

Wyoming Outdoor Council

wyomingoutdoorcouncil.org
236 S. 2nd Street
Lander, WY 82520
t: 307.332.7031



July 24, 2026

USDA Forest Service, Intermountain Region

Attn: Objection Reviewing Officer

Hansen Federal Building, Room 4016

324 25th Street

Ogden, UT 84401

Responsible Official: Kim Pierson, Forest Supervisor, Caribou-Targhee National Forest

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=291095>

Re: Objection to the Forest Plan Programmatic Amendment for the 2018 Grand Targhee Master Development Plan Projects #58258

Dear Reviewing Officer,

The Wyoming Outdoor Council (Objector) files this objection to the United States Department of Agriculture Forest Service, Intermountain Region regarding the Caribou-Targhee National Forest's Programmatic Amendment to the 1997 Revised Targhee National Forest Land and Resource Management Plan for the 2018 Grand Targhee Master Development Plan Projects #58258, noticed May 29, 2026. This objection is submitted pursuant to 36 C.F.R. Part 2018, Subparts A and B and 36 C.F.R. Part 2019.¹ Objector requests an objection-resolution meeting and all remedies outlined below.

The Objector has been engaged with this project previously, having filed timely comments on the Proposed Action and Draft Environmental Impact Statement (DEIS) with specific consideration of amending the Forest Plan on June 18, 2025 (Appendix A). Throughout this objection, we cite preserved arguments from the DEIS granting the Objector eligibility to object, as well as specific Response to Comments (RTC) that Objector was listed for within the Final Environmental Impact Statement (FEIS). Objector has been involved with Grand Targhee Resort (GTR) development decisions in the past due to the presence of sensitive habitat for vulnerable wildlife populations adjacent to GTR and appreciates the consideration of Objector's expertise and insight on whether and how to move forward with development in the area.

These objections are based on Objector's June 18, 2025 DEIS comments and issues that arose after the formal comment opportunities for the DEIS through FEIS, draft ROD, and other

¹ See 36 C.F.R. §§ 218.8(c), (d)(5)-(6), 218.10(a)(4)-(5), 219.53(a), and 219.54(c)(5)-(7)

subsequently issued Forest Plan amendment materials. Each objection below identifies the issue, connects it to prior comments or newly available decision documents, and provides suggested remedies. Objector preserves all arguments necessary for administrative exhaustion under 36 C.F.R. §§ 218.8(c), 218.8(d)(6), 218.10(a)(4), 219.53, and 219.54(c)(7).

Objector is of the opinion that a plan can be developed that meets GTR's demonstrated needs without compromising the integrity of sensitive habitat required to support vulnerable populations of wildlife, visual resources of the project area, or the best interests of the public. Numerous and varied concerns have been raised throughout this process, alerting the Forest Service to likely impacts to Teton County, sensitive wildlife and plant species, water resources, backcountry recreation, and wilderness character. Our objection focuses on Objectors' mission-specific issues with the proposed Programmatic Amendment while cross-referencing related concerns preserved by project partners, where relevant.

OBJECTIONS

I. The FEIS and Draft ROD improperly treat GTR's private operational objectives as the basis for expanding the Special Use Permit (SUP) and do not adequately explain why the expansion serves the public interest.

The Forest Service has not provided an adequate response to our comment on the DEIS questioning the purpose and need for the SUP expansion.^{2,3} The FEIS notes that the project proponent cited a need to improve the recreational experience and terrain offerings to "remain viable in the competitive destination skier/rider market". We do not dispute that these may be needs for the project proponent – a private, commercial entity. However, as stated on pages S-3 and 4 of the FEIS:

*"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)".*

- emphasis added

The FEIS and Draft ROD do not adequately explain why Alternative 2 serves the public interest, as distinct from GTR's private operational interests. Further, the term "public interest" is only mentioned once in the RTC section of the FEIS, and this reference is merely a callback to page 4 of the FEIS (quoted above). RTC 2.1 suggests that the SUP boundary expansion could benefit the public because expansion into South Bowl could

² See WOC DEIS comment letter pages 1-2.

