Subject: Response to CTNF Forest Service Environmental Impact Statement

Grand Targhee Master Development Plan Projects

Livestock and Grazing

To: Jay Pence, Forest Supervisor, Teton Basin Ranger District

From: Clyde Waddell and Janet Heslin

Date: May 22, 2025

1. Introduction

This document is a response to the Grand Targhee Resort Master Development plan and Environmental Impact Statement prepared by the Forest Service. It provides specific comments during the public comment period through June 20, 2025. The scope of this document is focused on the impacts to the **Mill Creek/Teton Grazing Allotment** from GTR's proposed expansion into adjacent NFS lands. To be clear, none of the five Alternatives outlined in the GTR Development plan eliminate livestock grazing in the current GTR footprint or in the proposed resort boundary expansion into the Mono Trees or South Bowl areas. However, if adopted, Alternatives 2 and 5 will have significant impacts on the permittee, making it difficult for him to assure the health and safety of his herd in the near term and outer years. Under optimal conditions, livestock grazing on this alpine allotment is risky, difficult and time consuming. It demands a daily commitment from the permittee to monitor the welfare of his herd. Few ranchers have the skill and experience to do this work in a steep, forested area like CTNF. Currently, the area shared by GTR and the permittee is modest. Under the proposed Alternatives 2 and 5 the shared area will be expanded to encompass a substantial portion of the Mill Creek/Teton allotment. The co-existence of both operations will require a significant commitment of resources from both parties. The Grand Targhee Resort Master Development plan and Environmental Impact Statement provides insufficient detail on the required actions, ongoing management and

timeline of the 2 party interactions during construction and future operation in the Mono Trees area.

This formal response will make specific recommendations to ensure that livestock grazing can continue as an established FS use.

2. Historical and traditional grazing practice

NFS lands have traditionally supported multiple uses. While recreation is widely acknowledged as a public benefit, other uses, such as hunting and livestock grazing are as important and have existed for generations on NFS lands. The Mill Creek/Teton allotment is one of 11 grazing allotments located in the Teton Basin Ranger District of the CTNF. The permittee, Mr. Clyde Waddell is authorized to use the allotment, divided into 3 areas, to graze 55 cow/calf pairs from June 16 to September 30, 2025. He has been the permit holder for X years under an FS system that grants permits for a 10-year period.

If the FS grants GTR the option to expand its boundaries it calls into question the commitment of the FS to continue the traditional multi-use system of management in the Tetons. For over 100 years the FS has supported livestock grazing on NFS lands, providing a valuable resource to the livestock owners as well as other forest users.

It was recognized early in the history of the Reserves (later National Forests) that grazing was a legitimate use. In 1897, the newly formed Forest Service was authorized by Congress to regulate grazing and permit it if it did not injure forest growth. The agency's controls (permits, herd size, allotments, season of use) were enacted to protect the range/forest and prevent the monopolization by large outfits.

By the 1936 edition of the policies, it was recognized that the "cattle and sheep which are grazed in the national forests bear an important relation to the supply of beef and mutton in this country, and represent an important industry and basis for established homes and every effort will be made by forest officers to promote the fullest possible use of grazing resources" (USDA Forest Service 1936). Today livestock grazing continues as an important and valid use of the country’s national forests. While it was

never the intent of the Congress that all uses would occur in all areas, it was determined that grazing was feasible and appropriate on the CTNF and a Land and Resource Management Plan was implemented.

The history, custom and culture of the American West is very closely tied to ranching and livestock grazing. Many rural communities, such as Teton Valley, continue to be dependent upon ranching for their economic livelihood and most of these ranches rely on federal land grazing, for at least a portion of the grazing.
The proposed expansion (Alternatives 2 and 5) of GTR boundary into the Mill Creek/Teton grazing allotment threatens the welfare of the livestock (cattle) grazing the allotment as well as the ability of the permittee to manage the herd both during construction and thereafter when the landscape has been altered. It conflicts with the longstanding FS goal of conserving vegetation, soils, water, wetlands, wildlife and forests. The expansion will also conflict with another FS goal of supporting the Western culture and economic livelihood of the Teton Valley ranching community.

3. **Grazing as part of FS summer land management plan**

Grazing of sheep and cattle has a long history on the western slope of the Teton Range, predating the establishment of the modern ski industry. Local ranchers registered their brands and trailed their sheep to the high meadows in the Teton range in the 1800s. Multiple generations of the Siddoway family grazed sheep and operated a sawmill on the Teton river beginning in 1886. While grazing operations have declined in numbers, all 11 allotments are in active use each summer from June to September by local ranchers. The most recent Forest Plan Management (1997) continues to support and authorize grazing under standards for utilization. The current permittee of the Mill Creek/Teton allotment has worked with the FS managers and range specialists to comply with all regulations to maintain and support the health of the forest and its resources. His continued operation is threatened by the proposed expansion of GTR into the main body of the allotment, impacting it creeks, wetlands, forage and soils.

