

Mel Bolling, Caribou-Targhee Supervisor  
c/o Jay Pence, Teton Basin District Ranger  
P.O. Box 777  
Driggs, ID 83401

Date: 7 January 2022

**Subject: Additional Scoping Comments – Big Horn Sheep / Teton Canyon – Grand Targhee Master Development Plan Projects**

Dear Mr. Bolling, Mr. Pence,

In light of the recent Big Horn Sheep Study Group's Recommendations (attached) to Close South Bowl to skiing, I'm writing to you with some Additional Scoping Comments for the GTR EIS. Thank you for seeing that the EIS ID Team receives and analyzes these comments. Also attached are the Wyoming Game and Fish and Grand Teton National Park scoping comments. You probably read those a year ago as I did, but in light of the new BHS Recommendations, it was a good refresher for me to read them again, and better understand the potential impacts from Targhee's proposal to wildlife in the Greater Yellowstone Ecosystem.

It's interesting, South Bowl is the nexus of a number of competing interests. The Bighorn Sheep Study Group, Grand Teton National Park & Wyoming Game and Fish, who have the Responsibility for the Sheep's Long-Term Survival, Grand Targhee Ski Resort, who wants to Develop it with Ski Lifts and Ski Runs, Backcountry Skiers, who want to Keep Targhee Out and keep skiing there, the Bighorn Sheep, who are trying to Eek out a Living there, and then downstream, the Cross Country Skiers who want a Safe and Pollution-Free place to ski in Teton Canyon – South Bowl is a nexus of all these interests.

Background

At the beginning of the nineteenth century, bighorn sheep in North America were estimated to number between 1.5 and 2 million, but today less than 70,000 remain. The Teton herd is small and genetically unique, and unlike the Yellowstone population has dropped in numbers by 50% in the last 10 years, making them vulnerable to local extinction. According to the Bighorn Institute, habitat loss and fragmentation are recognized as the most significant threats facing bighorn sheep today. Bighorn Sheep, like most animals, need habitat security, a place to live that is protected from danger or threat.

The Big Horn Sheep Group Winter Closure Recommendation is:

## **NEW WINTER CLOSURE OF SOUTH-FACING SLOPES IN TETON CANYON AND NORTH FORK TETON CANYON**

### ***Opportunities***

- ✓ Protects high value bighorn sheep winter habitat at low and mid-elevations.
- ✓ Would protect this bighorn sheep winter habitat area from the high potential of expanding winter recreation in the future.
- ✓ Protects a bighorn sheep movement route to natural mineral lick.
- ✓ This closure would provide added benefit to the habitat treatments planned for this area for bighorn sheep. These habitat treatments are a unique opportunity to increase winter habitat for bighorn sheep.
- ✓ Proposed closure would not include the creek bottom, enabling continued recreation access along the bottom of the drainage and the groomed trail.
- ✓ Members of the public who participated in the collaborative public meetings did not identify this area as high value for backcountry skiing.
- ✓ Enforcement may be easier than in other areas due to high visibility of offenders by other members of the public and one exit point at the Teton Canyon winter trailhead.
- ✓ This proposed closure combined with the planned habitat treatment are expected to increase bighorn sheep use of this area, which would provide excellent bighorn sheep viewing opportunities for the public from the Teton Canyon groomed trail.

