

February 21, 2020

Re: Jackson Hole Mountain Resort (JHMR) Backcountry Guided Skiing Permit User Days Increase

Dear District Ranger Moore and Bridger-Teton staff,

Thank you for considering our comments regarding the proposed increase in JHMR ski guide days. Overall, we ask that you consider this project through a lens of how to better protect the native Teton bighorn sheep herd. As you know, the herd is in dire straits largely due to modern human impacts, and we need to do all we can to protect this unique population of animals – who have been here much longer than we have – from extinction.

We are engaged in the interagency bighorn sheep community engagement process, and the local ski community is actively discussing whether to voluntarily decrease use in important sheep habitat. Additionally, Grand Teton National Park is closing significant areas of the park to the public in order to lethally remove mountain goats. Given these significant actions to protect bighorn sheep, we believe that all relevant management decisions must use a “how can we best protect the bighorn sheep” lens and analysis. We respectfully ask that protecting bighorn sheep be a paramount goal of this project.

We offer the following specific comments:

- Please include “Increase protection of bighorn sheep habitat” as an explicit **Purpose** for this project
- Please use an **Environmental Assessment**, not a Categorical Exclusion, given the importance of bighorn sheep habitat and potential impacts
- Please measure **actual counts** of how many skiers are using this area (e.g. going out the gates), instead of relying on old counts or imprecise estimates – including both guided and private use
- Please consider negotiating an arrangement with the guide company to limit the geography of their use, **excluding important sheep habitat**, in exchange for their desired increased number of days. This could lead to a win-win situation where they can increase their use **and** our community can better protect sheep habitat, and JHMR could lead by example in staying out of areas we need to protect.
- Please also consider **education** measures in the new permit, so that the guides are always teaching their clients about bighorn sheep and other wildlife protection. We would welcome the opportunity to share Don’t Poach the Powder resources.

Please keep us updated and involved in this project.

Sincerely,



Skye Schell
Executive Director
Jackson Hole Conservation Alliance