



Kim Pierson, Forest Supervisor
c/o Jay Pence, Teton Basin District Ranger
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

June 19, 2025

Re: Comments on the Draft Environmental Impact Statement for the Grand Targhee Master Development Plan Projects [FR Doc. 2025 – 04859]

Forest Supervisor Pierson and District Ranger Pence:

On behalf of the National Parks Conservation Association (NPCA), I submit the following comments on the United States Department of Agriculture– United States Forest Service (Forest Service) Draft Environmental Impact Statement (DEIS) for the Grand Targhee Master Development Plan Projects (GTMDP Projects), Forest Service Docket # 2025 – 04859.

Since 1919, NPCA has worked to protect and enhance the United States' National Park System (NPS) for present and future generations. NPCA and our more than 1.6 million members and supporters have a long history of advocating for the interests of Grand Teton National Park (GTNP) and its wildlife, both inside and outside of the park's boundaries. Our shared natural resources are vital parts not only of our national parks, but also of the broader, surrounding ecosystems, which include land within the National Forest System (NFS) and specifically on the Caribou Targhee National Forest (CTNF). We are grateful for this opportunity to work with the Forest Service and CTNF to provide comments on the DEIS for the GTMDP Projects.

NPCA appreciates the Forest Service's distribution of project information to the public for review and comment, as well as the Forest Service's careful consideration of the environmental concerns in its decision-making processes related to the selection of a preferred alternative for the GTMDP Projects. We believe that a modified version of Alternative 3 – No SUP Expansion is the most balanced solution for all stakeholders.

National Parks Conservation Association

321 East Main Street, Bozeman, Montana 59715 | P (208) 949-0308 | nPCA.org



I. MODIFIED ALTERNATIVE 3 – NO SUP EXPANSION AND NO GUEST SERVICES FACILITIES AT THE SUMMIT OF FRED’S MOUNTAIN

Alternative 3 – No SUP Expansion was developed in response to a variety of resource concerns by the CTNF interdisciplinary team and members of the public. Alternative 3 – No SUP Expansion specifically excludes any proposed expansion of the Special Use Permit (SUP) and only includes projects within the existing SUP boundary. The project components associated with Alternative 3 – No SUP Expansion includes many facility upgrades to existing resort facilities, as well as the construction of several new facilities including the construction of full-service, on-mountain, guest services facilities at the summit of Fred’s Mountain.

NPCA believes that the project component that directs the construction of full-service, on-mountain, guest services facilities at the summit of Fred’s Mountain should explicitly be removed from Alternative 3 – No SUP Expansion to form a new and improved Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred’s Mountain. The modifications we propose to Alternative 3 – No SUP Expansion are essential to its efficacy as a successful solution for all stakeholders.

Recommendation: select a new Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred’s Mountain as the preferred alternative.

II. IMPACTS TO GRAND TETON NATIONAL PARK

Alternative 1 and Alternative 3 are the only alternatives that do not propose a SUP boundary expansion into previously undeveloped areas that would likely impact scenic viewsheds from within GTNP’s boundaries. These scenic viewsheds looking out at the west side of the Teton Range are important for park visitors, because they provide GTNP’s visitors with a spectacular opportunity to look at the lower portion of Teton Canyon as well as other undeveloped areas of the CTNF adjacent to the park from high elevation. These viewsheds and visual resources are critical resources to GTNP and its many visitors and supporters.

Alternative 3 – No SUP Expansion, as originally proposed, plans to construct full-service, on-mountain, guest services facilities at the summit of Fred’s Mountain. However, the DEIS fails to provide sufficient building specifications, including the exact location for the facilities, related to the proposed guest services facility. The DEIS discloses only that the facilities would be approximately 11,000 square feet in size and located on top of Fred’s Mountain and south of the existing Dreamcatcher Lift top terminal with simple, linear forms and natural colors as well as low-reflective materials.