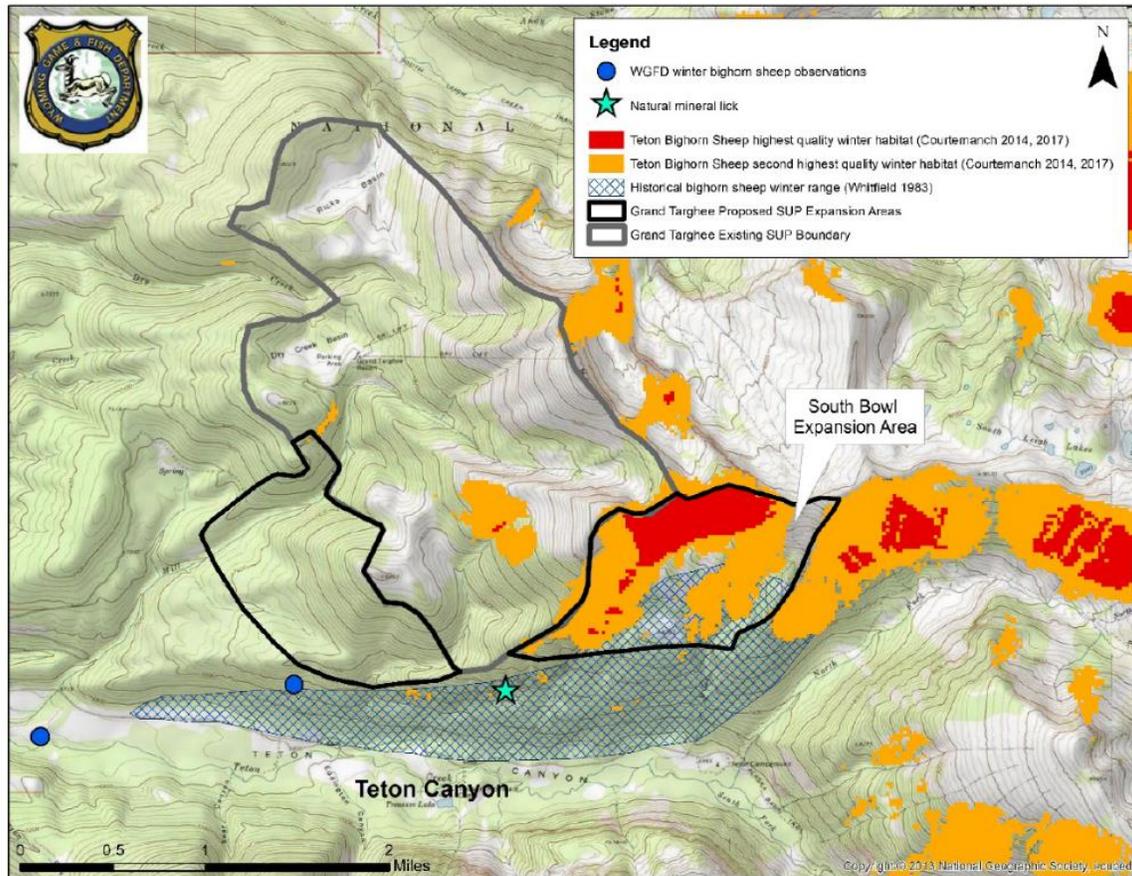
### ***Challenges***

- ✗ Would close some backcountry ski routes that are accessed from the Grand Targhee Resort boundary and drop into Teton Canyon.
- ✗ Likely to be opposed by the segment of the ski community that recreates here.
- ✗ Moderate financial costs to sign the area, provide education, and conduct enforcement.

During the Big Horn Sheep presentation, you put up a slide that pointed out the Caribou-Targhee has a “Shared Sense of Urgency” about the Teton Big Horn Sheep herd, but also that the CTNF has “Concerns about Enforcement of Closures”, along with several other concerns. The slide also said the CTNF is “Committed to stewarding bighorn sheep habitat and maintaining high quality skiing access” – I have to be honest, I don’t understand how the conflicting goals of that statement could be reconciled in a meaningful way for South Bowl. With the Forest Service multiple-use mandate, the Forest Service is often put in the difficult, if not impossible position, of trying to satisfy competing objectives, which at times result in compromised outcomes that don’t adequately address any of the concerns they are trying to resolve. Please make a clear-cut, unambiguous decision about South Bowl that prioritizes wildlife over recreation, and protects the Teton Big Horn Sheep population.

