



**BACKCOUNTRY
HUNTERS & ANGLERS**
IDAHO

October 12, 2020

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c/o Jay Pence
Teton Basin District Ranger
Caribou – Targhee National Forest
P.O. Box 777
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SUBMITTED ELECTRONICALLY VIA THE WEB PORTAL

RE: Grand Targhee Master Development Plan Projects – Scoping Comments

Backcountry Hunters and Anglers (BHA) is a non-profit conservation group with 40,000 members in chapters across forty-eight states, two Canadian provinces and one territory. BHA seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting, through education and work on behalf of wild public lands and waters. Because the proposed actions would occur near the state line, sportspeople from both Wyoming and Idaho could be impacted. The Idaho and Wyoming BHA chapters represent 2,800 hunters and anglers.

We are concerned about the proposed Grand Targhee Resort (GTR) expansion closely because of the negative impacts it could have on local and regional wildlife of high recreational, economic and heritage value. The existing Special Use Permit (SUP) boundary around GTR is large and still not built out. However, even with only partial build out, wildlife impacts within that boundary are very high owing to the recent major expansions of the trail system to accommodate increased summer recreation primarily by mountain bikers. Adding another 1200 acres to the SUP, particularly in the South Bowl and Mono Trail areas will continue to erode otherwise high functioning wildlife habitat within and outside the resort, including the Jedediah Smith Wilderness. The cumulative impacts of continued habitat fragmentation and high-intensity, year-round human recreation need to be analyzed not just within the proposed SUP but at the Forest Subsection or Ranger District scale to properly assess impacts.

In addition to listed and special status species like grizzly bear, lynx and wolverine, which are all present in the area, we are gravely concerned about big game populations. Notably we are worried about bighorn sheep, moose, deer and elk, all of which use habitat in and around the proposed SUP expansion area. These species will all be negatively impacted through displacement, habitat compression and lower fitness caused by increased habitat fragmentation and year-round recreation, but in different ways. Following are some specific examples that we would like to see addressed in the DEIS process.

The Teton Range big horn sheep population is already very low and vulnerable to extirpation. Big horn sheep are extremely sensitive to human presence. Radio collar data support summer use of the South Bowl area by sheep. Teton Canyon supports a natural mineral lick important to sheep. We are concerned that seasonal migrations into Teton Canyon could be severed by increased human use. Due to the high vulnerability of this population, impacts of this scale could further tip the scale towards extirpation. We want to see GTR analyze this issue carefully in the DEIS and fully identify and disclose direct, indirect and cumulative impacts to ensure that this fragile resource is maintained.

Moose populations throughout Idaho and Wyoming have declined significantly over the last 20 years. Given that moose are cold weather adapted, climate change is expected to contribute to further declines from habitat degradation and increased disease pressure. The IDFG have collared moose that migrate to that area during summer-fall. High elevation habitat may become even more crucial in the coming decades to conserve this species. The DEIS should fully identify and disclose direct, indirect, and cumulative impacts to regional moose populations today and in the future with climate change.

The Idaho Department of Fish and Game has collar data from multiple elk in the GTR area showing that they use it during spring-fall. They also have multiple collared mule deer in that area that stay near GTR in spring-fall. Much of the SUP and vicinity is crucial calving/fawning and rearing habitat as well as summer and transition range for these species. In the greater surrounding area including Teton Canyon, IDFG has collared elk and moose that remain in the area year-round and mule deer that spend fall-winter-spring in the area. Teton Canyon specifically is a critical holdout of winter range for our populations of mule deer in that area. We request specific analyses to fully identify and disclose direct, indirect, and cumulative impacts to these species, at least at the Forest Subsection level.

Given likely impacts to wildlife and the backcountry hunting experience, BHA would like to see No Action alternatives, as well as alternatives that do not include development within the South Bowl Area and Mono Trail Areas.

Thank you for the opportunity to comment, you can count on our continued interest and engagement in this process.

Sincerely,

Jeffrey Klausmann, East Idaho Co chair, Idaho Backcountry Hunters and Anglers

Erik Kramer, Jackson Region Board Member, Wyoming Backcountry Hunters and Anglers

