

JACKSON HOLE



WILDLIFE
FOUNDATION

BOARD OF DIRECTORS

Bruce Pasfield
President

Dawson Smith
Vice President

Leslie Steen
Treasurer

Geneva Chong
Secretary

Caroline Baker-Donza

Daniel Bernstein

Ross MacIntyre

Mark Newcomb

Jennifer Newton

Gregg Servheen

David Watson

Ben Wise

STAFF

Renee Seidler
Executive Director

Kate Gersh
Associate Director

Kyle Kissock
Communications Manager

October 16,2020

Mel Bolling
c/o Jay Pence
Teton Basin District Ranger
P.O Box 777
Driggs, ID 83401

Re: Grand Targhee Master Development Plan Projects, NEPA Scoping

Dear Forest Supervisor Bolling,

The Jackson Hole Wildlife Foundation appreciates this opportunity to provide scoping comments for the Grand Targhee Master Development Plan Projects. We are a 501c3 nonprofit organization that was founded in 1993. We work in Teton County and the Greater Yellowstone Ecosystem to promote ways for our communities to live compatibly with wildlife. The Jackson Hole Wildlife Foundation advances a conservation vision that implements community-focused and supported projects benefitting wildlife in western Wyoming. We also gather and disseminate wildlife data that can inform wildlife-friendly policies and educate the community and reduce human-caused impacts on wildlife. Our efforts are based on credible and objective scientific data and they encourage local participation and support of a land ethic that values and conserves wildlife movement. We provide crucial wildlife data for decision-makers including Teton County, the Bridger-Teton National Forest, the Wyoming Department of Transportation and the Teton Conservation District.

Grand Targhee Resort and Geordie Gillett have proposed that Caribou-Targhee National Forest expand their Special Use Permit (SUP) area by 1,200 acres to the south of the existing SUP area. This expansion would create ski trails, ski lift and facilities infrastructure, additional roads, snowcat, and skier presence where they are not currently located on the Forest or are currently in lower density. The proposal also outlines increased trails, new lift alignments, new lifts, lights to accommodate night skiing, increased snowmaking, and increased infrastructure within the existing SUP area. The proposal would increase the amount of SUP area adjacent to Designated Wilderness in the CTNF, bringing skiers closer to protected lands that provide important and secure habitat for wildlife. Below, we submit our comments on several aspects of the Grand Targhee Resort proposed expansion.

Wildlife Values

Sensitive large carnivore species utilize the existing SUP area and surrounding lands, such as wolverine, and the federally listed (Threatened, under the Endangered Species Act) grizzly bear. Additionally, the federally listed (Threatened, under the Endangered Species Act) Canada lynx has been documented here and the area is part of the Caribou-Targhee's Teton Creek Lynx Analysis Unit.

The proposed expansion areas—South Bowl and Mono Trees—primarily consist of south facing slopes which provide important winter, transition, summer, calving/fawning, and rearing habitat for ungulates like moose, elk, and deer as well as parturient and nursing bighorn sheep. Mule deer that summer in Grand Teton National Park and winter in the valleys in Idaho, traverse through this area twice per year. In addition, great grey owls, a sensitive species, has important year-round habitat in the proposed expansion area and peregrine falcon utilize the area for nesting habitat beginning in April. Data supporting this information can be obtained from biologists and managers at Wyoming Game and Fish Department, Idaho Department of Fish and Game, Grand Teton National Park and others. We strongly encourage the Forest and contractor to be in regular communication with these experts to ensure wildlife values are clearly quantified, understood, and considered during the NEPA process.

Many studies have documented the impacts of winter recreation on wildlife, especially species such as wolverine, grizzly bear, moose, deer, elk, and bighorn sheep (references). Skiers and other winter recreationists can impact wildlife behavior at a critical time when animals need to maximize their energy savings. Human presence can push animals off important winter range and can increase stress levels for animals that try to endure human presence. Ecologists know well the tenuous balance of fat reserves in ungulates as they struggle to retain crucial body condition through long, high mountain winters. This balance can be tripped by stressors in the environment, affecting the fitness of individuals, herds, and populations.