## Winter Sheep Range

In their Scoping letter, Wyoming Game and Fish documented their concern about expanding the GTR SUP into Big Horn Sheep Winter Habitat. Below is their map of High Quality Big Horn Sheep Winter Habitat in and around the proposed expansion area, including historical winter range that extends to the bottom of Teton Canyon. This is documented Sheep habitat and critical winter range, it is occupied by Bighorn Sheep. Sheep have been spotted in the proposed SUP expansion in South Bowl, in February, in recent years.



The Bighorn Sheep Study Group recommends a “New closure on South-Facing Slopes in Teton Canyon and North Fork Teton Canyon from the Mineral Lick to the National Park Boundary” because of the High Benefit for Bighorn Sheep. This is not hypothetical, Bighorn Sheep have been sighted in the South Bowl of Peaked during the middle of winter in recent years.

Quadrant 2: High Benefit for Bighorn Sheep, Lower Feasibility			
29	New closure on of south-facing slopes in Teton Canyon and North Fork Teton Canyon from mineral lick to national park boundary	18.0	11.5

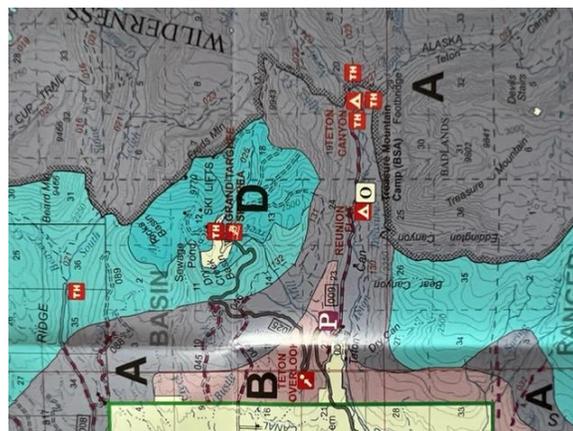
The study group also notes it's a Lower Feasibility – I'm not sure why that is, I don't know the criteria the BHS Group used to make that determination, but maybe it's a combination of pressure on the CTNF to expand resort skiing in South Bowl, and a few backcountry skiers reluctant to give up some ski terrain.

With the CTNF expressing a "Shared Sense of Urgency" to protect the very small and isolated Southern Teton Bighorn Sheep herd, I hope you will do everything in your power to support the conclusions and recommendations of the biologists and land managers who have been studying this sheep population for years.

The biologists and land managers of Grand Teton National Park and Wyoming Game and Fish have the responsibility to ensure the long-term viability of the Teton Bighorn Sheep herd. One could argue that it's a shared responsibility all of us have, including the National Forests and Backcountry Skiers. It's a responsibility the National Forests are not mandated to have, but fortunately the Caribou-Targhee NF has expressed a sense of urgency to protect the Teton Sheep herd. I hope that sense of urgency translates into action, by placing a Winter Wildlife Closure in South Bowl.

### Winter Wildlife Closure

Of course the National Forests have different mandates than the National Park Service and the Wyoming Game and Fish, one being a policy of Multiple-Use, but that mandate does not preclude the option of closing some areas to protect wildlife. There is ample precedence for closing South Bowl to protect the Teton Bighorn Sheep herd in their winter habitat, in fact there are a number of Wildlife Closures on the Caribou-Targhee NF including one in Teton Canyon to protect big game winter range. S



