



October 15, 2020

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c/o Jay Pence  
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U.S. Forest Service  
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Dear Mr. Bolling,

The Wyoming Wild Sheep Foundation (WY-WSF) has reviewed the 2018 Master Development Plan Projects and scoping statement associated with the Grand Targhee Ski Resort. Our organization has invested considerable resources in the long-term conservation of bighorn sheep in the Teton Range and we have concerns over the potential impacts to bighorn sheep resulting from the proposed expansion outside the SUP area – i.e. South Bowl and Mono Trees areas.

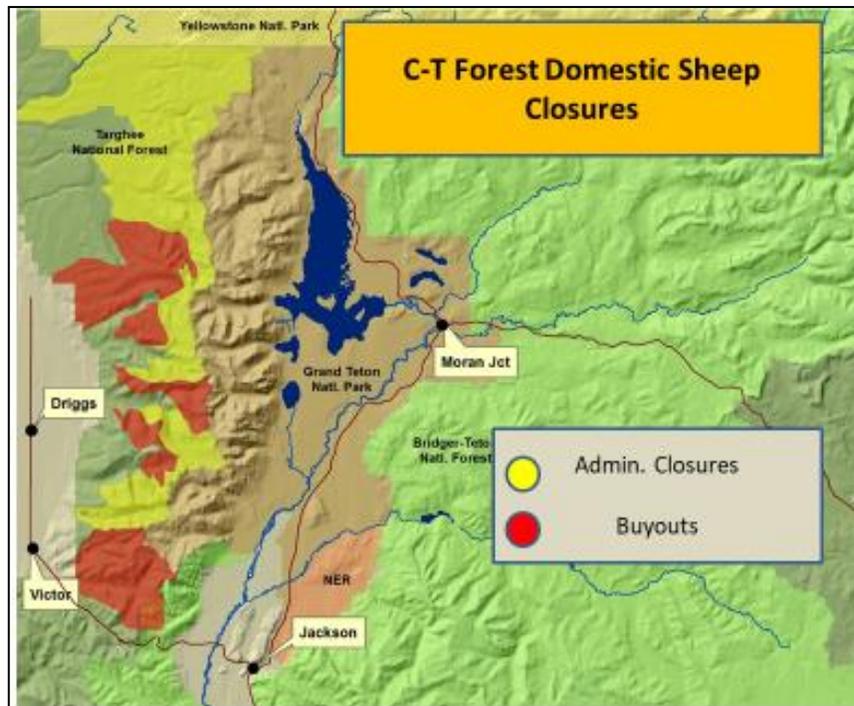
WY-WSF representatives worked closely with Caribou-Targhee National Forest (CTNF) personnel to place an emphasis on conservation of bighorns during the 1997 CTNF Plan revision. The 1997 CTNF Forest Plan revision provided goals, objectives, standards and guidelines to maintain/enhance the integrity of wild sheep habitats (see attachment A). The CTNF Plan range objective states, “Within three years of signing the ROD, assess opportunities to modify grazing allotment boundaries and permits to more effectively use natural barriers, change grazing patterns, adjust seasons of use, administratively close some additional areas, etc., to further separate domestic sheep from bighorn sheep.”

Bighorn sheep are classified as a Sensitive Species on the CTNF and the Forest Plan direction for sensitive species management includes, “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.”

The 1982 National Forest Management Act (NFMA) Implementation Regulations (36 CFR 219.19) states, “. . . 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 ensure its continued existence is well distributed in the planning area . . .”

The above National Forest policies and direction provided the opportunity for willing-seller/willing-buyer domestic sheep allotment buyouts and subsequent allotment closures.

Prior to such buyouts, the CTNF had implemented administrative closures on numerous nonactive domestic sheep allotments (Figure 1).



**Figure 1.** CTNF Allotment closures implemented to provide separation between domestic and wild sheep.

The Wyoming Wild Sheep Foundation (previously WY FNAWS) and the National Wildlife Federation (NWF) raised approximately \$250,000 over a three year period and provided compensation to domestic sheep allotment permittees for waiving their grazing permits back to the CTNF with no preference of a replacement permittee. The CTNF subsequently closed four allotments: Green Mountain, Table Rock/Mill Creek, Moose Creek, badlands and Badger-Jackpine allotments (Table 1). The remaining CTNF allotments on the west side of the Tetons are stocked with cattle.

