



June 20, 2022

Supervisor Chip Jenkins  
c/o Grand Teton National Park Planning Office  
Attn: Bighorn Sheep Winter Habitat Protection  
P.O. Box 170  
Moose, WY 83012-0170

Submitted online at <https://parkplanning.nps.gov/commentForm.cfm?documentID=120042> and via email to [GRTE\\_Public\\_Affairs\\_Office@nps.gov](mailto:GRTE_Public_Affairs_Office@nps.gov)

Dear Supervisor Jenkins,

This document contains comments for Grand Teton National Park's scoping for a Bighorn Sheep Winter Habitat Protection Plan (Plan), submitted by the [Teton Backcountry Alliance](#), [Teton Climbers' Coalition](#), [Winter Wildlands Alliance](#), [American Alpine Club](#), and [Access Fund](#). With these comments, we are including a copy of the "Findings of the Online Survey on Teton Bighorn Sheep Conservation and Winter Backcountry Recreation." Our comments are submitted in the spirit of cooperation, with the hope that they will be helpful to Grand Teton National Park and the Teton Bighorn Sheep Working Group. Going forward, we intend to continue our collaboration with the working group to conserve Teton bighorn sheep into the future.

**About our organizations:**

Our organizations work on behalf of backcountry skiers, splitboarders, climbers, and mountaineers, and other human-powered winter recreationists. **Teton Backcountry Alliance** (TBCA) is a grassroots non-profit organization with the mission to promote public safety, community, stewardship, and sustainable access for Teton-area winter backcountry users. **Teton Climbers' Coalition** (TCC) is a local non-profit organization that advocates, stewards, and engages on behalf of Teton climbers. **Winter Wildlands Alliance** (WWA) is a national non-profit that works to inspire and empower people to protect America's wild snowscapes. Its alliance includes 34 grassroots organizations affiliates in 16 states, including Teton Backcountry Alliance. **The American Alpine Club** (AAC) is a national non-profit organization with more than 25,000 members. Grounded in community and place, the AAC's mission is to share and support members' passion for climbing and respect for the places they climb. The **Access Fund** (AF) is a national advocacy organization and accredited land trust with over 25,000 members and 130 local affiliates, whose mission keeps climbing areas open and conserves the climbing environment.

**Ecosystem Stewardship as a core principle:**

Ecosystem stewardship and access for backcountry winter recreationists are core principles of our organizations' missions. Meeting the first objective sometimes requires making compromises on the second. Following this principle, we recognize that the Teton bighorn sheep (TBHS) population is critically low, and action is needed to allow TBHS to recover to a level that insures its long-term sustainability. These actions are especially critical at a time when Earth is in crisis due to the forces of climate and land-use change. We also recognize the significant role Teton backcountry winter travel plays in the social, spiritual, and physical well-being of our community members, and fully support



winter backcountry recreation in a manner that is compatible with the conservation of TBHS and other wildlife. It is with these principles that we approach the Plan.

The Teton Range is globally renowned for backcountry skiing, splitboarding, and mountaineering, drawing many to recreate in the area. The Teton Range as part of the Greater Yellowstone Ecosystem is a premier area for wildlife, including the majestic Teton bighorn sheep, and our five organizations care deeply about sustainability of the Teton ecosystem. Many of our members carried GPS units during the winters of 2009 and 2010 to assist researchers with understanding Teton winter recreation use patterns. Teton Backcountry Alliance and Winter Wildlands Alliance held a public meeting to address issues related to Teton bighorn sheep and winter recreation in 2019, and later supported the Teton Bighorn Sheep Working Group's collaborative public workshops in 2020 and 2021. And, we actively sought to educate winter users about the voluntary closures this past season. We appreciate the work that the National Park Service (NPS) and Teton Bighorn Sheep Working Group (Working Group) have done to understand winter recreation uses and values in the Tetons, and the work the agencies continue to do to develop a Teton bighorn sheep habitat protection plan that also provides for backcountry winter recreation opportunities. We hope that our comments will assist NPS in developing the Winter Habitat Protection Plan.

