

October 12, 2020

Caribou-Targhee National Forest
Forest Supervisor Mel Bolling
c/o Jay Pence, Teton Basin Ranger District
P.O. Box 777
Driggs, ID 83422

RE: Grand Targhee Master Plan Scoping Comments

Electronic scoping comments submitted to District Ranger Jay Pence at jay.pence@usda.gov and Project Lead Rachel Franchina at rachel.franchina@usda.gov.

Attempts to submit comments electronically via the online portal (<https://cara.ecosystem-management.org/Public//CommentInput?Project=58258>) were unsuccessful.

Dear Supervisor Bolling:

Please accept these comments and concerns from Wyoming Wildlife Advocates (WWA) and Sierra Club (SC), submitted in response to the scoping period on the draft environmental impact (DEIS) statement for the Grand Targhee Resort Master Development Plan projects. WWA informs, educates, and empowers communities to preserve our wild legacy, protect our shared wildlife, and modernize wildlife management across the state. WWA speaks for the wildlife of the Greater Yellowstone Ecosystem (GYE) in order to protect and preserve this shared resource. Since 1892, SC has worked to help people enjoy, explore and protect the planet. More than 3.6 million SC members and supporters from across the country are inspired by and treasure our remaining undeveloped public lands, including those in the Caribou-Targhee National Forest (CTNF). We are committed to fully participating in the planning process for the proposed expansion of the Grand Targhee Resort (GTR).

In the following comments, we will highlight significant concerns about the proposed expansion related to impacts on wildlife and loss or significant deterioration of wildlife habitat. Our comments will focus primarily on the South Bowl and Mono Trees areas as development in these areas poses the greatest risk to wildlife and would require an extension to the boundaries already allowed in the Special Use Permit for GTR.

Bighorn Sheep

We are highly concerned about the Teton Range bighorn sheep herd. Throughout the past 50 years, this small population has been cut off from all migration routes, whittled down to fewer than 100 individuals, remains highly vulnerable to disease, and is on the brink of extirpation from the Teton Range. Teton Canyon houses a unique mineral lick that the bighorn sheep rely on in the winter to obtain minerals that boost their immune system. Grand Teton National Park is so concerned with the survival of the bighorn sheep that they recently instituted both aerial gunning and a volunteer culling program for mountain goats that inhabit the same territory as the sheep and threaten to spread disease to this very vulnerable population. The Teton Range Bighorn Sheep Working Group, which consists of

government and non-governmental organizations, has met several times to discuss the future of the bighorn sheep herd and how to protect them from winter recreation disturbances to ensure their long-term survival. Bighorn sheep are decidedly disturbed by human presence even when just within eyesight across a canyon. Weidmann & Bleich (2014) found that “metapopulations of bighorn sheep occurring in fragmented habitat having minimal vertical relief may be especially susceptible to sources of disturbance, which should be a consideration when recreational facilities are developed.” A detailed analysis of the effects that proposed expansion into the South Bowl and Mono Trees area would have on the tenuous Teton Range bighorn sheep population must be conducted. The 2003 Caribou-Targhee Revised Forest Plan (CTFP) states, “The NFMA diversity provision and the fish and wildlife resource regulation establish a goal to provide habitat for the continued existence of vertebrate species in the planning area. The goal is met by following the provisions of 36 CFR 219.19(a)(1) through (a)(7). The bottom line is that the Forest Service **may not adopt a plan** that it knows or believes would, through possible future Forest Service actions, **extirpate a vertebrate species from the planning area.**” (CTFP, emphasis added)

Canada Lynx

Canada lynx are a threatened species under the Endangered Species Act. The CTFP states, “Forest management contributes to the recovery of federally listed threatened, endangered, and proposed species and provides for conditions, which help preclude sensitive species from being proposed for federal listing.” With lynx mostly extirpated from the area, any new development in prime lynx habitat (such as the Mono Trees area) must be fully analyzed. Research has shown that lynx tend to avoid areas with motorized use but can withstand some disturbance from backcountry skiers due to the similar habitat utilized by both and characterized by heavy forest canopy cover (Squires, et al., 2019). We are particularly concerned by the proposed clearing of dense forest cover in the Mono Trees area to make way for new ski runs, as this likely will preclude lynx from using that habitat. Proposed motorized SnowCat operations in the South Bowl may also deter lynx from using that habitat.

