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July 28, 2026

Deputy Regional Forester Brant Peterson
Grand Targhee Master Development Plan Projects
USDA Forest Service, Intermountain Regional Office
Room 4016, 324 25th Street
Ogden, UT 84401

Submitted electronically via: *CARA project portal (Project 291095)*

Re: Objection to the Programmatic Amendment (TNF RFP Amendment 8) to the 1997 Revised Targhee National Forest Land and Resource Management Plan — Grand Targhee Master Development Plan Projects, Caribou-Targhee National Forest.

Dear Mr. Peterson,

On behalf of the Jackson Hole Wildlife Foundation (JHWF), and pursuant to 36 CFR Part 219, Subpart B, we submit this objection to the programmatic amendment to the 1997 Revised Targhee National Forest Land and Resource Management Plan (Forest Plan), designated TNF RFP Amendment 8, associated with the Grand Targhee Master Development Plan Projects. This objection pertains to the “1997 Targhee National Forest Land Management Plan amendment” for the Caribou-Targhee National Forest. The Responsible Official for this decision is Kim Pierson, Forest Supervisor, Caribou-Targhee National Forest.

1. Objector and contact information

Lead objector: Jackson Hole Wildlife Foundation is a conservation 501(c)3 non-profit entity located in Wyoming.

Contact:

Renee Seidler
Executive Director
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renee@jhwildlife.org.

JHWF will provide a signature or other verification of authorship upon request. Kate Gersh, Associate Director, co-authored the underlying comments and is identified as an additional author.

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2. Eligibility to object

JHWF is eligible to file this objection under 36 CFR 219.53.¹ During the public comment period on the Draft Environmental Impact Statement (DEIS), JHWF submitted timely, written, substantive formal comments attributed to the organization, dated June 18, 2025.² Those comments were within the scope of and specific to this proposal, bore a direct relationship to it, and were supported by reasons and scientific citation, meeting the definition of substantive formal comments.³

This objection is based on those prior comments. In particular, JHWF's June 18, 2025 letter expressly addressed the proposal's consistency with the governing Forest Plan and federal law, stating that the DEIS "fails to meet the standards set by the 1997 Caribou-Targhee Forest Plan, the Endangered Species Act, and the National Forest Management Act," and that the ecological costs of the proposal "will be borne publicly and permanently." The same letter documented, with supporting citations, the habitat and resource values at stake in the South Bowl and Mono Trees areas that this amendment would rezone, including whitebark pine and habitat for grizzly bear, wolverine, and the Teton bighorn sheep herd. With one exception, the issues raised below are drawn directly from those comments. The exception is the scenic-character issue in Part 4, which concerns the adequacy of the Draft ROD's evaluation of substantive requirements, a document that postdates the comment period; JHWF raises that issue as one that arose after the opportunities for formal comment, as 36 CFR 219.53(a) permits.

3. Parts of the plan amendment to which this objection applies

JHWF objects to TNF RFP Amendment 8 in its entirety. The amendment would rezone approximately 694 acres in the South Bowl and Mono Trees expansion areas out of Management Prescription 2.8.3 (Aquatic Influence Zone) and Management Prescription 2.1.2 (Visual Quality Maintenance) and into Management Prescription 4.2 (Special Use Permit Recreation Sites) and would govern all future management of those lands. JHWF objects specifically to the removal of the Aquatic Influence Zone (2.8.3) and Visual Quality Maintenance (2.1.2) prescriptions from these lands and their replacement with a developed-recreation prescription.

4. The plan amendment is inconsistent with law and regulation

The 2012 Planning Rule requires the Responsible Official to identify and apply the substantive requirements of 36 CFR 219.8 through 219.11 that are directly related to the plan direction being

¹36 CFR 219.53(a). An entity that submitted substantive formal comments related to the plan amendment during the public comment period may object, and the objection must be based on those comments unless the issue arose afterward.

²JHWF, Comments on Grand Targhee Resort Master Development Plan Draft Environmental Impact Statement (June 18, 2025) (attached and incorporated by reference).