**Table 1.** CTNF Allotments closed via economic incentives to producers.

Name	Date	Acres
Green Mtn	2001	16,041
Table Rock Mill Creek	2001	7,665
Moose Cr	2003	24,436
Badlands	2004	6,640
Badger-Jackpine	2001	16,370
<b>Total</b>		<b>71,152</b>

Over the past several years we have spent near \$250,000 on monitoring, habitat enhancements, and research projects associated with the Teton bighorn herd. We were significant financial supporters of the research conducted by Aly Courtemanch (2014), which identified important long-term ecological concerns associated with this herd. Our contributions to annual monitoring by the Wyoming Game and Fish Department and Grand Teton National Park have also been considerable.

Over the past three years, we have been involved in over 40 one-on-one and collaborative public meetings designed to inform and listen to the public about the Teton bighorns. We were the primary financier of an “expert panel” consisting of eight professional wild sheep managers/researchers from across the West. In March 2019, the expert panel met with over 20 local biologists (including the CTNF biologists) for an entire day to review the status of this herd and make management recommendations. The expert panel also provided an evening presentation to approximately 90 individuals. Most recently, the WY-WSF helped lead and fund a public collaborative consensus building process using the University of Wyoming’s Ruckelshaus Institute as a facilitator. That process will be completed near the end of 2020 and will provide a document identifying management/research recommendations addressing the future conservation of the Teton bighorn sheep herd.

Given the WY-WSF’s commitment to the conservation of this core native herd, we are quite concerned about the potential impacts to bighorn sheep (a sensitive species on the CTNF) from the proposed action. As such, we offer the following comments relative to the proposed expansion of operations associated with the Grand Targhee Resort.

The Teton bighorn sheep herd is a “core native herd,” meaning it has never been extirpated or reestablished through transplants. Such herds are the highest priority sheep herds for conservation as identified 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 compounds threats to long-term bighorn persistence and the proposed expansion could lead to a loss of viability of bighorn sheep on the CTNF and violate the Forest Plan and NFMA.

The Teton Range Bighorn Sheep Working Group brought together a team of bighorn 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 sheep habitat and is not consistent with recommendations of the CTNF Plan as it relates to bighorn sheep.

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 create habitat displacement 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 described disturbance. It can reasonably be anticipated that Grand Targhee Resort will eventually request authorization for full expansion of its summer recreational trails system into this area with all the resultant impacts to bighorn sheep. Additionally, 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 the Wyoming Game and Fish Department 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.

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 ridgeline would further compromise the integrity of delineated crucial winter range in this area. It is uncertain if new “backcountry gates” will be installed for out-of-bounds skiing, which could expand the anthropogenic disturbance beyond the currently proposed resort expansion and exacerbate disturbance of bighorns in this area.

The proposal also indicates that Grand Targhee Resort will shift Snow 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 Grand Targhee Resort 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 bighorn sheep and subsequently is not compatible with the CTNF Plan.

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. Consequently, the CTNF Plan identifies bighorn sheep as a “sensitive species”. We have provided excerpts from the CTNF Plan relative to bighorn sheep annotated with notes as they pertain to this proposal (Attachment A). We feel there are

inconsistencies relative to some of the CTNF Plan goals, standards, guidelines and bighorn sheep management direction as they relate to the Grand Targhee Resort expansion. Thus, we encourage the Interdisciplinary Team to meet with The Teton Range Bighorn Sheep Working Group to further discuss these discrepancies and the full impacts (both direct and cumulative) of the proposed GTR expansion to bighorn sheep. We suggest that a bighorn sheep viability assessment be conducted using both Wyoming Game and Fish and CTNF monitoring data (as indicated in the Forest Plan, referenced in Attachment A) to help determine if the expansion will violate the Forest Plan and NFMA as they relate to bighorn sheep as a sensitive species. Finally, we ask that you strongly consider an alternative proposal that does not include expansion into the South Bowl area.

Sincerely,

On Behalf of the Wyoming Wild Sheep Foundation Board of Directors



Zach McDermott  
President – Board of Directors  
Wyoming Wild Sheep Foundation



Katie Cheesbrough  
Executive Director  
Wyoming Wild Sheep Foundation

**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.

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

### **Teton 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: *This has not been initiated or completed to our knowledge.***)

### **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 proposed expansion.**)

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.**)

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 #1, 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 (pg. A-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 proposed expansion would be in 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 | 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 merits a thorough viability analysis.*)**

### **1982 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 may threaten the viability of this population.*)**
- 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.