



**BACKCOUNTRY
HUNTERS & ANGLERS**
IDAHO

June 19, 2025

Kim Pierson
Forest Supervisor
1405 Hollipark Drive
Idaho Falls, ID 83401

SUBMITTED ELECTRONICALLY VIA THE WEB PORTAL

RE: Grand Targhee Master Development Plan Projects – DEIS Comments

Backcountry Hunters and Anglers (BHA) is a non-profit conservation group with 20,000 members in chapters across forty-eight states, two Canadian provinces and one territory. BHA seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of wild public lands and waters. Because the proposed actions would occur near the state line, sportspeople from both Wyoming and Idaho could be impacted because big game (deer, moose, elk) rely on habitats in both states to satisfy life history needs. The Idaho and Wyoming BHA chapters represent 2,000 hunters and anglers.

We are concerned about the proposed Grand Targhee Resort (GTR) expansion because of the direct, indirect and cumulative negative impacts it would have on local and regional wildlife which are of high recreational, economic and heritage value. Others will comment extensively on the impacts to sensitive and threatened wildlife. We enthusiastically support conservation of those species, but we are limiting the scope of our comments to big game. Based on discussions with Idaho Fish and Game regarding their telemetry data on deer, moose, and elk, we know that GTR along with Teton and South Leigh Canyons are very important to big game that reside in or transition there throughout the year. These animals end up in multiple game management units in Idaho providing excellent hunting opportunities. Impacts on the Teton Bighorn Sheep Herd would be even more perilous.

The existing Special Use Permit (SUP) boundary around GTR is large and not yet fully developed. Despite partial development, recreation use is intense across all seasons. Responding to population growth, recent trail proliferation for both skiing and mountain biking/hiking has been rapid and extensive within the SUP, resulting in high habitat fragmentation coupled with very high, almost year-round human use. Particularly notable are the major expansion of the trail system for summer recreation, primarily by mountain bikers, and the development of the Colter lift and Peaked Mountain ski terrain. Despite the presence of potentially high-quality summer and transitional habitat for deer, moose and elk, the resort itself has become somewhat of a “sacrifice” area for big game because of disturbance coupled with a lack of security habitat.

Given these existing and growing impacts locally and within the landscape, we support Alternative 1 (No Action) because it provides the only viable chance to conserve big game within this landscape. Alternatives that propose expansion into the South Bowl and Mono Trees areas are particularly alarming and would further fragment remaining security habitat and continue to displace big game animals. The South Bowl and Mono Trees areas currently serve as important security buffers between highly impacted



WWW.BACKCOUNTRYHUNTERS.ORG/IDAHO_BHA
IDAHO@BACKCOUNTRYHUNTERS.ORG

areas within the resort and relatively pristine and functional habitats adjacent. The proposed South Bowl buffers the Jedediah Smith Wilderness. Development in these areas would increase spillover effects outside the SUP boundary on other important public lands by increasing year-round human recreation, potentially even in wilderness. An example of this already exists: With the development of Peaked Mountain and the Colter ski lift, GTR has provided sidecountry access to Teton Canyon, an important big game winter and transition area already under excessive pressure from year-round recreation. Mountain bike trail development in the same area has degraded summer habitat and further displaced big game wildlife.

Alternative 3, which keeps GTR to their existing SUP boundary, also proposes a multitude of actions harmful to wildlife. The largest direct threat is removal of hundreds of acres of tree and shrub habitat for trails, roads and infrastructure. Expected increases in visitation due to a multitude of infrastructure installations and upgrades under this alternative further harms wildlife by squeezing animals into smaller and disconnected patches of secure habitat. Given that the existing footprint has already impacted big game habitat, it is also worth noting that indirect big game impacts would likely include increased vehicle traffic and animal collisions along Ski Hill Road, which is terminal winter habitat for some deer and elk herds.

For some game species that are very sensitive to human presence, like big horn sheep, loss of security would likely cutoff access to an important natural mineral lick in Teton Canyon and shrink otherwise valuable seasonal habitat from fragmentation and recreational displacement. The Teton Range big horn sheep population is already very low and vulnerable to extirpation. We have communicated with Wyoming Game and Fish (WYGF) and carefully reviewed their comments related to Big Horn Sheep and the GTR Proposed Alternative. We agree with the WYGF and support their analysis and position regarding the conservation of this herd. Rather than restating their comments, we want to underscore key points. Conservation of the Teton Bighorn Sheep Herd has enjoyed long term public commitment. For decades a broad collaboration of stakeholders has worked tirelessly to secure this population. These efforts have largely been buttressed by financial support from the sporting community. In our opinion, the applicant has failed to show how resort expansion accommodates sheep conservation and avoids imminent threats to herd demise. Radio collar data shows summer use of the South Bowl area by sheep, and expansion into this area would undermine all past efforts and threaten the viability of this herd. We want GTR to analyze this issue carefully and identify and disclose direct, indirect and cumulative impacts to ensure that this fragile resource is maintained.

We also believe that GTR has failed to address cumulative impacts from Alternatives 2-5 for deer, moose and elk because they have failed to adequately analyze and address impacts from increased recreation in the wider landscape. As we pointed out during the scoping phase, the cumulative impacts of continued habitat fragmentation and high-intensity, year-round human recreation need to be analyzed not just within the proposed SUP, but at the Forest Subsection or Ranger District scale to properly assess impacts. Numerous studies, including from the Forest Service, demonstrate that high-use recreation trails displace ungulates at distances of up to over 800m (Wisdom et. al 2018), thus the big game impacts of additional recreation infrastructure extend beyond the SUP and potentially into the nearby Jedediah Smith Wilderness. The current analysis also overstates the anticipated big game forage benefits of the Teton Canyon Hazardous Fuels Reduction Project because it fails to consider wildlife displacement from these enhanced habitats due increased year-round recreation in Teton Canyon and within the GTR SUP.

Telemetry data collected by the Idaho Fish and Game Department for big game in Teton County sheds light on larger scale population movement patterns. Some movements by moose, for example, are much wider ranging than originally thought. Specifically, IDFG have collared moose that migrate to this area



during summer-fall. Moose populations throughout Idaho and Wyoming have declined significantly over the last 20 years. Given that moose are cold weather adapted, climate change is expected to contribute to further declines from habitat degradation and increased disease pressure (Pouchet et. al 2024). High elevation habitat may become even more crucial in the coming decades to conserve this species.

The Idaho Department of Fish and Game also has collar data from multiple elk in the GTR area showing that they use it during spring-fall. Likewise, multiple collared mule deer in that area stay near GTR in spring through fall. Much of the SUP and vicinity is crucial calving/fawning and rearing habitat as well as summer and transition range for these species. In the surrounding area including Teton Canyon, IDFG has collared elk and moose that remain in the area year-round and mule deer that spend fall-winter-spring in the area. Teton Canyon specifically is a critical holdout of winter range for our populations of mule deer in that area. GTR expansion is likely to result in direct, indirect, and cumulative impacts to these species which deserves significant consideration.

Given likely impacts to wildlife and the backcountry public lands hunting experience, BHA strongly favors the No Action Alternative. All other alternatives will threaten the conservation of big game resources. Impacts would be especially detrimental under Alternatives that include expansion within the South Bowl and Mono Trees Areas. We further feel the GTR has not adequately justified the need for this expansion and analyzed the conservation tradeoffs that would occur. Significant deference has been given for their need to maintain a market niche. However, by expanding to maintain their market niche, substantial private benefit will be conveyed to GTR on public land at the expense of critical big game habitat.

Thank you for the opportunity to comment. You can count on our continued interest and engagement in this process.

Sincerely,

Jeffrey Klausmann, Regional Representative, Idaho Backcountry Hunters and Anglers

Erik Kramer, Board member, Wyoming Backcountry Hunters and Anglers

References:

- Wisdom, Michael J.; Preisler, Haiganoush K.; Naylor, Leslie M.; Anthony, Robert G.; Johnson, Bruce K.; Rowland, Mary M. 2018. *Elk responses to trail-based recreation on public forests*. Forest Ecology and Management. 411: 223-233. <https://doi.org/10.1016/j.foreco.2018.01.032>.
- Pouchet, C., Fernandez - Prada, C., Dussault, C., Leclerc, M., Tremblay, J., & Côté, S. D. (2024). *Linking weather conditions and winter tick abundance in Moose*. The Journal of Wildlife Management, 88(3). <https://doi.org/10.1002/jwmg.22551>

