



July 28, 2026

Submitted Electronically via the U.S. Forest Service CARA Objection Portal

Objection Reviewing Officer

USDA Forest Service, Intermountain Region

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 Programmatic Amendment to the 1997 Revised Targhee National Forest Land and Resource Management Plan, Grand Targhee Master Development Plan Projects, Caribou-Targhee National Forest (submitted pursuant to 36 CFR Part 219, Subpart B)

Dear Reviewing Officer:

The Wyoming Wild Sheep Foundation (WYWSF), joined by the Wyoming Wildlife Federation, the Theodore Roosevelt Conservation Partnership, and the Wild Sheep Foundation (collectively, "Objectors"), submits this objection to the programmatic amendment to the 1997 Revised Targhee National Forest Land and Resource Management Plan (1997 Forest Plan) approved in connection with the Grand Targhee Master Development Plan Projects Final Environmental Impact Statement ("FEIS") and Draft Record of Decision (Draft ROD), both issued in May 2026. This amendment converts approximately 694 acres from 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 current Forest Plan" (Draft ROD p. 19).

Objectors have separately submitted, and incorporate by reference, a companion objection under 36 CFR Part 218, Subparts A and B, addressing the underlying project-level FEIS and Draft ROD and their specific impacts on the Teton Range bighorn sheep herd. This letter is directed solely at the programmatic Forest Plan amendment. We file it as a distinct objection under 36 CFR Part 219, Subpart B because, as the agency itself acknowledges, the management-prescription conversion at issue is not bounded to this project: it governs all future activity on these 694 acres for the remaining life of the 1997 Forest Plan. See 36 CFR 219.59(b).

Eligibility to Object

WYWSF's June 19, 2025 comments on the Draft Environmental Impact Statement (DEIS), and its October 15, 2020 scoping comments (WY-WSF 2020 Comments), documented in detail the harm the South Bowl expansion would cause to the Teton Range bighorn sheep herd, including the loss of winter range, summer habitat, and mineral lick access within the South Bowl SUP expansion area, the same 694 acres this amendment now permanently rezones out of the Aquatic Influence Zone and Visual Quality Maintenance prescriptions that had constrained development there. Those comments are directly related to the plan direction this amendment removes, within the meaning of 36 CFR 219.53(a): the resource protections WYWSF's comments relied on to argue against approval of the South Bowl expansion are the very protections this amendment eliminates.

To the extent the Reviewing Officer concludes that WYWSF's prior comments addressed the project's impacts rather than the amendment mechanism itself, Objectors further raise the issues below, particularly

the precedent and significance-determination issues in Sections II and III, as issues that arose from the Draft ROD's own analysis, which was not available for comment until after the DEIS comment period closed on June 20, 2025. That basis for eligibility is independently available under 36 CFR 219.53(a).

Scope of This Objection

This objection is directed at the programmatic amendment only: the conversion of 694 acres from Management Prescription 2.1.2 and 2.8.3 to Management Prescription 4.2. Objectors take no position here on the five additional project-specific wildlife amendments addressing American goshawk, boreal owl, flammulated owl, and peregrine falcon standards, which are outside WYWSF's mission and expertise and are addressed by other objectors. Our concern is with the amendment that touches occupied, mapped Core Native bighorn sheep habitat, and with what approving it on this record would mean for every other Core Native herd and every other protective prescription on the Forest going forward.

I. The Amendment Permanently Removes Habitat Protection from Occupied Core Native Bighorn Sheep Range Without Applying the Diversity and Viability Requirements at the Scale of the Amendment

The 2012 Planning Rule requires the Responsible Official, for every plan amendment, to identify which substantive requirements of 36 CFR 219.8 through 219.11 are directly related to the plan direction being changed, and to apply those requirements within the scope and scale of the amendment itself, not through project-specific mitigation that will not bind future activity. 36 CFR 219.13(b)(5). Where an amendment substantially lessens protection for a specific resource, that determination is mandatory, not discretionary. 36 CFR 219.13(b)(5)(ii)(A).

