Mel Bolling

c/o Jay Pence

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Dear Mr. Bolling,

The Teton Range Bighorn Sheep Working Group has reviewed the 2018 Master Development Plan Projects and scoping letter associated with the Grand Targhee Ski Resort (GTR) proposed expansion. We are quite concerned about the real and potential impacts to bighorn sheep, which are listed as a “sensitive species” on the Caribou-Targhee National Forest (CTNF). We offer the following comments.

The Teton Range Bighorn Sheep Working Group, consisting of mostly professional agency biologists, was created in the early 1990’s as a result of concern for the long-term conservation of the bighorns in the Teton Range. The group has been working diligently to conserve this core native herd into the future and presents the following comments relative to a proposed expansion of operations associated with the GTR.

The Teton Range bighorn sheep herd is a “core native herd” which is a herd which has never been extirpated and then reestablished through transplants. Such herds are the highest priority sheep herds for conservation in by the Wyoming Game and Fish Department). Moreover, the Teton bighorn sheep herd is small in numbers, has a restricted range, and lacks connectivity with neighboring herds. The above combination of factors places the Teton Range bighorn sheep herd at risk of extirpation. Additionally, recent research has shown that winter recreation is an additional threat to long-term bighorn persistence.

The Teton Range Bighorn Sheep Working Group brought together a team of bighorn sheep experts from across the West to review the current status and future management of the Teton bighorns in March 2019. The expert panel met in collaboration with numerous local bighorn sheep managers and addressed habitat concerns along with other ecological and biological factors associated with the herd. The expert panel was concerned about the restricted winter range available to the Teton herd and articulated that “every acre was of importance” to the future conservation of the herd. The proposed expansion of the Special Use Permit area would impact occupied bighorn habitat and is not consistent with recommendations of the C-T Forest Plan as it relates to bighorn sheep, the expert panel and local biologists.

Research by Courtemanch (2014), indicates the proposed South Bowl Expansion area is occupied by bighorns in the summer and serves as an important nursery area. Summer construction in this area would likely result in habitat nonuse and fragmentation for bighorns. Moreover, once the area is “developed” summer public use will inevitably increase due to the trails and roads planned for development of ski lifts etc., exacerbating the above disturbance. It can reasonably be anticipated that GTR will eventually request authorization for full expansion of its summer recreational trails system into this area with all the resultant impacts to bighorn sheep. In addition, an important mineral lick exists below the project area in the Apostle cliffs area. Radio telemetry data document that bighorns access the mineral lick via the South Bowl, so development of this area will compromise an important bighorn movement corridor. Remote cameras have documented a significant portion of the bighorns in the area using this lick. Managers and researchers agree that such mineral licks are vital to wild ungulate health. With increased public use, access to the mineral lick will be severely compromised.

Courtemanch (2014) and Whitfield (1983) have documented high quality winter habitat within and below the South Bowl area. Development within this area would result in a direct loss of winter habitat, which is already compromised and minimized across the Teton Range due to winter recreational activity. In recognition of Teton Canyon’s winter habitat value and potential, the CTNF has entered into agreement with Wyoming Game and Fish Department (WGFD) to complete vegetation treatments, specifically prescribed burning, in this area. We would encourage the Forest Service to optimize the value of the southern exposure of Teton Canyon for wintering bighorn sheep in consideration for this population’s habitat limitations.

The WGFD and the CTNF have worked cooperatively to design and implement the Teton Canyon Hazardous Fuels Reduction Project. This project would use prescribed fire to enhance approximately 840 acres of limited bighorn sheep winter habitat. Approximately a third of the proposed treatment is within the South Bowl proposed expansion area. Implementing the proposed expansion will result in direct negative impacts to a third of the habitat enhancement project and severely compromise the wildlife habitat efficacy of the remainder of the project.

We are also concerned about expanded backcountry dispersed recreational use associated with development in the South Bowl area. Enhanced access to the Teton Canyon area via the Teton Canyon ridge line would further compromise the integrity of delineated crucial winter range in this area. It is uncertain if “new gates” will be installed for out of bounds skiing, which could further exacerbate disturbance of bighorns in this area.

The proposal also indicates that GTR will shift cat skiing and backcountry skiing from Peaked Mountain to the South Bowl area. We have similar concerns relative to compromising bighorn sheep winter range and ask that this be addressed in the analysis.

The proposed GTR expansion into the southern exposure of Teton Canyon will extend to the Jedediah Smith Wilderness Boundary. This expansion will likely encourage incursion of recreation pressure into bighorn habitats within the Wilderness that is not compatible with the well-being of the bighorns and subsequently is not compatible with the CTNF Plan.