### **Online Survey Results**

From April 11 until June 6, 2022, our organizations conducted an online survey to document the perspectives and knowledge of Teton backcountry skiers and climbers to inform development of the Plan. The survey asked winter backcountry travelers about options for managing important sheep habitat, the extent and need for specific closure areas, future bighorn sheep research, and the willingness of backcountry travelers to participate in citizen programs for bighorn sheep conservation and to observe closures. The survey was available for 8 weeks. When asking about backcountry use, the survey delineated a north-south boundary with Leigh Canyon and South Leigh Creek. Questions about time spend in the backcountry asked about the period from December 1 to April 30<sup>th</sup>. A brief summary of findings are listed below. A full report detailing survey results is included as an appendix with this letter ("Final Survey Report 6-20-22.pdf"). We encourage readers of this report to examine the many qualitative comments in the report, in addition to the figures of quantifiable responses. A second edition of the report will be released and shared with the NPS after further analysis is completed.

- 258 respondents participated in the survey.
- Most (67%) of the respondents resided in communities of the Teton region, with 47% having greater than 20 years of experience backcountry skiing. 92% had traveled the Teton backcountry in winter. 12% of the respondents were employed as winter guides. These data suggest that the sample of respondents represent winter Teton backcountry travelers with a high level of experience.
- Most respondents had spent their backcountry days in the southern portion of the Tetons.
- Those respondents who spend the most days (>20) in the backcountry spent very few of their days in the north end of the park, confirming that the north end of the park receives limited visitation.



- Overall, respondents expressed a high willingness to comply with closures, regardless of closure's being voluntary or mandatory. However, many of these same people stated in their comments that closures were not necessary or should be limited.
- Questioning the need for closures was mostly explained by backcountry travelers' believing there is a lack of evidence that skiers have a negative impact on bighorn sheep. Some also mentioned the loss of important unique wilderness experiences of the Tetons. A few people suggested that closure periods could be shortened. Several people suggested modification to full-season closures (e.g., closing areas every other day) and closures that are based on need, such as the actual location of sheep.
- Many of those supporting, and not questioning the need for closures stated that they defer to biologists on managing bighorn sheep.
- Respondents gave many suggestions for alternative actions that could complement or replace closures. The most frequently noted alternatives were better and more monitoring and research and limiting activities of backcountry skiing and economic development. Other suggestions included halting the agency-sponsored hunt of bighorn sheep, reducing the number of user days for guiding at the Jackson Hole Mountain Resort, educating non-local skiers, the establishment of more backcountry travel corridors, providing for sheep migration corridors, decreasing user days of guides at the Jackson Hole Ski Resort, increasing genetic diversity of the Teton bighorn population, addressing growth in the valley bottoms, and using a "need-based" approach to closures rather than instituting static long-term closures, limiting tourism growth, eliminating mountain goats, addressing climate change, establishing of migration corridors, habitat enhancement with prescribed burns, supplemental feeding, and more public education.
- Many comments (186) referenced specific geographic locations in the Tetons, with Avalanche Canyon receiving the most references. These comments mentioned specific ski runs. 56% of the respondents commented that they had never or seldom seen bighorn sheep when traveling the Tetons in the winter. Those that did observe bighorn sheep noted that they were almost always occupying windblown, low-snow ridges and appeared not to respond to skiers.
- Backcountry skiers of the survey stated their willingness to document their observations of bighorn sheep and that having access to real-time access to sheep locations would be helpful in their backcountry travels.
- Respondents offered several suggested areas for future research. Most noted the need for more studies that focus on human-bighorn sheep interactions. Others suggested research questions focused solely on bighorn sheep biology or ecology, including the need for a better understanding of winter habitat quality, a comparison of north and south winter Teton habitat conditions, more ground-truth data to complement remote-sensed habitat studies, better methods for determining herd population, studies of population dynamics, identifying the threshold at which augmentation is needed to stabilize a population, and treatments for pneumonia in sheep. Access to raw data about sheep distributions for independent review was also mentioned. 29% responded that they did not know of questions to ask.
- Responding to a final question requesting "other comments," many respondents reiterated comments they had pervious provided. Here, people asked about wolverines, stated their perspectives on the herd's decline, suggested that dogs not be allowed in the backcountry, and the need for closures, but not at the proposed scale. Several were philosophical, espousing their



respect and love for Teton wildlife and the need for conservation. A few commented on the “selfish” nature of some skiers. No comments were reported on mountaineering, ice, or rock ascent routes from the survey.