³36 CFR 219.62 (definition of substantive formal comments): comments within the scope of, specific to, and directly related to the proposal, and including supporting reasons for the responsible official to consider.

changed, and to apply them within the scope and scale of the amendment.⁴ Whether a requirement is directly related is determined by, among other things, whether the amendment lessens plan protections. The Draft ROD's Evaluation of Substantive Requirements does not meet this standard in two central respects.⁵

First, the decision relies on project-specific design criteria to conclude that a permanent, forward-looking prescription change will not significantly affect at-risk species or riparian resources. JHWF's DEIS comments documented, with citations, that the South Bowl and Mono Trees lands support grizzly bear, wolverine, the imperiled Teton bighorn sheep herd, and whitebark pine, a species listed as Threatened under the Endangered Species Act. The Draft ROD resolves the diversity requirements (36 CFR 219.9) and the riparian requirement (36 CFR 219.8(a)(3)) by pointing to project design criteria and best management practices that minimize impacts. But the programmatic amendment changes management direction for all future projects and activities within the 694 acres for the life of the Forest Plan, and those future activities will not be bound by this project's design criteria. Applying project-level mitigation to satisfy a permanent management-direction change does not apply the substantive requirements within the scope and scale of the amendment, as 36 CFR 219.13(b)(5) requires. The Draft ROD itself acknowledges that the amendment is inconsistent with the goal of the 2.8.3 Aquatic Influence Zone prescription, which is to minimize adverse effects to aquatic and riparian dependent species. That acknowledged lessening of protection is precisely what the substantive requirements must be applied to, independent of the current project's design criteria.

Second, and as an issue arising from the Draft ROD's evaluation itself, the decision removes a scenery prescription without applying the scenic-character requirement that removal triggers. The amendment eliminates Management Prescription 2.1.2 (Visual Quality Maintenance) on the 694 acres. Removing a prescription adopted to protect scenic quality is a lessening of plan protections, which under 36 CFR 219.13(b)(5) is itself a basis for finding a substantive requirement directly related. The scenic-character requirement at 36 CFR 219.10(b)(1)(i) is therefore directly related to this amendment. The Draft ROD, however, addresses only 36 CFR 219.10(a) (integrated resource management for multiple use) and neither identifies nor applies the scenic-character requirement. Because this deficiency appears in the ROD's Evaluation of Substantive Requirements, which postdates the comment period, JHWF raises it as an issue that arose after the opportunities for formal comment under 36 CFR 219.53(a). The decision removes a scenery prescription while omitting the one substantive requirement that removal makes directly related, contrary to 36 CFR 219.13(b)(5).

Third, these failures are compounded by the decision's reliance on scale, leaning on the amendment's small footprint to avoid applying the substantive requirements. The Draft ROD repeatedly concludes

⁴36 CFR 219.13(b)(5) (an amendment must identify and apply the substantive requirements of 36 CFR 219.8 through 219.11 that are directly related to the amendment).

⁵Grand Targhee Master Development Plan Projects, Draft Record of Decision (May 2026), Evaluation of Substantive Requirements and Forest Plan Amendments sections.

that impacts are not significant because the amendment covers less than a tenth of a percent of the forest. That forest-wide framing measures the wrong thing. On the 694 acres themselves, the loss of the Aquatic Influence Zone and Visual Quality Maintenance prescriptions is total and permanent, and the rule requires the substantive requirements to be applied within the scope and scale of the amendment, not diluted against the size of the forest.

Fourth, and as JHWF stated in its DEIS comments, the record does not present compelling evidence that visitor-capacity concerns warrant an expansion of this scale. A plan amendment that permanently rezones protected lands should rest on a clearly justified need.

5. How the draft decision should be improved (requested remedy)

JHWF requests that the Responsible Official not adopt TNF RFP Amendment 8 and instead retain Management Prescriptions 2.8.3 and 2.1.2 on the South Bowl and Mono Trees lands. This outcome is consistent with the No Action alternative that JHWF supported in its DEIS comments.

Should the Responsible Official proceed with a plan amendment, a proper application of the omitted requirements does not support the amendment as written. Applying the scenic-character requirement (36 CFR 219.10(b)(1)(i)) and analyzing the riparian and diversity requirements at the scale of the amendment itself, rather than through project-specific design criteria that will not bind future activities, would require retaining the Aquatic Influence Zone (2.8.3) and Visual Quality Maintenance (2.1.2) protections on these lands, or at minimum narrowing the rezone to exclude the aquatic influence and high-scenic-value acres. JHWF requests that the 2.8.3 and 2.1.2 prescriptions be retained.

In the alternative, and at a minimum, JHWF requests that the amendment and the associated expansion be modified to remove or defer the South Bowl portion pending resolution of bighorn sheep concerns with the Wyoming Game and Fish Department, retaining the Aquatic Influence Zone and Visual Quality Maintenance prescriptions on those lands until that coordination is complete.

6. Attachment

JHWF incorporates by reference and attaches its June 18, 2025 DEIS comment letter, which contains the full record of the substantive formal comments on which this objection is based.

Thank you for your consideration of this objection.

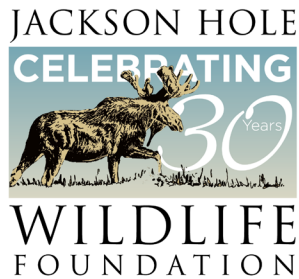
Sincerely,



Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation



Kate Gersh
Associate Director
Jackson Hole Wildlife Foundation



June 19, 2025

Kim Pierson
Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
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Re: Comments on Grand Targhee Resort Master Development Plan Draft Environmental Impact Statement (DEIS)

Dear Forest Supervisor Pierson,

On behalf of the Jackson Hole Wildlife Foundation (JHWF), thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Grand Targhee Resort Master Development Plan.

After thorough review of the DEIS and supporting documentation, we remain firmly opposed to the proposed expansion of Grand Targhee Resort into the South Bowl and Mono Trees areas. We strongly support Alternative 1: No Action, which would prevent new development and allow the landscape to retain its current ecological integrity, wildlife habitat, and natural character.

This position is grounded in substantial and well-documented concerns about the impacts the proposed expansion would have on sensitive species and irreplaceable habitat.

Wildlife and Habitat Concerns

The proposed expansion area encompasses important habitat for numerous wildlife species, including grizzly bears, wolverines, bighorn sheep, Black Rosy-Finch, raptors and owls, and whitebark pine. The DEIS fails to sufficiently evaluate the direct, indirect, and cumulative effects this development would have on species persistence, habitat connectivity, and ecosystem resilience.

Grizzly Bears

The proposed project lies within the Greater Yellowstone Ecosystem, which supports one of the last remaining strongholds for grizzly bears

(*Ursus arctos horribilis*) in the lower 48 states. The Grand Targhee expansion area overlaps with designated critical grizzly bear habitat—zones where human presence remains low and secure for foraging, denning, and seasonal movement. Development of ski infrastructure, a mountaintop restaurant, increased trail access, and year-round human presence will:

- Introduce more human-bear conflict risk through unsecured attractants, surprise encounters, and increased human use of bear habitat (Gunther et al., 2004; Schwartz et al., 2010).
- Compromise secure habitat by converting important foraging and travel corridors into disturbed or inaccessible terrain (Servheen et al., 2001).
- Increase the likelihood of lethal management removals, the leading cause of mortality for grizzly bears in the ecosystem (USFWS, 2017).

While grizzly bears have recolonized most parts of the Teton Range, their persistence depends on connected, undisturbed habitat—especially at the periphery of the recovery zone. The proposed expansion undermines those conditions and reverses decades of collaborative conservation gains.

Wolverines

The proposed expansion area is currently used by wolverines and represents important year-round habitat. Inman et al.'s *Greater Yellowstone Wolverine Study* documented marked use of the Targhee area by multiple individuals, confirming its value within the broader ecological landscape. Specifically, the study states that “the Targhee area appeared to provide consistent winter use and supported at least one reproductive female,” (Inman & Heinemeyer, 2007, p. 30) highlighting its importance not only for movement but also for denning and population persistence.