Wolverine

The Forest Service (FS) must conduct thorough surveys for wolverine den sites, both currently used and potential sites, and restrict motorized use in areas with identified or potential den sites from March 1 through May 15, in accordance with the Idaho Department of Fish and Game's (IDFG) 2014 management plan on wolverines. Wolverines are known to be extremely sensitive to disturbance by the mere presence of humans (Heinemeyer, et al., 2019), and climate change may additionally impact wolverine habitats as winter snowpack diminishes over time. The IDFG 2014 wolverine management plan states that, “During the 21st century, most projections predict progressively warmer and wetter conditions in the PNW, although summer drought may worsen. Temperatures in the region will increase 0.1–0.6° C per decade through at least 2050.” The IDFG plan further states that, “Given projected temperature increases, much of the western U.S. is expected to transition from a snow-dominated system to one more rain-dominated, spring snowpack is expected to decline, especially at warmer low to mid-elevations, and existing snow is expected to continue melting earlier.” Wolverines are dependent on persistent snowpack in higher elevations. The analysis of any development into the South Bowl and Mono Trees areas must include the effects of predicted climate change on the survivability and cumulative impacts to wolverines in the Teton Range and throughout eastern Idaho.

Moose

Moose are declining throughout the GYE, for reasons that are not fully understood but that are the subject of ongoing research. Climate change will continue to impact their populations heavily as moose are denizens of cooler northern climates and exhibit heat stress in temperatures greater than 60 degrees Fahrenheit. The new mountain biking trails proposed in the South Bowl could significantly impact moose populations in Teton Canyon by removing higher elevation habitat where moose seek shelter from high temperatures. Furthermore, removal of trees in the Mono Trees area could also decrease important security habitat for moose as they seek shelter and hiding cover from predators. Potential impacts of the proposed development on moose should be identified and studied closely.

Birds

Great grey owls are known to inhabit the Mono Trees area. The FS is required under the CTFP to “maintain over 40% of the forested acres in mature and old age classes within a 1,600-acre area around all known great grey owl nest sites.” Surveys should be conducted for great grey owl nests and effective strategies identified and implemented to protect nesting sites and the surrounding mature forest.

Northern goshawks inhabit the proposed area of expansion. The FS should conduct comprehensive surveys to identify northern goshawk nesting, foraging, and other occupied habitats and follow all management standards and guidelines for roads (existing and proposed), buffer zones around nesting areas, forest rotation age, size class distribution for forested acres, maximum size and proximity of created openings, numbers of snags and reserved trees, downed logs, and thinning for northern goshawk nesting areas, post-fledging family areas, and foraging areas (Table 3.5 CTFP, 2003).

Ground-dwelling birds can be negatively impacted by outdoor recreation both in winter and summer (Arlettaz, et al., 2015; Coppes, et al., 2017). The proposed summer and winter activities in the South Bowl and Mono Trees areas will increase the amount of human activity and particularly fast-moving activities (SnowCat skiing and mountain biking) which can often cause the greatest stress to ground-dwelling birds like grouse. The impacts of the proposed development on all ground-dwelling birds must be fully analyzed and effective mitigation strategies must be identified and incorporated into any future development.

Grizzly Bears

With its dramatic topographic relief and diverse habitats, Teton Canyon hosts nearly all wildlife species native to the broader ecoregion, including the endangered grizzly bear. The FS must include a thorough analysis of all potential disturbance to grizzly bear habitat including den sites as well as important summer foraging and cub-rearing habitats in both South Bowl and Mono Trees in the DEIS .

