

June 5, 2026

Kim Pierson
Forest Supervisor
Caribou-Targhee National Forest

Re: Objection to the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Grand Targhee Resort Master Development Plan

Dear Forest Supervisor Pierson:

We submit this objection to the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) approving the Grand Targhee Resort Master Development Plan expansion on the Caribou-Targhee National Forest.

We are eligible objectors because we submitted timely written comments on June 10, 2025, during the public comment period. In those comments, we expressed concerns regarding wildlife impacts, wilderness character, recreation values, climate resilience, transportation impacts, and effects on local communities. We believe the FEIS and ROD fail to adequately address these concerns and therefore request that the decision be withdrawn and reconsidered.

For over thirty years, we have lived in the Teton area and have regularly hiked, climbed, and skied in Grand Teton National Park and the Jedediah Smith Wilderness. Our concerns arise from a long-standing connection to these public lands and from our desire to see them managed responsibly for future generations.

Inadequate Analysis of Wildlife and Habitat Impacts

The FEIS does not adequately analyze or mitigate the effects of expanding resort infrastructure and recreation into currently undeveloped habitat. Construction of new lifts, ski terrain, roads, avalanche-control facilities, and associated infrastructure will increase human disturbance and fragment habitat used by grizzly bears, wolverines, moose, elk, mule deer, bighorn sheep, and other sensitive wildlife species.

While the FEIS acknowledges impacts, it does not sufficiently demonstrate that habitat connectivity, seasonal movement patterns, and long-term wildlife viability will be maintained. Nor does it adequately evaluate cumulative impacts when considered alongside ongoing development pressures throughout the Greater Yellowstone and Teton ecosystems.

We request additional analysis and stronger mitigation measures to ensure that wildlife conservation objectives are not subordinated to resort development.

Impairment of Wilderness Character and Scenic Values

One of our primary concerns during the comment period was the effect of expansion into the South Bowl area and the development of guest facilities on Fred's Mountain. The FEIS does not adequately address how these developments will affect viewsheds, natural soundscapes, and the wilderness experience enjoyed by visitors to nearby public lands.

The Wilderness Act identifies opportunities for solitude and primitive recreation as core wilderness values. Increased mechanical infrastructure, lift systems, avalanche-control activities, noise, and visitor use will inevitably diminish those values. The FEIS understates the significance of these impacts and fails to fully consider how development immediately adjacent to designated wilderness affects wilderness character itself.

Insufficient Consideration of Climate Change and Long-Term Sustainability

The FEIS does not adequately address the long-term viability of major ski area expansion in a changing climate. Climate projections for the Rocky Mountain region indicate increasing temperatures, changing precipitation patterns, and uncertainty regarding future snowpack conditions.

Given these realities, expansion into additional undeveloped terrain may not represent a sustainable long-term use of public lands. The FEIS should have more thoroughly evaluated alternatives emphasizing modernization of existing facilities, lower-impact recreation opportunities, and diversified year-round recreation rather than substantial expansion into currently undeveloped areas.

Inadequate Analysis of Transportation and Infrastructure Impacts

The FEIS fails to fully account for the cumulative transportation impacts associated with increased visitation. Ski Hill Road and Highway 33 already experience congestion and safety concerns during peak recreation periods.

Expansion of resort capacity will likely increase traffic volumes, parking demand, emergency service burdens, and infrastructure costs borne by local communities. The FEIS does not adequately demonstrate that existing transportation systems can safely accommodate projected growth.

Effects on Local Communities and Housing

Our comments also raised concerns regarding the social and economic impacts of resort expansion on Teton Valley communities. Increased visitation and development pressure frequently contribute to workforce housing shortages, rising property values, displacement of long-term residents, and loss of community character.

The FEIS does not adequately evaluate these indirect and cumulative community impacts or identify effective mitigation measures. Public land decisions should fully account for foreseeable consequences to the people who live and work in nearby communities.

Failure to Fully Evaluate Less-Damaging Alternatives

We continue to believe that alternatives focused on improving existing infrastructure and enhancing current resort operations would better balance recreation opportunities with environmental protection. The FEIS does not adequately demonstrate why expansion into relatively undeveloped public lands is necessary to achieve project objectives.

The Forest Service should have given greater consideration to alternatives that minimize new disturbance while improving visitor experience within the existing developed footprint.

Requested Relief

We respectfully request that the Reviewing Officer:

1. Reverse or remand the Record of Decision;
2. Require supplemental environmental analysis addressing the deficiencies identified above;
3. Reevaluate impacts to wildlife habitat, wilderness character, scenic resources, transportation systems, and local communities;
4. Reconsider the Forest Plan amendments adopted to facilitate the expansion; and
5. Fully evaluate alternatives that avoid or substantially reduce development in currently undeveloped areas.

We appreciate the opportunity to participate in this process and respectfully request careful consideration of these objections before any final authorization is granted.

Sincerely,

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