4. **Grazing benefits, environmental compatibility, sustainability**

The grazing of cattle on CTNF benefits the forest health and provides a livelihood for the permittee. The cattle graze on native, non-native and weed species. They prevent overgrowth of underbrush and maintain optimal spacing of trees. Grazing is one of several variables in an ecosystem that enhances the quality of the watersheds and the health of wildlife habitats. Reduction in brush reduces wildfire risk. Grazing enhances the health of vegetation and prevents erosion on slopes. Less erosion means less sediment in streams and cleaner drinking water for the communities of Alta and Driggs. Grazing helps maintain sightlines on hiking and biking trails threatened from overgrowth of brush. Meadows that are grazed remain meadows, preserving open spaces in the forest. Other grazing animals such as deer and elk benefit from the optimal height and types of vegetation. In addition, grazing on public lands supports rural communities, helps to sustain ranching as a livelihood and helps keep ranching as a viable part of Teton Valley. Residents of Teton Valley place a high value on intact landscapes, migration corridors and open space that ranches provide. Ranchers who raise cattle are a valuable part of US agricultural food production, supplying livestock products to the meat processing and grocery industries.

The negative impacts of the expansion of GTR into the core of the Mill Creek/Teton allotment will make a large part of the allotment unusable for a period of 3 or more years. Construction of roads, lifts, and ski runs will eliminate the vegetation, natural terrain, and water sources that sustain the grazing operation in the summer months. Slash piles, excavations, and burning operations will exclude grazing. Restoration of vegetation will be a slow process and will alter the character and suitability of the range for many years.

5. **Business and economic case for grazing on CTNF**

The grazing permit holder, Mr. Clyde Waddell, is a full-time rancher who has resided in Teton Valley for most of his life. He and his son work year-round

raising Black Angus beef cattle and derive the bulk of their income from sales of cattle each fall. His operation is extensive, encompassing all aspects of breeding, calving, raising and selling and would not be economically viable without access to FS lands each summer for grazing. Loss of use of the Mill Creek/Teton allotment for a period of years may force a reduction in the size of the herd, resulting in a significant loss in income.

6. **Discussion of GTR proposed expansion and project plan by Alternatives 1-5**
    a. **Overview of plan deficiencies in identified project design criteria; including unknowns, lack of detail and clarity**. In many aspects the EIS is an impressive document that details proposed actions and impacts of actions under each of 5 alternatives in the GTR Master Plan for the CTNF. Tables, figures, diagrams, and text detail the direct and indirect consequences of each action on each entity in the forest impact area. The level of detail is notable. But when it comes to the project design criteria for livestock and grazing there is a paucity of detail. For example, the total acreage in the Mono Trees area that will be disturbed by vegetation clearing and or grading is not clear. Tree removal, chipping, slash pile burning, soil erosion, noxious weed invasion, construction roads, construction equipment, gravel, stockpiles, and applications of chemical herbicides are incompatible with livestock grazing. There are no details on how GTR and the permittee will coordinate their respective operations during this time. While not expressly stated, it appears that the permittee will be excluded from the Mill Creek/Teton allotment for an extended period. The PDC stipulates that GTR will contribute funds for fencing, but no details are provided on the type of fencing, the location, and the duration. Further GTR is required to produce, at some unspecified time, a summer operating plan. It is unclear if this management plan includes only the construction phase or its lengthy aftermath. Given the scale and scope of the proposed buildout of a Mono Trees lift, ski runs and a base of operation, it is remarkable that no details are provided to the grazing permittee on how he will maintain his

operation. EIS maps show that the proposed Mono Trees ski area will overlay **both** Mill Creek and a contributing natural spring. Both are important to the ability of graze cattle. No mention is made of how this will be managed. The new lift lines, runs and trails will change grazing patterns, resulting in herd migration into areas of resort operation. More information about the location of the fencing would be important to gauge how this would be managed. Similarly, GTR is required to use vegetation barriers to exclude cattle from portions of the grazing allotment. Vegetative barriers/buffers have never been used to restrict movement of livestock on a grazing allotment or wildlife in a forest setting. Their primary use is for control of erosion.

b. **Impacts by Alternatives 1-5 on livestock grazing on Mill Creek/Teton Grazing Allotment**. Of the five alternatives, Alternatives 2 and 5 would significantly disrupt the value and useability of the Mill Creek/Teton grazing allotment. The adoption of Alternative 3 would have a lesser impact.