### **Monitoring and Research: Adaptive Management**

Monitoring and research are viewed by our organizations as integral elements of an “Adaptive Co-management process.” Adaptive Co-Management is defined here as a multi-level process of learning by doing, through adjusting conservation regulations and policies as more information is gathered and lessons are learned. As noted to us by Superintendent Jenkins, Park decisions should be viewed as experiments. In that spirit, we suggest that the NPS follow an adaptive management approach to TBHS conservation. This would mean that monitoring and research would be reviewed, evaluated, and adjusted as needed periodically. This process should include:

- evaluating the status of sheep distribution, movements, and abundance, changes in recreational activity, and other relevant changes in the social-ecological system;
- reviewing the assumptions that drive closures and new discoveries on the state of knowledge;
- and as necessary, modification of public education programs, monitoring, research activities, regulations, and other aspects of the Plan.

Experience across the US and internationally shows that successfully executing adaptive management can be challenges, but it can also support social learning that helps to achieve conservation costs. Working with our organizations and other partners to find funding to address research questions, modifying winter closures or travel routes for recreation, and/or updating public engagement methods are just a few ways this adaptive management process could be realized.

Through our interactions with the Teton backcountry ski and winter mountaineering community, we have heard many people express their fear that once areas are closed, they will never again be reopened. They make this comment, in part, because the Static Peak/Mt. Hunt area has been closed for about 20 years, with no formal assessment of if and how the closure has been beneficial to sheep. Indeed, the National Park Service has repeatedly closed areas to recreation for conservation across the country without re-evaluating the effectiveness of the closures. Grand Teton can, and should, do better.

As this Plan is implemented, we encourage the NPS and the Working Group to soften the boundaries between scientists and the public through more public involvement and better dialogue on monitoring and research. We therefore suggested an “adaptive co-management” approach to highlight the value for meaningful public involvement in all aspects of the Plan. We suggest that engaging the skier/winter climbing community in monitoring, research, and policymaking could offer important insights in management options, while helping to build public buy-in on decisions. Our organizations have led citizen science efforts related to wildlife conservation in other Park Service units. For example, Access Fund has partnered with North Cascades National Park and Zion National



Park to set up volunteer monitoring programs for seasonal raptor closure areas. Access Fund built a volunteer sign-up sheet and helped streamline data entry sheets for volunteers to use to assist in seasonal monitoring of known raptor nests. Access Fund promoted the volunteer opportunity and helped organize a volunteer training day with National Park staff. These volunteer monitoring programs were successful, a dedicated group of 10-15 climbers volunteer each season to assist NPS biologists in collecting weekly raptor activity monitoring data. We make this recommendation while also acknowledging that “best available science” is an important basis on which decisions are made, and that all policy decisions are made with some level of uncertainty. In order to achieve this goal, the plan should identify specific research questions to inform adaptive management, and outline a research program to answer these questions. It should also strive to identify indicators of success and thresholds at which changes are appropriate.

Skiers and climbers spend considerable time traveling in winter to remote areas of the Tetons rarely visited by others, including most biologists. Others, such as JHMR Ski Patrollers and guides observe sheep on a regular basis. Hence, there is an opportunity for these users to contribute to and grow our body of knowledge on TBHS. Allowing for public access to the information generated through monitoring and research will also encourage more people to participate, and help to cultivate a stronger sense of stewardship among members of the public. The public is generally more receptive to and supportive of closures when they have assurance that closures are effective at achieving their intended purpose, and will be re-assessed as new information becomes available.

We therefore suggest that NPS consider including the following approaches and research questions in the Plan, to understand the plan’s effectiveness, the need for adaptive management, and to advance the overall state of knowledge concerning winter recreation and bighorn sheep in the Tetons:

- Provide opportunities for representatives of the backcountry ski/winter climbing community to participate in adaptive management,, such as creating a Working Group advisory board consisting of representatives from the backcountry ski/winter climbing community and/or providing a role for these representatives within the Working Group, and hosting annual public meetings to share information and solicit ideas pertaining to adaptive management.
- Monitor visitor use to better understand how many people ski in areas adjacent to winter habitat protection zones, and how this number changes over time, as well as to accurately measure compliance with the plan.
- Launch additional studies to assess the implications of winter recreation-sheep interaction to bighorn sheep distribution, movements, and abundance, including sheep survival and reproductive success.
- Continue to study the Teton bighorn sheep herd via scat collection and DNA analysis. We would like to help NPS recruit volunteers, raise funds to pay for training, and/or develop an internship program in partnership with Grand Teton specifically to support this study. A willingness to partner with non-profit organizations for research and monitoring should be identified in the Plan.