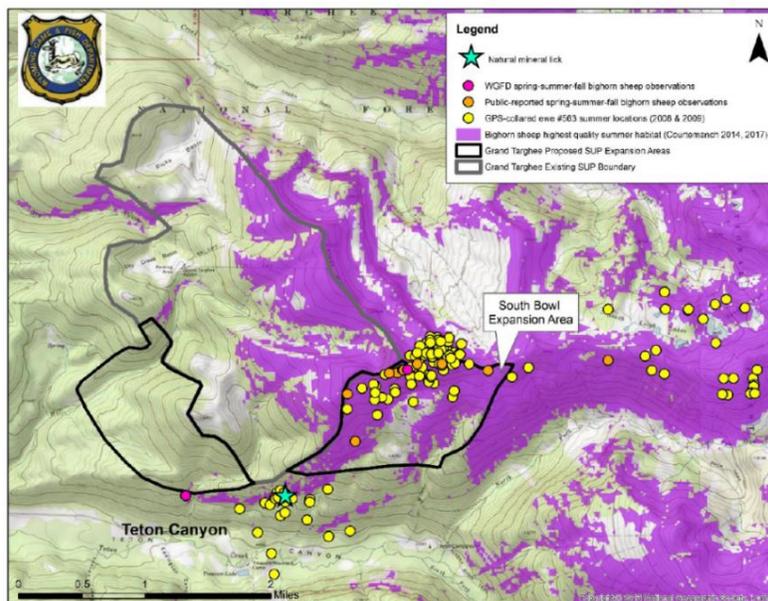
Below is the legend for the map.

WINTER CROSS-COUNTRY USE (Opportunities and Restrictions Off Designated Routes)				
AREA REFERENCE LETTER	NON-MOTORIZED USES	OVER-SNOW MOTORIZED VEHICLES	WHEELED MOTORIZED VEHICLES	PURPOSE OF REGULATION
A	OPEN	CLOSED Except on designated routes	CLOSED	To protect wilderness or wildlife in winter ranges and cross-country ski areas
B	CLOSED From Thanksgiving Day to April 15 on the Teton Basin RD & December 15 to April 15 on the Palisades RD -except on designated routes	CLOSED Except on designated routes	CLOSED	To protect wildlife in winter ranges

That big game winter wildlife closure in Teton Canyon is just over a mile away from South Bowl. If the lower West Slope closure is important, wouldn't closing South Bowl to protect the struggling Teton Bighorn Sheep herd also be important, or even more important? The fact is Bighorn Sheep are occupying South Bowl and the North Fork of Teton Canyon year around. At least some sheep, of the very small and isolated Southern Teton herd, have found South Bowl suitable winter habitat and are trying to survive there – let's not take the chance of adding any more stress to their already stressful situation. I urge the CTNF to place a Winter Wildlife Closure on South Bowl and the habitat they use in the North Fork of Teton Canyon.

### Summer Sheep Activity

Also in their Scoping letter, Wyoming Game and Fish documented known Big Horn Sheep summer activity with GPS locations from a collared Ewe, who likely had other sheep and/or lambs with her. She and the group spent considerable time inside the proposed expanded SUP boundary and all the way down into the bottom of Teton Canyon.



The GTNP comment letter says “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”. This alone is reason enough to not expand the SUP into South Bowl.

#### Proposed Grand Targhee SUP Expansion

If the CTNF were to approve the requested boundary expansion and the associated infrastructure in South Bowl for lift-served skiing – roads, lift building, cutting runs, avalanche control, etc. – there would be many year-around negative impacts to wildlife, and the view scapes from Grand Teton National Park and the Jed Smith Wilderness.

#### Possible Backcountry Gate

Another major concern, now that the CTNF has approved the Peaked Six-Pack, is whether or not there will be a Backcountry Access Gate on Peaked. If a gate is allowed, it would be an advertisement to skiers, resulting in a lot more skiers in South Bowl, some whom would be unprepared or not have the skills for that extreme terrain. The GTNP also expressed concern about a possible backcountry gate impacting Sheep in their comment letter. While the possible backcountry gate needs to be analyzed during the EIS, it also needs to be analyzed by the CTNF now, so a decision can be made before the Peaked Six-Pack begins operating next winter, as it’s possible the EIS may not be completed by then.

