United States Department of the Interior

NATIONAL PARK SERVICE
GRAND TETON NATIONAL PARK
P.O. BOX 170
MOOSE, WY 83012-0170

IN REPLY REFER TO:
ER 20/0367

October 16, 2020

Subject: NPS Comments on Notice of Intent to prepare Environmental Impact Statement (EIS) for the *Grand Targhee Resort Master Development Plan,* Teton County, WY

Mr. Pence,

The National Park Service (NPS) appreciates the opportunity to provide comments on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the *Grand Targhee Resort Master Development Plan* in Teton County, WY. The NPS seeks to support the US Forest Service (USFS) while maximizing protection of NPS resources through the external review process. Based on our review of available information regarding the proposed action, the NPS has identified several issues related to biological and visual resources of Grand Teton National Park which we believe should be analyzed further in the EIS process.

The views presented within this memo are those of NPS Grand Teton National Park. The park strongly supports native wildlife population and habitat management in the Caribou – Targhee National Forest and other federal lands within the Greater Yellowstone Ecosystem, and is sharing the data and supporting literature below regarding such efforts in response to the USFS request for comments from Federal agencies that "identify resources or effects that should be considered".

Wildlife

Bighorn Sheep (*Ovis canadensis)*

The expansion of Grand Targhee Resort could further impact diminishing habitat for the small, genetically isolated population of native bighorn sheep that has endured in the Teton Range since the last ice age. The herd lives year-round at high elevations, cut off from their historical valley winter ranges by residential and recreational development.

There is widespread interest among local, state, and national stakeholders in conserving the herd. As members of the Teton Range Bighorn Sheep Working Group, the Caribou – Targhee National Forest and Grand Teton National Park have been involved in working on management concerns related to bighorn sheep for many years. The park has taken extensive measures over the last year to protect the herd including through the removal of non-native mountain goats that can carry bacterial pathogens that can lead to diseases lethal to bighorn sheep.

Development of ski area infrastructure in the South Bowl would result in a direct loss of occupied bighorn sheep summer habitat and further fragment the available summer bighorn sheep habitat in Teton Canyon. Construction in the South Bowl area would presumably occur during the summer and would disturb and displace bighorn sheep trying to use the area. Construction would also result in direct loss of high-quality winter habitat. In winter, most species attempt to conserve energy by limiting their movements and spatial range. Disturbance during winter can induce costly displacement to wildlife at a time when energy reserves and resources are limited. Research has indicated that recreation on and adjacent to winter range is a threat to this population's persistence (Courtemanch 2014).

NPS data demonstrates that the proposed project could directly impact the following areas important for bighorn sheep:

- High quality winter habitat for bighorn sheep within and adjacent to the proposed South Bowl Expansion Area. (Figure 1)
- Occupied summer habitat for bighorn sheep nursery groups in the proposed South Bowl Expansion Area. (Figure 2)
- Access to a natural mineral lick utilized by bighorn sheep year-round in the Apostle Cliffs area south of the proposed South Bowl Expansion Area. (Figures 1 and 2)
- Access to lower elevation spring habitat documented to be used by rams.

Given this information and the importance of this resource, NPS would like to collaborate with USFS to consider a design alternative that:

- Does not disrupt the current access route bighorn sheep use to obtain important trace minerals at the mineral lick in the Apostle Cliffs during months of April through August (at a minimum).
- Does not prevent wintering bighorn sheep from accessing winter habitat below the proposed South Bowl expansion area.
- Retains opportunities to implement planned prescribed fire projects aimed at improving the condition of bighorn sheep habitat in Teton Canyon allowing for increased use by bighorn sheep.
- Retains connectivity and existing travel paths between patches of bighorn sheep habitat (winter and summer) from the crest of the Tetons (and Grand Teton National Park) to historic winter range (Whitfield 1983) in lower Teton Canyon and current occupied summer habitat in the South Bowl area and in the vicinity of the mineral lick in the Apostle cliffs.
- Conserves and maintains occupancy of existing summer habitat currently used by Grand Teton bighorn sheep ewe/lamb groups.

