

Wyoming Outdoor Council

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Caribou Targhee National Forest
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Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58258>

Re: Grand Targhee 2018 Master Development Plan Projects #58258

Dear Forest Supervisor Pierson,

Thank you for the opportunity to provide comment on the proposed expansion of Grand Targhee Resort into South Bowl and Mono Trees. On behalf of the Wyoming Outdoor Council, I am writing to express our reservations with the expansion as outlined under Alternative 2 (proposed action). We believe that the public interest and natural resources on the Forest would be better served by Alternative 3, which allows for the increase in services sought by Grand Targhee without expanding the boundaries of the current Special Use Permit (SUP) area. The Wyoming Outdoor Council has over 5,000 members and supporters who care deeply about our public lands and the wildlife that depend on them. On their behalf we urge you to adopt Alternative 3 with the modifications outlined below.

RATIONALE FOR CHOOSING ALTERNATIVE 3

Adherence to purpose and need

The underlying purpose and need for the Draft Environmental Impact Statement (DEIS) is to decide whether the Forest Service should grant a SUP for new areas outside Grand Targhee's existing footprint. As specified in the DEIS "Executive Summary":

"[t]he Caribou-Targhee National Forest (CTNF) will consider the application for use of NFS lands and determine if the project is in the public interest and is appropriate, based on the 1997 Revised Forest Plan for the Targhee National Forest (1997 Forest Plan)."

We would emphasize that the benchmark for granting a new SUP hinges on whether it is in the public interest and in alignment with the 1997 Forest Plan. The proponent has laid out numerous objectives to “remain viable in the competitive destination skier/rider market” as justification for an expansion, but it is unclear how any of these objectives serve the public interest. In fact, mention of public interest or benefit are largely absent from the DEIS. Based on what has been presented, we believe granting this SUP would prioritize private, commercial interests over those of the public and require divergence from guidelines laid out in the 1997 Forest Plan. We urge the Forest Service to hold true to the stated purpose and need of the DEIS and choose Alternative 3.

Adherence to the Forest Plan

As noted above, the purpose and need statement is clear that granting a new SUP should only occur if expansion of Grand Targhee is appropriate based on the 1997 Forest Plan. Expansion into the South Bowl area conflicts with management goals and guidelines outlined in said Forest Plan, which would have to be amended for this expansion to proceed. These inconsistencies with the existing Forest Plan are outlined below:

1. Prescription 2.1.2(b) - Visual Quality Maintenance

This Forest Plan prescription aims to “maintain existing scenery within major travel corridors with high quality natural vistas” with an explicit goal to “protect the natural visual quality” of the area¹. The expansion proposed for South Bowl would impact travel corridors covered by this Forest Plan prescription – namely Ski Hill Road and Teton Canyon Road. For Grand Targhee to expand into South Bowl, CTNF would have to reclassify these areas to fall under the Special Use Recreation Site category. This would mark a major departure from current management and permanently degrade the scenic value the public currently enjoys in this part of the CTNF.

2. Biological Elements (Wildlife) - Peregrine Falcon Habitat

The Forest Plan guideline for peregrine falcon habitat specifies that human activities ***including permanent facilities*** be minimized within 2 miles of known peregrine falcon nests between March 15 and July 31¹. The DEIS states that known nest sites have been occupied within 2 miles of the South Bowl SUP in recent years and going back decades. Granting Grand Targhee permission to expand here would create significant new disturbance and negatively impact the valuable nesting habitat present in Teton Canyon. This goes against explicit guidelines in the existing Forest Plan and we are opposed to exempting Grand Targhee from these guidelines to pave the way for the South Bowl expansion.

¹ US Forest Service. 2003. Revised Forest Plan for the Caribou National Forest. US Department of Agriculture.

With the above inconsistencies and resource management conflicts, we contend that confining expanded services to Grand Targhee's existing footprint is the most appropriate option, given existing management guidelines mandated by the 1997 Forest Plan.

Bighorn sheep

Of all the negative impacts a Grand Targhee expansion would cause for wildlife, the harm to bighorn sheep habitat is the most acutely concerning. The Targhee Bighorn Sheep Herd exists as a small, isolated population confined to high elevations in the Teton Range where they remain year round. Bighorn sheep are habitat specialists reliant on escape terrain and winter ranges that lack persistent snow cover, allowing access to forage². This makes the species especially vulnerable to habitat loss and for the Targhee Herd, which hovers between roughly 50 and 100 animals^{3,4,5}, there is essentially no margin for error when it comes to keeping this population on the landscape.

