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Comments:

I understand this is not the proper way to make my personal comment to you. I honestly cannot improve on the letter which I have copied below. I am not articulate enough to explain to you my feelings or scientific understanding of allowing any further human/recreational/resort development proposed for the Grand Targhee Master Plan Development projects. We must see further down the road, farther out the gate, and include the lives of other species. It's a tough subject for humans who see wonderful opportunities to provide cool and wonderful recreation for humans and great ways to make more money enjoying the wonderful wildlands this land still has. I need you, I ask you, I beg you, to consider a larger picture, a larger plan, where more than humans profit, recreate, thrive. None of us will get out of this alive, but it is so wonderful to consider the possibilities of all we can leave to those who follow. Thank you.

Dear Supervisor Bolling:

Please accept this document as record of our comments and concerns for the scoping period on the draft environmental impact (DEIS) statement for the Grand Targhee Resort Master Development Plan projects. Wyoming Wildlife Advocates informs, educates, and empowers communities to preserve our wild legacy, protect our shared wildlife, and modernize wildlife management across the state. We speak for the wildlife of the Greater Yellowstone Ecosystem in order to protect and preserve this shared resource. We have some significant concerns about the proposed expansion and thank you for the opportunity to comment.

Bighorn Sheep

For these comments, we will focus primarily on the South Bowl and Mono Trees areas as development in these areas poses the greatest risk to wildlife and would require an extension to the boundaries already allowed in the Special Use Permit for Grand Targhee Resort. We are highly concerned about the Teton Range Bighorn Sheep Herd. Throughout the past 50 years, this small population has been cut off from all migration routes, whittled down to fewer than 100 individuals, remains naïve to disease and is on the brink of extirpation from the Teton Mountains. Teton Canyon houses a unique mineral lick that the bighorn sheep rely upon in the winter to obtain minerals that boost their immune system. Grand Teton National Park is so concerned with the survival of the bighorn sheep that they have recently instituted both aerial gunning and a volunteer culling program for mountain goats who inhabit the same territory as the sheep and threaten to spread disease to this very vulnerable population. A working group known as the Teton Range Bighorn Sheep Working Group which consists of government and nongovernmental organizations has also met several times to discuss the future of the herd and how to protect them from winter recreation disturbances to ensure their long-term survival. Bighorn sheep are decidedly disturbed by human presence even when just within eyesight across a canyon. Weidmann & Bleich (2014) found that "metapopulations of bighorn sheep occurring in fragmented habitat having minimal vertical relief may be especially susceptible to sources of disturbance, which should be a consideration when recreational facilities are developed." A very careful review and evaluation of the effects that proposed expansion into the South Bowl and Mono Trees area would have on the tenuous Teton Range Bighorn Sheep population absolutely needs to be conducted. From the 2003 C-T Revised Forest Plan, "The NFMA diversity provision and the fish and wildlife resource regulation establish a goal to provide habitat for the continued existence of vertebrate species in the planning area. The goal is met by following the provisions of 36 CFR 219.19(a)(1) through (a)(7). The bottom line is that the Forest Service may not adopt a plan that it knows or believes would, through possible future Forest Service actions, extirpate a vertebrate species from the planning area (C-T Revised Forest Plan, 2003, emphasis added)." Please remember this when considering the actions proposed by Grand Targhee Resort and alternatives for the DEIS.

Canada Lynx

Canada lynx are a threatened species according to the Endangered Species Act. The Caribou-Targhee Revised Forest Plan (2003) states, "Forest management contributes to the recovery of federally listed threatened, endangered, and proposed species and provides for conditions, which help preclude sensitive species from being proposed for federal listing." With lynx being mostly extirpated from the area, careful consideration of any new development in prime lynx habitat (such as the Mono Trees area) must be fully analyzed. Research (Squires, et al., 2019) has shown that lynx tend to avoid areas with motorized use but can withstand some disturbance from backcountry skiers due to the similar habitat utilized by both and

characterized by heavy forest canopy cover. We have particular concern for the clearing of dense forest cover in the Mono Trees area to make way for new ski runs which may preclude lynx from using that particular habitat. SnowCat operations similarly pushed into the South Bowl may also deter lynx from using that habitat.

