of the area are management issues that extend beyond the scope of this analysis. JHMR guides will appropriately educate their clientele to preclude any JHMR guests from contributing to these ongoing conditions.

8. Offering a shuttle that doesn't need parking does nothing to alleviate the parking problems at the top of Teton Pass. Has the resort offered to make their shuttle available to other backcountry users, perhaps alleviating some of the parking problem at the top of the Pass?

Addressing historic parking problems atop Teton Pass is beyond the scope of this analysis. The Forest Service acknowledges that there are ongoing issues surrounding the use and management of Teton Pass. However, this proposal and analysis are not the proper mechanisms for addressing them. The Forest is currently investigating the possibilities of providing public transportation on Teton Pass.

9. In light of the heavy use on Teton Pass by the general public for backcountry recreation, there is no need to allow JHMR to add to the congestion on the east side of Teton Pass, including Black Canyon, that will result from the ability to utilize a shuttle bus back to the top of the Pass. This would especially be funneling more users to the Old Pass Road area.

The Selected Alternative would not increase the number of annual service days allocated to the ski area, and therefore represents no change over historic conditions. Furthermore, JHMR's potential contribution of 50 skiers per season at Teton Pass is considered inconsequential in light of overall use of the area by the public and other outfitter and

guides. The reader is additionally referred to the response provided to comment number six above.

- 10. It seems that the Jackson Hole Mountain Resort has more than adequate backcountry territory available in the existing area from Jensen Canyon to Rock Springs Bowl. Teton Pass is already heavily used both in winter and summer and adding such a large entity as the JHMR would only affect that use further.**

Reissuing 50 annual service days to JHMR at Teton Pass represents no change from historic authorizations. Furthermore, in light of overall use of this area, JHMR's potential 50 annual service days constitutes such a small contribution as to be inconsequential. The reader is additionally referred to the response provided to comment number six above.

- 11. Even if the present permit is "under-utilized", the potential for increased use cannot be ignored. According to numbers in the EA, use of the Pass has more than doubled in three years. Even if parking is mitigated by the use of a shuttle for JHMR clients, the increased use will erode the quality of backcountry experience for non-guided skiers.**

The Forest Service acknowledges that there are issues surrounding use and management of this area. However, these issues are beyond the scope of this analysis, which focuses on JHMR's contribution to guided use of Teton Pass. As detailed in the EA, 50 user days in the Teton Pass area is considered inconsequential and will not negatively affect the quality of the backcountry experience. While yo-yo skiing in the upper portions of Black Canyon and Triple Direct is common for JHMR clientele, it is not typical for them to make more than one complete lap (i.e., top to bottom with a vehicle waiting) per day at Teton Pass.

- 12. Installing lifts in Cody Bowl and Rock Springs does not make sense.**

Lift installation of any kind is not a part of this proposal. It is unclear where the reader obtained this information or how it is relevant to this proposal/analysis.

- 13. The resort giving guided tours on Teton Pass is not necessary to the success of their business, or to the Forest Service's.**

The Forest Service values its partnership with outfitter and guide operators because they provide essentially needed services to the public that the Forest Service otherwise could not offer. The reader is correct – JHMR's success is not contingent on guiding at Teton Pass. However, the resort would like to maintain this opportunity that they have offered for over 20 years.

- 14. Considering the large annual increases in guided and unguided backcountry use at the Teton Pass area, efforts must be made to minimize user conflicts and limit environmental degradation. Even though a permit for fifty user days per year at Teton Pass is minimal in comparison to overall use levels in the area, removal of the fifty skier day permit will help limit future use of Teton Pass.**

As detailed in the EA (page 3-24), JHMR's historic contribution to utilization of Teton Pass is so small, it is considered unlikely that the elimination of JHMR guided use on Teton Pass would noticeably improve the experience for non-guided users. It is conceivable that the remaining 11 permitted outfitter guides would absorb a portion of JHMR's use atop Teton Pass, further diluting the effect of precluding JHMR from guiding there.

- 15. Parking is already an issue on top of the Pass. There is not enough room for all of the vehicles to park up there as it is. How could there be room for shuttle busses?**

The Forest Service recognizes that parking issues existing at the top of the Pass. However, as detailed within the Decision Notice, JHMR shuttle busses will not be permitted to park atop Teton Pass.

SOCIO-ECONOMICS

- 16. By giving JHMR permits at both Teton Pass and the Rock Springs-Jensen Canyon areas, the Forest Service is giving preferential treatment to the ski area.**

Authorizing JHMR to operate in two separate areas under the same OG SUP does not constitute preferential treatment. JHMR is uniquely situated to provide guiding services at both areas, although most clients opt for the Rock Springs-Jensen Canyon area.

