

July 13, 2026

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c/o Jay Pence
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Caribou Targhee National Forest
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Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=291095>

RE: Objection to the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD) for the 2018 Grand Targhee Master Development Plan Projects (#58258)

Dear Reviewing Officer,

The Greater Yellowstone Coalition (GYC), the Idaho Conservation League (ICL), and The Wilderness Society (TWS) are jointly filing this objection to the Caribou-Targhee National Forest (CTNF) for its Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS) for the 2018 Grand Targhee Master Development Plan Projects (#58258), noticed May 29, 2026. This objection is submitted pursuant to 36 CFR Part 218, Subparts A and B, and 36 CFR Part 219.

Our organizations submitted a timely comment on the draft Environmental Impact Statement on June 20, 2025, focusing on wildlife, public land, and wilderness impacts from Grand Targhee Resort's proposed expansion and associated projects. Our comments on the DEIS asked the Forest Service to select Alternative 3 with some modifications. Tom Hallberg, Idaho Conservation Associate at GYC, was our main signatory on the DEIS comments and will act as our lead objector in the next phase of this process.

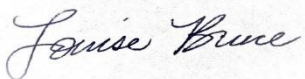
We recognize Grand Targhee Resort's desire to expand its operating area to increase skier numbers and improve the user experience. However, resort operations should not come at the expense of the public lands and wildlife populations in Teton and South Leigh canyons, particularly the Teton Range Bighorn Sheep Herd and grizzly bears and wolverines protected under the Endangered Species Act. Our objections will focus on the issues we raised in our DEIS comments and attempt to mitigate impacts to public resources that remain unaddressed in the draft ROD and FEIS.

Thomas Hallberg

Tom Hallberg, Idaho Conservation Associate, Greater Yellowstone Coalition



Josh Johnson, Central Idaho Director, Idaho Conservation League



Louise Bruce, East Idaho Conservation Manager, The Wilderness Society

Objection 1: Expansion into South Bowl Unnecessarily Impacts the Teton Range Bighorn Sheep Herd.

Expansion into South Bowl is likely to cause mortality among the Teton Range Bighorn Sheep Herd, potentially leading to a loss of viability among this geographically isolated group. Sheep utilize South Bowl for summer and fall habitat, and they use it as a travel route to the Apostle Cliffs Mineral Lick, a rare and crucial resource for this herd. In our comments on the Draft Environmental Impact Statement, we noted, “increased winter and summer use for recreation, construction, or maintenance would effectively cut off this important path.”¹

Bighorn sheep are not likely to traverse the lower boundary line, even though the Forest Service removed 21 acres from the proposed expansion in hopes sheep would do so.² They are skittish and do not travel below activity and other animals, and the noise from Avalaunchers that will be placed along the lower boundary will act as another deterrent.

These impacts go against the 1997 Targhee Revised Forest Plan goals for the Teton Range Subsection³, which state that the Caribou-Targhee will work with Grand Teton National Park and the Wyoming Department of Game and Fish (WDGF) to manage sheep populations. Allowing expansion directly contradicts comments made by WDGF on the DEIS and fails to meet the collaborative goal set out in the 1997 Forest Plan. The 1997 Forest Plan also states that recreation in the Teton Range Subsection will be managed to “provide for recreational activity while maintaining the integrity of crucial wildlife habitats.” Given that the FEIS clearly acknowledges that the South Bowl expansion would limit access to the Apostle Cliffs, this decision falls short of the Forest Plan’s goals.

At least in winter, when the ski area is operating, this may result in a total loss of this habitat and resource for Teton bighorns. This represents not only an intrinsic loss of individual bighorns but also an infringement on the responsibilities of the Wyoming Department of Game and Fish (WDGF) as a wildlife management agency. By categorizing the Teton sheep as a “core, native herd,” WDGF prioritizes them for conservation, a mandate impeded by the expansion outlined in the draft ROD.