The Teton Range bighorn sheep herd is a small, genetically isolated, Core Native population that has never been extirpated or augmented (estimated at 125 to 175 animals in 2020, reduced to 71 after the severe 2022–2023 winter, and only partially recovered to 80 animals as of February 2025; FEIS p. 292). The FEIS itself acknowledges that the South Bowl expansion "has the potential to result in an overall decline in the population of the Teton or Targhee Herd (FEIS pp. 316–317)." Yet the Draft ROD's Evaluation of Substantive Requirements does not identify bighorn sheep, or the Core Native herd designation under Wyoming Statute Section 11-19-604, as a resource directly related to this amendment. It resolves diversity and viability concerns (36 CFR 219.9) by pointing to project-specific design criteria and mitigation measures, the same design criteria that, by the agency's own description, bind only this project and "all subsequent projects and activities within the project area will be subject to" the ordinary Forest Plan standards once construction ends (Draft ROD, Forest Plan Amendments section). That framing gets the amendment backward. The Aquatic Influence Zone and Visual Quality Maintenance prescriptions do not expire when construction ends; the amendment removes them permanently, for the life of the Forest Plan, from land that is not a one-time construction footprint but is year-round bighorn sheep habitat. A permanent management-prescription change cannot be justified by mitigation measures tied to a temporary construction window.

This is not a hypothetical resource conflict discovered late in the process. The South Bowl SUP expansion area sits within the former Table Rock/Mill Creek domestic sheep allotment, retired in 2001 using approximately \$250,000 in non-federal conservation funding that WYWSF (then Wyoming FNAWS) and the National Wildlife Federation raised specifically to protect this herd, with the CTNF's own endorsement (WY-WSF 2020 Comments at p. 2, Table 1). It overlaps roughly 279 acres of the Teton Canyon Hazardous Fuels Reduction Project, a collaborative CTNF-WGFD prescribed-burn effort to restore historical bighorn sheep habitat. It sits adjacent to a documented mineral lick in the Apostle Cliffs that the herd depends on and that is rarely replaceable on this landscape. The Draft ROD's Forest Plan Amendments section and its evaluation of substantive requirements address none of this history. An amendment that erases the very

protections the CTNF helped build, on the very ground the CTNF helped restore, requires more than a boilerplate finding that impacts will be "not significant at the ecosystem scale."

II. Approving This Amendment on This Record Sets a Precedent That Forest Plans Can Be Amended Rather Than Complied With

The Draft ROD concedes that "several elements of the Selected Alternative will not fully meet the intent of certain guidelines in the 1997 Revised Targhee Forest Plan" (Draft ROD p. 6). Rather than modifying the project to fit the Plan (the first option available under 36 CFR 219.15(c)), the agency is amending the Plan to fit the project. We recognize that Forest Plan amendments are a lawful tool in appropriate circumstances. Our concern is narrower and more specific: this amendment was proposed because a private permittee's preferred development footprint conflicted with existing protections for sensitive wildlife habitat, and the agency's response was to remove the protections rather than to relocate, resize, or decline the conflicting activity.

That sequence matters well beyond this single 694-acre footprint. If a Forest Plan amendment can be justified simply because a commercial project would otherwise be inconsistent with the Plan, without a record showing that project modification or avoidance was considered and rejected, and without applying the viability and diversity requirements at the scale of the amendment itself, then no protective management prescription on any National Forest is durable against a sufficiently motivated permit application. Every Aquatic Influence Zone, every winter-range protection, every Species of Conservation Concern crucial habitat designation becomes provisional, good only until a project proponent's business needs require its removal. The Forest Plan ceases to function as a constraint on development and starts functioning as a draft subject to revision by any applicant who asks. For wildlife agencies and conservation partners who have spent decades and real conservation dollars building protections like the Table Rock/Mill Creek allotment retirement into a Forest Plan's management prescriptions, that precedent is corrosive: it tells every stakeholder who negotiates a habitat protection in good faith that the protection lasts only until it becomes commercially inconvenient.

This concern is heightened, not lessened, by the herd's Core Native status under the Wyoming Statewide Bighorn/Domestic Sheep Interaction Working Group's plan, codified at Wyoming Statute Section 11-19-604. Core Native herds are, by definition, irreplaceable: they cannot be reconstituted by translocation or augmentation without losing the designation itself. If the Forest Service will amend a management prescription to accommodate private development within Core Native bighorn sheep habitat, it is difficult to identify what wildlife protection on this Forest would be considered non-negotiable.

