

**November 10, 2009**  
**Jackson Hole Conservation Alliance Preliminary Comments**  
**on the Jackson Administrative Site Land Conveyance and Development**  
**Draft Environmental Assessment**

The Bridger-Teton National Forest released the draft Environmental Assessment (EA) for the sale of Forest Service land on Cache Street on Oct. 26, 2009. The EA offers four alternatives regarding how much and which parts of the Forest Service's 15-acre administrative site on North Cache in Jackson might be offered for sale, as well as various plans for putting more employee housing in an area called Cottonwood in the Snake River Canyon and at an 80-acre site off Nelson Drive in East Jackson at the popular Putt-Putt trailhead. The Environmental Assessment is available for review and comments at: <http://www.fs.fed.us/r4/btnf/projects/>. (Look for "Conveyance" files under the 2009 NEPA Documents section.) Comments are due by 4:30 p.m. on Nov. 30, and can be mailed to Attn. Carole "Kniffy" Hamilton, Bridger-Teton National Forest Supervisor, P.O. Box 1888, Jackson, WY 83001, or emailed to [comments-intermtn-bridger-teton@fs.fed.us](mailto:comments-intermtn-bridger-teton@fs.fed.us) (put "Conveyance Project" in the subject line).

The Jackson Hole Conservation Alliance will be recommending that the BTNF select Alternative 1 in their decision regarding selling the land on Cache and building new facilities. Alternative 1 is the "No Action" choice. The draft EA also brings up concerns about the action alternatives. As the Alliance works on our comments to Supervisor Hamilton, we would like to share the following points that could help you identify and comment on the issues of greatest importance. We hope that you take the time to respond to the BTNF on this proposal. Please call Louise Lasley, (307) 733-9417, or email [Louise@jhalliance.org](mailto:Louise@jhalliance.org) if you have any questions.

- The Alliance has long argued that the use of the Forest Service Facilities Realignment Act of 2005, Section 504(d)(4), which allows transactions such as this to bring additional revenues to a forest unit by releasing administrative lands to the public for the highest price, is a failing of the government responsibility to provide for agencies operating under its direction. Government funding through agency budgets should be adequate to address the fiscal needs of the agency, including replacement of old, inefficient facilities and employee housing.

**The Alliance does not believe that selling public land is the appropriate way to fund the Bridger-Teton's budget needs. This allows the government to ignore their responsibility to provide the needed money to operate.**

- Current economic factors would suggest that this is not the best time to attempt to sell lands in Jackson. The decrease in expected value of the land would mean that the BTNF would have to sell more land in order to realize the greatest profit.

**The Alliance believes that this is not the time to sell property in Jackson Hole. At the very least, there should be a delay to allow the value of the property to rebound in order to maximize the amount of money and decrease the amount of land that the sale will bring.**

- Moving facilities, specifically the fire cache and/or crew offices to the Cottonwood site (approximately 17 miles down the Snake River Canyon) would place increased travel time and inefficiencies on fire response. The additional mileage to the airport, food and retail stores, and employee housing for all or part of the crew would create safety issues and fuel and wage increases.

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**The Alliance believes that moving the fire cache and/or crew to the Cottonwood area in the Snake River Canyon is a safety and efficiency issue for the BTNF and should not occur.**

- Housing at Cottonwood would mean those employees would have to drive longer commutes to work, schools, doctors, shopping and community activities. The lack of cell phone reception, school bus transportation and other services would have a direct impact on employee retention and recruitment.

**The Alliance believes that the negative impacts on those employees that would have to move to Cottonwood and the environmental impacts created because of the long-distance driving would not be an acceptable solution to the BTNF needs.**

- Adding up to 18 units at Nelson Drive would impact existing neighborhoods and adjacent wildlife habitat. The increased traffic, pets, and site footprint at Nelson have been a factor in the strong objections to this proposal in the East Jackson area.

**The Alliance believes that the BTNF should minimize the impacts to wildlife habitat and adjacent neighbors by not placing the maximum number of units (26 with 18 new buildings and 8 relocated modular homes) at this site.**

- The cost to BTNF employees of moving the existing modular homes on the Cache Street site to another would be an extreme hardship to those employees.

**The Alliance believes these employee-owned modular units on the Cache Street site should remain there, be gradually phased out in the future and replaced by efficient housing structures.**

The EA states repeatedly that the components of each alternative will be assessed individually. This means that the merits or concerns of each component should be evaluated and commented upon.