Bighorn sheep are a top priority for the department, one it has propped up through years of management, including habitat treatments, mountain goat culling, and voluntary recreation closures. As we noted in our DEIS comments, the Caribou-Targhee National Forest was a partner in those efforts. The Forest Service signed onto voluntary backcountry skiing closures⁴ in areas it would now allow industrial ski area development to take place, and it treated habitat in Teton Canyon to open terrain for bighorn sheep use below the Apostle Cliffs. Using bighorn sheep across the Targhee Planning Unit, many of which are resources for the Idaho Department of Fish and Game, to justify population loss of Wyoming bighorn sheep blatantly ignores Wyoming statutes and management responsibilities. Bighorns found in Idaho cannot make Wyoming’s wildlife managers whole for the depletion of their important sheep populations.

¹ Joint DEIS comments, 2025, p. 5.

² Personal communication, Alyson Courtemanch.

³ 1997 Revised Targhee Forest Plan, p. III-56.

⁴ Teton Bighorn Sheep Working Group management recommendations, p. 49.

The draft ROD states sheep may utilize other habitat on the forest to make up for losses in South Bowl⁵. However, the analysis fails to identify suitable habitat that sheep are not currently utilizing. Without information on replacement habitat or how sheep would access that habitat, it is impossible to gauge the true extent of sheep mortality that could result from this decision.

The only way to truly protect the Teton bighorn herd would be to remove the South Bowl expansion from the ROD. We recognize the forest is balancing many priorities in coming to a final decision, so if that is not possible, we offer the following remedies to mitigate the impacts to bighorn sheep.

Remedies

1. No summer operations should take place in South Bowl to allow bighorn sheep access through the area to the Apostle Cliffs. The only summer work allowed should be maintenance for winter operations.
2. Replace the avalaunchers currently sited near the proposed southern special use permit boundary with top-down avalanche control infrastructure.
3. No backcountry gates should be placed along the eastern and southern boundaries of the South Bowl expansion.
4. Suitable replacement habitat should be identified for displaced bighorn sheep.
5. Grand Targhee should contribute appropriate mitigation funds to perform habitat treatments and improvements in identified replacement habitat.

Objection 2: Project Design Does Not Adequately Protect or Conserve Whitebark Pine

Project design criteria included in the draft ROD and FEIS includes some protections for whitebark pine (WBP), including Forest Service consultation before removal of individual trees, requiring the resort to submit an updated Vegetation Management Plan, and avoiding Whitebark Plus individual trees⁶. However, these are inadequate to protect whitebark pine within the project boundaries due to a lack of information about both the project scope and the resort's plans for mitigating impacts.

The 2023 Standing Analysis for Effects to Whitebark Pine (*Pinus albicaulis*) from Low Effect Projects and Whitebark Pine Restoration and Recovery Activities within Montana and Wyoming includes requirements for projects that remove fewer than 125 WBP individuals⁷, but it is impossible to determine from the decision documents how many the project will impact. Instead, the ROD says the resort must leave islands of WBP and limber pine during construction of new lifts and cutting of new runs with Forest Service consultation.

The draft ROD does not limit the number of trees that may be removed for such activities, meaning expansion, its associated construction, and projects within the current special use permit boundary may exceed the 125-tree threshold outlined in the standing analysis. If this project removes more than 125 WBP of any age, it would require Section 7 consultation and not be governed through the standing analysis. Without knowing the extent of WBP removal, it is also impossible to gauge the impact on other Endangered Species Act listed species that feed on WBP

⁵ Draft ROD, p. 14.

⁶ Draft ROD, p. C-5.

⁷ 2023 Whitebark Pine Standing Analysis for Wyoming and Montana, p. ii.

seeds, particularly grizzly bear, which the FEIS notes are still likely to use the area within Grand Targhee's permit boundary as a movement corridor.