#### Negative Impacts from Skiing

South Bowl can be a dangerous place to ski, with high avalanche danger and difficult route finding. If the CTNF approves GTR’s request to expand the SUP into South Bowl, or allows a backcountry access gate into South Bowl, here are some of the concerns and impacts:

- Avalanche Danger
- Avalanche Control, which would likely have an Impact on Bighorn Sheep
- Noise in the Wilderness from Bombing the slopes
- Difficult Route Finding
- Search and Rescue, and putting Rescue Teams in Danger
- Liability for both Grand Targhee and the Forest Service
- A Backcountry Gate would be an Invitation to Skiers, encouraging even more skiing there
- Non-Compliance with limitations on when and where people can ski
- Difficulty Enforcing Closures

All of those concerns would be eliminated if South Bowl were simply closed to all skiing. Your enforcement concerns would also be completely eliminated as it would be easy to stop skiing access by placing a fence, not a boundary rope that people can duck under, but a winter fence along the current SUP boundaries. The winter fence could be made to be removed or dropped to allow summer wildlife migration and activity.

While the FS may not have the discretion to close access to Public Lands from ski areas, you do have the discretion to Close Public Lands to Protect Wildlife, by adopting a Wildlife Closure, as the CTNF has elsewhere on the Forest.

Because of the High Benefit for Bighorn Sheep, the South-Facing Slopes in Teton Canyon and North Fork Teton Canyon from the Mineral Lick to the Nation Park Boundary should be closed to all Winter Activities, as the Bighorn Sheep Study Group Recommends.

#### Cross Country Skiing in Teton Canyon - Downstream / Cumulative Impacts

One of the downstream impacts from allowing lift-served skiers to ski South Bowl, include the negative impacts to the Cross Country Ski Trail in Teton Canyon. There has been historical cross country skiing in Teton Canyon for the past 30+ years, with the Forest Service initiating grooming for cross country skiing along the road in 1990. Teton Valley Trails and Pathways (TVTAP) took over the grooming in the early 2000's.

More recently, a small number of skiers and snowboarders have been using lift-served access from Targhee to access South Bowl, ski to the bottom of Teton Canyon, and have found it convenient to use snowmobiles to tow themselves out of the canyon along the groomed ski trail. The pentathlon of: driving to Targhee, riding a lift, hiking a short ways, skiing down to Teton Canyon and then using snowmobiles to get back to the trailhead, is not exactly backcountry skiing. Plus, that activity has significantly compromised the historic cross country skiing use in Teton Canyon.

Being towed on skis by a snowmobile in Teton Canyon has not been analyzed or approved. It's not snowmobiling, it's a different activity altogether, called Skijoring, a several hundred year old Scandinavia tradition.

The snowmobile skijoring use in the canyon is relatively new and has ruined the quiet, peaceful, almost wilderness-like experience cross country skiers used to have while skiing there. The obnoxious 2-cycle exhaust fumes can linger in the air for 10-15 minutes in the forested sections which can make it hard to breathe when doing an aerobic workout. Skiers should not have to endure noise and air pollution while skiing in such a beautiful place.

There are also serious safety issues with snowmobile skijoring. Last winter, while ski skating up the canyon, I came around a corner and was startled to see a skier coming towards me, at a good clip, making turns down the middle of the skate lane, being pulled with a rope by a snowmobile. Fortunately the skier turned back onto the snowmobile track at the same time I skated to the right and we avoided a collision. One vivid memory of the situation was the rope he was being towed with was stretched right across the trail in front of me – I was afraid it might take me out. If either the skijorer or myself were less accomplished, it could have been an ugly situation.

I also had a friend tell me of a similar situation she had. She was classic skiing up the north side of the groomed track, next to the snowmobile track, when a skier being pulled by a snowmobile came towards her in the skate lane with the tow rope stretching across the track in front of her. She quickly moved to the other side of the trail at the same time the skier turned back onto the snowmobile trail – luckily, accident avoided.

Below are some photos of skijorer tracks. You can see they are using both sides of the groomed ski trail, which means that at times the snowmobile is on one side of the groomed trail and the skijorer on the other side, with their rope stretching across the ski trail.



Last spring, I wrote to District Ranger Jay Pence to let him know I had a close call with a snowmobile skijorer in Teton Canyon. I asked him to please do something about it for the safety of cross country skiers on the groomed trail. He said I should send a letter to the GTR EIS ID Team with my concerns, so here they are.