- Develop a mobile application to complement the Plan, to provide a means for skiers and climbers to report Teton bighorn sheep encounters. This past winter WWA worked with the Colorado Mountain Club (CMC) to add a winter recreation violations and conflict reporting function in their Recreation Impact Monitoring Systems mobile application ([RIMS app](#)). and we have already begun discussions with CMC about building out a wildlife monitoring component in RIMS. Other options for winter travelers to contribute to monitoring also exist. We would like to work with the NPS to ensure that citizen data collection will be useful for the agency in terms of advancing our collective understanding of Teton bighorn sheep.
- Utilize remote cameras to monitor bighorn sheep (presence/absence) in winter closure areas and, possibly, to record sheep behavior in response to skier travel on designated routes.
- Monitor human use in the plan area. Ski tracks are visible from considerable distance and we suggest using high altitude overflights, spotting scopes, and binoculars to monitor for plan compliance. End of season surveys would also be a useful tool to understand how the recreating public interacts with and is affected by the Plan.
- Provide a means for skiers and winter climbers to voluntarily file trip reports sharing information about bighorn sheep sightings, travel on designated routes, or other activities relevant to the Plan in much the same way members of the public currently submit avalanche observations. Our organizations would be willing to provide this service, hosted on one of our websites, and share information gathered with the NPS.
- Establish a Grand Teton National Park Winter Backcountry Ambassador Program, in partnership with our organizations, to help advance public education and monitoring goals. Backcountry Ambassadors would be tasked with outreach and education, as well as monitoring for plan compliance, training other volunteers, and collecting data. NPS cabins located in the Park backcountry could provide remote workstations for extended monitoring trips and the NPS could provide (winter) housing for Backcountry Ambassadors in Colter Bay.

Our community of skiers and winter climbers have posed comments and questions that could potentially inform new and/or additional research initiatives. Borrowing from this input, we have compiled the following list of questions, which we consider to be essential to measuring the effectiveness of any plan and to understand the extent to which the plan is contributing to overall TBHS conservation success:

- What are the ideal TBHS population objectives, both absolute and spatial, that any plan would hope to achieve??
- Do TBHS demonstrate habituation in response to skiers who are using designated travel routes?
- What are the effects of human winter travel on TBHS distribution and movements, survival, and reproductive success?
- Are TBHS preferentially utilizing winter habitat in zones closed to human activity?
- Are there differences in TBHS occupancy and/or behavior in winter habitat zones that are closed to human activity versus those that are managed as “voluntary avoidance areas”?

The plan should clearly articulate how the NPS intends to answer these, and other, research questions. Our members are very interested in citizen science opportunities related to bighorn sheep monitoring and research. While we understand that there are limitations to citizen science, we encourage the NPS



to seriously consider opportunities for citizen science that can complement research conducted by agency and/or university biologists. This engagement can help to build public buy-in and confidence in the plan, and can be an important tool for public engagement. The Teton Science School could be an excellent partner for developing citizen science opportunities.

As with public outreach and education, the monitoring, data collection, and adaptive management aspects of this Plan should not be limited by current NPS capacity. Our organizations are very interested in working with Grand Teton National Park to implement and monitor this Plan, including raising funds and recruiting volunteers (or hiring paid staff) to support monitoring and data collection. We encourage the NPS to specifically articulate a willingness to work with partners to achieve Plan goals - including through cost-share agreements and formal partnerships – in the final Plan.

### **Habitat and Recreation Management**

We appreciate that the NPS has made an effort to take a measured approach to create new or expanded winter habitat protection areas for Teton bighorn sheep, and that this process was front-loaded with information sharing and public input. In these comments, we seek to provide additional information from the perspective of winter recreationists to inform NPS decision making. Below we have provided general recommendations about the use of types of closures in different areas based on their current level of visitation, and also provided NPS with recommendations we have heard from the community of Teton backcountry skiers and climbers. We encourage NPS to draw both on our general recommendations and the specific comments from backcountry users to develop Alternatives and determine the best way forward.

In our experience, we have found that the best tools for successful management of an area where recreation is limited or restricted include communication, adaptation in response to new information, and education. Voluntary avoidance can be an effective management strategy if paired with good communication from the land manager, education through programs such as backcountry ambassadors, and compliance monitoring. We have found that closures, whether they are mandatory or voluntary, if not paired with these elements are less effective. Therefore, we stress their importance as integral to achieving success with the habitat management portion of this plan.