While the project criteria require Grand Targhee to become a Whitebark Pine Friendly Ski Area, we argue that does not go far enough to meet the protections outlined in the USFWS 2023 Section 4(d) rule for whitebark pine. The rule allows exceptions for infrastructure development, "as long as we reach the conclusion that these activities will not jeopardize the species, because these activities pose no threat to the whitebark pine at the species level and can contribute to the species' conservation into the future."⁸ Without specific mitigation requirements or updated project design criteria, nothing in this ROD contributes to WBP conservation, but instead will likely result in a net loss for the species.

In the 2023 standing analysis for Montana and Wyoming, Grand Targhee Resort is listed as a target restoration zone and known area for blister-rust-resistant families of the trees⁹. Allowing take of WBP individuals without specific conservation or restoration measures is antithetical to the goals specified in that document. However, in a project of this size, reasonable steps can and should be taken to offset any impacts to WBP, not simply limit them.

Remedies

1. Do not approve an alternative until Grand Targhee submits a WBP management plan that can be publicly reviewed.
2. Require Grand Targhee to contribute to and participate in replanting and recovery efforts on the Caribou-Targhee National Forest as part of its WBP management plan.
3. Require replanting of WBP individuals within project boundaries to replace any individual trees removed during construction activities.

Objection 3: Backcountry Gates Put Undue Pressure on Critical Species and Degrade Wilderness Characteristics of Adjacent Land

Grand Targhee attempts to justify this expansion, in part, based on backcountry travelers exiting the resort boundary into South Bowl and presenting a safety risk that needs to be managed. Their argument is that a new resort boundary will result in higher adjacent backcountry use, so expansion will allow Grand Targhee to better keep users safe in South Bowl. In our comments on the DEIS, we noted that expansion would likely create the same problem along the expansion boundary.

The ROD specifies that Targhee will work with the Forest Service biologist to site backcountry access points in an updated operations plan. New backcountry access points from Mono Trees, South Bowl, or the North Boundary would likely increase pressure on wildlife during the difficult winter months and degrade the wilderness experience on the nearby Jedediah Smith Wilderness. It would be inappropriate to approve this project without giving the public the chance to review updates to the resort's operations plan, including new proposed backcountry gates.

Forest Supervisor Kim Pierson writes that the decision to reduce the Mono Trees expansion was in response to a Wyoming Department of Game and Fish request to protect mule deer winter range in

⁸ ESA 4(d) rule for whitebark pine.

⁹ 2023 WBP Standing Analysis, p. 56.

Teton Canyon¹⁰. Any backcountry gate located on the proposed Mono Trees boundary would allow backcountry recreation access into that same winter range and defy the Forest Service's stated rationale for the reduction in the Mono Trees area.

Backcountry access points from South Bowl would similarly allow increased use of critical habitat. Grizzly bear, bighorn sheep, and wolverine have been shown to use Teton Canyon and South Bowl. Access points from the expanded SUP boundary would allow lift-served customers into critical habitat that includes a known wolverine denning site a mere half-mile from South Bowl. As listed species under the Endangered Species Act, grizzly bear and wolverine warrant higher levels of protection, including limiting human access into denning and winter habitat.

Similarly, members of the Teton Range Bighorn Sheep Herd are known to travel in or near South Bowl year-round, with habitation in spring, summer, and fall, and winter passage to the Apostle Cliffs Mineral Lick. Given the species' avoidance of human activity, allowing expanded resort-adjacent backcountry access into the North Fork of Teton Canyon will likely lead to effective habitat loss and infringement upon the Wyoming Department of Game and Fish's mandate to conserve this core, native bighorn sheep herd.

Though the 1968 Wilderness Act and the Wyoming Wilderness Act of 1984 maintain that buffer zones cannot be mandated around wilderness areas, the Caribou-Targhee must still manage areas of the Jedediah Smith Wilderness for characteristics that include seclusion and untrammelled landscapes. Increased backcountry skier or hiker travel in areas of the wilderness that are otherwise difficult to reach and currently see little human presence in winter will degrade the wilderness experience available to those who currently recreate in this area.

