

October 29, 2018

Mary Moore, District Ranger  
U.S. Forest Service  
Bridger-Teton National Forest

**Re: Snake River Sporting Club**

Dear District Ranger Moore,

We are concerned with modifications made along the Snake River by the owners of the Snake River Sporting Club – and have also heard concern from a wide range of our members and local residents and partners.

The Jackson Hole Conservation Alliance (Alliance) represents over 2,000 constituents locally and works to protect the wildlife, wild places and community character of Jackson Hole. We strive to make sure that we recreate and develop in ways that respect our wild places, and to have honest conversation about our decisions based on facts and data.

With that in mind, we are concerned with the modifications completed by the Snake River Sporting Club that went ahead without the proper approval under Section 7 of the Wild and Scenic Rivers Act or county permitting. We implore Forest management to fulfill its role as the Managing Agency of the Snake River to enforce compliance with Wild and Scenic protections.

**The Snake River is ecologically and socially essential to this valley**

As explored in our 2018 *State of Wildlife* report, the Snake River and its associated tributaries, wetlands, and watershed are central to the ecological and social make-up of Jackson Hole, and are also facing significant threats:

The upper Snake River is said to serve as the ecological nexus for biodiversity at all levels from invertebrates to large mammals and is ranked the largest, best preserved, least vulnerable wetland systems in the state, except for the private lands within its center which are deemed at high risk. This system's integrity, size, and location with the GYE [Greater Yellowstone Ecosystem] signify that the upper Snake River is integral to the largest preserved ecosystem in the contiguous United States...

The ongoing and future threats to the Snake River Wetlands Complex, including the hydrological processes, are several, inter-related, and synergistic. Pressures include increased development of private lands and increased recreation on lakes, ponds, streams, and rivers on public lands. The dam and *levees continue to compromise natural river flows*. Climate change adds a wildcard into the type, amount, and timing of precipitation, and therefore, the natural hydrological dynamics of even unaltered riverine and wetland systems.

**Protecting the wildlife, wild places, and community character of Jackson Hole.**

Combined, these threats pervade the Snake River Wetlands Complex<sup>1</sup>.  
[emphasis added]

**Wild and Scenic protocols must be followed**

In 2009, the Snake River Headwaters gained protection under the Wild and Scenic Rivers Act as the largest single designation of protected waters. This unprecedented federal legislation granted protections for 414 miles of rivers, streams, and creeks in the Snake River watershed. We applaud the efforts of all groups, agencies, and individuals involved in championing this vital legislation that acknowledges the social and ecological role of the river. This year also marked the significant 50<sup>th</sup> anniversary of the Wild & Scenic Rivers Act – a major milestone and a time to celebrate, not to watch unpermitted modifications made in our own river.

Section 7 of the Wild and Scenic Rivers Act requires analysis of projects to determine impacts to river values, the free-flowing character of the river, and the Outstandingly Remarkable Values (ORVs). We support the letter submitted to you on October 2<sup>nd</sup> by the Snake River Fund and reiterate their request that the Forest Service uphold your role as the managing agency to uphold the Wild and Scenic Rivers Act protections and processes. The water resource projects completed by the Snake River Sporting Club should be evaluated under Section 7 requirements prior to the issuance of any after-the-fact permits by Teton County.

Thank you for all of your work in protecting our unique and diverse ecosystem in the Bridger-Teton. Please be in touch if you have any questions or would like to discuss the project further.

Sincerely,



Leah Zamesnik  
Conservation Policy Manager  
Jackson Hole Conservation Alliance

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<sup>1</sup> Clark & Riginos (2018). *State of Wildlife in Jackson Hole*. 19-24. Available on Alliance's website [Reports page](#).