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First name: William

Last name: Bradley

Organization:

Title:

Comments: Objection to the Grand Targhee Resort Master Development Plan Projects and Associated Project-Specific Forest Plan Amendments Submitted pursuant to 36 CFR 218, Subpart A [mdash] Pre-Decisional Administrative Review Date: 8-Jun-2026 Section 2 [mdash] Project and Responsible Official Identification (36 CFR 218.8(d)(4)) Project Name: Grand Targhee Resort Master Development Plan Projects Responsible Official: Jay Pence, Teton Basin District Ranger, Caribou-Targhee National Forest National Forest and Ranger District: Caribou-Targhee National Forest, Teton Basin Ranger District, located in Teton County, Wyoming Section 3 [mdash] Aspects of the Proposed Project Addressed by This Objection (36 CFR 218.8(d)(5)) This objection addresses the following components of the Proposed Action (Alternative 2) and its associated project-specific Forest Plan amendments as analyzed in the Grand Targhee Resort Master Development Plan Projects Final Environmental Impact Statement (FEIS), published May 28, 2026: 1. South Bowl expansion [mdash] Addition of approximately 600 acres to the resort's Special Use Permit (SUP) boundary, including new ski runs, an access road, a chairlift, a ski patrol building, a vault toilet, a rescue cache, and two avalanche launchers. 2. Mono Trees expansion [mdash] Addition of approximately 600 acres to the resort's SUP boundary, including new ski runs, access roads, a chairlift, and a mountaintop cabin. 3. Project-specific Forest Plan amendments [mdash] Including amendments to American goshawk habitat standards (size of each area and management season) necessary to permit tree clearing and ski area operations that would otherwise conflict with current Forest Plan direction. 4. Infrastructure upgrades within the existing permit boundary [mdash] Including a proposed mountaintop restaurant on Fred's Mountain, expanded snowmaking, additional terrain development, and year-round recreational facilities. The objector does not object to modest, carefully conditioned facility upgrades within the existing permitted boundary that are consistent with current Forest Plan direction and do not require Forest Plan amendments (consistent with a Modified Alternative 3 approach described below). Section 4 [mdash] Specific Issues and Environmental Analysis Concerns (36 CFR 218.8(d)(5)) Issue 1: The Boundary Expansions Will Cause Significant, Irreversible Environmental Harm The South Bowl and Mono Trees expansion areas encompass alpine ecosystems, old-growth conifer stands, whitebark pine forest, and riparian drainages. The FEIS acknowledges that the proposed action would have direct, indirect, and cumulative impacts on terrestrial and aquatic ecosystems, watersheds, riparian areas, and wildlife habitat within the expansion area. Construction would involve tree clearing, road building, grading, snowmaking infrastructure, and year-round human activity in terrain currently undisturbed by resort operations. These impacts are irreversible. Once the SUP boundary is expanded and the management prescription is converted, the scenic, ecological, and quiet-use character of these areas cannot be restored. The Draft Record of Decision should not approve any alternative that includes SUP boundary expansion into South Bowl or Mono Trees. Issue 2: Wildlife Habitat Fragmentation and Species of Conservation Concern The FEIS identifies impacts to grizzly bears, Canada lynx, wolverines, northern goshawk, bighorn sheep, mule deer, and several raptor species within the project area. Specifically: [bull] American goshawk: The Proposed Action acknowledges that construction and tree clearing in the Mono Trees expansion area would reduce the post-fledging family area below the 400-acre Forest Plan standard and would occur outside the October[ndash]February management season. Project-specific Forest Plan amendments are required to override these protective standards. Overriding wildlife standards to permit expansion represents a significant and precedent-setting departure from existing Forest Plan protections. [bull] Grizzly bear: The expansion areas fall within or adjacent to occupied grizzly bear habitat in the Greater Yellowstone Ecosystem. Year-round human activity, increased noise, new roads, and construction will fragment movement corridors and escalate conflict risks. [bull] Wolverine and lynx: Both species rely on undisturbed, remote alpine terrain for denning and foraging. Tree removal, snowmaking, new roads, and operational activity would eliminate or substantially degrade habitat quality in areas the FEIS acknowledges currently support or could support these species. The FEIS does not adequately demonstrate that projected wildlife impacts can be fully mitigated. Project Design Criteria and Best Management Practices are largely discretionary, lack specific measurable thresholds, and rely on monitoring plans that have not been finalized. The EPA raised this concern in comments on the Draft EIS, noting that BMPs

"offer no guaranteed protections" and recommending specific environmental thresholds and mandatory adaptive management triggers. The Final EIS did not fully resolve this deficiency.