If a goal of the expansion of Grand Targhee Resort is to increase the number of visitors and skiers (which is currently not clear in the Purpose and Need) or if an increase in visitors is expected, then increases in traffic on local roads and their subsequent impact on wildlife must also be considered. Increased traffic traveling to and from the mountain on Ski Hill Road creates safety issues for both motorists and wildlife when summer and winter recreationists access the mountain and animals are either moving between seasonal ranges or moving about summer and winter range. This county road already experiences very high wildlife-vehicle collision rates. During the EIS, a thorough investigation is needed of what the current wildlife-vehicle collision rate is, how the proposed expansion will impact that rate, and if there are sensitive species vulnerable to wildlife-vehicle collisions and road and traffic permeability hurdles. How will the increased threat of wildlife-vehicle collisions be mitigated by the Forest? How will the threat of increased traffic density and its potential barrier-effect to wildlife movement be mitigated?

NEPA

Purpose and Need

The mission of the Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations (reference). The Forest was established originally to provide quality water and timber for the nation's benefit. This management scope later broadened to include the multiple uses and benefits of water, forage, wildlife, wood, and recreation (reference).

As written, the Purpose and Need of the Grand Targhee Master Development Plan serves only the need of developed recreation. Given the vast wildlife resources in the proposed expansion area as well as the geographic scope of impact and the vulnerability of those resources, the Purpose and Need is insufficient. The Forest's knowledge of these critical resources to the local, state, and national economies should not be overlooked in this process for the benefit of developed recreation without consideration of the importance wildlife have on livelihoods and communities. As written, the Purpose and Need appears to limit the scope of an unbiased analysis. If the Purpose and Need were written in a balanced manner that includes wildlife impacts that will likely occur, then Alternatives could be developed which will address these impacts either through a No Action determination or through the appropriate application of effective mitigation.

The stated Purpose and Need is to improve the recreational experience at Grand Targhee Resort. It is unclear whether terrain expansion is needed to improve the recreational experience. In a 2006 Teton County Planning Commission meeting discussing the expansion of Grand Targhee Resort's mountain base, the George Gillett family argued that the mountain's current ski runs (in 2006) could accommodate additional skiers to the extent of at least 875 additional dwelling units built at the resort. The county approved an up-zoning, allowing expansion to 450 units. Whether this expansion has occurred in the interim or not, we would like to see the Forest determine if a geographic expansion as well as density infill in the existing SUP area are even necessary to improve the recreational experience, given that the resort could accommodate at least 875 additional mountain users during the proposed dwelling unit development year. Are there other ways the resort could improve the recreational experience without expanding their footprint? Are there other ways the resort can remain competitive in the ski market? This business decision does not seem like it is the responsibility of the Forest.

While the Master Development Plan (2018) speaks to the desire to "improve its offerings in order to remain viable in the competitive destination skier/rider market," neither the Master Development Plan nor the Purpose and Need speak to other values of the landscape that must be considered within NEPA process before considering expansion of infrastructure and removal of important wildlife habitat. It appears from the Master Development Plan that skier numbers have inconsistently increased and decreased between 2013 and 2018 (MDP 2018). Given the volatility of the ski industry in light of climate change and the unpredictability of businesses in light of a pandemic and a national economic crisis, we believe the Forest should seriously consider the longevity of any need for expansion, if there truly is one. Specifically, we suggest that the Forest investigate the actual need for expansion to accommodate current visitor numbers and projected increases over the next several decades. Will expansion of Grand Targhee Resort's skiable lift-service terrain be a short-term economic boon with long-term negative implications for ecosystem health which eventually lead to long-term economic losses for the community?