   Alternative 2, if approved, would expand GTR's existing boundary into the Mono Trees and South Bowl areas. The South Bowl area is not grazed by cattle due to the steep terrain. In the Mono Trees area, approximately 720 acres would be the locus of considerable development, including a new lift, ski runs, roads and a base area. While slightly less than the entire area of the Mill Creek/Teton allotment, its large size and the nature of the transformation of the landscape would make it unusable as a grazing allotment during construction and for 2-5 years thereafter. In addition, it is likely that the expansion of roads and trails will result in increased summer usage by hikers and mountain bikers. Interactions with grazing cattle could result in emotional and physical trauma to users.

   With the loss of so much acreage, the Mill Creek/Teton allotment would not be capable of supporting the herd during the July 20-August 14th timeframe. Neither would the allotment be economically feasible to the

permittee. The increased management time and complexity represents an additional burden to both GTR and the permittee.
For these reasons and those delineated below, the proposed action is not practicable, and therefore the Alternative 2 expansion should not be undertaken.

Alternative 5, if approved, would expand GTR's existing boundary into the Mono Trees area. As in Alternative 2, the impacts to livestock and grazing would be significant due to the removal of trees, vegetation and disruption of natural springs, wetlands, and Mill Creek. Increased visitation will also bring trail users and cattle into conflict. With the loss of so much acreage, the Mill Creek/Teton allotment would not be capable of supporting the herd during the July 20-August 14th timeframe. Neither would the allotment be economically feasible to the permittee. The increased management time and complexity represents an additional burden to both GTR and the permittee.
For these reasons and those delineated below, the proposed action is not practicable and therefore the Alternative 5 expansion should not be undertaken.

Alternative 3, if approved, would not result in an expansion of the current GTR boundary, but would increase allotment recreation during the summer months. GTR plans to increase road and trail building in the area that both operations currently share. This would result in more human use and an increased likelihood of human and livestock interactions. Mountain biking, hiking and trail use with dogs would occur on the same terrain occupied by over 100 cows, calves and bulls.

"Project Design Criteria" specific to grazing (for Alternatives 2 and 5) addresses the need for cooperation between the FS, GTR and the permittee. The directive calls for the FS to approve the installation of vegetative buffers, fencing and other unnamed measures to protect the interests of both parties. It is unclear how vegetative buffers will function to impede the travel of cattle into and through construction zones and/or technical base area operations. Permanent or semi-

permanent fencing comprised of metal posts and barbed wire are a better solution. However, the presence of wildlife in the forest will impact the efficacy of any barrier fencing and will require daily inspections to ensure the integrity of the barrier.

c. Qualitative analysis of impacts to grazing by Alternative and Phase of development

i. **Water**. Adoption of Alternatives 2 or 5 would impact Mill Creek in the Mono Trees expansion area. Mill Creek descends from east to west in a draw through the entire Mono Trees area. Several of the proposed ski runs terminate in the vicinity of the creek. The EIS Mono Trees area map appears to site the new base area, road and confluence of the ski runs at an intersection with Mill Creek. This contradicts the PD criteria to avoid or minimize effects of water and wetlands. Mill Creek is a vital resource that enables livestock grazing on the Mill Creek/Teton allotment. The EIS fails to provide an adequate analysis of the impact on Mill Creek. The PDCs do not address how to minimize the adverse effects.
Parts of Mill Creek are fed by a spring. The EIS Mono Trees map shows the potential for one of the ski runs to overlap this spring. A FS hydrologist should have been consulted to assess the methods needed to preserve the spring.

ii. **Soil**. Some of the largest impacts of the proposed expansion under Alternatives 2 and 5 would be to the soil in the Mono Trees area. The EIS describes there would be a "permanent loss of soil resources due to ground disturbing activities, an increase in soil erosion and sedimentation, and changes to soil physical and chemical characteristics reducing soil productivity." A large portion of the grazing allotment (over 600 acres) would be disturbed by grading and vegetation clearing. None of this area would be suitable for grazing until topsoil and organic matter were restored and the area re-planted with native forage. "Steep and south- and west-facing cut slopes may require more than 5 years

for vegetation ground cover to reach pre-disturbance levels without soil amendments" (EIS, 2025). The GTR operation in Mono Trees would effectively end grazing for an extended period. There are few entities or individuals who would bear as great an impact on their livelihood as would the holder of the grazing allotment. It is a fiction to pretend that both operations can co-exist on the same ground. This challenges the assumption that the FS is committed to a multi-use policy as outlined in the 1997 Forest Plan.

iii. **Wetlands**. The EIS acknowledges that wetlands would be impacted in a variety of ways in the Mono Trees area under Alternatives 2 or 5 (approximately 178 acres). There would be both direct and indirect impacts on wetland functions and values lasting 3 to 5 years. Springs and their surrounding wetlands are indispensable to livestock grazing and the maintenance of native wildlife species. The FS plan concedes that these impacts are significant and real. Impacts on wetlands from recreation activities have been going on for years at GTR within the current boundaries. The project design criteria propose ways to mitigate the devastating effects on wetlands and creeks. It is our contention that these mitigating practices are incapable of preventing short-term and long-term damage to wetlands in the Mono Trees area. It is not acceptable to approve the expansion based on the inadequate project design criteria delineated in the EIS. It is not technically or financially feasible to conclude that the wetlands and creeks can be restored by replacing streambed materials or filtering runoff. The proposed construction will forever alter the wetlands and creeks in Mono Trees. If it were merely a question of esthetics, one could waive these concerns. However, the quality and quantity of the streambeds are crucial to sustaining the lives of grazing animals whether they be livestock or wildlife.

iv. **Vegetation**. Under Alternatives 2 and 5 a substantial portion of the highest quality vegetation needed to sustain grazing in the Mono Trees area would be removed during grading operations. The forage on the lower slopes and open meadows is the value of the allotment. Higher elevation areas have dense timber. The loss of these high value areas during construction diminishes the value of the entire allotment. It is unreasonable to expect that the permittee could sustain his operation for the duration of the construction and revegetation. It must be a condition of the expansion that the permittee is compensated for the loss of revenue during this time. The project design criteria outlined in the EIS for revegetation are reasonable if followed. Fencing and weed management are clearly defined and would ultimately result in an area that is suitable for grazing and would safeguard the ability of both the resort and the grazing activities to co-exist with the newly created ski runs in Mono Trees.

v. **Increased recreation and human animal interactions**. If either Alternative 2 or 5 is approved there will be an increase in the number and types of summer recreation activities provided by GTR in the Mono Trees area. More recreationalists will utilize the area and there will be more conflicts between trail users, their dogs and grazing cattle. The proposed project design criteria stipulate the use of permanent fencing to exclude cattle from areas with structures and hazards. However, the PDCs do not address how to educate people on safe practices while biking and hiking in proximity to grazing stock. Use of signage and other educational materials would be appropriate.

vi. **Ski Hill Road traffic, public safety, wildlife and stock safety**. Adoption of any of the Alternatives will result in increased visitor traffic on Ski Hill Road. Alternatives 2 and 5 will result in significant increases in road use. Ski Hill Road traverses the Mill Creek/Teton Allotment. Typically, the cattle traverse the road daily

to utilize forage and water during the months of June and July. This presents a safety hazard to drivers. The Project design criteria do not address how minimize collisions. Currently there are 2 signs warning motorists that there are free-ranging cattle. More could be done to exclude cows from the road by installing fencing and an underpass. Wildlife underpasses have been successfully used throughout Wyoming to prevent highway collisions with migrating wildlife. An underpass would protect both wildlife and cattle and improve public safety on Ski Hill Road.

7. Recommendations

a. Approve Alternative 1 or 4.
b. Do not approve Alternatives 2 and 5.
c. If either Alternatives 2 or 5 are approved, the FS will require GTR to compensate Clyde Waddell for lost revenue and increased expenses for each year the Mono Trees area is unavailable for grazing due to construction and/or restoration of vegetation. The exact amount of compensation will be negotiated between GTR and Mr. Waddell.
d. If either Alternatives 2 or 5 are approved, the FS will require GTR to install permanent fencing around the entire Mono Trees area for the period of time when it is under construction and restoration.
e. If either Alternatives 2 or 5 are approved, the FS will require GTR to install permanent fencing around the base area of Mono Trees lift to protect equipment and structures.
f. If either Alternatives 2 or 5 are approved, the FS will modify the current grazing regulations to provide a waiver of the 4-year non-use period on the Mill Creek Allotment while it undergoes restoration. Under current regulations the permittee would forfeit the grazing right if the allotment was not used for 4 years. The new regulation would wave this requirement during the time of construction and restoration of vegetation.
g. If either Alternatives 2 or 5 are approved, the FS will require GTR to submit an updated vegetation plan, a summer operating plan, and a

specific livestock management plan prior to initiation of projects that overlap the Mill Creek/Teton allotment.

h. If either Alternatives 2 or 5 are approved, the FS and WYDOT will commit to the installation fencing on both sides of Ski Hill Road with an underpass to protect migrating wildlife and cattle. Basic road safety should be a requirement.