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Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58258>

Re: Grand Targhee 2018 Master Development Plan Projects #58258

Dear Forest Supervisor Pierson,

Thank you for this opportunity to provide comments regarding the Grand Targhee Resort (GTR) Master Development Plan Draft Environmental Impact Statement (DEIS). Please accept the following comments on behalf of the Wyoming Wilderness Association (WWA), an education, stewardship and advocacy nonprofit organization dedicated to protecting Wyoming's public wildlands. Our organization represents nearly 3,000 members and supporters from across Wyoming and the United States. Our community is made up of conservationists, nature lovers, sportsmen, and outdoor recreationists alike. WWA is involved in statewide efforts to protect designated Wilderness, and wildlands that may one day qualify.

Despite a myriad of valid concerns spanning from impacts to Teton County, Idaho, to impacts on protected wildlife and plant species, WWA will focus our comment on the following issues that we have determined are most directly related to our mission:

1. Gratitude for the inclusion of our past recommendations;
2. Lack of clarity and adherence to the Purpose and Need Statement of the DEIS;
3. Project components that are inappropriate based on the 1997 Forest Plan;
4. Impacts to the neighboring Jedediah Smith Wilderness (JSW); and
5. Cautious support of Alternative 3 with caveats

WWA has been involved with GTR development decisions in the past due to its proximity to the JSW area, and we appreciate your consideration of our following comments regarding this DEIS again today.

1. Gratitude for the inclusion of past recommendations

WWA would like to acknowledge and express gratitude that elements from our 2020 scoping comments were either addressed or included within this DEIS. The first example is that you included three alternatives that exclude the South Bowl Special Use Permit (SUP) boundary adjustment, including the No Action Alternative. As the single most harmful thing included in this plan, WWA appreciates that it is not included in multiple Alternatives. We are also grateful to see that cat skiing was removed altogether, due to the role it could play in providing commercially driven use in the JSW. Last of all, we were surprised to see that the South Bowl boundary had been adjusted away from the once adjacent Wilderness boundary. Although these updates do not address our basic concerns regarding the JSW, it is clear that comments submitted were considered, and that attempts to include recommendations and remedy concerns were made. However, as we consider the DEIS as it stands now, there are still many issues within project components being presented and we ask again for continued consideration of our concerns.

2. Lack of clarity and adherence to the Purpose and Need Statement of the DEIS

This DEIS starts off strong sharing on page S-1 a clear and concise Purpose Need for the Forest's action, stating the following:

1. "The Forest Service is responding to an application submitted under the National Forest Ski Area Permit Act of 1986 and Ski Area Recreational Opportunity Enhancement Act of 2011 (SAROE) by GTR to implement projects from their accepted 2018 Grand Targhee Resort Master Development Plan (2018 GTR MDP)."
2. "The purpose of, and need for, the Forest Service's action is to decide whether to grant a special use permit (SUP) for the project. **The Caribou-Targhee National Forest (CTNF) will consider the application for use of NFS lands and determine if the project is in the public interest and is appropriate, based on the 1997 Revised Forest Plan for the Targhee National Forest (1997 Forest Plan).**"

WWA applauds this Purpose and Need Statement. We recommend that the remainder of the DEIS is adjusted to adhere to this clear direction within the forthcoming EIS. We also recommend that you remove language that conflates objectives outlined in the GTR Master Plan from 2018 with the Purpose and Need Statement, as you have done in section 1.3 where GTR objectives are shared as "Purpose and Need for Action". Problematically, as it stands right now, this DEIS is much more aligned with the objectives of GTR than the direction that CTNF outlined for itself. This is confusing, misleading and needs to be remedied. The easiest and best way to achieve this clarity and eliminate confusion is to remove section 1.3 altogether, as these solely private interests should not be driving/informing either the Forest Service or the public within this decision making process. As you rework the final EIS, the driving lens for assessing project components is simply what you outline in the true Purpose and Need statement on pg. S-1, to... "consider the application for use of NFS lands and determine if the project is in the public interest and is appropriate, based on the 1997 Revised Forest Plan for the Targhee National Forest (1997 Forest Plan)."

3. Project components that are inappropriate based on the 1997 Forest Plan

Forest planning is an arduous process that demands public involvement and trust. The outcome of the process is a forest plan drafted with the greatest good in mind, and with a shared understanding that the plan will be upheld by the Forest Service for the long-term. Disregarding clear direction while also reducing protections via forest plan amendments at the request of a private developer, will damage public trust in the Forest Service, and disenfranchise the public from good faith participation in future revision efforts. Throughout the DEIS the project components conflict with the 1997 Forest Plan management guidelines and in two cases these would require actual amendments.

