

Drive Trailhead. My property boundary on the east side abuts Forest Service land and this was a determining factor in my purchase.

4. I have owned my house since 2004, a period of over 20 years. This is my permanent residence.

5. I am a member of Nelson Neighborhood Conservation Coalition, a Wyoming nonprofit corporation formed to preserve and protect the environmental quality and residential character of the Nelson Drive area and to ensure compliance with federal environmental laws affecting the area.

II. UNIQUE POSITION AT E. HANSEN AVENUE AND NELSON DRIVE INTERSECTION

6. My home is located at the intersection of E. Hansen Avenue and Nelson Drive. E. Hansen Avenue "T's" into Nelson Drive. The proposed project traffic, if leaving the project site, can turn north or south on to Nelson Drive (it forms a loop around existing Forest Service housing). All traffic traveling south will drive by my residence, and the traffic traveling north will intersect Nelson drive's main road approximately 100 yards from my house. At that juncture, traffic could still travel south to access E. Hansen Avenue and again travel by my residence toward Rancher Street or Redmond Street.

7. Because of this unique geographic position, I experience traffic impacts from both E. Hansen Avenue and Nelson Drive. Any increase in traffic on Nelson Drive directly affects my property and my daily use of E. Hansen Avenue.

8. The proposed development authorized by the November 21, 2025, Special Use Permit is located at the Nelson Drive Trailhead, which is accessed via Nelson Drive. All vehicle traffic to and from the proposed 36-unit development will travel on Nelson Drive, either directly past my residence or in close proximity to my residence.

9. This creates a compounded traffic impact for me and my property: (a) increased traffic approaching from Nelson Drive; (b) increased turning movements and congestion at the E. Hansen/Nelson intersection; (c) increased noise from vehicles accelerating, decelerating, and turning at the intersection; and (d) increased safety concerns for pedestrians and vehicles entering and exiting E. Hansen Avenue.

III. TRAFFIC AND SAFETY IMPACTS

10. Nelson Drive is a narrow, winding residential street. It has no sidewalks and no pedestrian infrastructure of any kind.

11. E. Hansen Avenue also has no sidewalks in this area. Pedestrians walking to or from the Nelson Drive Trailhead must walk in the street, sharing the road with vehicle traffic.

12. During construction periods, Nelson Drive is effectively reduced to a one-lane road due to construction equipment and vehicles parked along the narrow street.

13. During summer months, Nelson Drive functions as a one-lane road due to boats and trailers parked along the road by recreational users accessing the nearby Snake River and National Forest lands.

14. The November 21, 2025, Special Use Permit authorizes construction of 36 residential dwelling units at the Nelson Drive Trailhead. The 2012 Finding of No Significant Impact (FONSI) had authorized only 13 housing units.

15. Based on standard residential traffic planning estimates of 7-10 vehicle trips per unit per day: (a) the 2012 authorization for 13 units would generate approximately 91-130 vehicle trips per day on Nelson Drive; and (b) the 2025 authorization for 36 units will generate approximately 252-360 vehicle trips per day on Nelson Drive.

16. This represents an increase of approximately 160-230 additional vehicle movements per day on Nelson Drive compared to the 2012 authorization. All of this traffic will pass either directly by my home at the E. Hansen/Nelson intersection or in close proximity to my home.

17. To my knowledge, no traffic study has been conducted to analyze the impacts of this substantial increase in vehicle traffic on Nelson Drive, on the E. Hansen / Nelson intersection, or on the safety of pedestrians and cyclists in the area.

18. To my knowledge, no traffic calming measures, sidewalk improvements, crosswalks, or other pedestrian safety infrastructure have been proposed to mitigate the impacts of 160-230 additional daily vehicle trips on this narrow, winding, sidewalk-free street system.

19. The failure to analyze or mitigate these traffic and safety impacts causes me direct, concrete harm in the form of increased danger when entering and exiting E.

Hansen Avenue, increased noise and congestion at the intersection where I live, and degraded safety for pedestrians walking to the Nelson Drive Trailhead.

IV. DAILY USE OF NELSON DRIVE TRAILHEAD

20. The Nelson Drive Trailhead is part of my daily routine and is one of the primary reasons I chose to live at this location in 2004.

21. I regularly use the trails accessible from the Nelson Drive Trailhead for hiking, walking, and accessing National Forest System lands. This is not occasional recreational use - the trailhead and surrounding National Forest lands are central to my well-being with almost daily use.

22. My work life is stressful. The peace and quiet of this neighborhood and my daily connection to open space, wildlife, and the National Forest trail system are critical to my physical and mental well-being. This is not an abstract issue for me.

23. The proposed construction of a 36-unit residential development at the Nelson Drive Trailhead will inevitably lead to: (a) increased congestion at the trailhead; (b) increased noise and human activity in what is currently a relatively quiet entry point to National Forest land; (c) diminished experience accessing public land on a daily basis; and (d) loss of the peaceful, natural character that drew me to this location.

24. These impacts to my daily use and enjoyment of the Nelson Drive Trailhead are direct, concrete, and permanent. They represent a fundamental alteration of the environment I chose to live in and depend upon for my quality of life.

V. WILDLIFE HABITAT IMPACTS

25. One of the most important aspects of living in this location is the presence of wildlife and the understanding that this area serves as meaningful habitat for native species.

26. I regularly see and coexist with wildlife in this area. Living here means experiencing wildlife as part of my daily environment. This is not a generalized environmental concern - it is something I personally value and experience every day.

27. Parts of the Bridger-Teton National Forest in this area are seasonally restricted in winter specifically to protect wildlife habitat. That alone underscores the ecological importance and sensitivity of this area.

28. The proposed 36-unit development will: (a) increase human activity, noise, and vehicle traffic in sensitive wildlife habitat; (b) add sustained pressure to an already sensitive habitat area; (c) further fragment and stress wildlife movement patterns in a place where they are already vulnerable; and (d) degrade the quality of habitat that wildlife in this area depend upon.

29. The degradation of wildlife habitat and the added stress on wildlife populations is a direct loss to my daily environment and quality of life. I chose to live in this location specifically to be near National Forest land and to coexist with wildlife. The loss of that experience is a concrete, personal harm to me.

VI. DARK SKY ENVIRONMENT AND LIGHT POLLUTION

30. Our neighborhood places a strong value on maintaining a "dark sky" environment. The absence of excessive artificial lighting is an important part of both the natural ecosystem and the character of living adjacent to National Forest land.

31. A dark sky environment allows for clear night skies, supports wildlife that depend on natural light cycles, and contributes to the quiet peace and natural character of this area.

32. The current open space at the Nelson Drive Trailhead maintains a dark sky environment at night. There is minimal artificial lighting in the immediate area.

33. A development of 36 residential units in 14 buildings would introduce a substantial increase in artificial light from residential units, parking areas, outdoor lighting, and associated infrastructure.

34. This added light pollution would: (a) diminish the experience of the night sky for those of us who live in this area; (b) disrupt wildlife behavior in an area that is already recognized as sensitive habitat; (c) permanently alter the natural character of the area; and (d) create light trespass affecting neighboring properties including my own.

35. The loss of a truly dark night sky is not a small change - it is a permanent shift in how this place is experienced, both for residents and for the wildlife that depend on natural light cycles.

36. The degradation of the dark sky environment is a direct, concrete harm to my enjoyment of my property and the surrounding National Forest land.

VII. AESTHETIC AND NEIGHBORHOOD CHARACTER IMPACTS

37. The current open space at the Nelson Drive Trailhead contributes significantly to the character of this neighborhood. It is part of what makes this area feel connected to the surrounding National Forest rather than separated from it.

38. The open, natural character of the trailhead area is visible from my property and is part of the aesthetic and environmental quality that I experience daily.

39. I chose to purchase my home in this location in 2004 specifically because of the quiet nature of the neighborhood, the connection to open space and National Forest land, and the relatively undeveloped character of the area.

