

To: Kim Pierson, Forest Supervisor
Caribou-Targhee National Forest

Subject: Grand Targhee Master Development Plan Projects

Dear Forest Supervisor Pierson,

This letter serves as a formal administrative objection regarding the Grand Targhee Resort Master Development Plan Projects Final Environmental Impact Statement (FEIS) and draft Record of Decision (*Ref. 1*). Formal comments on these matters were previously submitted during the public review of the Draft Environmental Impact Statement (DEIS) (*Ref. 2*).

This objection is filed concurrently under both the 45-day objection period for project-specific activities (36 CFR 218) and the 60-day objection period for the programmatic Forest Plan amendment (36 CFR 219) (*Ref. 9*).

Transparent data and rigorous methodological review are paramount to a valid environmental review. The current FEIS fails to meet basic standards of scientific and procedural integrity. With the exception of the newly raised procedural violations outlined in Section 1, the core of this objection expands strictly upon topics raised in prior DEIS comments: water quality, hydrology, climate resilience, socioeconomic equity, and wildlife protections.

Pursuant to the 36 CFR 219.53 exception, the procedural issues in Section 1 are legally raised here because they involve new information and agency missteps that arose *after* the formal DEIS comment period closed (*Ref. 9*). The Forest Service is formally requested to withdraw the current FEIS and draft Record of Decision and issue a Supplemental EIS to correct these empirical and procedural deficiencies.

1. Procedural Violations and Withheld Data (New Issues Under 36 CFR 219.53)

A valid environmental review requires that the public and scientific community have access to the data being used to establish baselines and make decisions. The NEPA process was circumvented in several ways after the DEIS was published:

- **Withholding Foundational Data:** The FEIS relies heavily on the *Impacts on Groundwater Report* and the *Rockfall and Landslide Hazards Report*. However, the Forest Service admits in its Response to Comments that these critical documents were mistakenly not provided to the public during the DEIS comment period and were only released alongside the FEIS (*Ref. 1*). Expecting the public to evaluate environmental impacts without access to foundational geological and groundwater data is a procedural violation that actively prevents adequate scientific peer review.

- **Preempting Active Socioeconomic Research:** In mid-May 2026, a formal Research Agreement was advanced to fund a joint study by the University of Wyoming and University of Idaho to evaluate the cross-boundary impacts of this expansion on both Teton County, Wyoming, and Teton County, Idaho (*Ref. 6*). By abruptly publishing the FEIS on May 29, 2026 (*Ref. 9*), the Forest Service actively preempted an ongoing, publicly funded scientific study designed to analyze the very socioeconomic impacts the FEIS claims to address.
- **Ignoring Foreseeable Base Area Development:** The FEIS fails to accurately analyze cumulative socioeconomic and traffic impacts by relying on an outdated baseline of only 12,300 square feet of approved commercial development at the base area (*Ref. 1*). The analysis explicitly ignores a new, reasonably foreseeable application for private land development at the resort base that includes 150,000 square feet of commercial development (*Ref. 1*). Under NEPA, the agency cannot artificially segment its environmental review by using private land boundaries to ignore the cumulative socioeconomic and traffic impacts of a massive, reasonably foreseeable expansion that is intrinsically linked to the resort's overall growth. Segmenting and ignoring a base area development of this scale means the impact models presented to the public are fundamentally inaccurate.
- **"Dark Skies" Exemption Loophole:** Teton County, Wyoming, is a globally recognized "Dark Sky" community. The FEIS approves night lighting for the Palmer Platter and mountaintop facilities. When commenters raised concerns about light pollution, the Forest Service added a Project Design Criteria stating that lighting will comply with the county's Dark Sky regulations—"unless specifically exempted by a Forest Service Authorizing Official" (*Ref. 1*). Granting the agency a "blank check" to arbitrarily ignore local environmental ordinances undermines the entire purpose of mitigation measures.
- **Misapplication of Executive Orders to Dodge Science:** The FEIS justifies ignoring climate change analytics and environmental justice impacts by citing the newly issued Executive Order 14154, "Unleashing American Energy" (*Ref. 1*). However, internal USDA FOIA documents confirm that EO 14154 was intended to expedite "domestic energy resources," specifically updating regulations for locatable minerals and oil and gas resources (*Ref. 7*). Applying a directive meant for mining and fossil fuels to justify ignoring climate science for a recreational ski resort is a methodological failure. Furthermore, Forest Service spokespersons admitted that Executive Order 14313, "Make America Beautiful Again" (signed July 3, 2025)—which directs agencies to expand outdoor recreation to drive economic growth (*Ref. 8*)—played a "substantial role" in shaping the approval. Utilizing top-down political directives designed for economic growth to override localized, site-specific environmental "hard looks" violates the foundational intent of NEPA. The FEIS additionally admits that an analysis of disproportionate impacts to low-income populations was intentionally dismissed because Executive Order 12898 was rescinded (*Ref. 1*).