³ FEIS, Response to Comments 2.10, page 667.

“provide an opportunity to increase public safety” by allowing management-induced avalanches in South Bowl skiers currently access to ski out-of-bounds. That rationale may address a subset of skier-safety concerns, but it does not justify the full 694-acre SUP expansion or show that the expansion serves the broader public interest. Likewise, adding low-paying, seasonal jobs by expanding the SUP boundary provides limited public benefit. When weighed against adverse impacts to public lands, wilderness quality, viewsheds in Teton Canyon and Grand Teton National Park, backcountry recreation, wildlife habitat, and hunting opportunities, the Forest Service has not made the case that selected Alternative 2 is in the public interest. The public-interest analysis must account not only for resort-user benefits, but also for impacts to adjacent public land managers, wildlife agencies, local governments, non-skiing forest users, hunters, and downstream communities.

In addition, a number of justifications for the selection of Alternative 2 are listed on page 5 of the Draft ROD. The second bullet reads that the selected alternative, *“provides a quality winter recreation experience while minimizing conflicts between use and wintering big game (as intended by the 1997 Forest Plan).”* This implies that the infrastructure and amenities within the existing SUP do not currently provide a quality winter recreation experience. We do not believe the Forest Service or project proponent have shown that the winter recreation experience is lacking at GTR – only that other ski areas may offer more amenities than GTR. GTR’s own marketing materials and social media indicate confidence in the quality of the winter recreation experience it provides, including deep powder and the absence of fancy amenities (see Appendix B). Accordingly, the Forest Service has not shown that expanding the SUP is necessary to provide a quality winter recreation experience at GTR or on the CTNF more broadly, as opposed to improving GTR’s competitive position relative to other ski areas.

Remedies:

- Do not approve the SUP expansion unless the Forest Service first identifies the public-interest factors it applied and explains why those factors justify expanding the SUP onto additional National Forest System lands.
- Provide an analysis of how the project and selected Alternative 2 are in the public interest, including for members of the public who do not downhill ski and are not employed by GTR. This analysis should also include a full accounting of ways in which Alternative 2 will not serve the public interest. The analysis should be presented as a standalone, cohesive appendix or table that can be readily parsed and understood by readers.

- Define what a “quality winter recreation experience” is and explain why selected Alternative 2 is necessary to provide such an experience at GTR and on the CTNF more broadly.

II. The Draft ROD does not independently justify the 694-acre programmatic Forest Plan amendment converting visual-quality and aquatic-influence lands to special-use recreation.

As noted under Objection I, the Draft ROD has not proven an expansion of GTR’s SUP is in the public interest. Accordingly, amendments that deviate from management prescriptions codified in the Forest Plan are unjustified in this instance. The Forest Service has not provided an adequate response to our comment on the DEIS questioning the decision to make a programmatic Forest Plan amendment.^{4,5}

The programmatic Forest Plan amendment is separate from the five project-specific wildlife amendments. It would convert 694 acres now managed under Management Prescription 2.1.2 – *Visual Quality Maintenance* and Management Prescription 2.8.3 – *Aquatic Influence Zone* to Management Prescription 4.2 – *Special Use Permit Recreation Sites* for the life of the Forest Plan.

That amendment requires a National Forest Management Act (NFMA) and Planning Rule justification independent of the NEPA purpose-and-need discussion. The problem is not that the Forest Service can never amend the Forest Plan for a site-specific project. The problem is that a protective management prescription should not be converted at a private permittee’s request without a clear explanation of why the conversion is necessary, why avoidance or a narrower amendment is inadequate, and what limiting principle prevents the same rationale from eroding other resource-protection prescriptions.

The FEIS and Draft ROD do not provide that explanation. They rely on the same project objectives and resort operational interests used to support the SUP expansion, but do not adequately explain why public lands managed for visual quality and aquatic influence should be permanently converted to special-use recreation, or why Alternative 3 or a narrower expansion would not satisfy any lawful public recreation objective while avoiding or reducing the amendment.

