



November 30, 2022

Doug Linn
BLM Pinedale Field Office
P.O. Box 768, Pinedale, WY 82941
RE: Parcel 26 – 2920 Lease Temporary Housing

Dear Mr. Linn:

On behalf of Protect Our Water Jackson Hole (POWJH), I am pleased to submit this letter in response to the Bureau of Land Management's (BLM) invitation for public comments on the above-referenced Wyoming Department of Transportation (WYDOT) Temporary Housing proposal.

POWJH is a locally-based nonprofit organization dedicated to serving Teton County, Wyoming, as a powerful advocate for restoring and protecting the surface and groundwater in and around the Snake River Headwaters. I am writing to express our opposition to the current application for the land use permit submitted by the WYDOT to use the west side of BLM "Parcel 26" for temporary housing.

Parcel 26 is a 23-acre plot located on the western bank of the Snake River along Highway 22 south of Jackson. This stretch of river is designated as a Wyoming Class 2AB water, which is protected for uses including drinking water supplies, nongame fisheries, fish consumption, aquatic life other than fish, recreation, wildlife, industry, agriculture and scenic value uses. To this point, WYDOT has displayed a discouraging lack of stewardship as they use the parcel as a construction staging area. Due to current use and lack of natural riparian vegetation, it is likely that sedimentation into the river has increased. Further, there has been construction waste consistently scattered across the site. The proposed wastewater removal for the labor camp also greatly amplifies the risk of fecal contamination getting into the river; just upstream of a beloved and designated recreational section that is protected under the Craig Thomas Snake Headwaters Legacy Act of 2008. Lastly, this proposal joins a concerning trend of developments which negate local control of local lands.

How does this proposal fit within the bounds of the 1999 Resource Management Plan, the BLM's 2004 Record of Decision, or 2008's Snake River Corridor Management/Ownership Transfer Plan? The 2019 Memorandum of Understanding clearly states that land and water within the Snake River corridor should be managed to protect and improve recreational opportunities while enhancing open space and wildlife habitat. As it currently stands, the proposal to place a labor camp on Parcel 26 goes against both of these goals. This does not have to be the case, however.

It is abundantly clear that deficient workforce housing is an issue hindering our community at nearly every level. Thankfully it is possible to improve the ecological function of this site while also enabling construction activity to take place over the next few years. We implore the BLM, WYDOT and other relevant parties to examine the opportunity to restore the shoreline of Parcel 26 to better protect water quality, enhance wildlife habitat and buffer the river from human activities taking place on the plot. With a robust riparian zone in place on the western section, human use of and ecological function provided by Parcel 26 will be greatly enhanced.

Thank you for your time and consideration.

Sincerely,

Matt Bambach,
Water Quality Advocate