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March 3, 2025

RE: Jackson Hole Mountain Resort 2025 Mountain Improvements

Location: Jackson Hole Mountain Resort (JHMR), Bridger-Teton National Forest, Teton County, Wyoming. The resort is located adjacent to Teton Village, Wyoming.

Dear Interested Public:

In December 2024, Bridger-Teton National Forest (Bridger-Teton) formally accepted an amendment to JHMR's 2022 Master Development Plan (MDP; previously amended in 2023). The amendment included five projects that JHMR hopes to implement during the 2025 construction season. These projects are on National Forest System lands within JHMR's special use permit area. As a result, JHMR has requested that the Bridger-Teton initiate the National Environmental Policy Act (NEPA) process necessary to determine whether to authorize these projects. See "Proposed Action" below for detailed project descriptions.

We anticipate preparing a categorical exclusion for this proposal, precluding more in-depth environmental analysis in an environmental assessment or environmental impact statement. If it is found that there are no extraordinary circumstances related to the proposed action that may result in significant environmental effects, it is expected that it would be authorized using category 36 CFR 220.6(e)(22):

Construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site, including infrastructure or improvements that are adjacent or connected to an existing recreation site and provide access or utilities for that site. Recreation sites include but are not limited to campgrounds and camping areas, picnic areas, day use areas, fishing sites, interpretive sites, visitor centers, trailheads, ski areas, and observation sites. Activities within this category are intended to apply to facilities located at recreation sites managed by the Forest Service and those managed by concessioners under a special use authorization.

If this proposed action is authorized under a categorical exclusion, as described in the Forest Service NEPA regulations (36 CFR 220), it would not be subject to pre-decisional administrative review (36 CFR 218) and this may be the only opportunity to comment.

This letter invites public comment on JHMR's proposal and the scope of the environmental review. We invite you to inform us of any concerns you may have about these projects and their potential environmental impacts.

PURPOSE AND NEED

The Bridger-Teton Land and Resource Management Plan (Forest Plan) identifies the land within JHMR's permit boundary as Defined Future Condition (DFC) 9B: Special Use Recreation Areas. The Forest Plan goals for DFC 9B include:

- 1.1(f) "provide areas for alpine skiing and commercial ski and snowmobile operations,"
- 2.2(a) "retain, improve, and add developed sites," and
- 2.2(b) "design facilities for all ages and abilities."

Reflecting this Forest Plan direction, the purposes of this proposed action are:

To maintain and improve winter sports infrastructure on National Forest System lands that is JHMR's cornerstone (Forest Plan Goal 2.2 (a)).

- To capitalize on the established relationship between Bridger-Teton and JHMR that connects visitors with the natural environment and supports the quality of life and the economy of the local community (Forest Plan Goal 1.1 (f)).
- To increase the safety and efficiency of year-round operations by alleviating emerging hazards on the mountain and upgrading key infrastructure.

To achieve these purposes, the <u>needs</u> addressed by JHMR's proposal are to:

- Provide upgraded water and sewer utilities to existing facilities.
- Upgrade key infrastructure to increase skier safety and maintain efficient operations by building a dedicated ski patrol station at the top of the Tram.
- Respond to variable snowpack and associated hazards by adding snowmaking to high-use areas.

PROPOSED ACTION

The proposed action includes five projects summarized below and shown on the attached figures.

1. Utilities Upgrade: Install new domestic water and sewer lines to service on-mountain facilities.

Water and sewer utilities are proposed for several existing facilities on the mountain, including Corbet's Cabin, Bear Flats Café, and Thunder Café. This would not only improve the guest experience over the existing individual water systems and vault toilets but also provide the most effective available method of treatment by connecting to the Teton Village Water and Sewer District facility.