Similarly, any North Boundary gates that would be created in an updated operations plan would increase access into South Leigh Creek, an otherwise secluded area of the Jedediah Smith Wilderness. Paying customers accessing the wilderness from lift-served terrain would decrease the feeling of seclusion currently found in this canyon. These concerns would be easily remedied by prohibiting new backcountry access points from the resort and maintaining only the existing gates.

Remedies

1. Add project design criteria that prohibit new backcountry access gates on the resort's North Boundary.
2. Add project design criteria that prohibit new backcountry gates in the Mono Trees and South Bowl expansions.
3. Include an updated operations plan with backcountry access points in the final ROD.

Objection 4: Inappropriate Approval of Mountaintop Restaurant

While we appreciate the included project design criteria that require use of natural building materials and restrict hours of use for the proposed mountaintop restaurant, we argue that siting the facility atop Fred's Mountain ignores the wilderness characteristics the Caribou-Targhee is mandated to protect. The Wyoming Wilderness Act of 1984 and the 1997 Revised Forest Plan

¹⁰ Draft ROD, p. 5.

require protection of visual landscapes and wilderness qualities in the Jedediah Smith Wilderness (JSW).

A large-scale restaurant visible from high-alpine ridges in the JSW, including along the Teton Shelf and Table Mountain, would significantly alter the user experience in these otherwise untrammelled areas. These vistas currently have little to no human infrastructure visible from them, resulting in an objectively wild experience, and no amount of natural building materials can make up for the loss of that pristine view being interrupted.

We're not opposed to Targhee building such a restaurant, just the fact that it would be visible from untrammelled parts of the JSW and Grand Teton National Park. Siting the facility just below the ridgeline would eliminate this particular concern.

Remedy

Include in the final ROD project design criteria that require the mountaintop restaurant to be sited below the summit of Fred's Mountain so it is not visible from the JSW and Grand Teton National Park.

Objection 5: Expansion May Lead to Incidental Take of Wolverines

GYC was a plaintiff in litigation to secure Endangered Species Act protection for the wolverine specifically because the species is acutely vulnerable to habitat loss, human disturbance, and disruption of denning sites in high-elevation, snow-dependent terrain – the same terrain the Selected Alternative would convert into permanently managed ski infrastructure at South Bowl and Mono Trees. The Draft ROD confirms the Selected Alternative "will have effects on wolverines and their habitat and denning habitat" in these areas, and that winter recreation noise is expected to preclude wolverine use of that habitat for any purpose other than travel¹¹.

Increased human presence from motorized and non-motorized winter recreation occurring in wolverine habitat increases wolverine avoidance of those areas that are potential denning habitat.¹² Habitat quality is linked to reproductive success in wolverines¹³ and winter recreation is indirectly linked to habitat loss.¹⁴ The agency's own analysis further states that avalanche control associated with the South Bowl expansion is expected to increase avalanche frequency such that resulting wolverine mortality "will no longer be considered a chance occurrence," supporting the Forest Service's determination that the project "MAY AFFECT, AND IS LIKELY TO ADVERSELY AFFECT individual wolverines."¹⁵

This determination carries particular weight because the governing interim 4(d) rule for the wolverine exempts take only for research activities, incidental trapping mortality, and forest management activities that reduce wildfire risk¹⁶; it provides no exemption for take resulting from resort development or avalanche control operations. Any incidental take of wolverines caused by

¹¹ Draft ROD, p. 12.

¹² Heinemeyer et al. 2019.

¹³ Rauset et al. 2015.