Purpose and Need

The purpose and need for this proposed action appears to be driven by the desire of a for-profit corporation, the GTR, to increase its business and profitability by increasing recreational opportunities, which conflicts with the FS's mission “to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” GTR’s Master Plan states that, “GTR has a well-earned reputation within the ski industry. It is known for the intimate, uncrowded skiing and riding experience that it offers—reminding guests of “how skiing is supposed to be.” Its

abundant “champagne powder,” fun and diverse terrain (both traditional and hike to), and outstanding views of the Grand Tetons make it a truly unique regional destination resort.” We believe GTR can retain that special feeling and uniqueness without sacrificing critical wildlife habitat and viability of certain highly vulnerable species by not expanding into the South Bowl or Mono Trees.

All the above species of wildlife are facing multiple challenges, including those from increased recreation in important habitats. The FS has no mandate to provide more extreme or adventurous recreational activities on the CTNF. It already offers many year-round, accessible, family-friendly activities including wildlife and bird-watching, mountain biking, disc golf, hiking, nature trails, and camping. The ability of the FS to work with commercial entities shouldn’t be at the expense of the health of our shared wildlife and undeveloped public land resources. The FS website states that its purpose (“the ultimate answer to why we do what we do”) is intended to help sustain forests and grasslands for present and future generations” (USFS website 2020). Improvements at GTR that serve to greatly increase user days in both the winter and summer months are in direct opposition to sustaining forests for present and future generations. New and continuing research (Naidoo & Burton, 2020) is showing increased impacts to wildlife from recreation. Richard & Côté (2015) “recommend that future ski area developments generally consider the behavior of species sensitive to anthropogenic disturbances and that construction should not occur in habitat essential for sensitive species.”

Wildlife stands to be significantly impacted by these proposed changes with lasting negative effects. The GYE is one of the last places in the United States that still supports a full suite of native wildlife. Some species are still holding their own, but others are struggling. Considering the effects of climate change in addition to ever-increasing human development, it is clear that wildlife will face increasing challenges in the coming years. If we continue to allow further development and downplay or completely ignore the impacts of our current actions to wildlife, we will effectively keep placing more stress on wildlife populations that have already seen a major increase in human development and activities.

Facilities, ski runs, snowmaking, mountain biking, ziplines, new roads, and new ski lifts will all intrude on and diminish the value of important wildlife habitat year-round. Alternatives in the DEIS must fully evaluate all of the risks and intrusions to wildlife not only in the proposed area, but the cumulative effects to wildlife in the surrounding areas as well. To comply with the National Environmental Policy Act, the FS must offer an full range of alternatives to a proposed action of this magnitude (High Country Conservation Advocates v. United States Forest Service, 2020).

The GYE is experiencing an exponential increase in outdoor recreation and all its accompanying development, including in the backcountry that historically has been relatively undisturbed by humans. Superficially stating that the proposed GTR expansion will “increase slightly” impacts to wildlife completely ignores the reality of cumulative impact from climate change and all development throughout CTNF. We are deeply concerned that negative impacts of development and recreation on wildlife are reaching a critical point that will lead to significant population level declines.

In summary, we are specifically opposed to the following actions:

- Special Use Permit (SUP)/Operational Boundary Adjustments for the South Bowl and Mono Trees Areas, including required CTFP amendments
- Non-Winter and Alternative Activities, including:
 - (1) the construction of new summer recreation trails (hiking, downhill mountain biking and multi-use trails),

- (2) other summer activities like a canopy tour/fly line, zip line, aerial adventure course and re-location of the disc golf course, and
- (3) alternative winter activities like a snowtubing facility and expansion of existing Nordic, snowshoeing and fat biking offerings in South Bowl and Mono Trees.
- A summertime zipline will mean more noise and more people in summer, which could cause abandonment of habitat by wildlife. At least one DEIS alternative should not include zipline installation.

In a letter dated February 5, 2019 to Geordie Gillett, Supervisor Bolling stated, “we remained concerned about wildlife...” We sincerely hope that you still remain concerned and will seriously consider our comments and other comments from the community in this important decision that will forever change critical wildlife habitats and undeveloped areas of the CTNF. Thank you for your time and for looking out for the best interests of our shared resources.

Sincerely,

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