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First name: Matthew

Last name: Robertson

Organization:

Title:

Comments: Matthew Robertson

205 Aspen Meadows Road

Driggs, ID 83422

m.stevens.robertson@gmail.com

Kimberly Pierson

Forest Supervisor

Caribou-Targhee National Forest

1405 Hollipark Drive

Idaho Falls, ID 83401

RE: Objection to the Grand Targhee Resort Master Development Plan Record of Decision and Final Environmental Impact Statement

Dear Forest Supervisor Pierson,

I respectfully submit this objection to the proposed approval of the Grand Targhee Resort Master Development Plan and associated expansion of the Special Use Permit area into South Bowl and Mono Trees, including associated infrastructure, lifts, snowmaking, roads, and facilities.

I submit this objection as an individual who values the extraordinary ecological, scenic, and public character of the Caribou-Targhee National Forest and Greater Yellowstone Ecosystem, and who believes public lands adjacent to designated wilderness and Grand Teton National Park warrant the highest standard of stewardship, restraint, and scrutiny. I urge the Forest Service to pause, reconsider, and substantially revise the proposed action before irreparable decisions are made.

I. The FEIS acknowledges significant ecological harm while simultaneously dismissing it through speculative mitigation

The FEIS repeatedly acknowledges that the South Bowl area constitutes important habitat and movement terrain for wildlife, including bighorn sheep, elk, mule deer, and moose, yet repeatedly concludes that impacts will remain acceptable because of management interventions, mitigation, and assumptions regarding wildlife adaptation. NEPA specifically requires the Forest Service to consider cumulative harm; it does not.

The agency's own analysis recognizes that South Bowl contains important winter habitat and movement connectivity and that recreation and infrastructure may reduce habitat effectiveness, displace animals, or alter movement behavior. Yet the FEIS appears to rely heavily on mitigation measures, such as boundary management, skier routing, lift operations, closures, and behavioral assumptions, to conclude that substantial adverse impacts can be avoided.

The analysis does not identify any data-driven evidence of the efficacy of said mitigation.

A decision to convert currently undeveloped terrain into mechanized lift-served recreation in a sensitive ecological area should not rest upon optimistic assumptions that wildlife will adapt to novel disturbance or that human behavior can be appropriately managed indefinitely. Mitigation measures are not substitutes for avoidance, particularly where habitat fragmentation and displacement are foreseeable and irreversible.

Public lands adjacent to wilderness and near one of the most intact ecosystems in North America should be managed conservatively where uncertainty exists. The Forest Service's own acknowledgment of ecological sensitivity counsels caution, not acceleration.

The proposed South Bowl expansion is especially troubling because it transforms an area presently functioning as habitat and refuge into intensively managed recreation terrain. Even where acreage reductions have been made since scoping, the fundamental question remains unchanged: whether infrastructure development in a known wildlife movement and winter-use area is compatible with the agency's stewardship obligations.

II. The project is difficult to reconcile with the forest service's long-term stewardship obligations in an era of climate change

The FEIS acknowledges changing climatic conditions, warming temperatures, and long-term challenges affecting snowpack, snow reliability, and wildlife. Yet the selected action dramatically expands ski infrastructure, lifts, facilities, and snowmaking coverage, creating an unreconcilable contradiction.

The Forest Service appears to recognize that climate trajectories will alter winter conditions and stress wildlife over coming decades while simultaneously approving substantial permanent disturbance to support a recreation model whose environmental and economic assumptions may become increasingly unstable. Expansion into intact habitat, construction of new infrastructure, additional grading, increased water demand, and expanded mechanized recreation are permanent actions.

The question is not whether skiing should exist at Grand Targhee. It does and should. Rather, the question is whether expanding into undeveloped public lands, with irreversible consequences to wildlife, scenery, hydrology, and wilderness character, is prudent when the agency itself recognizes the impacts of long-term climatic uncertainty.