¹⁴ Heinemeyer et al. 2019

¹⁵ Draft ROD, p. 12

¹⁶ 88 Fed. Reg. 83,726 (Nov. 30, 2023)

this project therefore falls squarely within Section 9's take prohibition and cannot proceed absent authorization through a Section 7 incidental take statement. Our issue with the decision is that the Responsible Official approved this project-level authorization without requiring pre-construction wolverine surveys or avoidance of identified denning habitat, instead relying on a reactive den-buffer provision triggered only if a den is discovered during construction.¹⁷

Remedy

We request as remedy that the Reviewing Officer instruct the Responsible Official to withhold implementation of the South Bowl and Mono Trees special use authorization until Section 7 consultation¹⁸ is complete and the resulting Biological Opinion's incidental take statement and terms and conditions — including any survey, avoidance, or avalanche-control limitations — are incorporated into the final decision.

Objection 6: Draft ROD Fails to Properly Analyze Food-Driven Impacts to Grizzly Bears

GYC has direct litigation history establishing the significance of the very issue raised here: in *Greater Yellowstone Coalition v. Servheen*, 665 F.3d 1015 (9th Cir. 2011), affirming 672 F. Supp. 2d 1105 (D. Mont. 2009), GYC successfully challenged the Fish and Wildlife Service's 2007 delisting of the Yellowstone grizzly bear because the Service failed to rationally explain why the accelerating decline of whitebark pine, a critical high-fat food source enabling grizzly survival and reproduction, did not threaten the population. This decision kept the grizzly bear on the threatened species list specifically because of dependence on this food source.

The Draft ROD's own findings echo the exact threat GYC's litigation established: the Draft ROD confirms the Selected Alternative will reduce whitebark pine within the existing SUP area and the South Bowl and Mono Trees expansion areas through direct removal, soil compaction, altered hydrology, and avalanche control impacts on remaining trees, concluding that the project "MAY AFFECT, AND IS LIKELY TO ADVERSELY AFFECT whitebark pine."¹⁹ The same "likely to adversely affect" determination independently is reached for the grizzly bear itself, whose potential for "mortality of individual bears, through human-bear conflicts into the future" and increased incidental take over the life of the 50-year permit is explicitly acknowledged.²⁰

Our concern with the decision is that, notwithstanding the Ninth Circuit's holding that whitebark pine decline cannot be dismissed as insignificant to grizzly bear survival without a reasoned, evidence-based explanation, the Draft ROD does not analyze the relationship between ski area expansion-caused whitebark pine loss and grizzly bear food availability in the same landscape, instead treating the two "likely to adversely affect" determinations for whitebark pine and grizzly bear as independent findings rather than assessing their cumulative interaction. The Draft ROD further relies on landscape-scale reassurance ("over 101,000 acres of secure habitat" remaining in the Teton Bear Analysis Unit)²¹ without addressing whether whitebark pine loss in this specific area could increase grizzly reliance on alternative, human-proximate food sources, precisely the

¹⁷ Draft ROD, p. 12.

¹⁸ Initiated May 20, 2026, per Draft ROD p. 28.

¹⁹ Draft ROD, p. 12.

²⁰ Draft ROD, p. 11

²¹ Draft ROD, p. 11

mechanism of harm the Ninth Circuit identified in the above-referenced litigation. The only mitigation tied to the project decision is a reactive measure requiring “coordination with Forest Service wildlife biologist if a grizzly bear den is found during project construction/implementation,”²² with no comparable pre-project commitment addressing whitebark pine-driven food scarcity or resulting human-bear conflict risk.

Remedies

1. As remedy under this objection, we request that the Reviewing Officer instruct the Responsible Official to withhold implementation of the South Bowl and Mono Trees special use authorization until the Section 7 Biological Opinion's terms and conditions for grizzly bear expressly account for the cumulative effect of project-caused whitebark pine loss on grizzly bear food availability and conflict risk, and include binding, enforceable measures responsive to that analysis.
2. Grand Targhee should contribute appropriate funds for a law enforcement officer or recreation ambassador position to educate recreational users in Teton and South Leigh canyons and enforce closures and backcountry gates.

²² Draft ROD, p. 12

Sources

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