

November 30, 2009

Carole “Kniffy” Hamilton
Forest Supervisor
P.O. Box 1888
Jackson, WY 83001

Re: Jackson Administrative Site Land Conveyance and Development

Dear Supervisor Hamilton;

The board of directors of the Jackson Hole Conservation Alliance, speaking for our 2,000 members, is recommending that the Bridger-Teton National Forest (BTNF) select Alternative 1, the “No Action” alternative, in your decision on the sale of land on Cache Street and the associated construction of new facilities at the Nelson and Cottonwood administrative sites in Jackson, Wyoming. Our concerns range from the inappropriateness of selling public lands to finance agency needs to the inefficiencies inherent in any of the action alternatives described. We submit these comments on the EA as a supplement to our letter with comments specific to NEPA irregularities.

The Jackson Hole Conservation Alliance (JHCA) participated fully in the community effort to retain the BTNF Supervisor’s office in Jackson. We provided a strong voice supporting the importance of the office and employees to the social and economic fabric of Jackson Hole. Our comments regarding the impacts of the sale of public lands to facilitate the decision to retain the supervisor’s office in Jackson should be prefaced by our recognition of the value of that decision to the community.

NO to the Sale of Public Lands

The proposal to sell up to 10.4 acres of this site is a result of the Forest Service Facilities Realignment and Enforcement Act of 2005 (FSFREA) that allows a forest unit to release administrative lands to the public for the highest price. We understand that the need to bring building facilities into compliance with various codes and to provide better energy efficiency and space utilization is a driving force of this proposal. The lack of adequate Forest Service budgeted funds to accomplish this need made it necessary to rely upon FSFREA. The JHCA finds the sale of public lands to accomplish these tasks a failing of the government responsibility to provide for agencies operating under its direction. Current economic conditions would also indicate that this is not a reasonable action to pursue.

Poor Economic Times

Even in Jackson Hole, an area with historically high real estate values, the national crisis in home and land sales has had an obvious impact. The proposal to sell land at this time would not be a good business move. In order to obtain the amount of money necessary to replace existing structures and construct new ones, more land would need to be sold than in better financial times. The JHCA has repeatedly stressed that a minimum amount of land on Cache Street should be sold—if any. The JHCA request to the BTNF for Alternative 1, No Action, is based on the principle that there should not be a sale of public lands to provide Forest Service funding. This

decision to ask the BTNF for Alternative 1 is further supported by the proposal to sell land in these economically distressed times. We feel that this is not the time to be selling lands, and specifically public lands, to provide Forest Service funding.

Public Interest

The proposal to sell 10 or 10.4 acres also opens up the potential for very flexible and unpredictable zoning on this parcel of land. With the joint planning commission discussions just beginning on Town as Heart in the revision of the Comprehensive Plan, the JHCA believes that without this fundamental basis for development planning, buyers and the community will be faced with added challenges in meeting the will of the public. This project should not move forward without the updated Comprehensive Plan in place.

Inefficient Alternatives

The second and equally significant JHCA argument for Alternative 1, No Action, are the inefficiencies generated by the relocation of facilities and housing from the Cache Street site to outlying administrative sites. The EA states as one of three goals for the *Facilities Master Plan*: “Assure that facilities are in the best location to manage the resources.” EA;3. The purpose of this proposal “is to generate funds for facility replacement through the sale of property and buildings; and reduce facility deferred maintenance costs, improve energy and operational efficiencies, provide for customer service and visitor contact, maintain fire response, and increase housing availability for employees with the construction of new facilities. EA;6. And, “Operational efficiency and effectiveness is at the core of the purpose and need for this project.” EA;87. We feel that placing facilities and/or housing at the Cottonwood Work Site would neither fulfill the goals of the Facilities Master Plan, nor the purpose and need of the EA and would exacerbate the retention of employees and place additional hardships on them. Some of the issues identified that would illustrate the need to select Alternative 1, No Action, as the final decision:

- Expense created for employees to move their manufactured homes,
- Locating employee housing at Cottonwood—increased driving, lack of cell service, school bus service, and limited utilities,
- Work inefficiencies and lost productivity if work equipment, storage facilities and horses are separated from office locations or not proximate to work areas,
- Employee recruitment and retention due to these inefficiencies
- Supervisor and District Offices poorly located, less visible, and less able to provide customer service and visitor contact, and
- Impacts on wildlife on each of the proposed sites for relocation.

The remainder of the EA does not support the claim that: “Public benefits from this proposal include improved use of limited federal funds by reducing cost of operation through facility maintenance, and energy and operational efficiencies, improved visibility and access to buildings for improved customer service and visitor contact; fire facilities located for appropriate response; and employee housing located close to the work site.” EA;7.

The Nelson Drive administrative site, which currently contains employee housing, is to receive 7 to 18 additional units in Alternatives 2-4. The Master Development Plan states that this land has low to moderate value to wildlife for winter range, wintering big game or migration corridors. The JHCA believes with the increased pressure on our public and private lands, development,

even at incremental levels of a few acres, is detrimental to our wildlife. The current low-density employee-housing site extends into an area that does accommodate wildlife, particularly in winter, and should not be modified so that impacts increase. We support the recent resolution made by the Teton Board of County Commissioners and the Jackson Town Council on October 5, 2009, that would have the Forest Service develop the Nelson Drive site “in a manner which uses the smallest site footprint, is similar to the surrounding neighborhood in terms of density, and protects critical wildlife habitat.” We do not feel that expanding this site in the manner proposed will give adequate protections to wildlife.

NEPA Process

Finally, it has come to our attention that there are serious discrepancies in the NEPA process. Specifically, the commitment of funds to the construction of the Big Piney district office with money borrowed against the anticipated revenues from the sale of the Cache Street property. This action preceded the decision by Supervisor Hamilton on the Jackson Administrative Site Land Conveyance and Development. The initiation of construction on this project would indicate an irrevocable action by the Forest Service, and a failure to comply with NEPA. This action invalidates Alternative 1, No Action, by assuming the sale of some amount of land.

The Jackson Hole Conservation Alliance requests that the Bridger-Teton National Forest select Alternative 1, No Action, for this Environmental Assessment to ensure protection for the region’s wildlife, a better fiduciary decision for the Forest Service, fewer negative impacts to employees, and a more responsible direction for funding and long-term management of our forests.

Sincerely,

Louise Lasley
Public Lands Director