- 17. By changing the permit area on Teton Pass from the Edelweiss area (west side of the Pass) to the Black Canyon area (east side), JHMR is given an extra advantage over all other guide services on the Pass: their clients will not actually have to do any uphill hiking, thus making the backcountry of Teton Pass available to a larger client base.**

Modifying the permit area at the Pass was based on analyzing client preferences and operational issues. This modification is being made primarily to reduce use in the very popular west side areas (Edelweiss). Additionally, access to most areas on the east side of the pass will still require that guided clients hike uphill from the parking area atop Teton Pass. The ability for guides to take their guests out to the Trail Creek Trailhead

will simply preclude guests from having to hike uphill to get back to the top of the Pass at the end of their day. This will improve the recreational experience for JHMR guests.

18. The EA makes references to impacts on the outfitting community but no serious or in-depth analysis is offered, nor was the outfitting community formally consulted in the production of the EA. JHMR is additionally at an advantage over all of the other guide services as they are the only permittee to have lift-accessed backcountry skiing.

Socioeconomic issues were considered minor, and therefore the level of analysis presented in the EA pertaining to effects to other outfitter guides operating atop Teton Pass is relatively brief.

Under the Selected Alternative there would essentially be no changes to JHMR's guided operations on Teton Pass. The Selected Alternative essentially renews, for a period of five years, what the Forest Service has permitted for each of the last five years.

The fact that JHMR is the only outfitter to benefit from lift-accessed backcountry skiing is a consequence of the ski area's investment in infrastructure within its Ski Area SUP. Furthermore, JHMR's interest in acquiring additional annual service days in the Rock Springs-Jensen Canyon area is symptomatic of the demand for this type of experience within this area. The fact that JHMR has repeatedly requested additional annual service days from the Forest Service highlights that the Rock Springs-Jensen Canyon area is a popular area for those desiring a guided backcountry experience.

19. JHMR already benefits from significant, even overwhelming, economic advantages by virtue of its monopolistic permit with the Forest Service. We question the wisdom of allowing JHMR to expand their economic dominance to another niche already occupied by existing outfitter guides.

As detailed within the EA, JHMR is considered one of the outfitters currently operating on the BTNF. The Selected Alternative is therefore not considered to be a new or expanded use of the area.

20. The cost of backcountry rescue is high. The permitted users should provide funding to the agencies that will certainly be called upon to risk their personnel, and absorb the cost in these situations.

The incidence of backcountry search and rescue operations is not anticipated to increase as a result of implementation of any of the action alternatives. In fact, backcountry skiers that enlist the services of guides are less likely to find themselves in situations that demand search and rescue. JHMR maintains an excellent safety record for its guided backcountry skiing services. It is unclear as to why the commentor believes that the permitted guides in the area should bear the cost of general search and rescue operations.

- 21. Exum and Powderhounds have working relationships with JHMR. The EA should have noted whether or not JHMR had attempted to accomplish their ski guiding through these companies and their user days before requesting the issuance of new days. We could find no reference to that possibility within the EA.**

JHMR's relationship with Exum does not extend beyond the summer, when the rock climbing occurs within the SUP area. The ski area does not currently have a relationship with Powderhounds or Exum in which to explore guided skiing opportunities.

- 22. Table 3B-1 gives a misleading impression of the level and type of use by commercial outfitters on the Jackson District. In a recent conversation with those who are familiar with outfitters guide permitting on the Jackson District, it was learned that all winter outfitters are using the maximum number of user days they are allowed. The discrepancy between what is in the EA - a claim that outfitters are using 50% of their allowed user days - and what is actually happening on the ground is most likely due to poor reporting methods and incomplete record keeping.**

The data presented in Table 3B-1 is based on total service days utilized annually reported directly to the Forest Service by each of the listed permittees. The specific utilization of these service days is not always reported or recorded by season or specific area of use. It is logical to conclude that a portion of the use occurs within the non-winter months. However, the overwhelming majority is clearly attributable to winter use.

- 23. The resort [JHMR] is a for-profit entity. The goal of the resort is not to enhance the experience of the users of the national forest. Their goal is to make money. I see no reason why the Forest Service, while gaining nothing in return, should try to accommodate a for profit entirety at the expense of other forest users who are using the forest for recreation.**

The OG SUP issued to JHMR is consistent with Agency-wide direction found in Chapter 2720 of Forest Service Manual 2700 – *Special Use Management*. This designation includes all commercial outfitting operations involving services for accommodating guests, transporting persons, and providing equipment, supplies, and materials. It also includes commercial guiding activities wherein the guide furnishes personal services or serves as a leader or teacher. Notably, guests attracted to any of the recreational opportunities provided by JHMR are also entitled to use the forest for recreation.