We have organized our recommendations to address two types of areas: those with low winter backcountry usage (i.e. north of Leigh Canyon) and those areas where there are high numbers of travelers (i.e. areas to the south). We recommend that management of recreation in each of these areas differ in the initial plan. Foundational to our recommendations is the idea that any closures would be subject to periodic review and adjustment if deemed necessary in the future.

The Plan should provide clear guidance regarding designated travel routes, as there was confusion this past winter concerning these routes, especially with regard to how wide of a path each route represented and how far a skier could stray from the GPS line. We recommend that the Plan clearly



indicate that mapped designated route lines dictate general lines of travel, and that skiers should move through those areas efficiently, without lingering.

### *North Zone*

The habitat zones in the northern end of Grand Teton National Park (ie., Cirque Lake Basin, Ranger/Doane Complex, Owl/Elk/Red Mountain, Forellen Peak, and Survey Peak) currently see considerably fewer winter travelers than those zones farther south in the Park (see the findings of our online survey). We recommend that the management plan highlight the areas of high-value bighorn sheep habitat, actively communicate this information to backcountry travelers, and designate these areas as “voluntary avoidance zones.” Our rationale for this type of recreational management in the North is to provide bighorn sheep with needed habitat while allowing backcountry travelers the opportunity to assess conditions and exercise their judgment in selecting safe travel routes.

Although we recommend voluntary avoidance designations for the winter habitat protection areas north of Leigh Canyon, the NPS may also want to consider closing sheep habitat within these zones to human use while designating only the sheep viewsheds as voluntary avoidance areas. In our view, this would be a more complicated approach, but could have the advantage of an enforceable closure in the areas most critical for sheep. We encourage that all of our suggestions be incorporated into different alternatives for analysis.

Because little is known about recreation use in the North Zone, other than that it is low and potentially increasing, the plan should clearly articulate a strategy for monitoring visitor use to better understand how many people ski in this part of the Park and how this number changes over time. As noted above, the Plan should also include an adaptive management process to allow the NPS to adjust management as needed in the future in response to new information gained through monitoring and research, and to ensure the Plan is achieving its intended conservation outcomes.

### *South Zone*

The South Zone of the Park sees considerably more winter use than the North Zone and we are supportive of “hard closures” where they are deemed necessary by the Working Group. The boundaries of these areas, as defined by the voluntary closure map from this past winter, are generally acceptable to our community. Avalanche Canyon was the subject of the most comments in our online survey. We appreciate the need for some closures in Avalanche Canyon, and recommend they be paired with designated ascent and descent routes to provide access to classic ski lines. By allowing ski access on designated travel routes in Avalanche Canyon, the NPS has an opportunity to study whether sheep can habituate to frequent skier encounters in the backcountry and assess whether this is a viable conservation strategy.



As with the North Zone, monitoring and adaptive management must be integral to the Plan in the South Zone as well. The NPS should work with partners to monitor and assess the effectiveness of closures, designated routes, and other management actions in respect to sheep conservation.

### *Community Recommendations*

Designating travel routes to access highly valued ski routes and accommodate classic traverses and making boundary adjustments to accommodate safe travel around winter closures will help to build skier support for the Plan by providing highly-valued ski opportunities, with relatively little impact on TBHS. In determining the habitat management component of this plan, we encourage the NPS to consider the input generated from the public via our online survey (see survey sections on “Areas Traveled” and “Specific Locations”). As noted earlier, this input is included in Appendix 1.

Backcountry travelers noted that some access should be allowed in the Ranger/Doane massif. Ranger Peak especially was mentioned as an important goal for skiers willing to cross Jackson Lake. While relatively few skiers travel here, it is regarded as highly valued as a unique wilderness experience. They also noted that it is not realistic to expect skiers traveling between closure areas, such as up Webb Canyon, not to occasionally enter into closed areas for safety and ease of travel. In this case, it seems appropriate to leave the area as a voluntary closure with the caveat that it could change to a mandatory closure in future if deemed necessary. An addition of a travel route that allows movement between Webb and Snowshoe canyons via the high pass between Glacier Peak and Rolling Thunder Mountain was also requested. This route is part of the classic Teton crest high route. Survey respondents did not comment on the other polygons in the North zone of the park and it appears that these areas are rarely visited.