40. Replacing the current open space at the trailhead with a 36-unit, 14-building residential development would permanently alter the character of this neighborhood. This is a direct and lasting change to the environment I chose to live in and have invested in for over 20 years.

41. The visual impact of 14 buildings and associated parking, roads, and infrastructure will fundamentally change the view and character of the area as experienced from my property and from the neighborhood generally.

VIII. PROCEDURAL HARMS UNDER NEPA

42. I am aware that the 2012 Finding of No Significant Impact (FONSI) for the Nelson Drive site was based on a public process that included public meetings, published notices, and opportunities for public comment.

43. I am also aware that the November 21, 2025 Special Use Permit authorizing 36 housing units was issued with no public notice, no public meetings, and no opportunity for public comment.

44. I learned of the 36-unit development proposal only through informal neighborhood communications, not through any official notice from the Forest Service.

45. As a resident whose property is directly adjacent to Nelson Drive and who will be directly affected by the substantial increase in traffic, I had no opportunity to review the proposal, submit written comments, attend public meetings, or raise my concerns about traffic impacts, wildlife habitat, light pollution, and neighborhood character before the permit was issued.

46. Had the Forest Service provided public notice and an opportunity to comment on the proposed 36-unit development, I would have participated actively in that process. I would have submitted written comments detailing the impacts described in this declaration. I would have attended public meetings. I would have raised concerns about the lack of traffic analysis, the lack of pedestrian safety measures, the impacts to wildlife habitat, and the degradation of the dark sky environment.

47. The failure to provide notice and an opportunity to comment deprived me of my procedural rights under the National Environmental Policy Act (NEPA). I have a legally protected interest in participating in the environmental review process for a federal action that will directly affect my property, my daily use of National Forest land, and my quality of life.

48. This procedural harm is concrete and particularized to me as a resident whose property is located at the E. Hansen/Nelson Drive intersection and who will experience direct impacts from the increased traffic and development authorized by the permit.

IX. INJURY IN FACT, CAUSATION, AND REDRESSABILITY

49. I have suffered and will continue to suffer concrete injuries as a result of the Forest Service's issuance of the November 21, 2025, Special Use Permit. These injuries include:

- a. Increased traffic impacts at the E. Hansen/Nelson Drive intersection where I live, including 160-230 additional daily vehicle movements, increased turning movements and congestion, increased noise, and decreased safety for pedestrians and vehicles;
- b. Loss of quiet enjoyment and peaceful character of my property and neighborhood due to substantially increased traffic, noise, and human activity;
- c. Degradation of my daily recreational experience accessing the Nelson Drive Trailhead and National Forest lands due to increased congestion and loss of the natural, quiet character of the trailhead area;
- d. Loss of wildlife habitat and wildlife viewing opportunities that are central to my daily experience and quality of life in this location;
- e. Degradation of the dark sky environment due to increased artificial lighting from 36 residential units and associated infrastructure;

f. Permanent alteration of the aesthetic and environmental character of the area that I chose to live in and have invested in for over 20 years;

g. Deprivation of my procedural rights under NEPA to participate in the environmental review process and to comment on a proposal that directly affects my property and quality of life.

50. These injuries are fairly traceable to the Forest Service's decision to issue the Special Use Permit. Absent the permit, the 36-unit development cannot proceed, and the harms I have described will not occur.

51. These injuries are redressable by the relief sought in this action. If the Court grants the requested injunctive and declaratory relief invalidating or enjoining implementation of the Special Use Permit, the development will not proceed, and the harms to my property and quality of life will be prevented.

X. SUPPORT FOR COALITION'S INTERVENTION

52. I support the Nelson Neighborhood Conservation Coalition's Motion to Intervene as of Right in this action. The Coalition represents my interests and the interests of my neighbors in ensuring that federal environmental laws are followed and that impacts to our neighborhood and our use of National Forest land are properly analyzed before development proceeds.

53. I am prepared to participate fully in this litigation as a member of the Coalition. I am willing to provide testimony, participate in discovery, and assist in any way necessary to establish the concrete impacts this development will have on

