

Data Submitted (UTC 11): 7/14/2026 11:04:17 PM

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Organization: Grand Teton National Park

Title:

Comments: July 13, 2026

Kim Pierson, Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Subject: Grand Targhee Master Development Plan Projects Final Environmental Impact Statement

Dear Forest Supervisor Pierson:

Thank you for the opportunity to participate as a cooperating agency throughout development of the Grand Targhee Master Development Plan Projects Environmental Impact Statement and for the continued collaboration between the Caribou-Targhee National Forest and Grand Teton National Park.

The National Park Service appreciates the efforts of the Caribou-Targhee National Forest to evaluate the environmental consequences of the proposed projects and to consider comments submitted by Grand Teton National Park, partner agencies, Tribes, organizations, and members of the public. We recognize that the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD) include additional information, analysis, and modifications related to issues raised by the Park during review of the Draft Environmental Impact Statement.

Grand Teton National Park's primary interests in this project have focused on two areas: (1) conservation of the Teton Range bighorn sheep herd and associated habitat, and (2) protection of the scenic values and viewsheds experienced by visitors within Grand Teton National Park.

With regard to bighorn sheep, we appreciate the FEIS's acknowledgement of the importance of the South Bowl area as both habitat and a movement corridor providing access to the Apostle Cliffs mineral lick. We also appreciate the additional discussion regarding habitat use, recreation avoidance behavior, habitat connectivity, and potential effects associated with development and operation of the proposed South Bowl expansion area. We recognize that the selected alternative incorporates modifications to reduce the South Bowl development footprint and increase separation between proposed resort activities and the Apostle Cliffs area.

While these changes represent improvements, the Park continues to have unresolved concerns regarding the level of development and encroachment into the South Bowl area and the potential effects on the Teton Range bighorn sheep herd. Our concerns extend beyond the direct loss of habitat acreage and include the potential degradation of a seasonal habitat complex that supports year-round habitat use. The FEIS acknowledges that development and associated activities may affect habitat availability, movement patterns, and access to important seasonal resources, including the Apostle Cliffs mineral lick and habitats within Teton Canyon. The Park remains concerned that the additive effects of habitat loss, functional displacement, reduced connectivity, altered movement patterns, increased recreation pressure, avalanche management activities, and diminished access to important resources across seasons have the potential to affect habitat functionality and contribute to population-level impacts for a herd that is already small, isolated, and conservation-dependent.

Although the selected alternative reduces the spatial footprint of development within South Bowl, it remains unclear whether those modifications substantially reduce the potential for recreation-related disturbance and

behavioral avoidance that formed the basis of the FEIS's impact analysis. The Park continues to have unresolved questions regarding the magnitude of effects to habitat quality, habitat connectivity, access to key resources, and the long-term resiliency of the Teton Range bighorn sheep herd. Given the unique conservation importance of this herd, continued monitoring, adaptive management, and coordination among land management agencies and wildlife managers will be critical to understanding and addressing project-related effects over time.

The Park continues to have unresolved concerns regarding potential impacts to scenic values and viewsheds experienced by visitors within Grand Teton National Park. The Teton Range is a defining feature of the visitor experience and an important resource protected under the National Park Service mission. We appreciate that the FEIS and Draft Record of Decision include additional project design criteria intended to reduce visual impacts associated with the proposed Fred's Mountain Top Guest Facility, including architectural review, use of natural colors and low-reflective materials, limitations on nighttime operations, and lighting designed to minimize skyglow. The FEIS also describes the proposed Fred's Mountain Top Guest Facility as an approximately 11,000-square-foot facility, consisting of approximately 7,000 square feet of enclosed space and 4,000 square feet of outdoor use area, intended for daytime operation and proposed to be located below the ridgeline.

While the Park appreciates these refinements, our concerns extend beyond architectural treatment and protection of dark night skies. Our primary concern is the visibility of the facility and associated infrastructure from within Grand Teton National Park during daytime conditions, when the vast majority of park visitors experience the landscape. Although the FEIS states the facility is proposed to be below the ridgeline, it also concludes that the facility would remain visible from several viewpoints, including viewpoints within Grand Teton National Park. From the Park's perspective, simply locating the facility below the ridgeline does not, by itself, resolve our concerns if the completed facility and associated development remain visible from within the Park.

Accordingly, the Park continues to recommend that the Fred's Mountain Top Guest Facility and associated infrastructure be sited, designed, and constructed so that they are not visible from within Grand Teton National Park during either daytime or nighttime conditions to the greatest extent practicable. While locating the facility below the ridgeline represents an important design consideration, avoiding visibility from within the Park is the more meaningful measure of success in protecting the scenic character of the Teton Range and the visitor experience. If implementation of the selected alternative can avoid visibility of new development from within Grand Teton National Park, many of the Park's remaining concerns regarding scenic impacts could be substantially reduced.

Because final facility siting, grading, architectural design, lighting plans, and other implementation details will ultimately determine the extent of visual impacts, Grand Teton National Park requests continued coordination with the Caribou-Targhee National Forest and Grand Targhee Resort during subsequent design, permitting, and implementation phases for the Fred's Mountain Top Guest Facility and any other facilities, structures, lifts, lighting, or associated infrastructure that may be visible from within park boundaries. The Park requests to remain actively engaged as a cooperating agency and technical partner throughout the design review and implementation process to help identify opportunities to avoid, minimize, or mitigate impacts to scenic values and visitor experience before final design decisions are made.

The National Park Service appreciates the modifications incorporated into the selected alternative and the Forest Service's consideration of the concerns raised by the Park throughout this process. Nevertheless, unresolved concerns remain regarding potential effects to the Teton Range bighorn sheep herd and to the scenic resources and visitor experiences associated with Grand Teton National Park. These concerns are important considerations from the Park's perspective and are preserved as part of the administrative record.

We look forward to continued coordination with the Caribou-Targhee National Forest during project implementation, monitoring, and future site-specific planning efforts. Grand Teton National Park remains committed to working collaboratively with the Forest Service, Grand Targhee Resort, state wildlife agencies,

Tribes, local governments, and other partners to conserve the ecological integrity, wildlife resources, and scenic values of the Greater Yellowstone Ecosystem for present and future generations.

Thank you again for your partnership and coordination throughout this process.

Sincerely,

Palmer "Chip" Jenkins
Superintendent
Grand Teton National Park