The TVTAP trail counter in Teton Canyon recorded a total of 15,059 users for the 2020-21 season for an average of 106 users/day. With that high number of skiers and others using the groomed ski trail in Teton Canyon, many of them novice to intermediate skiers, the addition of backcountry skiers skiing down the South Bowl of Peaked and snowmobile skijoring out of the canyon, is a new safety hazard for the long established cross country ski use. Allowing this type of activity on the busy groomed cross country ski trail, an in-and-out trail with two-way skier traffic, is a serious safety concern. Please evaluate whether recreational snowmobiling and snowmobile skijoring are appropriate, compatible and safe winter activities along the groomed ski trail in Teton Canyon.

It's worth noting the Bighorn Sheep Study Group found that cross country skiing in Teton Canyon is compatible with wildlife in the canyon.

Skiing South Bowl may be important to a small number of skiers and snowboarders, and it may be convenient and fun for them, but it's done at the expense of wildlife and others – plus there are many other good places to backcountry ski in the Tetons. To me, as both a long-time backcountry skier, who used to ski South Bowl (and skin back up to Peaked) and long-time cross country skier who's been skiing Teton Canyon from before it was ever groomed, lift served access to South Bowl and snowmobile/skijoring out of Teton Canyon is not compatible with the historic cross country skiing in the canyon..

### Precedents

There are a number of precedents by the Forest Service of prioritizing certain winter recreational activities over others.

In the early 2000's, the Sawtooth National Recreation Area (SNRA) took the significant step of closing some prime backcountry ski terrain to snowmobiles – the snowmobilers were not happy, they didn't want to give up any terrain. The SNRA closed the terrain north of Baker Creek to snowmobile use, preserving that area for backcountry skiing, while still allowing snowmobile use south of Baker Creek. That was a hard decision which separated the conflicting and incompatible recreational activities.

Another precedent is on the Caribou-Targhee Ashton District, which has closed cross country ski trails to dogs, snowshoeing or pulling sleds on groomed ski trails, possessing or using an over-snow vehicle on groomed ski trails, possessing or using a wheeled motorized or non-motorized vehicle on groomed ski trails. There is also a closure on the CTNF Teton Basin District which closed the Southern Valley Nordic Trails to dogs.

In contrast, the Caribou-Targhee basically allows almost any form of over-snow use on the Teton Canyon Ski Trail that one can think of, seriously, maybe the only things not allowed are vehicles! Skiers – Classic Skiers, Ski Skaters, Ski Tourers, A/T skiers – People Walking on the trail, Snowshoeing, Dogs, Dog Walking, Dog Skijoring, Fat Biking, Sleds, Parents towing their children in Chariots, Snowmobiling and Snowmobiles Towing Skiers. What's being allowed in Teton Canyon is unheard of for a groomed X-C ski trail, it's a free for all, a policy of anything goes. Teton Canyon has a Multiple Abuse problem.

I've cross-country skied in a lot of places – Norway, Canada (Ottawa, Canmore & Silver Star), Alaska, the Mid-West (Minnesota & Wisconsin) and many X-C ski trails throughout the West (Idaho, Montana, Wyoming, Utah, Colorado, Oregon & California) and honestly, I cannot think of another groomed cross country ski trail anywhere, that allows such a hodgepodge of activities. The impacts from all of that activity are compounded by the two-way, in-and-out cross country trail, as everyone (and their dog) has to pass each other both coming and going on the trail, which is narrower than it needs to be in order to accommodate snowmobiles.

So that skiers have a good skiing experience, most groomed X-C ski trails only allow skiers. Many don't allow people to walk on the groomed trail because it damages it. Many don't allow snowshoeing, including on the Ashton District. A few allow Fat Bikes (most don't), a few allow Dogs (most don't), a few only allow Dogs on a portion of the trail or have a dedicated Dog Ski Trail. None that I can think of allows recreational snowmobiling or snowmobile skijoring.

Does it make sense to allow dogs on the in-and-out, Teton Canyon groomed ski trail? Dogs can intimidate skiers and have attacked skiers coming towards them on the two-way trail, which is when most of the aggressive behavior happens. Dogs can and do chase wildlife. Because the classic tracks are often firmer than the skate lane, dogs like to walk in the tracks, poking holes in them. Dogs poop on the trail and not all dog owners are good about cleaning up after them. There are two nearby and perfectly good alternatives for people to take their dogs. One is the Sheep Bridge Trail, which would be good for dog walkers and dog snowshoers. The other is the Alta Ski Track, which allows dogs and is laid out in loops, so skiers and dogs are not coming directly at each other as often.

My guess is that the problem of incompatible activities has evolved gradually over time, with each new use starting out small and seemingly not a problem. But the types of activities and numbers of users has grown to the point that it would be very helpful to take a step back, and think about what's appropriate on the groomed ski trail, and what's not. This is an opportunity to clean up the poorly regulated winter recreation mess we now have in Teton Canyon, eliminate some user conflicts, and turn it into a well-managed ski trail.

A good example of well-managed cross country ski trails on National Forest lands, are the Rendezvous Ski Trails in West Yellowstone. Hegban Lake District Ranger Jayson Brey, who oversees the well-regulated and very successful trails in West, might be able to offer some insight on what works and what doesn't.

With exceptions for search and rescue, and work related activities like grooming and supplying the permitted yurt, please consider closing the groomed cross country ski trail in Teton Canyon to snow machine use for the safety of cross country skiers, and to restore Teton Canyon to the peaceful and quiet, noise and air pollution free environment that many cross country skiers are looking for when they go to ski in such a beautiful place.

Please also take a hard look at what other activities are compatible on that highly used, in-and-out, two-way groomed ski trail and consider a closure order for the incompatible uses.

Sometimes the best decision is to not try and please everyone, but to separate incompatible activities, so users can have the best possible experience on public lands.

## Summary

Here are the Competing Interests for the use of South Bowl:

- The Teton Bighorn Sheep, who migrate to and from GTNP and occupy South Bowl year-around. It is important habitat for their long-term survival.
- Grand Targhee, who wants to expand their Ski Resort into South Bowl with lift-served skiing and all the infrastructure that goes with that – lifts, roads, new runs, avalanche control, etc..
- Backcountry skiers, who want to keep Targhee out of South Bowl so they can keep skiing there and ski down to Teton Canyon
- The Downstream / Cumulative Impacts to Cross Country Skiing in Teton Canyon.

Here are some Key Points to consider:

- South Bowl is occupied Bighorn Sheep Winter Habitat
- South Bowl is occupied Bighorn Sheep Summer Habitat
- Skier activity negatively impacts Bighorn Sheep
- There is a precedent for Winter Wildlife Closures on the CTNF and in Teton Canyon
- The Bighorn Study Group recommends Closing South Bowl to winter activity to protect the small and isolated Southern Teton Bighorn Sheep herd.
- Skiing in South Bowl has some serious safety concerns which would be eliminated by closing it to skiing.
- If closed, enforcement concerns would be completely eliminated.
- There are negative impacts – safety, noise & air pollution, to the cross country ski use in Teton Canyon from people skiing down from South Bowl and snowmobiling back to the trailhead.
- There is precedent to separate incompatible winter activities on Caribou-Targhee National Forest Service lands

Here are some Key Questions to be answered:

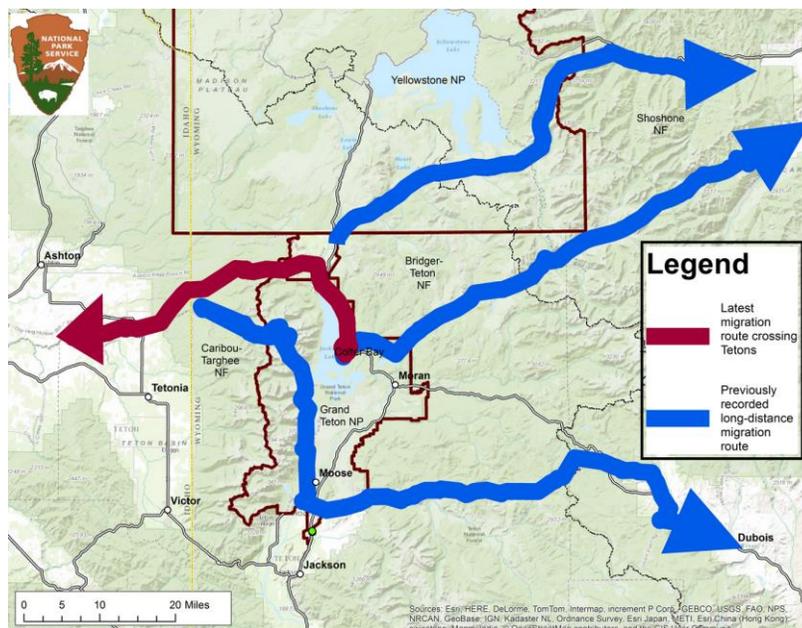
- Grand Targhee wants to expand their Ski Resort into South Bowl – is a private company's development wishes, a more important use of public land than protecting endangered wildlife?
- Backcountry Skiers want to keep Targhee out of South Bowl so they can keep skiing there themselves – are backcountry skier's wishes, a more important use of public land than protecting endangered wildlife?
- The biologists and land managers Responsible for the Long-Term Survival of the Teton Bighorn Sheep population, recommend Closing South Bowl to skiing – why would this NOT take priority over the other uses?

- The FS has set a precedent of protecting Wildlife in Teton Canyon and with several other Wildlife Closures on the Forest. Would the Forest consider placing a Winter Wildlife Closure in South Bowl to protect the Teton Bighorn Sheep herd?
- The FS has set a precedent of separating incompatible uses on cross country ski trails on the Caribou-Targhee NF. Would the Forest consider doing that in Teton Canyon?

### Conclusion

South Bowl is a confluence of ecosystems – the West Slope of the Tetons, the Jed Smith Wilderness and Grand Teton National Park, and expanding into the Greater Yellowstone Ecosystem, where recreation and wildlife are competing for the same resources. Placing a Winter Wildlife Closure in South Bowl to protect the Teton Bighorn Sheep population, an endangered species in the Tetons, would help ensure their habitat security and have the added benefit of eliminating some user conflicts in Teton Canyon.

The West Slope of the Tetons on the Caribou-Targhee National Forest is connected to Grand Teton National Park via migration routes used by Mule Deer, Elk and Bighorn Sheep – important migration corridors in the Greater Yellowstone Ecosystem.



With record visitation and population growth on both sides of the Tetons, wildlife are being squeezed from all sides, their habitat is being fragmented and lost. More visitors to public lands means more people hiking, biking and skiing all over the mountains, and by extension, hiking, biking and skiing all over wildlife’s critical habitat, which impacts an animal’s habitat security, an important metric tracked by wildlife biologists. Wildlife have fewer and fewer places to go to get away from predators and people – us humans need to give them some space.

Please do not add to that fragmentation, but instead look beyond just the local impacts of this proposal and consider the interconnectedness of the whole ecosystem that our wildlife depends on. In fact NEPA requires just that, by addressing Cumulative Impacts in your decision.

Please honor the new recommendations from the Bighorn Sheep Study Group to close South Bowl to all skiing, by enacting a Winter Wildlife Closure for that area. That would mean not expanding Targhee's Special User Permit into South Bowl and no longer allowing skiers and snowboarders to access South Bowl from the ski area. Doing so would not only protect the Teton Bighorn Sheep herd, it would have the added benefit of restoring Teton Canyon to a safe and pollution free place to ski for the thousands of cross country skiers who ski there every winter.

Please add these comments to the GTR EIS Scoping Comments and ask the ID Team to analyze them.

Thank you for your consideration,

Chi Melville  
Alta, WY