III. Forest Plan Amendments appear to function as accommodation rather than constraint

The integrity of forest planning depends upon land management plans functioning as meaningful constraints rather than adjustable obstacles.

The FEIS references multiple Forest Plan amendments developed to facilitate project consistency. This raises a serious concern that the project is being reshaped to fit the proposal rather than evaluated against the standards that were designed to protect ecological integrity and public values in the first place.

The public deserves to have confidence that principles do not become infinitely elastic whenever a proposal conflicts with it.

Where amendments affect wildlife habitat, scenery, wilderness-adjacent character, or other substantive protections, the agency bears a heightened obligation to demonstrate why deviations are necessary and why the public interest favors weakening those standards.

IV. The procedural evolution of the proposal raises legitimate concerns about the sufficiency of public comment

The FEIS acknowledges that the proposal evolved substantially following scoping, including revisions to South Bowl, new supporting infrastructure, utility elements, avalanche mitigation systems, road alignments, operational changes, and Forest Plan amendments.

Public participation under NEPA is not a technicality. It is one of the statute's central promises, and the Forest

Service has not provided sufficient opportunity for comment.

Meaningful participation requires that the public understand what is actually being proposed and the implications of those decisions. Where a proposal materially evolves over years of analysis and additional amendments emerge later in the process, the agency should exercise heightened caution before concluding that prior opportunities for comment remain sufficient.

This concern is especially acute for a proposal of this scale and consequence: one involving permanent changes to National Forest lands adjacent to wilderness and near nationally treasured landscapes.

V. Irreversible effects on wilderness character, scenic integrity, and the public trust

The land surrounding Grand Targhee forms part of one of the most ecologically and scenically important landscapes in the United States. Proximity to designated wilderness and Grand Teton National Park imposes not merely legal responsibilities, but moral ones.

Once roads are cut, lifts installed, ridgelines altered, lighting introduced, grading completed, and undeveloped terrain converted to managed recreation, these decisions are effectively permanent. The FEIS itself acknowledges irreversible and irretrievable commitments of resources. Those losses cannot simply be mitigated back into existence. The cumulative effect of incremental development matters.

Every new lift terminal, maintenance route, snowmaking corridor, patrol building, and recreational feature may appear modest in isolation. But together they fundamentally alter the character of public land. The danger is not one catastrophic mistake; it is death by accumulation.

The responsibility of the Forest Service is not simply to facilitate recreation markets. It is to steward lands held in trust for all Americans, including future generations who may value quiet, habitat continuity, dark skies, undeveloped ridgelines, and intact ecological systems more than expanded lift capacity.

VI. Ethical stewardship requires values

The purpose-and-need statement repeatedly invokes competitiveness, guest expectations, market position, and resort viability. But National Forest lands exist first for the public interest, not to satisfy an ever-escalating cycle of profit-driven recreational expansion.

Public lands teach humility before landscapes larger than ourselves. The lands surrounding Grand Targhee are valuable not because they have yet to be fully developed, but precisely because they have not.

Please, before this decision is final, consider John Muir: "When we try to pick out anything by itself, we find it hitched to everything else in the Universe." More to the point, Muir warned: "Nothing dollarable is safe, however guarded."

Request for Relief

For these reasons, I respectfully request that the Forest Service withdraw or substantially revise the proposed Record of Decision.

At minimum, the agency should:

- 1.Reconsider approval of South Bowl and Mono Trees expansion and associated infrastructure;
- 2.Select a substantially less damaging alternative that avoids expansion into sensitive wildlife habitat;
- 3.Reevaluate cumulative impacts, climate implications, and wildlife displacement assumptions;
- 4.Reassess Forest Plan amendments for consistency with the long-term purposes of the Forest Plan; AND

5.Reopen meaningful public review.

Public trust in federal land management depends upon confidence that agencies will exercise restraint where consequences are permanent and uncertainty substantial.

The Forest Service still has the opportunity and responsibility to pause before an irreversible decision is made.

Sincerely,

Matthew Robrtson