Remedies:

- Withdraw the programmatic Forest Plan amendment converting the 694 expansion-area acres to Management Prescription 4.2.

⁴ See WOC DEIS comment letter page 2.

⁵ FEIS, Response to Comments 3.5, page 679.

- Alternatively, narrow any programmatic amendment to the minimum footprint supported by the analysis and explain why avoidance or a narrower amendment is inadequate.
- Do not approve any conversion of Management Prescription 2.8.2 – *Aquatic Influence Zone* lands until the Forest Service completes and discloses the water-resource analysis necessary to support that conversion.

CONCLUSION

While we are not opposed to appropriate improvements to GTR services and infrastructure within its existing SUP boundary, we consider adverse impacts to wildlife, wildlife habitat, water resources, public land values, and the public interest associated with the 694 acre SUP expansion to be unacceptable and unjustified. Accordingly, we do not believe specific amendments to the 1997 Forest Plan to allow this project to move forward are warranted. Objector requests that the Reviewing Officer instruct the Responsible Official to withdraw or revise the Draft ROD to deny the programmatic Forest Plan amendment and SUP boundary expansion. Objector also requests an objection-resolution meeting with the Forest Service and the Reviewing Officer.

Sincerely,

Matt Gaffney
Legal and Government Relations Director
Wyoming Outdoor Council
307.332.7031
matt@wyomingoutdoorcouncil.org

Meghan Riley
Wildlife Program Manager
Wyoming Outdoor Council
307.488.8214
meghan@wyomingoutdoorcouncil.org

APPENDIX A

Wyoming Outdoor Council

Previously Submitted Comments on the Draft Environmental Impact Statement Grand Targhee Master Development Projects

Original submission date: June 18, 2025

Submitted during: Draft Environmental Impact Statement Public Comment Period

This appendix contains the Wyoming Outdoor Council's substantive comments submitted during the Draft Environmental Impact Statement public comment period. These comments are incorporated by reference into this administrative objection and are included to demonstrate compliance with the objection eligibility requirements set first in 36 CFR Part 218 and 36 CFR Part 219, requiring objections to be based upon previously submitted substantive, formal comments.

Wyoming Outdoor Council

wyomingoutdoorcouncil.org
236 S. 2nd Street
Lander, WY 82520
t: 307.332.7031



Kim Pierson
Forest Supervisor
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 the opportunity to provide comment on the proposed expansion of Grand Targhee Resort into South Bowl and Mono Trees. On behalf of the Wyoming Outdoor Council, I am writing to express our reservations with the expansion as outlined under Alternative 2 (proposed action). We believe that the public interest and natural resources on the Forest would be better served by Alternative 3, which allows for the increase in services sought by Grand Targhee without expanding the boundaries of the current Special Use Permit (SUP) area. The Wyoming Outdoor Council has over 5,000 members and supporters who care deeply about our public lands and the wildlife that depend on them. On their behalf we urge you to adopt Alternative 3 with the modifications outlined below.

RATIONALE FOR CHOOSING ALTERNATIVE 3

Adherence to purpose and need

The underlying purpose and need for the Draft Environmental Impact Statement (DEIS) is to decide whether the Forest Service should grant a SUP for new areas outside Grand Targhee's existing footprint. As specified in the DEIS "Executive Summary":

"[t]he 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)."

We would emphasize that the benchmark for granting a new SUP hinges on whether it is in the public interest and in alignment with the 1997 Forest Plan. The proponent has laid out numerous objectives to “remain viable in the competitive destination skier/rider market” as justification for an expansion, but it is unclear how any of these objectives serve the public interest. In fact, mention of public interest or benefit are largely absent from the DEIS. Based on what has been presented, we believe granting this SUP would prioritize private, commercial interests over those of the public and require divergence from guidelines laid out in the 1997 Forest Plan. We urge the Forest Service to hold true to the stated purpose and need of the DEIS and choose Alternative 3.

Adherence to the Forest Plan

As noted above, the purpose and need statement is clear that granting a new SUP should only occur if expansion of Grand Targhee is appropriate based on the 1997 Forest Plan. Expansion into the South Bowl area conflicts with management goals and guidelines outlined in said Forest Plan, which would have to be amended for this expansion to proceed. These inconsistencies with the existing Forest Plan are outlined below:

1. Prescription 2.1.2(b) - Visual Quality Maintenance

This Forest Plan prescription aims to “maintain existing scenery within major travel corridors with high quality natural vistas” with an explicit goal to “protect the natural visual quality” of the area¹. The expansion proposed for South Bowl would impact travel corridors covered by this Forest Plan prescription – namely Ski Hill Road and Teton Canyon Road. For Grand Targhee to expand into South Bowl, CTNF would have to reclassify these areas to fall under the Special Use Recreation Site category. This would mark a major departure from current management and permanently degrade the scenic value the public currently enjoys in this part of the CTNF.

2. Biological Elements (Wildlife) - Peregrine Falcon Habitat

The Forest Plan guideline for peregrine falcon habitat specifies that human activities ***including permanent facilities*** be minimized within 2 miles of known peregrine falcon nests between March 15 and July 31¹. The DEIS states that known nest sites have been occupied within 2 miles of the South Bowl SUP in recent years and going back decades. Granting Grand Targhee permission to expand here would create significant new disturbance and negatively impact the valuable nesting habitat present in Teton Canyon. This goes against explicit guidelines in the existing Forest Plan and we are opposed to exempting Grand Targhee from these guidelines to pave the way for the South Bowl expansion.

¹ US Forest Service. 2003. Revised Forest Plan for the Caribou National Forest. US Department of Agriculture.

With the above inconsistencies and resource management conflicts, we contend that confining expanded services to Grand Targhee's existing footprint is the most appropriate option, given existing management guidelines mandated by the 1997 Forest Plan.

Bighorn sheep

Of all the negative impacts a Grand Targhee expansion would cause for wildlife, the harm to bighorn sheep habitat is the most acutely concerning. The Targhee Bighorn Sheep Herd exists as a small, isolated population confined to high elevations in the Teton Range where they remain year round. Bighorn sheep are habitat specialists reliant on escape terrain and winter ranges that lack persistent snow cover, allowing access to forage². This makes the species especially vulnerable to habitat loss and for the Targhee Herd, which hovers between roughly 50 and 100 animals^{3,4,5}, there is essentially no margin for error when it comes to keeping this population on the landscape. Unfortunately, significant areas of highest quality winter habitat occurs in the South Bowl SUP area^{6,7}. While we appreciate the reduction in acreage of the South Bowl proposed expansion from 600 down to 266 acres, the expansion would still cut through the heart of highest quality winter habitat. Given the importance of this habitat for bighorn sheep persistence in the Teton Range, any loss of this highest quality winter habitat is unacceptable and the South Bowl SUP should not be granted.

In addition to direct habitat loss that would result from a South Bowl expansion, impacts from increased recreation in the area must be considered. Research conducted on the Targhee Herd showed winter backcountry recreation displaced sheep from important winter habitat⁶. Not only would expansion into South Bowl bring heavy recreation into winter habitat, it would expand the sphere of out of bounds winter recreation deeper into Teton Canyon where additional winter habitat exists. In both cases, this added recreational pressure in winter habitat will most certainly displace bighorn sheep from habitat they rely on to survive the winter when they are nutritionally stressed and can least afford it.

² Geist, V. 1971. *Mountain Sheep: A Study in Behavior and Evolution*. Chicago: The University of Chicago Press.

³ Wyoming Game and Fish Department. 1988. Targhee Bighorn Sheep Herd Job Completion Report. 15pp.

⁴ Wyoming Game and Fish Department. 1990. Targhee Bighorn Sheep Herd Job Completion Report. 18pp.

⁵ Wyoming Game and Fish Department. 2023. Jackson Region Job Completion Report. 79pp.

⁶ Courtemanch, AB. 2014. Seasonal habitat selection and impacts of backcountry recreation on a formerly migratory bighorn sheep population in northwest Wyoming, USA, MS Thesis, University of Wyoming, Laramie, WY.