- 24. Table 3B-1 indicates that there is a total of 6,041 authorized winter user days on the Jackson Ranger District. However, several of these outfitters offer very specialized trips or they are part of a larger program. These are not days analogous to what JHMR is proposing**

to offer. If all these days are segregated from the table the number of authorized use days drops to less than 3,000, of which 2,000 is accounted for by Powderhounds.

The purpose of Table 3B-1 is to disclose the authorized annual service days for each guide service in order to provide visitation data on Teton Pass. Indeed, this comment helps to clarify JHMR's and others' roles in providing winter recreational opportunities on the BTNF. The Forest Service maintains these seasonal records in order to manage use levels on Teton Pass. Regardless of the precise number of total service days authorized on Teton Pass, the 50 annual service days permitted to JHMR remains an inconsequential percentage of the guided and particularly the non-guided use of Teton Pass.

25. The proper way to manage this situation is to limit the number of guided skier days to 300 and stick to it. Since the USFS has allowed the JHMR to exceed its permitted service level of 300 skier days per year by an average of nearly 200 each year (this stat from a Jackson Hole News & Guide article, 6/2/04) since the current permit went into effect, it's logical to assume that "limiting " them to 900 days a year now means that they'll be guiding an average of 1500 people out of bounds per year, since demand will likely grow as the JHMR promotes their guide service to capacity.

As a portion of the stated Purpose and Need for the proposal, it is the Forest Service's intent to "Provide an OG SUP authorization that accurately reflects the existing demand for service days, thereby eliminating the need for requests for increased annual service days." With the approval of the Selected Alternative, the Forest Service will not grant requests for increases to total service days should they be requested by JHMR.

26. I suggest not letting [JHMR] guide on weekend days.

The Forest Service has the option of stipulating that JHMR cannot guide at Teton Pass on weekends, however, given the overall high level of use at the Pass, coupled with JHMR's historic low/sporadic use of the Pass, this measure is not considered necessary at this time.

27. Are other commercial guiding operations who already hold permits fully booked? If not, why expand?

Aside from AAI, which conducts avalanche training and certification, JHMR is the only OG SUP holder to operate in the Rock Springs-Jensen Canyon area. Demand for guiding in this area is high. The Selected Alternative represents no change in annual service days at Teton Pass.

- 28. The Selected Alternative will result in little to no increase in revenue for local companies. The decrease in untracked snow available at Teton Pass will hurt shops.**

A potential for 50 annual service days used at the Pass is not likely to noticeably affect the amount/quality of untracked snow at the Pass and the chance of these 50 day affecting the economic viability of local shops is unlikely. Additionally, the reader is referred to the response provided to comment #6, above.

- 29. There are already guide services on the Pass that provide services to those in need of a guide. Giving JHMR more days does not in any way serve the general public.**

The reader is referred to the response provided to comment number 23, above.

- 30. Why should a select group be given special rights to make money on Teton Pass?**

The reader is referred to the response provided to comment number 23, above.

WILDLIFE

- 31. The EA neglects to mention the effects that the Boundary Adjustment of Alternative 2 would have on moose. The lower part of Black Canyon, where all skiers exit from a run down Black Canyon or Triple Direct, is narrow. Stress to resident moose, which are frequently encountered by skiers in this narrow section, is unavoidable. This boundary adjustment is harmful and inappropriate.**

Per Wyoming Fish and Game (WYFG),¹ designated moose range in Black Canyon occurs on private land at the confluence of Black Canyon with the Fish Creek, which is over one mile from where skiers exit Black Canyon and Triple Direct before returning to Trail Creek. However, the wildlife analysis has been updated to include a discussion of MIS, including moose. The updated wildlife analysis has been included as Appendix A.

- 32. Currently, the Teton Range sheep herd winters exclusively at high elevation along the Teton crest on windswept ridges and cliff areas (Whitfield 1983, Reid and Cain 1997). The upper elevations of Rendezvous Peak were historical winter range of Teton Range sheep (Whitfield 1983) and more recent research shows winter sheep use of areas within the JHMR ski area and the guided backcountry skiing special use permit (SUP) area throughout the year. Specifically,**

¹ Personal communication between Lance Koch (Forest Service) and Doug Brimeyer 8/10/04

sheep winter on parts of Rock Springs bowl, all aspects of Rendezvous Peak, peak 10,332 to the south, and in the upper portions of Jensen Canyon. Sheep also use the ridgeline between Rendezvous Peak, the Tram, and Après Vous Mountain as a travel corridor between other wintering areas. Because of high snow depths in surrounding terrain, this ridgeline is the only travel corridor available between the Rendezvous Peak wintering area and others to the north in Grand Teton National Park. As such, maintaining this route as free from human disturbance as possible is an important consideration for the conservation of bighorn sheep, a Forest MIS.

JHMR and WYFG are currently preparing a Memorandum of Understanding (MOU) intended to create a cooperative monitoring program specifically pertaining to bighorn sheep. While the Forest Service will not be a signatory to this agreement, the agency fully supports its development. Additionally, the Forest Service has determined that the approval and implementation of the Selected Alternative analyzed within this EA will not be contingent upon the finalization of the MOU regarding bighorn sheep. Please note the wildlife section included in the EA has been updated with additional information pertaining to MIS. The updated Wildlife Section has been republished in its entirety and is contained in Appendix A to this document.

- 33. Since the subject document did not address impacts of the proposed action on wild sheep, prior to issuing a permit we would encourage you to conduct an analysis that at least considers 1) removing from authorized use areas known to be important for wintering sheep and 2) conducting a winter survey of the area to determine use by Bighorn sheep and sensitive nesting species to assess habitat use in the area, and 3) all possible mitigation measures consistent with sheep conservation generally and as outlined specifically in the Strategic Plan for managing Bighorn Sheep in the Teton Range (TRBSWG 1996). The applicant should fund Wyoming Game and Fish Department monitoring flights every two years during the life of this permit, and that the Decision Notice maintain flexibility in the permit so that adjustments can be made to the permit boundary to avoid occupied bighorn sheep range.**

The reader is referred to comment #32.

- 34. During scoping, we specifically identified concerns regarding the back-country use in occupied bighorn sheep habitat in the Rendezvous Peak and Jensen Canyon areas, and asked that an alternative be included in the Environmental Assessment (EA) that excluded winter recreation in occupied bighorn sheep habitat. The**

sheep in this area exhibit many characteristics of a low quality population, and recreational impacts have been identified as a potential threat for this herd. Winter closures have been instituted by Grand Teton National Park north of the Jackson Hole Mountain Resort to protect important bighorn sheep ranges. We are disappointed to find that the EA does not disclose the impacts this project may have on bighorn sheep.

The reader is referred to comment #32. A bighorn sheep cooperative monitoring program is currently being developed between WYFG and JHMR.

35. Results of any tracking surveys that have been completed for sensitive species within the project area in recent years should also be included in the EA.

No tracking surveys have been conducted for any Forest Sensitive Species in the analysis area other than the wolverine tracking study by the Wildlife Conservation Society, which is addressed in comment #37.

36. The probability of occurrence for resident goshawks in the project area should be rated as high, rather than low (EA, page 3-5), as goshawks have been known to nest along the eastern slope of the Teton Range in the vicinity of Wilson and Teton Village.

Comment noted. The reader is referred to Appendix A for corrected text.

37. The Wildlife Conservation Society (WCS) has been conducting a study of radio-tracked wolverines in the Teton Range for the past few years. The EA should incorporate the most recent data available on habitat use, foraging, and denning. The amount of potential denning foraging habitat should be estimated and disclosed. The impacts of the current level of backcountry recreation use on wolverine distribution in the Teton Range should be addressed.

Additional information on the results of the WCS tracking study pertinent to the analysis area has been incorporated into the updated wildlife analysis contained in Appendix A. Movement of collared male M304 through the analysis area is described there. This is the only wolverine documented to have occurred within or near the analysis area in the study.

- 38. It should be explained why the elevation range given for lynx (4,900-6,500 feet, noted in the EA, page 3-5) is lower than the 6,500-9,800 feet presented in the Lynx Conservation Assessment and Strategy (page 47) for Wyoming. Was this range used to define suitable habitat for the EA analysis?**

Comment noted. The reader is referred to the updated wildlife analysis presented in Appendix A.