Issue 3: Inadequate Water and Watershed Analysis The proposed expansion includes significantly expanded snowmaking within both the existing permit area and the new expansion areas. The FEIS acknowledges that snowmaking represents a significant new water use in a climate-stressed region. The Keep Targhee Inbounds coalition and other commenters documented that the FEIS lacks a water sustainability analysis that fully accounts for current and projected future climate conditions, including reduced snowpack and lower stream flows in the Teton Basin. Approving a major expansion of snowmaking capacity without completing this analysis is arbitrary and contrary to the agency's obligation to take a hard look at environmental consequences under NEPA. Additionally, the 125-acre Aquatic Influence Zone (AIZ) overlay within the expansion area currently provides protective management direction for riparian and stream resources. Converting this overlay to Management Prescription 4.2 (Special Use Permit Recreation Sites) eliminates that protection for the life of the current Forest Plan.

Issue 4: Visual Impacts on Adjacent Public Lands [mdash] Grand Teton National Park and Jeddediah Smith Wilderness The expansion areas are visible from Grand Teton National Park and the Jeddediah Smith Wilderness. The FEIS acknowledges that ski runs, lifts, and resort facilities in South Bowl and Mono Trees would introduce new visual elements into what is currently undisturbed forest terrain visible from these designated lands. The analysis relies on Visual Quality Objectives (VQOs) that permit modification within the existing SUP but does not adequately account for the cumulative visual degradation of the broader landscape when viewed from wilderness and park lands. The dark sky values of Driggs, Idaho [mdash] recognized as an International Dark Sky Community [mdash] and of Grand Teton National Park are also at risk from expanded night lighting and facility illumination. The FEIS acknowledges this concern but provides only general commitments rather than binding measurable protections.

Issue 5: Socioeconomic Impacts on the Surrounding Community Are Underanalyzed The expansion will substantially increase visitation, traffic, and demand for services in the Teton Basin, a rural community with limited infrastructure. The FEIS and the Keep Targhee Inbounds coalition both acknowledge that the following analyses are incomplete or missing:

- [bull] A full traffic and safety study for year-round use on Ski Hill Road, which is the only access route to the resort;
- [bull] A complete affordable housing and community services assessment quantifying increased demand on emergency medical services, fire response, waste management, and housing supply;
- [bull] A meaningful analysis of the displacement of non-motorized backcountry recreation users who currently access South Bowl and Mono Trees as undeveloped public land.

The expansion will effectively privatize 866 acres of public land that currently serves backcountry skiers, hikers, and other non-motorized users, replacing free public access with commercial resort operations. This displacement is a significant impact that the FEIS does not quantify or adequately address.

Issue 6: The Mountaintop Restaurant Proposal Is Inconsistent with Forest Management Direction The proposed restaurant on Fred's Mountain raises concerns beyond those addressed by existing facilities. The FEIS recognizes that Driggs holds International Dark Sky Community designation and that Grand Teton National Park values dark skies. A permanent, lit commercial dining facility at the summit would introduce a visible, year-round intrusion into the ridgeline skyline. Forest Service Manual 2343.141(a) requires that the primary recreation purpose of ski areas remain skiing and snow sports; a year-round mountaintop restaurant expands commercial operations beyond that primary purpose. The objector requests that the restaurant component be removed from any approved alternative.

Section 5 [mdash] Alleged Violations of Law, Regulation, or Policy (36 CFR 218.8(d)(5))

1. NEPA (42 U.S.C. [sect] 4332): The FEIS does not take the required "hard look" at cumulative water use impacts, wildlife habitat loss without adequate mitigation thresholds, community socioeconomic impacts, or displacement of existing backcountry recreation users. The use of discretionary BMPs and PDCs to substitute for rigorous impact analysis is inconsistent with NEPA's requirement for a thorough environmental review.
2. National Forest Management Act (16 U.S.C. [sect] 1604): The project-specific Forest Plan amendments override binding goshawk habitat standards without demonstrating consistency with the requirement that the plan provide for the diversity of plant and animal communities and viable populations of existing native species. Approving amendments that reduce goshawk post-fledging family area below the 400-acre standard undermines Forest Plan protections without an adequate viability finding.
3. 36 CFR Part 219 (Planning Rule): The programmatic amendment converts land managed under Visual Quality Maintenance and Aquatic Influence Zone prescriptions to a ski area recreation prescription in a manner that is not consistent with the requirement that Forest Plan amendments maintain or restore the ecological integrity of

terrestrial and aquatic ecosystems.4. Forest Service Manual 2343.141(a): The proposed year-round mountaintop restaurant and associated year-round commercial operations may not comply with the requirement that the primary recreation purpose of ski areas remain skiing and snow sports.

