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Re: Comments on Grand Targhee Resort Master Development Plan Draft Environmental Impact Statement (DEIS)

Dear Forest Supervisor Pierson,

On behalf of the Jackson Hole Wildlife Foundation (JHWF), thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Grand Targhee Resort Master Development Plan.

After thorough review of the DEIS and supporting documentation, we remain firmly opposed to the proposed expansion of Grand Targhee Resort into the South Bowl and Mono Trees areas. We strongly support Alternative 1: No Action, which would prevent new development and allow the landscape to retain its current ecological integrity, wildlife habitat, and natural character.

This position is grounded in substantial and well-documented concerns about the impacts the proposed expansion would have on sensitive species and irreplaceable habitat.

Wildlife and Habitat Concerns

The proposed expansion area encompasses important habitat for numerous wildlife species, including grizzly bears, wolverines, bighorn sheep, Black Rosy-Finch, raptors and owls, and whitebark pine. The DEIS fails to sufficiently evaluate the direct, indirect, and cumulative effects this development would have on species persistence, habitat connectivity, and ecosystem resilience.

Grizzly Bears

The proposed project lies within the Greater Yellowstone Ecosystem, which supports one of the last remaining strongholds for grizzly bears

(*Ursus arctos horribilis*) in the lower 48 states. The Grand Targhee expansion area overlaps with designated critical grizzly bear habitat—zones where human presence remains low and secure for foraging, denning, and seasonal movement. Development of ski infrastructure, a mountaintop restaurant, increased trail access, and year-round human presence will:

- Introduce more human-bear conflict risk through unsecured attractants, surprise encounters, and increased human use of bear habitat (Gunther et al., 2004; Schwartz et al., 2010).
- Compromise secure habitat by converting important foraging and travel corridors into disturbed or inaccessible terrain (Servheen et al., 2001).
- Increase the likelihood of lethal management removals, the leading cause of mortality for grizzly bears in the ecosystem (USFWS, 2017).

While grizzly bears have recolonized most parts of the Teton Range, their persistence depends on connected, undisturbed habitat—especially at the periphery of the recovery zone. The proposed expansion undermines those conditions and reverses decades of collaborative conservation gains.

Wolverines

The proposed expansion area is currently used by wolverines and represents important year-round habitat. Inman et al.'s *Greater Yellowstone Wolverine Study* documented marked use of the Targhee area by multiple individuals, confirming its value within the broader ecological landscape. Specifically, the study states that “the Targhee area appeared to provide consistent winter use and supported at least one reproductive female,” (Inman & Heinemeyer, 2007, p. 30) highlighting its importance not only for movement but also for denning and population persistence.

Wolverines depend on high-elevation, cold, and snowy landscapes for denning and reproduction (Copeland et al., 2010; Heinemeyer et al., 2019). The west slope of the Tetons, including the proposed expansion zones, offers some of the most suitable remaining habitat in the lower 48. Fragmentation and increased human activity could exclude this species from vital terrain (Inman et al., 2013). Displacement from core areas like Targhee would undermine recovery efforts and further isolate already vulnerable subpopulations.

Black Rosy-Finch

The Targhee expansion area includes known and potential nesting habitat for the Black Rosy-Finch, which relies on high-elevation alpine cliffs and talus slopes—features present in both the South Bowl and Mono Trees areas. Observations and habitat models indicate this species uses the west slope of the Tetons for breeding and foraging during the short alpine summer (Hayward et al., 2020).

As one of the highest-elevation breeding songbirds in North America, the Black Rosy-Finch nests in isolated alpine cliffs and talus (Johnson, 2002). It is highly vulnerable to both climate shifts and disturbance. Mountaintop construction would directly eliminate potential nesting habitat and

accelerate localized decline. Given the species' restricted range and declining population trends, loss of even marginal habitat may have disproportionate consequences for its long-term viability.

Raptors and Owls

The expansion area includes habitat used by Northern Goshawk, Great Gray Owl, Boreal Owl, and Flammulated Owl. These species rely on intact forest structure, prey availability, and low disturbance thresholds to nest and hunt. The removal of mature forest and the introduction of infrastructure-related noise and lighting will degrade this habitat and impact species viability (Reynolds et al., 1992; Hayward & Hayward, 1993; Richardson & Miller, 1997; Gura et al., 2022).

Bighorn Sheep

The South Bowl is within the seasonal range of the Teton bighorn sheep herd—one of the smallest, most isolated herds in the Greater Yellowstone Ecosystem. Increased human access and habitat loss are incompatible with recovery objectives for this imperiled native population (WCS Teton Bighorn Sheep Working Group, 2022).

Whitebark Pine

Whitebark pine, a keystone and federally listed Threatened Species, is slated for 78 acres of removal under the proposed plan. These trees play a critical role in high-elevation ecosystems, from snowpack retention to providing food for native wildlife such as Clark's Nutcrackers and grizzly bears (Tomback & Achuff, 2010). This level of removal is indefensible from both a conservation and regulatory perspective, especially considering its Threatened listing under the Endangered Species Act (USFWS, 2022).

Policy and Process Concerns

Beyond the biological consequences, the scale and nature of the proposed actions raise serious questions about compliance with existing Forest management directives and federal conservation law.

We are concerned that the DEIS underestimates the long-term ecological costs of this project and fails to meet the standards set by the 1997 Caribou-Targhee Forest Plan, the Endangered Species Act, and the National Forest Management Act.

Furthermore, the project's stated Purpose and Need lacks justification. The DEIS does not present compelling evidence that visitor capacity issues warrant an expansion of this scale. The ecological and social costs will be borne publicly and permanently, while the benefits will be largely privatized.

Support for Alternative 1: No Action

The Jackson Hole Wildlife Foundation supports Alternative 1: No Action. This is the only alternative that:

- Maintains critical habitat for grizzly bears, wolverines, and other at-risk species
- Avoids habitat fragmentation and future conflict potential

- Aligns with current recovery strategies and conservation goals in the Greater Yellowstone Ecosystem
- Upholds the integrity of the Caribou-Targhee Forest Plan and avoids irreparable ecosystem degradation

Conclusion

The Grand Targhee expansion represents a disproportionate and unjustifiable impact on one of the Greater Yellowstone Ecosystem's most ecologically sensitive regions. As stewards of our region's wildlife and wildlands, we urge you to adopt Alternative 1: No Action and reject this proposal in its entirety.

Thank you for your attention.

Sincerely,



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Executive Director
Jackson Hole Wildlife Foundation



Kate Gersh
Associate Director
Jackson Hole Wildlife Foundation

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