Additionally, the NPS recommends the DEIS include:

- Detailed information for any proposed public access gates or routes from the South Bowl into the in the backcountry areas of Teton Canyon, an analysis of how human

use levels will change, and potentially impact wildlife, like bighorn sheep, that are sensitive to disturbance.

- Analysis of related impacts on habitat availability and security for wildlife (including Teton Range bighorn sheep) if summer use becomes established informally or as part of the proposed action or other action alternative.
- Consideration of the additive impacts from prior habitat loss, fragmentation, and increasing levels of disturbance on bighorn sheep and other ungulates that use the South Bowl and adjacent habitats in Teton Canyon during critical times of year (e.g. in winter and summer and during migratory period).
- Clarification if avalanche control is needed for this project, where it will take place, and if it will have impact on aforementioned areas of bighorn sheep habitat.
- Integration of recommendations from the Teton Range Bighorn Sheep Working Group for prudent project planning.
- Clarification if the proposed action includes new visitor access gates between the resort and Teton Canyon, and whether this would allow visitors to enter high-quality winter bighorn sheep habitat.

Wolverine *(Gulo gulo luscus)*

The proposed project will increase development and recreational access in habitat for a wolverine population that uses both the forest and Grand Teton National Park.

The Teton Range is one of the few places in the Greater Yellowstone ecosystem where a small population of wolverine still occurs. The wolverine population is an important component of an intact ecosystem for the role they play as top predators and scavengers. Potential impacts of increased development could reduce secure habitat available to the wolverine population.

The proposal has potential to result in loss of habitat and indirect effects from increased winter recreation.

Given this information and the importance of this resource, NPS would like to collaborate with USFS to consider a design alternative that:

- Avoids predicted high-use areas of wolverines, especially denning/maternal habitat used by females and dependent young (Inman 2012, 2013).

Viewsheds and Visual Resources

This proposed expansion would occur in previously undeveloped areas that may impact scenic viewsheds from within park boundaries. The viewsheds on the west side of the Teton Range are important because they provide visitors an outstanding opportunity to view the lower portion of Teton Canyon and other nearby undeveloped backcountry areas of the Caribou – Targhee National Forest from alpine elevations in the park. Given the importance of this resource to the park, NPS recommends the EIS include a visual impact assessment. This assessment would aid in determining potential viewshed protection measures.

We appreciate the opportunity to work with the USFS to help ensure any proposed special use activities in this project are appropriately sited, designed, or mitigated to avoid or minimize

adverse impacts to shared wildlife resources and visual resources at Grand Teton National Park. NPS is happy to share the aforementioned data with USFS and to discuss the proposed mitigation measures. Because we have special expertise and jurisdiction for bighorn sheep and wolverines when they are in the park, as well as for visual resources that could be affected by the proposal, the NPS anticipates seeking cooperating agency status under the National Environmental Policy Act.

We look forward to working with you during the NEPA process. Should you have any questions about our comments, please contact Daniel Noon, Grand Teton National Park Chief of Planning and Environmental Compliance, at 307-739-3465 or daniel_noon@nps.gov.

Sincerely,

Gopaul Noojibail
Acting Superintendent
Grand Teton National Park
John D. Rockefeller, Jr. Memorial Parkway