2. Hydrology and Watershed Risks (Continuing Prior Comments on Water Quality)

Local communities rely on the integrity of the regional watershed. The scientific method requires evaluating data *before* reaching a conclusion. However, the FEIS routinely approves high-risk infrastructure concepts now while deferring the actual engineering and field validations until after approval.

- **Stripping Aquatic Protections for Public Drinking Water:** The programmatic Forest Plan amendment explicitly converts the 694-acre expansion area from "Visual Quality Maintenance," and strips "Aquatic Influence Zone" (AIZ) protections where they apply, converting the lands to a "Special Use Permit Recreation Site" (*Ref. 1, Ref. 9*). The AIZ is critical for maintaining water quality and biodiversity (*Ref. 3*). Stripping these protections from the Mill Creek watershed—a source water area for the Teton Creek Spring, which is a public drinking water source for the City of Driggs—in order to build ski infrastructure introduces unacceptable and unquantified risks to downstream public health.
- **Deferred "Figure It Out Later" Engineering in Karst Geology:** The FEIS acknowledges the presence of porous Karst topography (Bighorn Dolomite) under the proposed mountaintop infrastructure, which is prone to sinkholes and the rapid, unfiltered transport of contaminants (*Ref. 1*). However, rather than requiring geotechnical proof that the site is stable and safe for wastewater systems *prior* to approval, the FEIS defers this crucial step, relying on Project Design Criteria stating that final civil geo-technical engineering reviews will occur later (*Ref. 1*). Furthermore, the decision on whether the mountaintop facility will utilize a sanitary sewer line is also deferred to a "final engineering review and recommendations" (*Ref. 1*). Approving development over a vulnerable public watershed without finalizing the geotechnical safety or wastewater engineering is a failure of the agency's NEPA mandate.

3. Biological Flaws and ESA Compliance (Continuing Prior Comments on Habitat)

The FEIS attempts to circumvent biological realities and established habitat protections to facilitate this expansion.

- **Threatened Whitebark Pine (ESA Violation):** The Whitebark Pine was formally listed as a threatened species under the Endangered Species Act in December 2022. As a keystone species, it provides critical food for wildlife and stabilizes high-elevation snowpacks. The 1997 Forest Plan's Vegetation Guideline 8 explicitly requires the agency to "maintain, and where possible, increase" this species (*Ref. 3*). However, the FEIS openly admits that the Proposed Action "would not meet the intent of Vegetation Guideline 8" due to direct habitat destruction (*Ref. 1*). Relying on a technicality—that this is a "guideline" rather than a "standard"—to justify the destruction of a newly listed keystone species for ski terrain undermines the integrity of the ESA and the region's biological recovery efforts.
- **Bighorn Sheep Population Decline:** Expanding into the South Bowl introduces severe threats to the Teton Range Bighorn Sheep herd. The FEIS explicitly concludes that the

Proposed Action "may impact individuals or their habitat" for the bighorn sheep (*Ref. 1*). While the agency attempts to justify this by claiming it will not cause a loss of viability for the entire species, admitting that a recreational expansion will likely cause adverse impacts or declines to individuals in a localized, sensitive herd is a shocking admission that makes the approval of this project biologically indefensible (*Ref. 1*).

- **Wolverine Denning Habitat:** The wolverine is a threatened species highly sensitive to human disturbance. The FEIS acknowledges a potential wolverine den site identified in 2020 just 0.5 miles from the South Bowl expansion, but admits that personnel could not follow up due to access issues (*Ref. 1*). While the FEIS was corrected to evaluate impacts against the female wolverine home range (303 km²), it still attempts to dismiss direct effects on denning habitat as insignificant (*Ref. 1*). Proceeding with the destruction of habitat without conducting comprehensive pre-project field surveys on known den sites is biologically reckless and scientifically inadequate.
- **Exemptions for Protected Birds:** The FEIS acknowledges that the proposed expansion is inconsistent with the 1997 Forest Plan standards designed to protect the Peregrine Falcon and the Northern Goshawk, as well as the Boreal Owl and Flammulated Owl (*Ref. 1*). Rather than adjusting the project footprint to avoid disrupting historical nesting habitats, the Forest Service proposes amending the Forest Plan to simply exempt the resort from these wildlife guidelines for these specific species (*Ref. 1*). Altering biological protection standards specifically so a single development does not have to comply with them undermines the integrity of the region's wildlife management.