The most direct and efficient network to connect these utilities to the Teton Village facility is to connect the Thunder Café and Bear Flats Café to the existing infrastructure located at Corbet's Cabin (Figure 1). First, the proposed joint water and sewer lines would be installed along the South Pass Traverse from the bottom of the Thunder lift at Thunder Café to the bottom of the Sublette lift at Bear Flats Café, and along Rendezvous Trail to the bottom of Rendezvous Bowl. This would be 8,900 feet in length. Water and sewer pipe has previously been installed from Corbet's Cabin to the bottom of Rendezvous Bowl, and the new pipelines would tie in with the existing pipes. The proposal also includes constructing a pumphouse that would be located along this corridor along with storage tanks to provide sufficient water pressures and flow rates for the structures. Second, a sewer line would be constructed down Lower Tram Line run and connect to the Teton Village facility near the bottom of the Gros Ventre run and the Area 51 Pumphouse, about 4,400 feet long. Third, JHMR proposes a water pipeline from Thunder Café to the existing water pipeline at Mousetrap, about 1,300 feet long.

JHMR would submit the plans for Wyoming Department of Environmental Quality review and approval.

The project alignment would lie entirely within previously disturbed roads, ski runs, and traverses. Additionally, there are existing utility lines along nearly the entire route for primary power and snowmaking. This project would entail approximately 12.6 acres of ground disturbance.

<u>2. Patrol Station at Top of Tram</u>: Separate construction of the ski patrol station from the larger, previously authorized Corbet's Cabin replacement project.

The need for improved ski patrol facilities at the top of the Aerial Tram has been recognized for many years. Currently, ski patrol functions are based in the existing Corbet's Cabin facility under cramped and poorly laid out conditions. Dedicated patrol space was included in the Corbet's Cabin replacement analyzed in the JHMR Recreation Enhancements Project - Phase 2 environmental assessment (2017)and subsequently authorized, but that facility has not yet been built. The current proposal would address this pressing need by constructing a dedicated, stand-alone patrol station within the study footprint addressed in the 2017 environmental assessment. This project would occur in an area about 160 feet west of the existing Corbet's Cabin structure (Figure 1) that is heavily used year round. The ground disturbance associated with the patrol station would be approximately 0.4 acres.

3. Bear Flats Café Utilities: Upgrade utilities by connecting the café to proposed new on-mountain water and sewer network.

Plans to relocate and expand this facility were reviewed and authorized based on the JHMR Recreation Enhancements Project - Phase 2 environmental assessment (2017) and the Jackson Hole Mountain Resort Recreation Enhancements Project – 2023 environmental assessment (2024). Implementation of those plans is underway. The café structure has been relocated and re-opened for operations, and it has seen steady visitor demand. Final design of the authorized expansion is ongoing.

The previous authorizations included a domestic water storage tank and use of existing non-water restrooms downslope. Under the current proposal, those utilities would be dropped and upgraded by connecting with the water and sewer network described above, and restrooms would be included in the expanded facility. All work would take place in the area disturbed by the relocation and expansion of the facility addressed in the previous environmental assessments. The approximate ground disturbance for this project would be 0.1 acres.

<u>4. Teewinot Switchback Snowmaking</u>: Expand snowmaking system coverage to include this existing traverse.

This section of South Pass Traverse is the "easiest way" off the mountain frequented by beginner skiers and snowboarders. Snowmaking is needed due to the switchback's elevation and its importance for lower ability guests, particularly in the early and late season. The new lines would tie into the existing snowmaking system above and below this section, about 1,200 feet in length (Figure 2). This project would occur within an existing summer road corridor, but some cutting of the uphill slope will be necessary to achieve sufficient width. The approximate ground disturbance associated with this project would be 2.5 acres.

<u>5. Rendezvous Trail Snowmaking</u>: Expand snowmaking system coverage to include Rendezvous Trail above the bottom of Sublette chair.

The resort proposes to add snowmaking to this is high-use area where the snowpack can become thin in the early and late season. Lines would be installed concurrently with the new domestic water and sewer lines, in the same trench, described above under Utilities Upgrade. The lines would be about 1,100 feet in length (Figure 2). As a result, this project would have no additional effects or ground disturbance.

ISSUES CONSIDERED

Review of these projects will include the following environmental considerations. Overall, these projects would result in approximately 16 acres of soil disturbance and the removal of approximately 15 Douglas fir (*Pseudotsuga menziesii*) and shrubs. The Douglas fir trees range in diameter at breast height from 6 to 18 inches. These projects would be planned, constructed, and rehabilitated using proven techniques developed by the resort and the Bridger-Teton with the goal of reducing potential impacts on watershed resources, wildlife habitat, introduction and spread of invasive species, and other resources of concern within the project area. Specific, standard design criteria for each key resource are noted below.

Construction of these projects would begin in spring of 2025 with completion expected by 2030. Key environmental considerations reviewed by the Bridger-Teton are described below.

Whitebark Pine

The project area overlaps with the modeled whitebark pine range However, ground disturbance avoids areas with mature whitebark pine. It is possible that some whitebark pine seedlings may exist within existing ski runs and would therefore be impacted by the proposed action. However, these seedlings would be impacted by ongoing use and maintenance of the runs even if the proposed action were not implemented. These potential impacts would be offset by the resort's established program to protect many mature whitebark pine trees and expand the species' population through planting. The following design criteria are components of that program with specific relevance to the potential effects of these projects:

- The resort will continue the whitebark pine tree seed collection program, particularly from the "plus" trees, and will undertake efforts to identify additional "plus" trees.
- The resort will continue to support planting disease-resistant, genetically appropriate whitebark pine seedlings from seedlots selected by a Forest Service silviculturist, geneticist, or other approved specialist. Tree planting plans will be prepared by a Forest Service silviculturist.
- The resort will continue to protect whitebark pine trees from mountain pine beetle using verbenone patches and carbaryl spraying.
- The resort will train pertinent on-mountain personnel to identify whitebark pine and avoid adverse effects.
- The resort will educate guests about whitebark pine ecology, importance, protection measures, and recovery practices through interpretive programs.

Wildlife

Due to project design and the limited tree removal associated with the proposed action, impacts on wildlife, particularly owls, other migratory birds, and amphibians, are expected to be minimal. In order to protect these species, several design criteria will be employed, including:

- No mowing, clearing, cutting, burning, or other means of removing trees or other vegetation will occur between May 15 and July 15. If the nesting window for migratory birds cannot be avoided, the permit administrator will be notified to coordinate surveys for nesting birds no more than 10 days prior to beginning work. If no nests are found, project activities may proceed. If nests are found, coordinate with the permit administrator to explore mitigation options.
- No ground disturbance or equipment operation will occur within 300 feet of wetlands or ponds that may harbor amphibians from June 10–August 10. If this is not possible, coordinate with the Forest Service permit administrator, as areas to be disturbed will be surveyed for amphibians no more than 10 days prior to beginning work. If no amphibian activity or breeding is detected, project activities may proceed. If amphibians are found, timing restrictions within a buffer zone may apply.
- The proposed activities will immediately cease anywhere within 0.5 miles of bighorn sheep, if disturbance to individuals is a result of the project.

Streams and Wetlands

While intermittent channels occur within the ground disturbance area associated with the proposed action, several design criteria will be employed to mitigate potential impacts to streams and wetlands. These include:

- Disturbed site rehabilitation at the resort will be conducted in accordance with the resort's Storm Water Pollution Prevention Plan (SWPPP; JHMR 2023), which was prepared and is implemented as a condition of the resort's Wyoming Pollutant Discharge Elimination System General Permit. The SWPPP, updated annually to address projects slated for implementation that year, includes: appropriate BMPs for erosion control, sediment control, and site stabilization; operational controls; and provisions for maintenance and inspection.
- Vehicle service, storage, and refueling areas will be at least 150 feet from stream channels, riparian, and wetland areas, and should be on level ground. All petroleum products and other substances capable of polluting surface or groundwater should be stored within a diked area large enough to contain the largest theoretical spill (110%). Cleanup actions are to be taken immediately, and materials are to be stockpiled in the immediate area. Spills are to be reported to Wyoming DEO.

• Trench breakers will be used when snowmaking or other utility lines cross sloped wetland areas. Trench breakers will be placed at the lower wetland boundary so that groundwater is not drained through the trench and out of the wetland.

HOW TO COMMENT

The purpose of scoping is to invite your comments and identify any issues or concerns with the proposed action. Submit electronic comments at https://cara.fs2c.usda.gov/Public//CommentInput?Project=67702. Address written comments to Bridger-Teton National Forest, Jackson District Ranger Todd Stiles, P.O. Box 1689, Jackson, WY 83001, Attn: JHMR 2025 Mountain Improvements. Comments may be hand-delivered to the Bridger-Teton office, 340 N. Cache St. Jackson, WY 83001, between 8:00 AM and 4:30 PM, Monday through Friday, excluding holidays, or faxed to 307-739-5450. Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record.

For further information about the proposed project, contact Sean McGinness, Mountain Resorts Coordinator at 307-739-5415 or sean.mcginness@usda.gov.

TODD STILES District Ranger

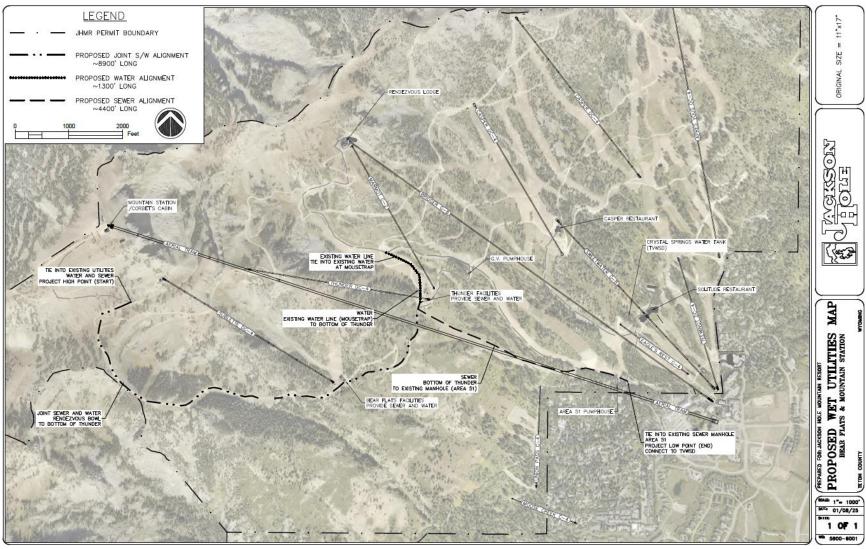


Figure 1. Map of Utility Upgrade, Patrol Station at Top of Tram, and Bear Flats Café Utilities projects.

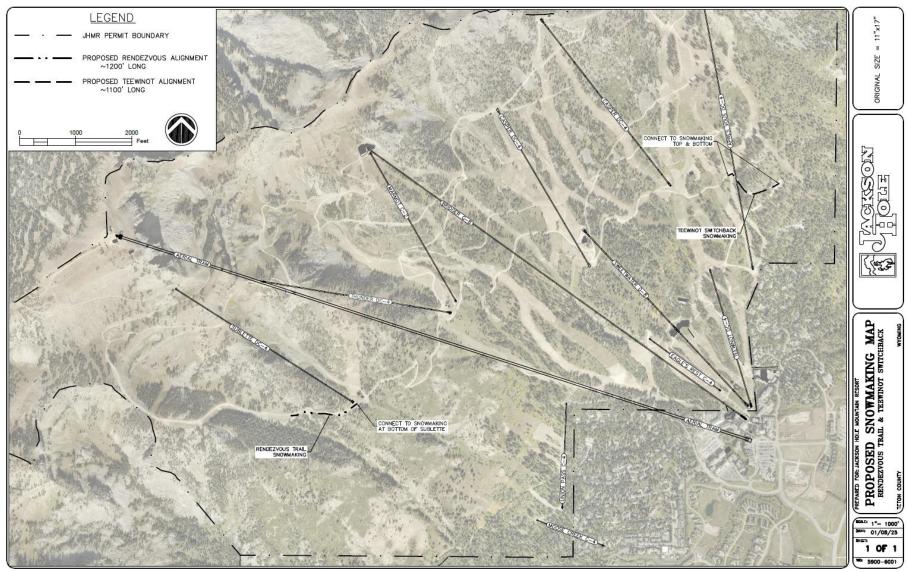


Figure 2. Maps of Teewinot Switchback and Rendezvous Trail snowmaking projects.