

July 27, 2026

Kim Pierson
c/o Jay Pence
Forest Supervisor
Caribou Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

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

RE: Objection to the Programmatic Amendment of the 1997 Revised Targhee Forest Plan for the 2018 Grand Targhee Master Development Plan Projects (#58258)

Dear Reviewing Officer,

The Greater Yellowstone Coalition (GYC), the Idaho Conservation League (ICL), and The Wilderness Society (TWS) are jointly filing this objection to the Caribou-Targhee National Forest (CTNF) for its Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS) for the 2018 Grand Targhee Master Development Plan Projects (#58258), noticed May 29, 2026. This objection is submitted pursuant to 36 CFR Part 218, Subparts A and B, and 36 CFR Part 219.

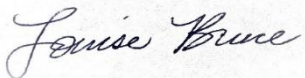
Our organizations submitted a timely comment on the draft Environmental Impact Statement on June 20, 2025, focusing on wildlife, public land, and wilderness impacts from Grand Targhee Resort's proposed expansion and associated projects. Our comments on the DEIS asked the Forest Service to select Alternative 3 with some modifications, and they referenced amending the 1997 Targhee Revised Forest Plan as it pertained to changing the management prescription for the South Bowl expansion area. Tom Hallberg, Idaho Conservation Associate at GYC, was our main signatory on the DEIS comments and will act as our lead objector in the next phase of this process.



Tom Hallberg, Idaho Conservation Associate, Greater Yellowstone Coalition



Josh Johnson, Central Idaho Director, Idaho Conservation League



Louise Bruce, East Idaho Conservation Manager, The Wilderness Society

Objection: The Programmatic Forest Plan Amendment is not Justified by the Purpose and Need

In order to expand into the South Bowl and Mono Trees areas, Grand Targhee is asking for a total of 694 acres currently managed as either *Management Prescription 2.1.2 - Visual Quality Maintenance* or *Management Prescription 2.8.3 - Aquatic Influence Zone* to be converted to *Management Prescription - 4.2 Special Use Permit Recreation Sites* for the life of the 1997 Revised Forest Plan for the Targhee National Forest.¹

Any programmatic amendment to the forest plan must be based on a preliminary assessment of the need to change the plan, and it may be based on a new assessment; a monitoring report; or other documentation of new information, changed conditions, or changed circumstances.² As we noted in our comments on the DEIS regarding the South Bowl expansion, proposed changes to management prescriptions will degrade the environmental conditions the 1997 Forest Plan protects.³ Any need identified must, therefore, provide justification that outweighs the harm an amendment may create. Targhee provides a list of desired outcomes in place of a true purpose and need statement, but it does not justify those as needs instead of wants. It appears that even the project proponents understand that the purpose and need statements used to prove the preliminary need for this amendment were deficient; they submitted an objection to the FEIS and ROD attempting to provide information after the fact to further justify their outlined needs.⁴

Putting aside the deficiencies of the resort's statement of needs, amendment of the 1997 Forest Plan requires a National Forest Management Act (NFMA) and Planning Rule justification independent of the NEPA purpose-and-need discussion. Forest plan amendments are not intended to accommodate individual development proposals simply because those proposals conflict with existing management prescriptions. Rather, an amendment must be supported by a documented need to change the Forest Plan itself, based on changed conditions, new information, monitoring results, or another reasoned basis demonstrating that existing plan direction no longer serves the purposes for which it was adopted. Neither the FEIS nor ROD provide the necessary justification. Instead, the agency concludes that because Grand Targhee's proposal is inconsistent with the current Forest Plan, the Forest Plan should be amended to accommodate the proposal. This reasoning inverts the planning framework established by NFMA. Given the absence of new information that warrants diminishing protections on the lands in question, adopting this programmatic amendment is improper and does not meet standards set out in federal regulations.

The ROD does not provide the necessary explanation of why these lands that are managed for visual quality and aquatic resources are now ripe for conversion to an industrial ski resort operation. It justifies the amendment by arguing that the scope of the amendment is small enough that it will maintain ecosystem-wide diversity of plant and animal communities as required by CFR

¹ Grand Targhee Master Development Plan Projects Draft ROD, p. 6

² CFR 219.13a

³ GYC/ICL/TWS DEIS comments, p. 6

⁴ Geordie Gillett objection to FEIS and ROD, p. 3-4

219.9; however, the ROD points to potentially catastrophic impacts to bighorn sheep in the Tetons.⁵ The amendment cannot be minimally impactful to biodiversity and potentially alter the viability of an entire sheep herd at the same time.

The distinction between a project need and a forest plan amendment need is critical. While the resort may identify business objectives or operational preferences that it wishes to achieve, those objectives do not establish a legal need to amend the Forest Plan. The FEIS largely substitutes the project's purpose and need for the independent analysis required to justify changing long-standing land management direction. The project proponent's subsequent objection, which attempts to supplement the record with additional justification after publication of the FEIS and ROD, further underscores the inadequacy of the agency's analysis.

Decisions to amend a forest plan, “must be based on the purpose for the amendment and the effects (beneficial or adverse) of the amendment, and informed by the best available scientific information, scoping, effects analysis, monitoring data or other rationale.”⁶ The Forest Service’s own FEIS determines that this amendment is likely to lead to adverse impacts on wolverines, grizzly bear, and the Teton Range Bighorn Sheep Herd, impacts that we highlight in our objections to the FEIS and ROD. Weighing the resort’s desire for increased terrain against the evidence of harm likely to occur because of this amendment, it is impossible to say that this decision was made with the best available information and, therefore, it does not meet federal standards.

These conclusions cannot be reconciled. An amendment cannot simultaneously be characterized as having only minimal ecological consequences while also posing potentially severe risks to one of the most vulnerable wildlife populations in the Greater Yellowstone Ecosystem. The agency never explains why the acknowledged risks to sensitive wildlife, aquatic resources, and scenic values are outweighed by the benefits of converting protected lands to intensive ski area development.

Ultimately, the Forest Service has failed to articulate a reasoned basis for concluding that the long-standing management direction governing these 694 acres should be abandoned. The record demonstrates only that the existing Forest Plan constrains the proposed expansion, not that the Forest Plan itself is flawed, outdated, or inconsistent with current resource conditions. Without legally sufficient justification for changing the Plan, the amendment is arbitrary, capricious, and inconsistent with the requirements of NFMA and the 2012 Planning Rule, and unsupported by the administrative record.

Remedy

We ask that the proposed programmatic amendment to the 1997 Targhee Forest Plan converting 694 acres to *Management Prescription 4.2* be withdrawn along with any project components dependent on the amendment. Unless and until the Forest Service demonstrates, through a legally sufficient Planning Rule analysis, that changing the Forest Plan is necessary and justified based on changed conditions and the best available scientific information, the existing management prescriptions must remain in place.

⁵ Grand Targhee Master Development Plan Projects FEIS, p. 316

⁶ CFR 219.13(b)(5)(i)