4. Climate Resilience and Socioeconomic Fiscal Imbalance (Continuing Prior Comments on Climate and Socioeconomics)

The FEIS fails to adequately evaluate the long-term viability and the geographic distribution of impacts associated with the expansion.

- **Ignoring the Greater Yellowstone Climate Assessment:** By using EO 14154 to dodge climate analysis, the FEIS fails to scientifically evaluate the project's long-term viability. The 2021 Greater Yellowstone Climate Assessment projects that the region has already warmed by 2.3°F since 1950, and forecasts the average winter snowline to rise to at least 10,000 feet by the end of the century (*Ref. 5*). Approving lower-elevation expansions into the Mono Trees area without rigorously assessing climate resilience, snowmaking water volume requirements, and changing snowpack dynamics contradicts fundamental scientific forecasting.
- **Wyoming/Idaho Fiscal Imbalance & Dismissal of Best Available Science:** The FEIS explicitly acknowledges the stark geographic inequity of the expansion's socioeconomic impacts. Teton County, Wyoming is projected to capture approximately 64 percent of all overall tax impacts, while Teton County, Idaho will bear the vast majority of the burdens, including infrastructure maintenance, housing shortages, and emergency services (*Ref. 1*). To quantify this, Teton County, ID and Teton County, WY co-funded the *July 2022 ECONorthwest Socioeconomic Study*, which demonstrated empirically that tax revenues would not outweigh the severe costs to Idaho's public services (*Ref. 4*). Instead of

integrating these targeted, locally funded findings, the Forest Service dismissed the ECONorthwest study and relied on generic IMPLAN software models (*Ref. 1*). Ignoring empirical, site-specific economic data in favor of generalized modeling fails NEPA's mandate to utilize the "best available science" to evaluate community impacts.

Conclusion The Caribou-Targhee National Forest cannot responsibly advance the Grand Targhee Resort expansion based on an FEIS that withholds foundational data from peer review, preempts ongoing socioeconomic research by local universities, deliberately skirts protections for ESA-listed species, and ignores the severe fiscal strains on neighboring communities.

It is strongly urged that the issuance of a final Record of Decision be halted, and a Supplemental Environmental Impact Statement (SEIS) be required to correct these methodological errors and subject this project to the rigorous, transparent scientific review it requires.

References

1. Caribou-Targhee National Forest (2026). *Grand Targhee Master Development Plan Projects Final Environmental Impact Statement (FEIS)*. U.S. Department of Agriculture, Forest Service.
2. Caribou-Targhee National Forest (2025). *Grand Targhee Master Development Plan Projects Draft Environmental Impact Statement (DEIS)*. U.S. Department of Agriculture, Forest Service.
3. Caribou-Targhee National Forest (1997). *1997 Revised Land Management Plan for the Targhee National Forest*. U.S. Department of Agriculture, Forest Service.
4. ECONorthwest (2022). *Effects of Proposed Grand Targhee Development on Public Services and Housing Markets in Teton County, ID*. Prepared for Teton County, ID and Teton County, WY.
5. Hostettler, S., Whitlock, C., Shuman, B., Liefert, D., Drimal, C., & Bischke, S. (2021). *Greater Yellowstone Climate Assessment: Past, Present, and Future Climate Change in Greater Yellowstone Watersheds*. Montana State University, Institute on Ecosystems.
6. Teton County Board of County Commissioners (2026). *Research Agreement between University of Wyoming and Teton County*. Teton County, Wyoming.
7. U.S. Department of Agriculture, Office of Information Affairs (2025). *Freedom of Information Act Request No. 2025-DA-05711-F: USDA Action Plan Response on Executive Order 14154: Unleashing American Energy*.
8. U.S. Executive Office of the President (2025). *Executive Order 14313: Establishing the President's Make America Beautiful Again Commission*. Federal Register.
9. U.S. Federal Register (2026). *Notice of opportunity to object to the programmatic amendment to the 1997 Targhee National Forest Land Management Plan for the Caribou-Targhee National Forest*. Department of Agriculture.