



November 14, 2008

Kniffy Hamilton, Supervisor
Bridger-Teton National Forest
P.O. Box 1888
Jackson, Wyoming 83001

Re: Jackson Administrative Site Land Conveyance

On behalf of the Jackson Hole Conservation Alliance, which represents over 2,000 members, please accept the following scoping comments regarding the proposed conveyance of the Bridger-Teton National Forest Jackson administrative site and the associated construction of new facilities at the Nelson and Cottonwood administrative sites.

The Conservation Alliance appreciates the current challenges faced by the Forest Service with regard to facility maintenance requirements and the shortage of employee housing units. Also, as indicated by our organization's participation in the community effort to retain the BTNF Supervisor's office in Jackson, we strongly support the importance of the office and employees to the social and economic fabric of Jackson Hole. While we recognize that the sale of public lands on N. Cache St. has the potential to remedy these short-term challenges, the alternatives presented during this early process would not result in the best long-term solution. Given the long-term implications of the proposed sale, we urge the Forest Service to take a different approach; an approach that would work to uphold our community goals to minimize the valley's development footprint, to protect wildlife habitat and to place housing close to the workplace. In general, we urge the Forest Service to not move forward with a land sale of 10+ acres (as presented in the two alternatives.)

Issues to Address

Key issues include the time and purpose of sale, limited alternatives with regard to total amount of acreage for sale (and consequent effect on efficient site design and ability to minimize development in previously undeveloped areas), visual impacts of development, and impacts on wildlife.

Time and Purpose of Sale

We understand that the need to bring building facilities into compliance with various codes and to provide better energy efficiency and space utilization is the driving force of this proposal. The lack of adequate Forest Service appropriated funds to accomplish this need made it necessary to rely upon the Facilities Realignment Act. The

Conservation Alliance finds the need to sell public lands to meet these terms unfortunate and questions the sale of such a significant portion of public lands with regard to their best economic use in the long term. If the sale moves forward, we urge the Forest Service to take a long-term perspective, and to consider the value in retaining higher portions of land acreage. Land is often the most expensive component of business operations in Jackson Hole. We urge consideration of the long-term fiscal benefits of retaining high-value public lands to provide for future opportunities and needs.

Also, given the current and forecasted economic conditions, we urge the Forest Service to evaluate whether this is an appropriate time to sell public lands. What consequences arise from slowing down the sale process?

Alternatives

We would like to see the Forest Service consider an alternative to sell less acreage than those proposed in the two conveyance maps (which both propose 10.411 +/- acres for sale.) If a land sale moves forward, why not sell 5-7 acres and retain the remainder for continued use by the Forest Service? Specifically, with increased land acreage retained on the North Cache property, we recommend that the Forest Service explore an alternative to place efficiently-designed employee housing on North Cache. This option would place higher-intensity employee housing in a location that does not require expansion of a development footprint in more environmentally sensitive areas. It also makes sense in terms of providing homes close to the workplace, and in an area where mixed-use development is being targeted in our community's ongoing Comprehensive Plan Update.

We understand the challenges posed by the eight pre-existing, employee-owned manufactured homes in terms of pursuing a more efficient site design for employee housing on North Cache (or at any of the proposed administrative sites). Is there an alternative that could include an 18-unit employee-housing complex alongside the pre-existing homes on North Cache? Could these pre-existing homes be phased out at some future point in time to order to accommodate future higher density rental housing at the North Cache site? Also, is there an alternative that would phase in higher intensity development on the existing footprint at the Nelson administrative site? In general, we urge you to explore options to the fullest extent possible that would not require an expansive footprint of single-story homes (or housing complexes) in important winter wildlife habitat and movement corridors.

In general, we urge the Forest Service to consider an alternative that includes 1) significantly higher land acreage retained as public lands, 2) efficiently-designed employee housing on the North Cache property, 3) no (to minimal) expansion of the building footprint onto undeveloped lands at the Nelson and Cottonwood administrative sites. We also urge a site design and facility configuration that places employees to established workplaces as much as possible.

Visual Impacts

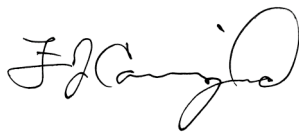
Visual impacts of development under each alternative should be evaluated.

Wildlife Impacts

We would like to see the environmental assessment address the impacts of higher intensity housing development at the Nelson and Cottonwood administrative sites. Specifically, we are very concerned about both the direct and indirect effects of an increased building envelope at the administrative sites. First, the direct and permanent loss of critical winter range should be addressed, particularly with regard to key movement corridors. Second, the indirect effects of more people (associated traffic, noise, recreation, pets, etc.) on the overall habitat function of the area should be evaluated. We are also very concerned about the impacts of a horse facility on wildlife habitat function at the administrative sites. Temporal effects should also be considered, particularly with regard to the shifts from primarily trailhead-based day use in the area. When do wildlife movements occur and how could this temporal pattern be affected? What are the consequences?

We understand the need to find effective, long-term solutions to the problems faced by the Forest Service. We also recognize the importance of upholding the community's top priority to be effective stewards of wildlife and their habitats. Given the permanency of selling public land (and the long-term implications such a sale carries), and the resulting displacement of increased human impacts into currently undeveloped wildlife habitat, we urge you to explore other alternatives. We look forward to being a part of finding a solution for the Forest Service to meet both its short-term needs and long-term obligations.

Sincerely,



Franz Camenzind
Executive Director



Kristy Bruner
Community Planning Director