Section 6 [mdash] Suggested Remedies (36 CFR 218.8(d)(5))The objector requests that the reviewing officer direct the responsible official to take one or more of the following remedial actions:

1. Select a Modified Alternative 3 that permits carefully conditioned facility upgrades within the existing SUP boundary [mdash] such as new or upgraded lifts, snowmaking improvements with binding water use limits, and terrain enhancements [mdash] without expanding the SUP boundary into South Bowl or Mono Trees. This is the approach recommended by the Keep Targhee Inbounds coalition and supported by the Jackson Hole Conservation Alliance, Teton Backcountry Alliance, Winter Wildlands Alliance, Valley Advocates for Responsible Development, and Wyoming Wilderness Association.
2. Remove the mountaintop restaurant from any approved alternative to protect ridgeline scenery, dark skies, and consistency with FSM 2343.141(a).
3. Complete the missing analyses before issuing a final Record of Decision: (a) a full water sustainability analysis accounting for current and future climate conditions; (b) a complete traffic and safety study for year-round use; (c) a complete affordable housing and community services impact assessment; and (d) a quantified assessment of recreation displacement.
4. Strengthen wildlife protections by incorporating binding, measurable environmental thresholds and mandatory adaptive management triggers for grizzly bear, goshawk, wolverine, lynx, and raptor species, and by requiring pre-construction surveys for unevaluated cultural resource sites in the Mono Trees expansion area.
5. Retain Aquatic Influence Zone protections by declining the programmatic Forest Plan amendment to the extent it would convert AIZ-overlain acreage to Management Prescription 4.2.6.
6. Require binding dark sky protections [mdash] measurable lighting limits and curfews [mdash] as enforceable Special Use Permit conditions before approving any facility with nighttime lighting in the expansion areas or on Fred's Mountain.

Section 7 [mdash] Connection to Prior Specific Written Comments (36 CFR 218.8(d)(6))The objector previously submitted specific written comments during the designated public comment period for the Grand Targhee Resort Master Development Plan Projects Draft Environmental Impact Statement (comment period ending June 20, 2025). Those comments raised the following concerns, each of which directly corresponds to the issues raised in this objection:

- [bull] Opposition to the SUP boundary expansion into South Bowl and Mono Trees on grounds that it would harm natural ecosystems, wildlife habitat, and the scenic character of the region (corresponds to Issues 1, 2, and 4 above);
- [bull] Concern that expanded snowmaking would constitute a significant new water use not adequately analyzed in the context of climate-stressed watersheds (corresponds to Issue 3);
- [bull] Concern that increased resort visitation and year-round commercial development would burden the rural community with traffic, housing, and service costs without adequate analysis or mitigation (corresponds to Issue 5);
- [bull] Objection to commercial facilities [mdash] including the proposed mountaintop restaurant [mdash] that go beyond the primary purpose of skiing and would visually intrude on the natural and community landscape (corresponds to Issue 6).

The issues raised in this objection are the same as, or a logical outgrowth of, those prior specific written comments.

Section 8 [mdash] References Incorporated by Reference (36 CFR 218.8(b))The following documents are incorporated by reference as permitted under 36 CFR 218.8(b), cited by document title, date, and relevant section:

1. Grand Targhee Resort Master Development Plan Projects Final Environmental Impact Statement (FEIS), Caribou-Targhee National Forest, May 28, 2026 [mdash] Appendix C (Forest Plan Amendments), Chapter 3 (Affected Environment and Environmental Consequences), Chapter 2 Table 2.4-1 (Project Design Criteria).
2. 36 CFR Part 218 [mdash] Project-Level Predecisional Administrative Review Process.
3. 36 CFR Part 219 [mdash] Planning, Subpart B [mdash] Pre-Decisional Administrative Review Process.
4. Forest Service Manual 2343.14 and 2343.141(a) [mdash] Additional Seasonal and Year-Round Recreation Activities at Ski Areas.
5. Keep Targhee Inbounds Information Sheet, prepared by Jackson Hole Conservation Alliance, Teton Backcountry Alliance, Winter Wildlands Alliance, Valley Advocates for Responsible Development, and Wyoming Wilderness Association (2025), identifying specific data gaps and recommending a Modified Alternative 3.

Filing Deadline NoticeThis objection must be filed within 45 calendar days following the date of publication of the legal notice in the Post Register initiating the objection period. The legal notice was published on or about May 28, 2026. The deadline for filing is therefore on or before July 12, 2026.

Objections may be submitted:

- [bull] By mail: Kim Pierson, Forest Supervisor, c/o Jay Pence, Teton Basin District Ranger, Caribou-Targhee National Forest, 1405 Hollipark Drive, Idaho Falls, ID 83401
- [bull] By email: jay.pence@usda.gov (include "Grand Targhee Master Development Plan

Projects" in the subject line)[bull] Online: Via the project website on the Caribou-Targhee National Forest project page