It is very likely that a facility of this size on the top of Fred’s Mountain in any location on the ridge would negatively impact the viewsheds and visual resources of GTNP that are so beloved



by park visitors and supporters. Therefore, we propose that the construction of full-service, on-mountain, guest services facilities at the summit of Fred's Mountain should explicitly be removed from Alternative 3 – No SUP Expansion to form a new and improved Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred's Mountain.

Recommendation: select a new and improved Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred's Mountain as the preferred alternative.

III. IMPACTS TO SHARED WILDLIFE RESOURCES

Alternative 1 and Alternative 3 are the only alternatives that do not propose a SUP boundary expansion into previously undeveloped areas that would likely impact shared wildlife resources, including those shared wildlife resources that move and migrate between NFS and NPS lands. NPCA is specifically concerned about the impacts of a SUP boundary expansion into previously undeveloped areas that would impact native bighorn sheep in the Teton Range.

The DEIS states that bighorn sheep have been detected within the proposed South Bowl expansion area and notes habitat modeling suggests that the project area contains valuable winter and summer habitat. Data cited in the DEIS additionally suggests that the South Bowl area is used as a movement corridor to access the Apostle Cliffs mineral lick, which is southwest of South Bowl on the north side of Teton Canyon.

Alternatives 2 and 4 propose to expand the SUP boundary of the resort which would directly impact native bighorn sheep habitat on the CTNF and consequently native bighorn sheep in GTNP. The small, genetically isolated population of native bighorn sheep has persisted in the Teton Range since the last ice age, and they rely on this essential habitat for their continued survival. Residential and recreational development already forced the herd from their historic winter range down at lower elevations on the valley floors up to higher elevations in the Teton Range where they now reside during the spring, summer, fall, and winter months.

Many local, state, and national stakeholders have joined together to invest myriad resources in the conservation of this native herd. The Teton Range Bighorn Sheep Working Group (TRBSWG) has coordinated conservation measures, research, and monitoring of this bighorn sheep herd for the past three decades. Wildlife and resource managers from NPS, Forest Service, and Wyoming Game and Fish Department have each participated in this joint effort to ensure the future of the Teton bighorn sheep population.

The NPS and GTNP have invested a great amount of time and money over the course of the last several years to protect the herd. These efforts included an effort to remove non-native mountain goats that can carry bacterial pathogens with the ability to lead to disease in the



native bighorn sheep population. These efforts additionally incorporated working with the CTNF and other working group members to create and advocate for the adoption of Bighorn Sheep Winter Zones, in which the public was asked to voluntarily avoid winter travel within the newly devised Bighorn Sheep Winter Zones.

The development and construction of ski area infrastructure in South Bowl as proposed by Alternatives 2 and 4 directly overlaps with some of the Bighorn Sheep Winter Zones created by CTNF itself. This development and construction, as well as subsequent recreation in South Bowl, could directly impact high-quality winter habitat for bighorn sheep in South Bowl; occupied summer habitat for bighorn sheep nursery groups in South Bowl; access to natural mineral lick utilized by bighorn sheep year-round just south of South Bowl; and, access to low elevation spring habitat utilized by rams.

Alternative 1 and Alternative 3 are the only alternatives that do not propose a SUP boundary expansion into previously undeveloped areas that would likely impact native bighorn sheep in the Teton Range. Therefore, we propose the selection of a new and improved Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred’s Mountain as the preferred alternative for this project.

Recommendation: select a new and improved Modified Alternative 3 – No SUP Expansion and No Guest Services Facilities at the Summit of Fred’s Mountain as the preferred alternative.

Thank you for the opportunity to submit comments on the DEIS for GTMDP Projects. We encourage the Forest Service to continue to work closely with its many local, state, federal, Tribal, and community partners to select a preferred alternative that offers a successful solution for all stakeholders. The protection and conservation of our shared natural resources is critical not only for our national parks, but also for our national forests and the broader ecosystems that surround those parks and forests now, and for future generations.

Sincerely,

Allison Michalski

Allison Michalski
Northern Rockies Connectivity Program Manager
National Parks Conservation Association

National Parks Conservation Association

321 East Main Street, Bozeman, Montana 59715 | P (208) 949-0308 | npca.org