To share one example of this misalignment, the 1997 Forest Plan gives conflicting direction with GTR's request for more skiable acres to spread out an already low density skiing public:

“The emphasis is on providing privately operated types of recreation on National Forest land **for large concentrated groups of people**. Overall, you find many signs of people. You see little or no evidence of resource development except for recreation...”¹

Considering that Targhee only has 200,000 skier visits each year² spread across 2,600 skiable acres³ when its closest competitors have significantly more e.g. Jackson Hole Mountain Resort has on average 500,000 skier visits each year with only 2,500 skiable acres⁴, it seems entirely inappropriate to consider additional acres for a ski area on the grounds of skier density, when the skier density is extremely low. All the while, the Forest Plan gives clear direction that GTR should be accommodating large concentrated groups of people. Even in the projections shared⁵ GTR will continue to host relatively low numbers of skiers annually (long into the future) for the acres they already operate on.

WWA also understands that legally there are at least two major issues that would require the 1997 Forest Plan to be amended specific to the proposed South Bowl SUP expansion:

1. The Visual Quality Maintenance prescription would need to be reclassified as a Special Use Authorization Recreation Site
2. Lifting of protected habitat for Peregrine Falcon

WWA urges the Forest Service not to amend the 1997 Forest Plan to accommodate the desires of GTR, a private interest. Instead we urge you to follow your Purpose and Need Statement and use the Forest Plan to guide this project, instead of using this project to guide the Forest Plan.

4. Impacts to the neighboring Jedediah Smith Wilderness

Despite there being just the two legal amendments there is a long list of concerns specific to the neighboring JSW that conflict with clear and critical management direction that we ask you to

¹ The 1997 Forest Plan's Management Prescription 4.2

² DEIS pg 59

³ <https://www.grandtarghee.com/Fckets-passes/season-passes/winter-season-passes>

⁴ <https://www.jacksonhole.com/mountain-stats>

⁵ DIES pg 64

reconsider. Please note that WWA understands that the Wyoming Wilderness Act of 1984 in designating the JSW explicitly states the prohibition of buffer zones:

“Congress does not intend that the designation of wilderness areas in the State of Wyoming lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.”⁶

One could assume this as a green light for GTR to expand freely up to the boundary of the JSW. We defend however, that the concern here is not one regarding buffer zones, but instead the impacts to the wilderness character within the Wilderness boundary that both the 1964 Wilderness Act, the 1984 Wyoming Wilderness Act and the 1997 Forest plan give clear direction to manage for. In Alternatives 4 and 5 within the DEIS, the South Bowl expansion has been moved from the wilderness boundary, if what we were concerned about was a buffer zone, this would solve our concerns. However, it does not because the buffer zone was never what we were asking for. For one, it is clear in the '84 Act that this is not a requirement of the designation, but what's more is that a buffer zone does not solve the impacts we are concerned with– a commercially driven spike in Wilderness use and adjacent development that impacts opportunities for solitude, degrades wildlife habitat, increases to Search and Rescue efforts within the Wilderness, and results in countless activities (construction, avalanche control, infrastructure) that will impact Wilderness values the Forest is tasked with protecting.

Throughout the DEIS the authors outline a myriad of impacts to Wilderness. In Section 3.9.4 on direct and indirect consequences, they introduce the scale of "no effect, minorly adverse, and adverse" and then go on to make the argument throughout the assessment that because none of the development components occur within the JSW all impacts are therefore indirect and can only possibly be "minorly adverse". Just because the project isn't occurring in the Wilderness doesn't mean the impacts are not. Please reconsider this scale of impact and realize the flaws in the conclusions you have drawn.

Use within the JSW is projected to increase if the South Bowl project component is adopted, simply due to the ski lift support that would allow skiers to gain elevation within terrain that was once much harder to access. Furthermore, skiers who are currently content with the access they have to the backcountry terrain available in South Bowl would be displaced into the JSW if South Bowl becomes inbound terrain as proposed. Use in and of itself has impacts to both solitude and wildlife habitat, and for this reason alone, we object to the South Bowl expansion. However, what is even more concerning is that this use will also drive up the need for Search and Rescue efforts as outlined in this DEIS,

“...However, as a result of the South Bowl projects, some skiers may travel farther from GTR and into the JSW in other uncontrolled and avalanche-prone terrain. As skiers move farther away from the GTR boundary, they are also moving farther from Search and Rescue resources, further increasing their risk in the event of an avalanche...”⁷

⁶ 1984 Wyoming Wilderness Act, Sec. 504.