Unfortunately, significant areas of highest quality winter habitat occurs in the South Bowl SUP area^{6,7}. While we appreciate the reduction in acreage of the South Bowl proposed expansion from 600 down to 266 acres, the expansion would still cut through the heart of highest quality winter habitat. Given the importance of this habitat for bighorn sheep persistence in the Teton Range, any loss of this highest quality winter habitat is unacceptable and the South Bowl SUP should not be granted.

In addition to direct habitat loss that would result from a South Bowl expansion, impacts from increased recreation in the area must be considered. Research conducted on the Targhee Herd showed winter backcountry recreation displaced sheep from important winter habitat⁶. Not only would expansion into South Bowl bring heavy recreation into winter habitat, it would expand the sphere of out of bounds winter recreation deeper into Teton Canyon where additional winter habitat exists. In both cases, this added recreational pressure in winter habitat will most certainly displace bighorn sheep from habitat they rely on to survive the winter when they are nutritionally stressed and can least afford it.

² Geist, V. 1971. *Mountain Sheep: A Study in Behavior and Evolution*. Chicago: The University of Chicago Press.

³ Wyoming Game and Fish Department. 1988. Targhee Bighorn Sheep Herd Job Completion Report. 15pp.

⁴ Wyoming Game and Fish Department. 1990. Targhee Bighorn Sheep Herd Job Completion Report. 18pp.

⁵ Wyoming Game and Fish Department. 2023. Jackson Region Job Completion Report. 79pp.

⁶ Courtemanch, AB. 2014. Seasonal habitat selection and impacts of backcountry recreation on a formerly migratory bighorn sheep population in northwest Wyoming, USA, MS Thesis, University of Wyoming, Laramie, WY.

⁷ Courtemanch, AB, MJ Kauffman, SA Kilpatrick, and SR Dewey. 2017. Alternative foraging strategies enable a mountain ungulate to persist after migration loss. *Ecosphere* 8: 1-16.

Negative impacts to bighorn sheep from a Grand Targhee expansion are anticipated outside winter months as well. Not only would new infrastructure overlap summer habitat for the Targhee Herd^{6,7}, but proposed development and increased human activity could impede access to a natural mineral lick in the Apostle Cliffs just downslope from the proposed South Bowl SUP. Because mineral licks are uncommon on the landscape and vital to mountain ungulate health⁸, development and increased human presence in bighorn sheep habitat that serves as a travel corridor to this mineral lick should be avoided.

Wolverine

The wolverine was recently listed as threatened by the US Fish and Wildlife Service⁹, heightening the importance of habitat protection for this species. The DEIS acknowledges anticipated negative impacts for wolverines if the proposed South Bowl expansion is granted. Specifically, the South Bowl SUP contains extensive maternal denning habitat that would be lost in the face of expansion. It would also greatly increase access and extend the sphere of human disturbance deeper into Teton Canyon as people exit resort boundaries to delve deeper into the backcountry. This would negatively impact maternal denning habitat beyond the boundaries of the South Bowl SUP. Research is clear that even moderate levels of winter backcountry recreation is detrimental to wolverines and can result in functional loss of habitat, with female wolverines being particularly vulnerable¹⁰. In addition to the presence of maternal denning habitat, the entirety of both the South Bowl and Mono Trees SUP areas overlap general wolverine habitat¹¹ and expansion in either area would negatively impact wolverines in the Teton Range.

In addition to the above habitat concerns, we believe the DEIS fails to adequately account for metapopulation dynamics at play for wolverines at the southern periphery of their range. As a snow obligate species, wolverines currently enjoy vast tracts of suitable

⁸ Mincher, BJ, RD Ball, TP Houghton, J Mionczynski, and PA Hnilicka. 2008. Some aspects of geophagia in Wyoming bighorn sheep (*Ovis canadensis*). *European Journal of Wildlife Research* 54(2): 193-198.

⁹ United States, Department of the Interior, "Endangered and threatened wildlife and plants; threatened species status with section 4(d) rule for North American wolverine." Vol. 88 Federal Register. pp 83726-83772. November 30, 2023.

¹⁰ Heinemeyer, K, J Squires, M Hebblewhite, JJ O'Keefe, JD Holbrook, and J Copeland. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. *Ecosphere* 10(2): e02611. <https://doi.org/10.1002/ecs2.2611>

