



October 12, 2020

Mel Bolling
c/o Jay Pence
Teton Basin District Ranger
U.S. Forest Service
P.O. Box 777
Driggs, ID 83422

Dear Mr. Bolling:

Please accept this scoping letter from the Wild Sheep Foundation (WSF), regarding the proposed expansion of Grand Targhee Resort (GTR). Please make certain that WSF (and our Wyoming Chapter WSF) remain on your mailing list for this CTNF EIS.

Please analyze potential impacts of the proposed GTR expansion on bighorn sheep in WGFD's Targhee herd unit. The Targhee BHS remain the most isolated, least genetically-diverse core, native BHS population in Wyoming. For nearly 20 years, WSF and our WY-WSF Chapter have led efforts to reduce/eliminate Risk of Contact between BHS in the Teton Range, and previously-permitted domestic sheep grazing along the W slope of the Teton Range.

For various reasons, BHS wintering in the Tetons largely remain at high elevations throughout the winter. Following removal of domestic sheep grazing, BHS have pioneered into historic but currently underutilized habitats, particularly low-elevation winter ranges. WSF is aware of planned prescribed burns being contemplated by the CTNF and WGFD, and we are very supportive of habitat enhancement needs and opportunities.

Depending on how the USFS EIS analysis proceeds, perhaps GTR project proponents could be approached, to determine their willingness (or not) to underwrite BHS habitat enhancement projects, away from the GTR SUP area. GTR expansion beyond the currently-permitted SUP is of greatest concern, in terms of this struggling core, native BHS herd in the Teton Range.

Research conducted over the past decade or more has demonstrated displacement of BHS which occurs from back-country, permitted (as well as out-of-bounds, non-permitted) skier use. WSF expects the CTNF EIS analysis to thoroughly investigate the likelihood that expanded skiing use will further displace BHS from preferred seasonal habitats.

WSF is aware of, and has helped support, efforts of the Teton Range Inter-Agency BHS Working Group. In particular, WSF provided funding to underwrite expenses associated with a March 2019 panel of experts convened to assist local WGFD and USFS managers address high priority issues in the Targhee BHS herd. Among many, three important recommendations from this panel of experts stood out, in terms of this proposed GTR expansion/USFS EIS:

- 1) Protect remaining winter habitat for the Targhee BHS herd;
- 2) Expand/enhance winter habitat using prescribed burns and/or managed wildfires; and
- 3) Limit human disturbance of BHS during winter

An additional recommendation would be to protect the integrity of, and BHS access to, identified mineral licks (e.g., Apostle Cliffs). WSF is aware of documented, highly-selective BHS use of natural mineral licks on the W slope of the Tetons. It is imperative that permitted GTR activities do NOT adversely impact BHS access to, and use of, these mineral licks.

WSF (and our Wyoming Chapter) are eager to engage with the CTNF and WGFD on this planned GTR EIS analysis. We look forward to hearing the next step(s) in this process.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Hurley". The signature is written in a cursive style with a large, looping "y" at the end.

Kevin Hurley
Wild Sheep Foundation
Vice-President for Conservation

cc: Gray N. Thornton, WSF President & CEO, Bozeman
Zach McDermott, WY-WSF President, Sheridan
Katie Cheesebrough, WY-WSF Executive Director, Casper
Doug McWhirter, WGFD, Jackson