Wolverines depend on high-elevation, cold, and snowy landscapes for denning and reproduction (Copeland et al., 2010; Heinemeyer et al., 2019). The west slope of the Tetons, including the proposed expansion zones, offers some of the most suitable remaining habitat in the lower 48. Fragmentation and increased human activity could exclude this species from vital terrain (Inman et al., 2013). Displacement from core areas like Targhee would undermine recovery efforts and further isolate already vulnerable subpopulations.

Black Rosy-Finch

The Targhee expansion area includes known and potential nesting habitat for the Black Rosy-Finch, which relies on high-elevation alpine cliffs and talus slopes—features present in both the South Bowl and Mono Trees areas. Observations and habitat models indicate this species uses the west slope of the Tetons for breeding and foraging during the short alpine summer (Hayward et al., 2020).

As one of the highest-elevation breeding songbirds in North America, the Black Rosy-Finch nests in isolated alpine cliffs and talus (Johnson, 2002). It is highly vulnerable to both climate shifts and disturbance. Mountaintop construction would directly eliminate potential nesting habitat and

accelerate localized decline. Given the species' restricted range and declining population trends, loss of even marginal habitat may have disproportionate consequences for its long-term viability.

Raptors and Owls

The expansion area includes habitat used by Northern Goshawk, Great Gray Owl, Boreal Owl, and Flammulated Owl. These species rely on intact forest structure, prey availability, and low disturbance thresholds to nest and hunt. The removal of mature forest and the introduction of infrastructure-related noise and lighting will degrade this habitat and impact species viability (Reynolds et al., 1992; Hayward & Hayward, 1993; Richardson & Miller, 1997; Gura et al., 2022).

Bighorn Sheep

The South Bowl is within the seasonal range of the Teton bighorn sheep herd—one of the smallest, most isolated herds in the Greater Yellowstone Ecosystem. Increased human access and habitat loss are incompatible with recovery objectives for this imperiled native population (WCS Teton Bighorn Sheep Working Group, 2022).

Whitebark Pine

Whitebark pine, a keystone and federally listed Threatened Species, is slated for 78 acres of removal under the proposed plan. These trees play a critical role in high-elevation ecosystems, from snowpack retention to providing food for native wildlife such as Clark's Nutcrackers and grizzly bears (Tomback & Achuff, 2010). This level of removal is indefensible from both a conservation and regulatory perspective, especially considering its Threatened listing under the Endangered Species Act (USFWS, 2022).

Policy and Process Concerns

Beyond the biological consequences, the scale and nature of the proposed actions raise serious questions about compliance with existing Forest management directives and federal conservation law.

We are concerned that the DEIS underestimates the long-term ecological costs of this project and fails to meet the standards set by the 1997 Caribou-Targhee Forest Plan, the Endangered Species Act, and the National Forest Management Act.

Furthermore, the project's stated Purpose and Need lacks justification. The DEIS does not present compelling evidence that visitor capacity issues warrant an expansion of this scale. The ecological and social costs will be borne publicly and permanently, while the benefits will be largely privatized.

Support for Alternative 1: No Action

The Jackson Hole Wildlife Foundation supports Alternative 1: No Action. This is the only alternative that:

- Maintains critical habitat for grizzly bears, wolverines, and other at-risk species
- Avoids habitat fragmentation and future conflict potential

- Aligns with current recovery strategies and conservation goals in the Greater Yellowstone Ecosystem
- Upholds the integrity of the Caribou-Targhee Forest Plan and avoids irreparable ecosystem degradation

Conclusion

The Grand Targhee expansion represents a disproportionate and unjustifiable impact on one of the Greater Yellowstone Ecosystem's most ecologically sensitive regions. As stewards of our region's wildlife and wildlands, we urge you to adopt Alternative 1: No Action and reject this proposal in its entirety.

Thank you for your attention.

Sincerely,



Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation



Kate Gersh
Associate Director
Jackson Hole Wildlife Foundation

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