Impacts analysis

As a cautionary for the Environmental Impact Statement analysis moving forward, I have witnessed underestimations of the proper geographic, temporal, and contextual Scope of Impacts Analysis during NEPA. Impacts Analysis, by definition, should not be confined to proposed project boundaries, rather the Impacts Analysis needs to consider however far the impacts may reach through space and time by looking at the direct, indirect and cumulative impacts a project will have. The wildlife that utilize the South Bowl and Mono Tree proposed expansion areas are not limited to these areas. In fact, many of these species move up to hundreds of miles seasonally and fall under many land jurisdictions including Idaho, Wyoming, Montana, Grand Teton National Park, National Forests, multiple counties, and many others. And the increase of human use that will occur in response to proposed developments will not be limited to the

existing or proposed SUP area. Mountain bike trails within the current SUP are proposed to be expanded, potentially leading to expanded use of the limited trail system outside the SUP area, i.e. Cold Springs and Mill Creek Trails. Adding lift access and groomed runs for skiers in the South Bowl and Mono Trees area will likely also increase the skier use outside of the existing and proposed SUP area, making it easier for skiers to chose ungroomed runs that lead them all the way down into Teton Canyon.

As an example of the need to consider the appropriate geographic breadth, or Scope, in this Impacts Analysis, the Teton Bighorn Sheep population that winters in Grand Teton National Park and is listed as a sensitive species on the Caribou-Targhee National Forest also utilizes the South Bowl area for lambing and nursery habitat. Below the South Bowl in Teton Canyon is an important mineral lick that provides the Teton Bighorn Sheep with critical resources. These sheep access this mineral lick by traveling through the South Bowl. These sheep will likely no longer be able to lamb or access this mineral lick if the South Bowl is developed for skiing. Additional studies show that the South Bowl itself is considered general high-quality bighorn sheep habitat (Courtemanch 2014). It is also known from local studies that bighorn sheep avoid areas with skiers (Courtemanch 2014?). This herd of bighorn sheep is considered so vulnerable that Grand Teton National Park has gone to great lengths to protect it from encroaching non-native mountain goats by lethally removing goats within the Park. In addition, the Caribou-Targhee National Forest has spent considerable effort to end domestic sheep grazing through the retirement of all allotments in the Teton Mountain Range (1997 CTNF Forest Plan).

Amendment of Forest Management Plan initiated by private development

There is currently no development described in the Caribou-Targhee National Forest Management Plan that accommodates the proposed expansion of Grand Targhee Resort. As it stands, this proposal for expansion does not meet the criteria of the Caribou-Targhee National Forest Management Plan and requires that the plan be amended. The lands that the proposed South Bowl and Mono Trees would occupy have a Management Prescription classified as Visual Quality Maintenance in the current Caribou-Targhee National Forest Plan (1997 CTNF Forest Plan). As per the US Forest Service's Scenery Management System, "if a project cannot meet the required scenic integrity objective, there are three options:

1. Deny the project as proposed.
2. Modify and/or mitigate the project to meet scenic integrity objectives.
3. Amend the forest plan."

We have concern that an amendment to the Forest Management Plan for Grand Targhee Resort's expansion are motivated by private interests alone that do not consider the scenic integrity objective and do not consider concerns for wildlife resources relayed in this letter and we hope to see extensive public process if an amendment is considered.

Specific Recommendations

We recommend that the Forest, through the NEPA process:

- Review and modify the inadequate Purpose and Need statement to account for the diverse values of the landscape that must be addressed under a multi-use US Forest Service mandate
- Ensure that the Impacts Analysis is of sufficient geographic, temporal, and contextual scope to account for wide-ranging species that migrate or live in large territories and cross multiple jurisdictional boundaries

- Ensure protection of protected, threatened, or sensitive species that utilize this area
- Include impacts to local, state, and national economies based on the impacts to wildlife that could impact tourism, wildlife viewers, hunters, business owners, and others in the Greater Yellowstone Ecosystem
- Not make amendments to the Forest Management Plan based on narrowly focused private development interests
- Give full consideration and analysis of the proposal in the context of climate change and its impacts to forest resources
- Encourage strong outreach and collaboration with the wildlife agencies and decision-makers including Wyoming Game and Fish Department, Idaho Department of Fish and Game, and Grand Teton National Park

Thank you for considering these comments.

Renee Seidler

Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation