**June 16, 2025**

**U.S. Forest Service**Teton Basin Ranger District
ATTN: Grand Targhee Resort Expansion DEIS

**RE: Opposition to the Grand Targhee Resort Expansion – Draft Environmental Impact Statement (DEIS)**

To Whom It May Concern,

I am writing as a concerned citizen and public land steward to express my strong opposition to the proposed expansion of Grand Targhee Resort. The project as presented is unnecessary, ecologically damaging, and fails to demonstrate any compelling public benefit that would justify the widespread harm it would inflict on the environment, wildlife, and surrounding communities. I strongly advocate for Alternative “Option 1”, no expansion, as outlined in the Draft Environmental Impact Statement (DEIS).

The DEIS suffers from a narrowly framed Purpose and Need that mirrors private development interests rather than fulfilling the Forest Service’s responsibility to manage public lands for the greater good. The proposed expansion prioritizes commercial growth over the preservation of intact wildlands at a time when we should be doing the exact opposite—especially given the twin threats of climate change and biodiversity loss. There has been no request by the community for an expansion. The Forest Service is tasked with balancing human use and environmental protection—not prioritizing private commercial gain over public interest or ecological health.

### **Key Concerns with the DEIS and Proposed Expansion:**

* **Wildlife Harm and Habitat Fragmentation**The proposed expansion would have devastating impacts on numerous sensitive and threatened species:

	+ **Grizzly bears** would lose over 80% of secure habitat within the project area, increasing conflict and violating ESA and Forest Plan standards.
	+ **Wolverines** face potential displacement without site-specific impact studies—despite known dens nearby.
	+ **Teton Bighorn Sheep** are already in decline, yet the DEIS offers no protections to prevent further habitat loss.
	+ **Moose** and **mule deer** would be displaced from key foraging, winter range, and migratory corridors in both South Bowl and Mono Trees, undermining their viability.
	+ **Canada lynx**, a federally listed species, would see over 230 acres of suitable habitat fragmented, endangering critical dispersal corridors.
	+ **Boreal, flammulated owls, and goshawks**, all Forest Service Sensitive Species, face significant risk due to nesting disturbance and habitat degradation.
	+ The **three-toed woodpecker**, reliant on snag-rich forest, would lose essential nesting grounds.
	+ The cumulative impacts on biodiversity have been systematically understated or ignored.
* **Inadequate Survey and Scientific Analysis**The DEIS fails to meet NEPA’s “hard look” standard by relying on outdated, insufficient, or absent species-specific surveys. Wildlife assessments are generalized and lack the site-specific rigor required to responsibly evaluate the impacts of large-scale development.
* **Whitebark Pine and Vegetation Loss** Nineteen and a half acres of whitebark pine—a threatened keystone species in the Greater Yellowstone Ecosystem—would be lost in South Bowl. These trees may include blister rust–resistant genotypes critical for species survival. The DEIS disregards Forest Plan directives to protect rare, high-elevation vegetation.
* **Visual and Acoustic Intrusion** Both the South Bowl and Mono Trees expansions would intrude on the scenic and soundscape integrity of the adjacent Jedediah Smith Wilderness and surrounding backcountry, degrading solitude and the wild character that make this area special. These impacts are incompatible with Wilderness Act values.
* **Recreational Displacement and Loss of Public Access** The South Bowl is a cherished non-motorized zone offering free, wilderness-style recreation. The proposal would privatize this space, replacing unstructured public access with resort-controlled terrain, fundamentally altering the public’s relationship with this landscape.
* **Water Quality and Riparian Zone Damage** Development in Mono Trees, including lift base placement in the Mill Creek Aquatic Influence Zone, threatens headwater quality and downstream drinking water supplies. The DEIS fails to address increased sedimentation, nutrient loading, and hydrological disruption—especially concerning given the Teton River’s significance to Driggs and the broader valley.
* **Public Safety, Emergency Access, and Traffic** Increased skier visitation will further burden the already precarious Ski Hill Road, delaying emergency response and straining under-resourced EMS and Search & Rescue units. The DEIS lacks a credible traffic analysis and offers no real mitigation for infrastructure stress or safety risks.
* **No Meaningful Public Benefit** The proposed expansion caters to a private resort’s growth model without delivering any substantive community benefits. Instead, it jeopardizes ecological integrity, public access, and rural character. In contrast, intact wildlands offer enduring public value—providing biodiversity, watershed protection, climate resilience, and equitable recreation access.

This project moves us in the wrong direction. It prioritizes short-term economic gains for a private entity over long-term public interest and ecological health. The Forest Service has a duty to uphold its stewardship mandate—not facilitate resort sprawl. Therefore, I am in support of Option 1, no expansion.

I respectfully urge you to reject the Grand Targhee Resort expansion and instead prioritize conservation, climate resilience, sustainable public land use, and our community interests over private interests. Our wildlands are irreplaceable. Please let your legacy be one of conservation and protection.

Sincerely,

Whitney Caskey