

February 17, 2016

HPMP Planning Team,
Grand Teton National Park
P.O. Drawer 170
Moose, WY 83012-0170

Subject: Jackson Hole Conservation Alliance's Comments on the Historic Properties Management Plan Environmental Assessment

Dear Planning Team,

The Jackson Hole Conservation Alliance (Alliance) thanks you for the opportunity to comment on your Historic Properties Management Plan Environmental Assessment (EA). The Alliance represents over 2,000 constituents in Jackson Hole, Wyoming, and works to protect the wildlife, wild places and community character of Jackson Hole.

The Alliance is glad to see the Grand Teton National Park (Park) taking steps toward better managing historic properties in the Park. We support actions that would allow the Park to preserve historic structures that serve as vital elements of our cultural history and provide for visitor access and interpretation at these sites while simultaneously protecting both the cultural and natural resources of the Park.

Overall, we support this proactive step toward better stewarding these cultural resources.

We also appreciate the work of staff in developing a novel toolbox (HPET criteria) for evaluating historic properties. In addition, we support certain actions in the Park's proposed alternative (Alternative B). Specifically, we are in favor of the proposed action to remove the Sky Ranch infrastructure from the landscape. We hope that doing so will have a positive impact on wildlife and vegetation as well as contribute to the quality of wilderness in the Park's managed wilderness areas. We also thank you and your staff for taking the effort to hold a public open house at which they fully explained and discussed the proposal with us and other members of the community.

However, we have significant concerns with other proposed actions and request the park to reconsider certain proposals.

Specifically, we oppose the Park's proposal to convert the 4 Lazy F Dude Ranch for use as seasonal housing. We also oppose the Park's proposal to increase the visitor and overnight use of the White Grass Ranch. The Park's environmental assessment clearly shows that these actions would have significant negative impacts to wildlife, especially

grizzly bears. We strongly urge the Park to reconsider both of these actions. Below we explain in greater detail our reasons for opposing these two Park proposed actions.

Further, given the negative wildlife impacts of these proposals, we question the analyses that allowed the Park to determine that Alternative B is the environmentally preferable alternative.

4 Lazy F Dude Ranch

We question the Park's proposal to rehabilitate the 4 Lazy F Dude Ranch for use as seasonal housing.

The EA clearly articulates the wildlife and habitat value of the 4 Lazy F Dude Ranch area (pg 156-157). It is vital habitat for a number of species and a critical movement corridor. It is also a well-known moose and elk calving area and approximately half a mile from an active bald eagle nest. This property is also within rich, riparian habitat adjacent to a wild and scenic river. The Biological Assessment (Appendix K) clearly shows that the proposed actions would "adversely affect" grizzly bears. This assessment also suggests that these proposed actions could result in the incidental take of grizzly bear, an endangered species. We ask if the Park has asked and received an incidental take statement from the US Fish and Wildlife Service (FWS) based on this assessment.

While we recognize the need for seasonal housing, given these significant wildlife resources and the impact of Park proposed actions on wildlife, we are surprised that the Park saw fit to impact these areas in order to make room for seasonal housing (p 49). When the Park's own analyses and biological experts show actions will have significant negative impacts to wildlife, we are confused by the decision to propose such actions. How does the benefit of housing additional seasonal employees at this location outweigh such significant wildlife impacts?

Again, we fully recognize the need for managing and maintaining housing for Park seasonal staff. Here's the thing, choosing to do so in a place of significant wildlife value while impacting those resources seems contrary to the Park's fundamental purpose of protecting resources. We strongly urge the Park to reconsider this action. The Alliance is a strong supporter of housing affordable for people who work in Jackson Hole. We would be happy to discuss creative solutions for housing that meets Park needs while not impacting wildlife.

White Grass Ranch

We question the proposal to increase the daytime and overnight use of this facility. The Park's proposed action, as analyzed in the EA, will result in significant day and overnight use. This could result in increased bear-human conflicts. Given the Park's efforts, which we support, to reduce bear-human conflicts in the nearby Moose-Wilson corridor, it seems counter-intuitive to take steps in White Grass Ranch that could

increase bear-human conflict. Here again, the Park's analyses have shown that this action would likely have an adverse effect on grizzly bears, with a potential for "take." Again, we ask if the Park has considered incidental take from the FWS in this analyses. We are confused by the need to increase use at this property. Would the need to maintain this property as a training center be met adequately at current use levels?

Environmental Preferable Alternative

Finally, we are confused by the Park's determination that Alternative B is the environmentally preferable alternative. Given the adverse effects on wildlife predicted by actions proposed (in particular, the actions for 4 Lazy F and White Grass ranches, as above) in Alternative B, we do not understand how the Park determined that Alternative B is the environmentally preferable alternative.

Thank you for the opportunity to comment on this EA. Please do not hesitate to contact us if you have any questions.

Sincerely,



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