- 39. The lynx analysis is based on the 75,384-acre Fall Creek North Lynx Analysis Unit (LAU). An explanation of how "suitable" habitat is defined in the EA should be included, along with an explanation of the size of that LAU, which greatly exceeds known female home range areas.**

The size of the LAU was based upon the number of acres capable of providing suitable lynx habitat and watershed boundaries, not the total number of acres within the watershed. Due to lower densities of snowshoe hare within the southern portions of the Northern Rocky Mountain Province, Lynx Analysis Units must be considerably larger than in habitats with higher snowshoe hare densities. Ward and Krebs (1985) identified a trend in which home range sizes increase as hare densities decline. The mean home range size of female lynx in southern boreal forests is more than twice as large as female home ranges in the taiga, regardless of hare densities.² Page 78 of the Lynx Conservation Assessment and Strategy suggests LAU's larger than 25,000 acres in the southern portions of the Northern Rocky Mountains Geographic Area (includes all of Wyoming) and poorer quality, less contiguous, or naturally fragmented habitat.

Per the 2004 Biological Assessment of Lynx for the Jackson Hole Mountain Resort Development Projects, Fall Creek Watershed (referenced in the EA's Wildlife section): "Recently the BTNF went through a re-analysis of LAUs. The original LAU delineation was disapproved by the USFWS and contained many LAUs (including the LAU surrounding the project area) that could not provide enough year-round habitat to provide a home range for one lynx. The re-delineation effort was supervised and approved by the National Lynx Team and the USFWS. As a result of this re-mapping effort, the LAU which originally contained the project area was changed and now incorporates sufficient lynx habitat to provide for a lynx's year-round needs. This re-mapping effort was Forest-wide and follows the directions and suggestions included in the LCAS. The resulting LAUs meet or exceed all standards included in the LCAS regarding LAU mapping."

² Aubry et al. 2000

- 40. It should be disclosed how estimates of amounts of old growth habitat and volume of coarse woody debris were determined.**

This comment is not clear, as the Wildlife section in the EA made no reference to volume of old growth habitat or coarse woody debris. Regardless, the wildlife analysis has been updated to reflect information contained in the 2004 Lynx BA.

- 41. More must be done to protect the viability of bighorn sheep. To do this, the BTNF must mitigate any adverse impacts to bighorn sheep.**

The reader is referred to the responses provided to comments #32, #33 and #34.

NEPA PROCESS

- 42. Are there any public meetings regarding the process of the permit for the JHMR's request for shuttling clients on the pass?**

The Forest Service determined that public meetings would not be necessary for this NEPA process.

CUMULATIVE EFFECTS

- 43. Your EA fails also to consider the cumulative impact of other human users in the backcountry. I suggest you look closer at the forest wide impact of your recent increase in the permitted use by helicopter skiers, and the increased use of the area by snowmobiles.**

Each resource discussed in Chapter 3 includes a cumulative effects analysis. Included are discussions of the proposed High Mountain Heli-Skiing operations.

- 44. JHMR recently issued a revised Master Plan proposal to the BTNF, which highlights all land use plans and proposals for the future. Included in this is a proposal to expand the development area for JHMR. What are the cumulative impacts on the study area if the BTNF increases JHMR's guided skiing permit in conjunction with increased heli-skiing, developed ski area expansion, and all foreseeable future actions by JHMR included in the Revised Master Plan? Thus, it is imperative that BTNF look closely at cumulative impacts to wildlife in the area.**

Foreseeable impacts should include the indirect effects of increased guided backcountry tours in the study area. Once an experienced skier goes on a guided tour s/he will be more likely to use the areas on her/his own and will likely introduce new users to the areas as well. Thus, increased guided backcountry use may lead to

exponential increases in winter recreation use in the Rock Springs-Jensen Canyon area.

The reader is referred to appendices A and B for a summary of the 2004 MDP as well as updates to the cumulative effects analyses for Wildlife and Vegetation, Recreation, Social and Economic Resources, and Parking and Traffic.

- 45. If the BTFN is unable to assess overall, unguided use of the Rock Spring-Jensen Canyon area, it is very difficult to analyze the cumulative impacts of this proposal. The Alliance argues that an additional condition should be added to the permit requiring that JHMR adequately monitor unguided use of the Rock Springs-Jensen Canyon area so that BTFN may have better information to guide future decision-making.**

While the collection of data pertaining to non-guided use of the Rock Springs – Jensen Canyon areas would continue to be useful, the Forest Service does not have specific cause to require that JHMR continue to monitor this use. However, JHMR would be encouraged and supported by all parties to continue their previous efforts in collecting this data.

SUPPORT

- 46. I do not believe that 50 user days for skiing south of the Pass to the valley floor will impact the terrain to the point where crowding will be a problem. I approve of the manner the parking problem will be handled by dropping guided skiers off and picking them up at the bottom near Trail Creek Ranch.**

Comment noted.

- 47. We support guided activities on public lands and feel it is important for the Forest Service to meet the needs of those persons who may not have the knowledge, skills or equipment needed to access these areas on their own.**

Comment Noted.