Backcountry travelers also noted that there are several other designated travel routes that would help build skier support for the habitat protection plan by providing highly-valued ski opportunities with relatively little impact on TBHS. For example, Mount Wister is an important destination for many skiers and mountaineers in the winter, and skiers requested a travel route in its south couloir to facilitate access to the summit and the north bowl. Likewise, it was requested that a designated route across Rendezvous Peak/Rendezvous Mountain to link Teton Pass to the ski area allow use of this classic Teton high route.

The notes listed above are not a complete representation of what people have suggested. Again, please review the survey results for more details. As well, we strongly encourage NPS to continue to engage our community of backcountry skiers and winter climbers to better understand their recommendations and to arrive at an effective Plan.

### **User Education and Public Engagement**

We are pleased that the NPS is considering increased public outreach and education, new signage, and map products as part of this Plan. Without outreach and education, the public cannot be expected to understand, much less comply with, the habitat and recreation management aspects of the Plan. Our organizations are eager to work with the NPS on user education and public



engagement. Here are our suggestions for outreach and education efforts to incorporate into the Plan:

- Post signs on information kiosks at winter trailheads with clear maps and information about the Plan and responsible winter recreational use.
- Develop a backcountry/trailhead winter ambassador program in cooperation with the Teton Backcountry Alliance’s Backcountry Ambassador Program to educate visitors about the Plan.
- Increase Park Ranger field presence in the backcountry.
- Work with guiding companies (and guides), Jackson Hole Mountain Resort, and local retailers to educate backcountry visitors about the Plan *before* they arrive at winter trailheads.
- Partner with the Bridger-Teton Avalanche Center and other organizations to share information about the Plan.
- Partner with local non-profits, including our organizations, to share information about the plan as well as information pertaining to monitoring, research, and adaptive management.
- Share maps and data with backcountry mobile applications, such as OnX Backcountry, Mountain Project, Gaia GPS, and Strava.
- Provide opportunities for winter backcountry travelers to share their TBHS observations and other relevant information via an online reporting system (see more on this topic in the section on Adaptive Management).
- Provide a page on the Grand Teton National Park website dedicated to the winter habitat protection plan with maps, information, and season-end reports.

Please lean on our organizations to help implement these goals if/when NPS funding is insufficient.

**Other Actions to Complement the Winter Habitat Protection Plan**

We appreciate that this Plan is only one piece of a larger effort to protect and grow the Teton bighorn sheep population. In addition to the ongoing efforts on this front, such as habitat improvement projects on the Caribou-Targhee and the mountain goat culling effort in Grand Teton National Park, we suggest that the NPS pursue the following additional efforts to boost Teton bighorn sheep conservation efforts:

- Advocate that Wyoming Game and Fish and Idaho Fish and Game end bighorn sheep hunting in the Teton Range until the population reaches a sustainable level.
- Advocate for the Caribou-Targhee National Forest to deny Grand Targhee Resort’s request to expand into bighorn sheep habitat (South Bowl).

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We again want to express strong support for conserving Teton bighorn sheep. With the suggested recommendations listed above, we hope to find a balance that allows Teton bighorn sheep to thrive while also allowing for winter backcountry travel and builds buy-in from the community of backcountry skiers and climbers.



On behalf of our organizations, we appreciate the opportunity to comment on this proposal and look forward to reviewing Alternatives once they are available. And again, we strongly urge the NPS not to limit itself to a plan that fits within the Park's current organizational capacity or budget. Instead, the NPS should develop a plan that will best achieve the Park's goals relative to TBHS winter habitat protection, trusting that there are a multitude of partners willing to work with the agency on Plan implementation.

Sincerely,

Gary Kofinas, Steering Committee Chair, Teton Backcountry Alliance, [gpkofinas@alaska.edu](mailto:gpkofinas@alaska.edu)

Charlie Thomas, Board Member, Teton Climbers Coalition, [magpiefurniture@gmail.com](mailto:magpiefurniture@gmail.com)

Hilary Eisen, Policy Director, Winter Wildlands Alliance, [heisen@winterwildlands.org](mailto:heisen@winterwildlands.org)

Taylor Luneau, Policy Manager, American Alpine Club, [tluneau@americanalpineclub.org](mailto:tluneau@americanalpineclub.org)

Erik Murdock, VP of Policy and Government Affairs, Access Fund, [erik@accessfund.org](mailto:erik@accessfund.org)