Appendix: Figures and References

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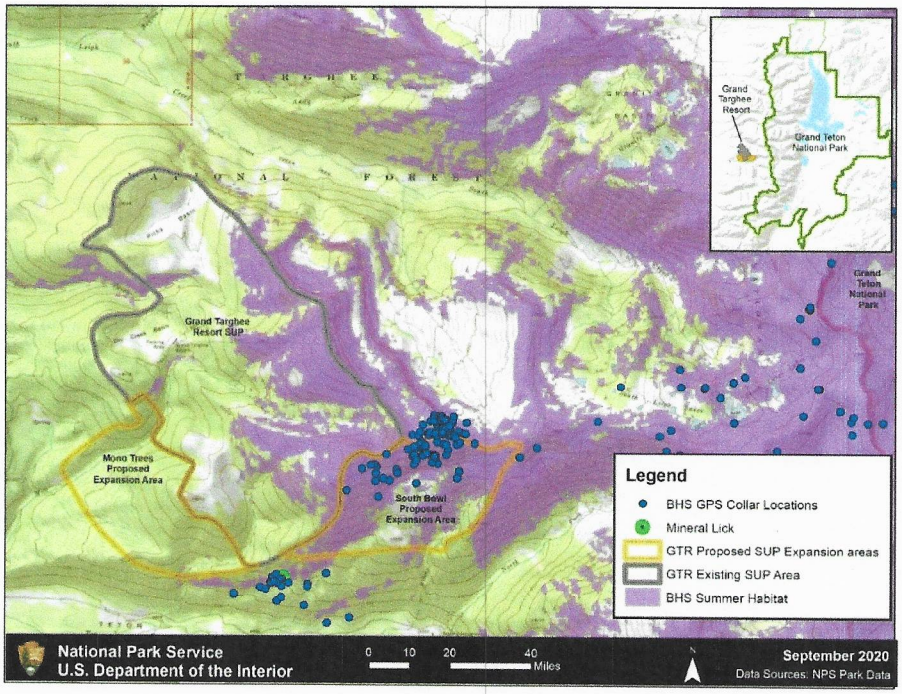

Figure 1. Summer bighorn sheep habitat and use in relation to the proposed Grand Targhee Resort Expansion.

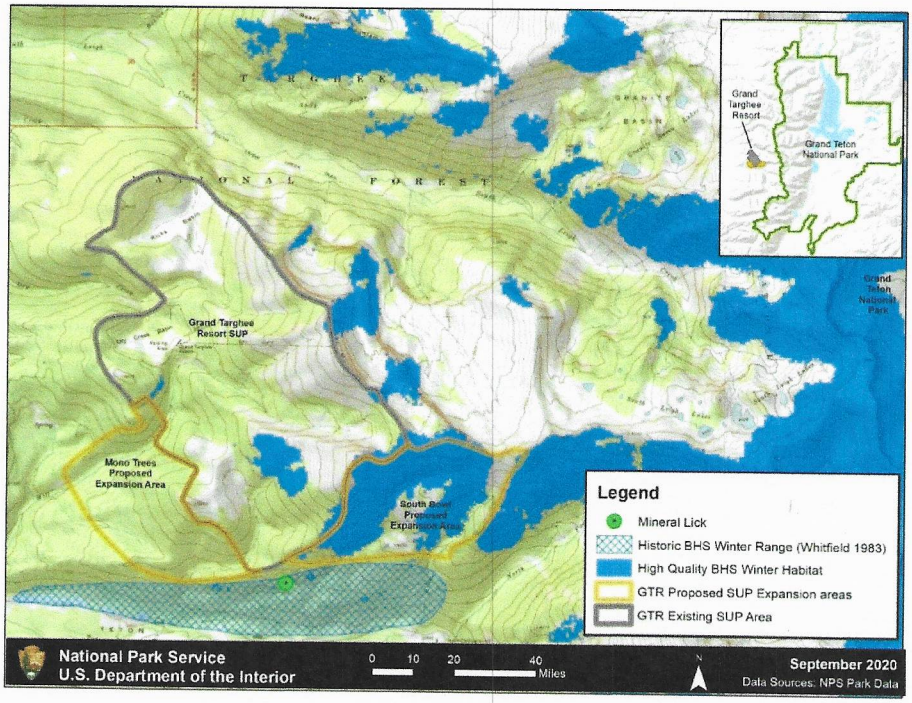

Figure 2. Winter bighorn sheep habitat and use in relation to the proposed Grand Targhee Resort Expansion

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Inman, R. M., M. L. Packila, K. H. Inman, A. J. McCue, G. C. White, J. Persson, B. C. Aber, M. L. Orme, K. L. Alt, S. L. Cain, J. A. Fredrick, B. J. Oakleaf, and S. S. Sartorius. 2012. Spatial ecology of wolverines at the southern periphery of distribution. Journal of Wildlife Management 76: 788–792.

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