⁷ Courtemanch, AB, MJ Kauffman, SA Kilpatrick, and SR Dewey. 2017. Alternative foraging strategies enable a mountain ungulate to persist after migration loss. *Ecosphere* 8: 1-16.

Negative impacts to bighorn sheep from a Grand Targhee expansion are anticipated outside winter months as well. Not only would new infrastructure overlap summer habitat for the Targhee Herd^{6,7}, but proposed development and increased human activity could impede access to a natural mineral lick in the Apostle Cliffs just downslope from the proposed South Bowl SUP. Because mineral licks are uncommon on the landscape and vital to mountain ungulate health⁸, development and increased human presence in bighorn sheep habitat that serves as a travel corridor to this mineral lick should be avoided.

Wolverine

The wolverine was recently listed as threatened by the US Fish and Wildlife Service⁹, heightening the importance of habitat protection for this species. The DEIS acknowledges anticipated negative impacts for wolverines if the proposed South Bowl expansion is granted. Specifically, the South Bowl SUP contains extensive maternal denning habitat that would be lost in the face of expansion. It would also greatly increase access and extend the sphere of human disturbance deeper into Teton Canyon as people exit resort boundaries to delve deeper into the backcountry. This would negatively impact maternal denning habitat beyond the boundaries of the South Bowl SUP. Research is clear that even moderate levels of winter backcountry recreation is detrimental to wolverines and can result in functional loss of habitat, with female wolverines being particularly vulnerable¹⁰. In addition to the presence of maternal denning habitat, the entirety of both the South Bowl and Mono Trees SUP areas overlap general wolverine habitat¹¹ and expansion in either area would negatively impact wolverines in the Teton Range.

In addition to the above habitat concerns, we believe the DEIS fails to adequately account for metapopulation dynamics at play for wolverines at the southern periphery of their range. As a snow obligate species, wolverines currently enjoy vast tracts of suitable

⁸ Mincher, BJ, RD Ball, TP Houghton, J Mionczynski, and PA Hnilicka. 2008. Some aspects of geophagia in Wyoming bighorn sheep (*Ovis canadensis*). *European Journal of Wildlife Research* 54(2): 193-198.

⁹ United States, Department of the Interior, "Endangered and threatened wildlife and plants; threatened species status with section 4(d) rule for North American wolverine." Vol. 88 Federal Register. pp 83726-83772. November 30, 2023.

¹⁰ Heinemeyer, K, J Squires, M Hebblewhite, JJ O'Keefe, JD Holbrook, and J Copeland. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. *Ecosphere* 10(2): e02611. <https://doi.org/10.1002/ecs2.2611>

¹¹ Inman, RM, BL Brock, KH Inman, SS Sartorius, BC Aber, B Giddings, SL Cain, ML Orme, JA Frederick, BJ Oakleaf, KL Alt, E Odell, and G Chapron. 2013. Developing priorities for metapopulation conservation at the landscape scale: wolverines in the western United States. *Biological Conservation* 166: 276-286. <http://dx.doi.org/10.1016/j.biocon.2013.07.010>

habitat in the circumpolar north¹². This is not the case in the conterminous US where populations exist in island-like patches of mountainous habitat that provide the persistent spring snow cover wolverines require¹¹. Because wolverines occur at extremely low densities – with average reported home ranges of 797 km² for males and 303 km² for females in the region¹³ – small mountain ranges like the Tetons can only support a handful of animals. The Greater Yellowstone Wolverine Program predicted the Teton Range is only likely to have 4 - 10 wolverines present at any given time, which would include juveniles and transient individuals¹⁴. In fact, for many of the Program's nearly ten years collaring and monitoring wolverines in Greater Yellowstone, only four resident, adult wolverines occupied home ranges in the entirety of the Teton Range¹⁵. This underscores that tiny wolverine populations confined to isolated mountain ranges in the Intermountain West are extremely vulnerable to local extirpation. Because successful dispersal across increasingly developed valley bottoms is perilous and uncertain¹⁶, it is imperative that land managers, including the CTNF, take pains to uphold habitat integrity for wolverines within their jurisdictional boundaries. The fact of the matter is, the Teton population of wolverines is already vulnerable to blinking out and recolonization from other occupied mountain ranges grows more difficult with each passing year. Given the hurdles wolverines face to persist this far south in their range, expanding Grand Targhee deeper into known wolverine habitat is irresponsible at best.