¹¹ Inman, RM, BL Brock, KH Inman, SS Sartorius, BC Aber, B Giddings, SL Cain, ML Orme, JA Frederick, BJ Oakleaf, KL Alt, E Odell, and G Chapron. 2013. Developing priorities for metapopulation conservation at the landscape scale: wolverines in the western United States. *Biological Conservation* 166: 276-286. <http://dx.doi.org/10.1016/j.biocon.2013.07.010>

habitat in the circumpolar north¹². This is not the case in the conterminous US where populations exist in island-like patches of mountainous habitat that provide the persistent spring snow cover wolverines require¹¹. Because wolverines occur at extremely low densities – with average reported home ranges of 797 km² for males and 303 km² for females in the region¹³ – small mountain ranges like the Tetons can only support a handful of animals. The Greater Yellowstone Wolverine Program predicted the Teton Range is only likely to have 4 - 10 wolverines present at any given time, which would include juveniles and transient individuals¹⁴. In fact, for many of the Program's nearly ten years collaring and monitoring wolverines in Greater Yellowstone, only four resident, adult wolverines occupied home ranges in the entirety of the Teton Range¹⁵. This underscores that tiny wolverine populations confined to isolated mountain ranges in the Intermountain West are extremely vulnerable to local extirpation. Because successful dispersal across increasingly developed valley bottoms is perilous and uncertain¹⁶, it is imperative that land managers, including the CTNF, take pains to uphold habitat integrity for wolverines within their jurisdictional boundaries. The fact of the matter is, the Teton population of wolverines is already vulnerable to blinking out and recolonization from other occupied mountain ranges grows more difficult with each passing year. Given the hurdles wolverines face to persist this far south in their range, expanding Grand Targhee deeper into known wolverine habitat is irresponsible at best.

Whitebark pine

Whitebark pine was recently listed as threatened by the US Fish and Wildlife Service¹⁷, underscoring the need to preserve existing stands. Rangewide declines for this species in the face of climatic shifts, blister rust, and mountain pine beetle infestations have been precipitous. As a keystone species that plays a pivotal role in ecological processes for high elevation mountain habitats, shoring up our remaining whitebark pines should be

¹² Glass, TW, AJ Magoun, MD Robards, and K Kielland. 2022. Wolverines (*Gulo gulo*) in the Arctic: revisiting distribution and identifying research and conservation priorities amid rapid environmental change. *Polar Biology* 45: 1465-1482.

¹³ Inman, RM, ML Packila, KH Inman, AJ McCue, GC White, J Persson, BC Aber, ML Orme, KL Alt, SL Cain, JA Frederick, BJ Oakleaf, and SS Sartorius. 2011. Spatial ecology of wolverines at the southern periphery of distribution. *Journal of Wildlife Management* 76(4): 778-792. <https://doi.org/10.1002/jwmg.289>

¹⁴ Inman, RM, KH Inman, AJ McCue, and ML Packila. 2006. Greater Yellowstone Wolverine Study Update: December 2005-February 2006. Wildlife Conservation Society, Ennis, MT.

¹⁵ ML Packila, Wildlife Air, personal communication, June 6, 2025.

¹⁶ Packila, ML, MD Riley, RS Spence, and RM Inman. 2017. Long-distance wolverine dispersal from Wyoming to historic range in Colorado. *Northwest Science* 91(4): 399-407. <https://doi.org/10.3955/046.091.0409>

¹⁷ United States, Department of the Interior, "Endangered and threatened wildlife and plants; threatened species status with section 4(d) rule for whitebark pine (*Pinus albicaulis*).” Vol. 87 Federal Register. pp 76882-76917. December 15, 2022.

prioritized to stave off cascading ecosystem impacts¹⁸. Proposals for both expansion areas fail in this regard and would remove significant acreage of forest containing whitebark pine. Specifically, the South Bowl SUP would remove nearly 20 acres of whitebark pine while the Mono Trees SUP would remove over 59 acres of forest containing whitebark pines, roughly 20 acres of which contains moderate to high density whitebark stands. We do not believe any whitebark trees, particularly not trees with the potential to produce cones or young trees, should be cut down to accommodate Grand Targhee expansion and urge adoption of Alternative 3.

CONCLUSION

Thank you for your careful review of this proposed project and consideration of public comment. Again, we believe the public interest would be best served by containing Grand Targhee within its existing SUP boundaries and urge you to select Alternative 3 of the DEIS. We appreciate your efforts to balance the needs of many uses as you steward the abundant natural resources and needs of the public on the CTNF.

Sincerely,



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¹⁸ Jenkins, MB, AW Schoettle, JW Wright, KA Anderson, J Fortier, L Hoang, T Incashola, RE Keane, J Krakowski, DM LaFleur, S Mellmann-Brown, ED Meyer, S Pete, K Renwick, and RA Sissons. 2022. Restoring a forest keystone species: a plan for the restoration of whitebark pine (*Pinus albicaulis* Engelm.) in the Crown of the Continent ecosystem. *Forest Ecology and Management* 522(15): 120282. <https://doi.org/10.1016/j.foreco.2022.120282>