



Jackson Hole Conservation Alliance  
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June 24, 2009

Superintendent  
Grand Teton National Park  
P.O. Drawer 170  
Moose, WY 83012

Re: Environmental Assessment/Assessment of Effect  
Gros Ventre Campground Rehabilitation

Dear Superintendent Scott;

The Jackson Hole Conservation Alliance (Alliance) and its members nationwide are fortunate to be able to not only recreate in Grand Teton National Park (GTNP), but to be able to offer our comments and suggestions for continued excellence in the park's management of its unique and spectacular natural resources. The proposed rehabilitation of the Gros Ventre campground provides for improved visitor services, opportunities to address the shortage of seasonal employee housing, and most importantly, will make improvements on and reestablish critical wildlife habitat.

The Gros Ventre campground is the largest in the park and the closest campground to Jackson. While it has historically been underused, its location along the Gros Ventre River and across major migration movements into and out of the National Elk Refuge increases its significance for habitat impacts.

The Environmental Assessment (EA) acknowledges the importance of the habitat in this area:

- "The campground was constructed in some of the area's highest quality riparian habitat." (EA:62)
- "The vegetation types found along the river corridor in the project area vicinity provide important breeding and seasonal habitats for a variety of wildlife." (EA:62)
- "The corridor also serves as an important travel or movement conduit facilitating within home range movements, dispersals, and movements associated with mating, migration, and genetic interchange for a number of species." (EA:62)
- "The river corridor is critically important to maintaining connectivity between spatially disjunctive individuals and populations." (EA:62)
- "The campground also lies within an important north-south ungulate migration corridor linking crucial winter ranges to the south with summer and transitional ranges further north." (EA:63)

The Alliance believes that all activities in this area both during construction and afterwards should respect the high wildlife and habitat values that exist.

"The combined infrastructure improvements would remove 35 percent of the mature cottonwood trees from loop E without replacement. Limited, but existent, cottonwood regeneration is present in loop E." (EA:56)  
The removal of 198 trees would appear to have a greater impact than stated in the EA. We would like to see a concerted effort to retain as many trees as possible and the evidence of cottonwood regeneration is encouraging. This riparian habitat exemplifies the high quality habitat that should be the standard for the park. We would offer that in addition to depending upon natural regeneration of trees, the park also plant trees within this area. We would also recommend shifting the location of the leach field to avoid the removal of trees at that site.

Allowing undisturbed conditions for moose during the winter and making sure that forage, shelter and other habitat needs for them are not diminished is also critical. The movement of elk during spring and fall through the campground and surrounding area is the most obvious use of the landscape by wildlife. Removing the western loops will facilitate more secure movement of elk on and off of the refuge and

provide more transitional range. The construction work and crew should not impact these ungulates, or other species that are either resident in the area or moving through. This would include small mammals, coyotes, amphibians, grizzly bears and black bears, and all species mentioned in the EA.

“Disturbances associated with the proposed campground rehabilitation are likely to exacerbate exotic species problems.” (EA:54) This project will encompass an extensive area of disturbance with the possibility of introduction or spread of non-native and/or invasive plant species. We would greatly encourage the highest compliance with your mitigation measures to eliminate this threat to habitat and wildlife.

The greatest potential for impacting both visitors and habitat is the large increase in administrative sites. We are concerned about the use of these sites by concessioner employees that are not working within the park. Sites have been designated in the EA to be “...used by park, partner, and concessioner employees and volunteers who are critical to park operations.” (EA:5) The availability of these sites should be restricted to GTNP seasonal employees and concessioner and partner employees who are directly working in the park. The seasonal use of the campground should remain at the current late May to early October schedule. This season should not be extended, nor should the campground be used for permanent housing for employees.

Original proposals included increasing commercial operations within the campground. We are pleased to see that those plans have been dropped and believe that any future modifications to the campground should not include commercial space. This campground should retain its rural character to accommodate wildlife and habitat concerns. In conjunction with this, the presence of electrical hookups should not impact the experience of our dark night skies. Whether visitor or administrative sites, there should be strong rules limiting use of exterior lights on RVs. There should be clear and prevalent measures taken at this campground to ensure that all users, visitors and employees, are informed of the unique and critical habitat conditions that must be honored.

The steps to be taken in this proposal address a deteriorating infrastructure and the shifting needs of park visitors and park staff. We applaud the thoroughness and professionalism that went into this EA and hope that our comments will help develop a successful improvement to the park.

Thank you.

Sincerely,

Louise Lasley  
Public Lands Director