Given the potential adverse impacts to bighorn sheep and their habitat outlined above from actions proposed in the South Bowl area, we suggest that the EIS team consider an alternative that does not include the South Bowl expansion area. We also recommend that the team consider the effects of the proposal on the viability of the bighorn sheep population in the context of additive impacts to the population from winter and summer habitat loss, unregulated winter recreation, and other stressors affecting the population.

Bighorn sheep numbers across the West are estimated to be approximately 5% of their historical numbers. This estimate is also consistent for Wyoming and Idaho bighorn populations. As a consequence, the CTNF Plan identifies bighorns as a “sensitive species”. We have provided excerpts from the CTNF Plan relative to bighorns (Attachment A). We have provided “notes” to some excerpts. We feel there are inconsistencies relative to some of the CTNF goals, standards, guidelines and bighorn sheep management direction as they relate to the GTR expansion. Thus, we encourage the EIS team to meet with The Teton Range Bighorn Sheep Working Group to further discuss these discrepancies and the full impacts of the proposed GTR expansion to bighorns.

**Literature Cited**

 Courtemanch, A. B. 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.

Whitfield M. B. 1983. Bighorn sheep history, distribution, and Habitat relationships in the Teton Mountain Range, Wyoming. MS Thesis, Idaho State University, Pocatello, ID.

Sincerely,

Michael Whitfield and Steve Kilpatrick on behalf of the Teton Range Bighorn Sheep Working Group.

**Attachment A - Excerpts from the Targhee Forest Plan Relative to BH Sheep Management**

T**eton Range Subsection (M33 1Db)**

Teton Range Goals - Wildlife pg 111-156

1. Maintain or improve big game winter range (**Note: The proposed development will directly and indirectly impact bighorn sheep winter range.)**

2. Coordinate with Grand Teton National Park and the Wyoming Game and Fish Department in the

 management of the bighorn sheep population and habitat.

3. Provide for recreational activity while maintaining the integrity of crucial wildlife habitats

4. Work with the Intermountain Research Station to establish a research project to study the effects

 of recreation on bighorn sheep in the Teton Range subsection. **(Note: To the best of our knowledge, this has not been initiated or completed. This research would have helped provide pertinent information relative to the proposed GTR expansion. Please provide justification for entertaining the proposed expansion with our completing the above research.)**

**1.1.6 DESIGNATED WILDERNESS - OPPORTUNITY CLASS I (pg 111-67)**

Description - This prescription applies to the Winegar Hole Wilderness and portions of the Jedediah Smith Wilderness

**Goals**

1 The maintenance of the natural diversity of wildlife species is given the highest priority and is

 dominant over other uses There is no great alteration of wildlife behavior or use of crucial habitat by

 wildlife as a result of human activities

**1.1.7 DESIGNATED WILDERNESS - OPPORTUNITY CLASS II (pg 111-70**

**Description -** This prescription applies to portions of Jedediah Smith Wilderness

**Goals**

1 The maintenance of the natural diversity of wildlife species is given high priority There is no

 displacement of wildlife during critical periods (winter and birthing), and only temporary displacement

 during noncritical periods.

**1.1.8 DESIGNATED WILDERNESS - OPPORTUNITY CLASS 111 (pg 111-72)**

 **Goals**

1 The maintenance of the natural diversity of wildlife species is given high priority but does not

 dominate other uses except where measures are needed to recover listed threatened and endangered

 species Temporary displacement of non-TES species may occur except on crucial ranges but there

 is no permanent displacement Some habituation of species may be evident

**Monitoring Item – Recreation/Wildlife Conflicts (pg V34)**

Type of Monitoring - Implementation and Effectiveness. Designed to measure conflicts between all

forms of recreation and wildlife. **(Note: We are unaware of such monitoring as it relates to bighorn sheep and the proposed expansion. Please provide justification for entertaining the proposed expansion without the above monitoring.)**

Priority - Forest Priority Group 2.

Tolerance or Variability Indicating Action - When evaluation of wildlife populations indicates they are

beginning to falter or seek out other areas for security and solitude, then an evaluation of recreation use

levels will take place. Evaluation of other uses of the area may also be appropriate. (**Note: The low number of bighorn sheep in this population puts it at risk of extinction. Thus, a thorough evaluation of recreational impacts associated with the proposed GTR expansion is warranted.)**

Frequency of Monitoring •

* Winter, in prescription areas emphasizing winter range values: weekly in 10 percent of winter range per year for 3-4 months;

• Summer, in prescription areas emphasizing big game security or summer range values:

 weekly for 3 to 4 months, especially in the early summer.