⁷ DEIS pg 184

Considering the remote and high consequence terrain that skiers are likely to be displaced into when faced with the loss of South Bowl, these Search and Rescue resources will likely need to be completed with the help of a helicopter which has additional conflicts with the management directives that the CTNF is tasked with upholding in regard to the JSW.

Degradation to opportunities for solitude, primitive recreation and physical and mental challenge will result from an increase in use of and access to the Wilderness as provided by the South Bowl expansion. Skiing is a celebrated form of primitive recreation, and when Wilderness is accessed via human power for the purpose of skiing, the law is being upheld. However, when these protected lands are accessed by lift, this clear management parameter, that reserves these lands for primitive recreation, is neglected. Recall that explicitly stated in the Wyoming Wilderness Act of 1984 is the responsibility of the CTNF to manage the JSW as to preserve these qualities for all Americans, and not turn a blind eye to this responsibility for the benefit of a private ski resort (a commercial enterprise) and its paying customers:

“The purposes of this Act are to -- designate certain National Forest System lands in Wyoming for inclusion in the National Wilderness Preservation System in order to preserve the wilderness character of the land and to protect watersheds and wildlife habitat, preserve scenic and historic resources, and promote scientific research, primitive recreation, solitude, physical and mental challenge, and inspiration for the benefit of all of the American people.”⁸

With this clear direction, it seems obvious that the projected impacts of the South Bowl expansion are out of line with the law that protects this neighboring Wilderness and should be removed from this planning process.

5. Cautious support of Alternative 3 with caveats

WWA generally supports Alternative 3 in the DEIS as it allows Grand Targhee Resort to enhance operations within its existing footprint, without pushing further into the Caribou-Targhee National Forest, placing undue pressure on designated Wilderness, the wildlife, and the neighboring communities. Our support of Alternative 3 does come with three major caveats that we ask you to adjust before the release of the EIS:

Exclude the Fred's Mountain Top Guest Facility- This proposed guest facility will impact the viewshed of the surrounding area, including the JSW. As mentioned above, we understand that a Wilderness buffer zone is not required, but building a large, commercial building, in a location that would tower over and be seen and heard from across the Wilderness area below would not be in line with the wilderness character you are responsible for protecting.

Include strong language prohibiting gates along the north boundary- Only in final reviews of this DEIS did WWA realize the potential risk to the JSW posed by the North Boundary development presented in Alternative 3. As you expand up to the north boundary, we ask that you include strong language that prohibits the inclusion of backcountry gates that would enable GTR's paying customers to ride a lift, exit the boundary of the ski resort through a designated gate, access a commercial experience within lands protected as Wilderness, easily return to the motorized

⁸ 1984 Wyoming Wilderness Act, Sec. 102. (b)(1)

convenience of a lift, and repeat the experience. The access of the Wilderness via the resort's commercial lift support conflicts with clear management outlined in the Wilderness Act of 1964 that prohibits *commercial enterprise* from occurring within any Wilderness area:

“Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act.”⁹

An increased human presence and an ease of access to areas within the Wilderness that have not been easily accessed before, pose a tremendous threat to these lands and the characteristics we have discussed many times within our comment already. A Snowsports Industries America report shows a well known trend that backcountry use is far greater in areas that can be accessed from lift-served terrain.¹⁰ Please remedy this concern and add clear language that would prohibit the addition of north boundary backcountry gates.

Remove all project components requiring 1997 Forest Plan amendments: Above, we have identified at least two legally required amendments that would need to be made were you to expand into South Bowl. By eliminating the South Bowl expansion from this project you alleviate the need for these two amendments. With that said, we acknowledge that there may exist additional necessary amendments that have yet to be identified, possibly within Alternative 3. These should be identified by the Forest as you compile the final EIS. We request that any and all project components requiring amendments are removed in order to align with your Purpose and Need statement, and in order for WWA to give Alternative 3 our enthusiastic support.

6. In Closing:

WWA understands the ski resort's desire to remain viable, and appreciates that GTR is truly an asset within the Teton Valley and greater ski community. We believe that a plan can be developed that respects both the people, wildlands, and wildlife surrounding the resort, and that meets the true needs of the resort itself. To review, this can be achieved by upholding your Purpose and Need Statement on page S-1, using the Forest Plan to guide this project and not allow this project to rewrite the Forest Plan, uphold your responsibilities to manage the JSW, and update Alternative 3 with the suggestions shared. Thank you again for your consideration of our comments and concerns. We look forward to staying engaged with this project as it moves forward.

Respectfully,
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⁹ 1964 Wilderness Act, pg 5

¹⁰<https://xcski.org/wp-content/uploads/2018/06/SIA-2017-Market-Intelligence-Report-US-SKI-3.18.pdf>