Whitebark pine

Whitebark pine was recently listed as threatened by the US Fish and Wildlife Service¹⁷, underscoring the need to preserve existing stands. Rangewide declines for this species in the face of climatic shifts, blister rust, and mountain pine beetle infestations have been precipitous. As a keystone species that plays a pivotal role in ecological processes for high elevation mountain habitats, shoring up our remaining whitebark pines should be

¹² Glass, TW, AJ Magoun, MD Robards, and K Kielland. 2022. Wolverines (*Gulo gulo*) in the Arctic: revisiting distribution and identifying research and conservation priorities amid rapid environmental change. *Polar Biology* 45: 1465-1482.

¹³ Inman, RM, ML Packila, KH Inman, AJ McCue, GC White, J Persson, BC Aber, ML Orme, KL Alt, SL Cain, JA Frederick, BJ Oakleaf, and SS Sartorius. 2011. Spatial ecology of wolverines at the southern periphery of distribution. *Journal of Wildlife Management* 76(4): 778-792. <https://doi.org/10.1002/jwmg.289>

¹⁴ Inman, RM, KH Inman, AJ McCue, and ML Packila. 2006. Greater Yellowstone Wolverine Study Update: December 2005-February 2006. Wildlife Conservation Society, Ennis, MT.

¹⁵ ML Packila, Wildlife Air, personal communication, June 6, 2025.

¹⁶ Packila, ML, MD Riley, RS Spence, and RM Inman. 2017. Long-distance wolverine dispersal from Wyoming to historic range in Colorado. *Northwest Science* 91(4): 399-407. <https://doi.org/10.3955/046.091.0409>

¹⁷ United States, Department of the Interior, "Endangered and threatened wildlife and plants; threatened species status with section 4(d) rule for whitebark pine (*Pinus albicaulis*). Vol. 87 Federal Register. pp 76882-76917. December 15, 2022.

prioritized to stave off cascading ecosystem impacts¹⁸. Proposals for both expansion areas fail in this regard and would remove significant acreage of forest containing whitebark pine. Specifically, the South Bowl SUP would remove nearly 20 acres of whitebark pine while the Mono Trees SUP would remove over 59 acres of forest containing whitebark pines, roughly 20 acres of which contains moderate to high density whitebark stands. We do not believe any whitebark trees, particularly not trees with the potential to produce cones or young trees, should be cut down to accommodate Grand Targhee expansion and urge adoption of Alternative 3.

CONCLUSION

Thank you for your careful review of this proposed project and consideration of public comment. Again, we believe the public interest would be best served by containing Grand Targhee within its existing SUP boundaries and urge you to select Alternative 3 of the DEIS. We appreciate your efforts to balance the needs of many uses as you steward the abundant natural resources and needs of the public on the CTNF.

Sincerely,



Meghan Riley
Wildlife Program Manager
Wyoming Outdoor Council

¹⁸ Jenkins, MB, AW Schoettle, JW Wright, KA Anderson, J Fortier, L Hoang, T Incashola, RE Keane, J Krakowski, DM LaFleur, S Mellmann-Brown, ED Meyer, S Pete, K Renwick, and RA Sissons. 2022. Restoring a forest keystone species: a plan for the restoration of whitebark pine (*Pinus albicaulis* Engelm.) in the Crown of the Continent ecosystem. *Forest Ecology and Management* 522(15): 120282. <https://doi.org/10.1016/j.foreco.2022.120282>

APPENDIX B

Grand Targhee marketing materials created in 2023 by Origin Outside (now MMGY Origin).
Marketing materials accessed online, 7/8/2026 at:

<https://www.originoutside.com/work/grand-targhee-resort-building-a-brand-where-skiing-still-rule>
S