**(Note: We unaware of the above monitoring results as it pertains to the proposed expansion area. If such monitoring did occur, please provide us with the data and analysis. If the monitoring did not occur, please provide justification for entertaining the expansion without such monitoring. )**

Lead Responsibility - District Rangers

**MONITORING (pgV-38)**

**Wildlife**

3. Continue annual population censusing of bighorn sheep including lamb survival and ram harvest

 (Wyoming Game and Fish Department).

**Wildlife and Fish Management in Wilderness \* 2323.31 (pg A-3)**

1 Provide an environment where the forces of natural selection and survival rather than human actions

 determine which and what numbers of wildlife species will exist.

2 Consistent with objective #I, protect wildlife and fish indigenous to the area from human-caused

 conditions that could lead to federal listing as threatened or endangered.

**Sensitive Species \* 2670.22 (pgA-10)**

1. Develop and implement management practices to ensure that species do not become threatened or

endangered because of Forest Service actions.

2. Maintain viable populations of all native and desired nonnative wildlife, fish, and plant species in

habitats distributed throughout their geographic range on National Forest System lands.

**Note: Allowing the proposed GTR expansion would conflict with 1 and 2 above.)**

3. Develop and implement management objectives for populations and/or habitat of sensitive species.

**BIOLOGICAL DIVERSITY (FSM 2670) (pg(A-18)**

**Sensitive Species**

1. Manage sensitive species habitat as directed in interim directive 2669-93-1

For more on Biological Diversity, see Chapter 3 l Forest wide Standards and

Guidelines.

**Sensitive Species - (pg G-37**) BH Sheep are a sensitive species on the C-T and B-T

Those species that (1) have appeared in the Federal Register as proposed for classification and are under consideration for official listing as endangered or threatened species or (2) are on an official state list or (3) are recognized by the U.S. Forest Service or other management agency as needing special management to prevent their being placed on federal or state lists.

**Forest Service definition of sensitive species (FSM 2670.5):** from **Sensitive Species - Key Policies and Requirements, Marc Bosch 2002 .**

**USDA Forest Service**

**2670.5 Definitions**

**“19. Sensitive Species**. Those plant and animal species identified by a Regional Forester for which

population viability is a concern, as evidenced by:

a. Significant current or predicted downward trends in population numbers or density.

b. Significant current or predicted downward trends in habitat capability that would reduce

a species' existing distribution.”

**Management for sensitive species, and delegation of sensitive species designation (FSM 2672.1):**

2672.1 - Sensitive Species Management. Sensitive species of native plant and animal species must

receive special management emphasis to ensure their viability and to preclude trends toward

endangerment that would result in the need for Federal listing. There must be no impacts to sensitive

species without an analysis of the significance of adverse effects on the populations, its habitat, and on

the viability of the species as a whole. It is essential to establish population viability objectives when

making decisions that would significantly reduce sensitive species numbers.

(**Note: The impacts of the proposed GTR expansion will create adverse effects on the bighorn sheep population and conflicts with C-T Forest Plan direction for management of sensitive species, i.e. bighorn sheep.)**

1**982 NFMA Implementing Regulations**

* 36 CFR 219.19: Fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area. For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area. In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area. **(Note: The proposed GTR proposed expansion will compromise the quantity and effectiveness of available habitat for bighorns and conflicts with C-T Forest Plan direction relative to maintaining viable populations.)**
* Planning alternatives shall be stated and evaluated in terms of both amount and quality of habitat and of animal population trends of the management indicator species.
* (3) Biologists from State fish and wildlife agencies and other Federal agencies shall be consulted in order to coordinate planning for fish and wildlife, including opportunities for the reintroduction of extirpated species.
* (4) Access and dispersal problems of hunting, fishing, and other visitor uses shall be considered.
* (5) The effects of pest and fire management on fish and wildlife populations shall be considered.
* (6) Population trends of the management indicator species will be monitored and relationships to habitat changes determined. This monitoring will be done in cooperation with State fish and wildlife agencies, to the extent practicable.
* (7) Habitat determined to be critical for threatened and endangered species shall be identified, and measures shall be prescribed to prevent the destruction or adverse modification of such habitat. Objectives shall be determined for threatened and endangered species that shall provide for, where possible, their removal from listing as threatened and endangered species through appropriate conservation measures, including the designation of special areas to meet the protection and management needs of such species.

Sec. 219.18 Wilderness management.

Forest planning shall provide direction for the management of designated wilderness and primitive areas in accordance with the provisions of 36 CFR part 293. In particular, plans shall--

(a) Provide for limiting and distributing visitor use of specific areas in accord with periodic estimates of the maximum levels of use that allow natural processes to operate freely and that do not impair the values for which wilderness areas were created; and

(b) Evaluate the extent to which wildfire, insect, and disease control measures may be desirable for protection of either the wilderness or adjacent areas and provide for such measures when appropriate.