#### Wolverine

Inspect for and identify any potential denning sites for wolverine and restrict travel in potential or current den sites from March 1 through May 15 as per the Idaho State Conservation Effort. Wolverines are extremely sensitive species who are disturbed by human presence (Heinemeyer, et al., 2019). Further climate change has the potential to severely impact wolverine habitats. The Idaho Conservation Strategy for wolverine (IDFG, 2014) states that, "During the 21st century, most projections predict progressively warmer and wetter conditions in the PNW, although summer drought may worsen. Temperatures in the region will increase 0.1-0.6° C per decade through at least 2050." Further, "Given projected temperature increases, much of the western U.S. is expected to transition from a snow-dominated system to one more rain-dominated, spring snowpack is expected to decline, especially at warmer low to mid-elevations, and existing snow is expected to continue melting earlier." Wolverine are dependent on persistent snowpack in higher elevations. The analysis of any development into the South Bowl and Mono Trees areas must include the effects of predicted climate change on the survivability and cumulative impacts to wolverines in the Teton Range and throughout Eastern Idaho.

#### Moose

Moose are declining in the Greater Yellowstone Ecosystem due to a variety of reasons which are still being studied. Climate change will continue to impact their populations heavily as moose are denizens of the northern climates and exhibit heat stress in temperatures greater than 60 degrees Fahrenheit. The new mountain biking trails proposed in the South Bowl could significantly impact moose populations in Teton Canyon by removing higher elevation habitat where moose seek shelter from high temperatures. Further, removal of trees in the Mono Trees area could also remove shelter moose rely upon to seek shelter and hide from predators. Impacts to moose should be studied closely.

#### Birds

Great grey owls are known to inhabit the Mono Trees area. The C-T National Forest has a mandate to "maintain over 40% of the forested acres in mature and old age classes within a 1,600-acre area around all known great gray owl nest sites." We would request that surveys are conducted for great grey owl nests and proper consideration be given to protect nesting sites and the surrounding mature forest.

Northern goshawks inhabit the proposed area of expansion. Please conduct thorough evaluations of northern goshawk nesting and habitat areas and follow all management standards and guidelines for new roads, proper acreage for nesting area, rotation age, size class distribution for forested acres, maximum created opening, snags and reserve trees, downed logs, and thinning for northern goshawk nesting areas, post-fledging family areas, and foraging areas (Table 3.5 C-T Revised Forest Plan, 2003).

Ground-dwelling birds can be negatively impacted by outdoor recreation both in winter and summer (Arlettaz, et al., 2015; Coppes, et al., 2017). The proposed summer and winter activities in the South Bowl and Mono Trees areas will increase the amount of human activity and particularly fast-moving activities (SnowCat skiing and mountain biking) which can often cause the greatest stress to grounddwelling birds like grouse. The impacts on any ground-dwelling bird must be fully analyzed and mitigated for.

#### Grizzly Bears

Teton Canyon remains a wildlife haven in both winter and summer. Given the diverse altitudes and habitats present in Teton Canyon, the region hosts nearly all wildlife species native to the area including the endangered grizzly bear. Proper assessment of disturbance of habitat in both South Bowl and Mono Trees should be included in the DEIS including a complete analysis of the impacts to grizzly bears. The purpose and need for this proposed action appears to be driven by the desire of Grand Targhee Resort to increase its business and user recreation, not to meet the directives of the Forest Service mission which is "to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." In Grand Targhee Resort's Master Plan, they state, "GTR has a well-earned reputation within the ski industry. It is known for the intimate, uncrowded skiing and riding experience that it offers- reminding guests of "how skiing is supposed to be." Its abundant "champagne powder," fun and diverse terrain (both traditional and hike to), and outstanding views of the Grand Tetons make it a truly unique regional destination resort." Grand Targhee Resort can retain that special feeling and uniqueness while at the same

time protecting wildlife by not expanding into the South Bowl or Mono Trees. All the above mentioned species are facing challenges from increased recreation demands. The C-T Forest has no mandate to provide more extreme or adventurous activities and also already offers many year-round, accessible, family-friendly activities like wildlife and bird-watching, mountain biking, disc golf, hiking, nature trails, and camping. The ability of the Forest Service to work with its commercial partners shouldn't be at the expense of the health of our shared wildlife resources. The Forest Service on its website states that its purpose ("the ultimate answer to why we do what we do") "is intended to help sustain forests and grasslands for present and future generations" (U.S. Forest Service, 2020). Improvements at Grand Targhee Resort that serve to greatly increase user days in both the winter and summer months are in direct opposition to sustaining forests for present and future generations. New and continuing research (Naidoo & Burton, 2020) is showing increased impacts to wildlife from recreation. Richard & Côté (2015) "recommend that future ski area developments generally consider the behavior of species sensitive to anthropogenic disturbances and that construction should not occur in habitat essential for sensitive species." Wildlife stands to be impacted greatly by these proposed changes with lasting impacts. The Greater Yellowstone Ecosystem is one of the last places on Earth that still boasts a full suite of native wildlife. Some of these wildlife are doing ok, others continue to struggle (lynx, wolverine, etc.). If we keep in mind the effects of climate change on top of increased human development, wildlife will face more challenges in the coming years. If we continue to allow further development and ignore the impacts of our current actions to wildlife we will effectively keep placing more stress on wildlife populations that have already seen a major increase in human development and activities. We have a responsibility as the current stewards of this place to protect wildlife and their habitat. Facilities, ski runs, snowmaking, mountain biking, ziplines, new roads, and new ski lifts will all intrude on wildlife habitat year-round. Acceptable alternatives offered in the Draft Environmental Impact Statement need to fully evaluate all of the risks and intrusions to wildlife not only in the proposed area, but the cumulative effects to wildlife in the surrounding areas as well. Failing to offer an acceptable range of alternatives violates the Forest Services' own policies and was recently challenged in a court case where the Forest Service lost (High Country Conservation Advocates v. United States Forest Service, 2020).

The Greater Yellowstone Ecosystem is seeing an exponential increase in outdoor recreation, including in the backcountry which historically has been undisturbed by humans. It may be easy to state that the proposed Grand Targhee Resort expansion will "increase slightly" the impact to wildlife, but what is the larger impact considering that the overall impacts are increasing on wildlife around the area? We are greatly concerned that the impacts on wildlife are reaching a critical point in which we will begin to see vast declines in their populations if further pressure is placed on them by human development and recreation. The cumulative impacts of development and human encroachment on wildlife habitat cannot be ignored.

In summary, we remain specifically opposed to the following actions:

? Special Use Permit (SUP)/Operational Boundary Adjustments for the South Bowl and Mono Trees Areas, including required Forest Plan Amendments.

? Non-Winter and Alternative Activities, including: (1) the construction of summer recreation trails (hiking, downhill mountain biking and multi-use trails), (2) other summer activities like a canopy tour/fly line, zip line, aerial adventure course and re-location of the disc golf course, and (3) alternative winter activities like a snowtubing facility and expansion of existing Nordic, snowshoeing and fat biking offerings in South Bowl and Mono Trees. ? A summertime zipline will mean more noise and more people in summer which could cause abandonment of habitat by wildlife. Alternatives should include no zipline installation. In a letter dated February 5, 2019 to Geordie Gillett, Supervisor Bolling stated, "we remained concerned about wildlife." We hope that you remain concerned and will take our comments and other comments from the community into consideration in this important decision that will forever change the areas wildlife call home. Thank you for your time and for looking out for the best interests of our shared resources.