III. The Significance Determination Understates a Permanent, Indefinite Land-Allocation Change by Measuring It Against the Wrong Denominator

The Draft ROD supports its conclusion that this amendment is not "significant" for purposes of 36 CFR 219.13(b)(3) by observing that the converted 694 acres amount to "less than a tenth of a percent" of the Caribou-Targhee National Forest's total acreage (Draft ROD p. 19). That comparison measures the wrong thing. Aquatic Influence Zone and Visual Quality Maintenance prescriptions are, by their nature, applied to a small fraction of any forest's total acreage. A test that divides converted acres by total forest acres will therefore never register as significant, regardless of what is actually lost. The relevant comparison for bighorn sheep purposes is not what fraction of the Caribou-Targhee this amendment touches, but what fraction of the herd's highest-quality winter range, summer habitat, and travel corridors to the Apostle Cliffs mineral lick it removes from protected status, permanently, not for the ten-year construction window the Draft ROD elsewhere describes as its implementation horizon (Draft ROD Appendix B), but "for the life of the current Forest Plan" (Draft ROD p. 19).

A permanent, indefinite management-prescription conversion on occupied Core Native herd habitat is a materially different decision than a bounded, project-specific exemption. The duration alone is a factor 36 CFR 219.13(b)(3) requires the Responsible Official to weigh, and a single forest-wide percentage does not substitute for that analysis.

IV. The Amendment's Analysis Does Not Reflect Coordination With Wyoming Game and Fish Department as Steward of the Herd

Under Wyoming Statute Section 23-1-103, bighorn sheep are the property of the State of Wyoming, and WGFD is charged with their management under Wyoming Statute Section 23-1-302. WGFD is also a cooperating agency on this project and has separately raised its own disagreement with the underlying viability determination (FEIS Appendix E, Comments 16.33 and 16.34). The Draft ROD's Forest Plan Amendments section and its evaluation of substantive species-specific plan components under 36 CFR 219.9(b) do not reflect any resolution of, or even engagement with, WGFD's documented disagreement, notwithstanding the Memorandum of Understanding for the Management of Bighorn Sheep on National Forest System Lands in Wyoming (FS Agreement No. 16-MU-11020000-006) between WGFD and the Forest Service's Intermountain and Rocky Mountain Regions. An amendment permanently altering management direction on a Core Native herd's habitat should not proceed over the documented, unresolved objection of the state agency that owns and manages the resource.

Requested Remedy

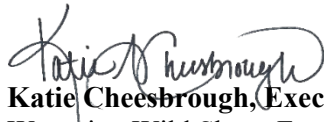
For the reasons stated above, Objectors respectfully request that the Reviewing Officer direct the Responsible Official to:

- Decline to adopt the programmatic Forest Plan amendment and instead retain Management Prescriptions 2.1.2 and 2.8.3 on the South Bowl and Mono Trees lands, consistent with Alternative 1 (No Action) or Alternative 3 (no SUP expansion);
- In the alternative, narrow the amendment to exclude the portions of the 694 acres that constitute the Teton Range bighorn sheep herd's highest-quality winter range, summer habitat, and the travel corridor to the Apostle Cliffs mineral lick, and retain the Aquatic Influence Zone and Visual Quality Maintenance prescriptions on that excluded acreage;
- If any amendment is approved, identify bighorn sheep and the Core Native herd designation under Wyoming Statute Section 11-19-604 as resources directly related to the amendment under 36 CFR 219.13(b)(5), and apply the diversity and viability requirements of 36 CFR 219.9 at the scale and duration of the amendment itself, rather than through project-specific, temporally bounded design criteria;
- Support any significance determination under 36 CFR 219.13(b)(3) with an analysis specific to the herd's habitat and the permanent, plan-life duration of the conversion, rather than a single forest-wide acreage percentage; and
- Document substantive coordination with the Wyoming Game and Fish Department regarding the amendment's consistency with the Wyoming Plan's Core Native herd designation and the WGFD-USFS MOU, and provide a reasoned response to WGFD's documented disagreement with the underlying viability determination before finalizing this amendment.

The Teton Range bighorn sheep herd cannot be rebuilt once its Core Native status is lost, and it has no alternative habitat to which it can retreat. We urge the Reviewing Officer to ensure that the durability of

Forest Plan protections for this herd does not depend on whether a private developer's preferred footprint happens to conflict with those protections.

Respectfully submitted,



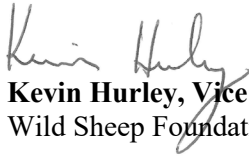
Katie Cheesbrough, Executive Director
Wyoming Wild Sheep Foundation



Nat Paterson, Policy Director
Wyoming Wildlife Federation



Josh Metten, Wyoming Field Manager
Theodore Roosevelt Conservation Partnership



Kevin Hurley, Vice President of Conservation - Emeritus
Wild Sheep Foundation

