To: Caribou-Targhee National Forest

Subject: Electronic Comments Submission EIS, Grand Targhee 2018 Master Development Plan Projects

From: Clyde Waddell, Janet Heslin

Date: August 30, 2020

**Introduction**:

This submission is a delineation of the specific impacts of the proposed boundary adjustments, new lifts, lift realignments, terrain expansions and improvements, glading, grading, road construction and rehabilitation, snowmaking, trail construction, and user facilities at the Grand Targhee Resort on the Mill Creek Teton C&H Grazing Allotment utilized by permittee Mr. Clyde Waddell. The Mill Creek Teton grazing allotment consists of two units (Mill Creek=Unit 1, Teton=Unit 2) and is utilized from June 16th to September 30th on an annual basis. Fifty-five cow and calf pairs subsist on herbaceous vegetation, grasses, shrubs, and woody plant species. Unit 1 water sources for stock are limited to Spring Creek and Mill Creek for grazing rotations during June- August 15th. After August 15th stock are rotated to Teton Canyon (unit 2) and utilize Teton Creek.

The grazing allotment utilized by local rancher Mr. Waddell is an integral part of his livestock operation. As such he expends considerable efforts on a daily basis to monitor the location and condition of his herd. This includes rotating between areas of the allotment, placement of mineral salt, and attending to needs of individual herd members. The area consists of rough, steep and brush-covered sections.

The grazing allotments provide resources not otherwise available to sustain Mr. Waddell’s cattle business and provide an income for his family, who have resided in Teton Valley for over 30 years. Mr. Waddell is a well-known and respected stockman in the Eastern Idaho livestock community. Other family members are active in providing veterinary services, livestock brand inspections and evaluating and judging the quality of animals exhibited at county fairs throughout Idaho and Wyoming.

**GTR Masterplan Comments**

1. **Proposed boundary expansion**. The GTR masterplan does not provide sufficient information on the exact location of the proposed boundary. Please provide survey data or coordinates.

The proposed boundary expansion would directly impact the area of grazing allotment unit 2 and indirectly impact grazing unit 1. The GTR Masterplan proposes to substantially alter both the terrain and the current use of the terrain within the area of the grazing allotment. These proposed changes would negatively impact the value of the grazing allotment. It is difficult to conceive of how the new GTR activities and cattle grazing could co-exist on the same piece of forest acreage. The area of impact includes the “Mono Trees” area and a smaller section south and east of Lightning Ridge.

1. Impact of **proposed winter trails project**.
2. The creation of winter ski trails as part of the Mono Trees expansion would impact the quality, quantity, and access to livestock water in Mill Creek and Spring Creek. Mill Creek and Spring Creek are the only sources of livestock water for most of the grazing allotment. Alteration and/or destruction of these creeks compromises the value of the entire allotment. Typically, cows travel long distances to these creeks several times a day from areas north, south, east and west of Ski Hill road.
3. New ski trails would obliterate natural boundaries to herd travel. Currently, the dense brush and trees limit overland travel, serving to concentrate herd grazing to small areas each day. Clearing vegetation and trees for new ski runs would have the unintended effect of creating cow highways. Cows would preferentially use these ski runs to access areas of the mountain outside of the grazing allotment and may interfere with resort operations. The GTR masterplan has no provision to limit herd travel outside of the allotment boundaries.
4. Creation of trails involves disturbing the ground. This results in loss of forage and both soft, unstable ground and compaction of soils. Vegetation removed during construction requires years to regrow. These interventions would decrease the value of the grazing allotment. Fewer cows could be supported.
5. Mono Trees area would result in more user created conflicts with livestock. Hikers, mountain bikers and dogs may have more frequent encounters with cattle.
6. Mono Trees area would result in increased camping, campfires, trash, and habitat destruction.
7. New winter trails and the concomitant impact on water sources would negatively impact rotation of the herd between sections of units 1 and 2. The lack of alternative water sources in the bulk of the allotment makes the rotation dependent upon access to water in Spring Creek and Mill Creek. Rotation is necessary to prevent over-grazing of any one area and enables the range to support 55 cow/calf pairs.
8. Impact of **proposed glading and grading to create winter ski runs** in Mono trees area.
9. Glading and grading used to create winter ski runs will result in changes to livestock water quality, quantity and access. Impacts use and value of entire allotment.
10. Glading and grading will disrupt natural boundaries and create cow highways to resort amenities.
11. Glading and grading reduce quantity of forage available on the allotment. Loss of value.
12. Glading and grading negatively impacts ability to rotate cattle from areas within the allotment. May result in more cows grazing along Ski Hill Road.
13. Impact of **proposed new ski lift** in Mono Trees area. Construction of a new lift will necessitate the creation of an access road to the site, and the use of heavy equipment such as excavators, cranes and helicopters. Such construction would likely be on-going during the months of June-September when cows are present. Construction of the lift would be expected to impact Spring Creek and Mill Creek during the driest months of the year. Cows typically will be frequenting this area several times per day.
14. Additional impacts from the lift and lift construction will be the disruptions of natural boundaries and the creation of cow highways.
15. Destruction and long-term reduction of forage at the site.
16. Inability to move and rotate cows from one area to another resulting in over grazing and loss of carrying capacity of the range.
17. Construction of the lift may necessitate the digging of trenches for electrical cables and large holes for concrete bases for lift towers. Cattle and calves may fall into holes and ditches and may need to be manually extracted with slings.
18. Impact of **upgrading existing access road** to base area of Mono Trees.
19. Improving the access road to the base area will increase the number of people who will enter the area during the summer season when cows are present. Such increased user access may result in increased camping, campfires, dogs, trail running, mountain biking, hiking, firearms target shooting and off-road motor vehicle use. All such activities could result in untoward encounters with cattle including injuries to cattle and people.
20. Additional impacts include disruption to Mill Creek drainage and loss of stock watering capability.
21. Loss of forage and the need for long term restoration work to restore habitat.
22. Disruption of cattle travel to and from the creeks from adjacent areas of the allotment.
23. Impact of **snowmaking** on groundwater and surface water. Increased snowmaking requires multiple new wells to be drilled. The impact of these wells on the ground water and surface water is unknown. Hydrology studies and simulations need to be completed to fully understand the impact.
24. Impact of **warming hut** on Lightning Ridge. The master plan does not provide details on year-round use of this facility. Will it be used during the months of June-September? Summer use could be considerable given the number of mountain bikers utilizing nearby trails. Please address.
25. Impact of **increased road traffic on Ski Hill Road** on grazing allotment. The current grazing allotment includes Ski Hill Road. Cows regularly cross and travel on the road to reach Spring creek and Mill Creek from other sections of the allotment.
26. Build out of the resort will increase year-round use. Not only will there be more mountain bike trails and hiking trails, but new restaurants, bars and entertainment will attract many more summer visitors. The summer resort guests will drive private cars, vans, RVS and campers.
27. The increase in road traffic (including delivery trucks and employee vehicles) will increase the risk of vehicle collisions with livestock on the road. Especially at night.
28. The response time for Teton County Wyoming police is long. Calls to 911 are routed to Driggs Fire/EMS. Please provide a plan for responding to emergency calls for road assistance, treatment of injured livestock and compensation for loss.
29. **Mitigation of impacts to grazing allotment**. The above impacts are numerous and serious, potentially creating a situation where Mr. Waddell is unable to continue to utilize the allotment. The loss of income to the Waddell family would be significant.
30. Mr. Waddell wishes to discuss these impacts with GTR and reach an agreement on a mitigation plan.