

Tuesday April 1, 2025



Bridger-Teton National Forest
Jackson District Ranger Todd Stiles
PO Box 1689
Jackson, WY 83001

Attn: JHMR 2025 Mountain Improvements

Mr. Stiles,

On behalf of Protect Our Water Jackson Hole (POWJH), I am pleased to offer comments on the JHMR 2025 Mountain Improvements projects. In addition to reading through the BTNF scoping letter dated March 3, 2025, POWJH had the opportunity to meet with JHMR staff to tour the sites impacted by these projects. We would like to provide important context for all work occurring within the Fish Creek watershed and offer our perspective on this suite of proposed mountain improvements.

Fish Creek, its tributaries and adjacent wetlands are all designated as Class 1 “Outstanding Waters” by the Wyoming Department of Environmental Quality (WDEQ). Chapter 1 of the Wyoming Surface Water Quality Standards lays out clear antidegradation standards for Class 1 Waters, which include a moratorium on new point-source discharges of pollutants and strict compliance standards to limit harmful impacts to water quality or existing uses (through requisite permitting, Clean Water Act section 401 certifications, and the implementation of best management practices). Fish Creek is also a prized fishery, and the entire length is listed by Wyoming Game and Fish Department (WGFD) as a red ribbon stream. A red ribbon stream is a high-quality WGFD designation given to trout fisheries with between 300 and 599 pounds of trout per mile. Fish Creek provides critical habitat for Fine Spotted Cutthroat Trout, a unique form of Yellowstone Cutthroat Trout endemic to the Snake River north of Palisades Reservoir.

Despite its history as a top-tier fishery and pleasant place to swim or float, Fish Creek has been included in Wyoming’s Integrated 305(b)/303(d) Report as impaired for Recreation by excess *E. coli* bacteria since 2020. What’s more, multiple lines of evidence from nutrient and aquatic life data collected throughout Fish Creek from 2014-2018 indicate that the Aquatic Life Other than Fish designated use is impaired due to excess nutrients (total nitrogen and total phosphorus). POWJH expects WDEQ to add an official impairment designation to the stream for these reasons and release the requisite Watershed Management Plan soon in 2025.

POWJH and its predecessor organization, Friends of Fish Creek, have invested heavily in efforts to improve water quality in Fish Creek since 2014. Most recently, we partnered with the United States Geological Survey to fund the continuous collection of water chemistry and clarity data from Fish Creek as it meanders through Wilson. This data will help local and statewide stakeholders implement the upcoming Watershed Management Plan. In December 2016, Friends of Fish Creek authored a letter to the BTNF regarding the JHMR 2016

Enhancement Projects. We expressed opposition to the proposed sanitary facilities, which would have placed a septic tank and leach field at Corbet's Cabin, due to very unfavorable soil properties at the site. Accordingly, we requested an on-site advanced treatment unit or connection to Teton Village Wastewater Treatment Plant as the preferred alternative. Fast forward to today and JHMR is seeking approval to "provide upgraded water and sewer utilities to existing facilities" (Proposed Actions #1 and #3). POWJH applauds JHMR for this improved approach to wastewater management. For over a decade, it's been clear that inadequate wastewater treatment was one of the primary forcing factors behind diminishing water quality in Fish Creek. Decisions like this, which invest in the proper infrastructure rather than deferring the costs to the community and environment, will be essential to restoring the Fish Creek watershed and ensuring a healthy future for our valley.

POWJH is excited to continue work to reverse declining water quality in Fish Creek that involves all stakeholders in the watershed. We would like to thank both BTNF and JHMR staff for their continued efforts to communicate effectively and grow in line with community sentiment and environmental realities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MB'.

Matthew Bambach
Water Resources Program Manager
Protect Our Water Jackson Hole
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