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Comments: Subject: Grand Targhee Master Development Plan Projects

To: Kim Pierson, Forest Supervisor Caribou-Targhee National Forest

I am submitting this objection to the Grand Targhee Master Development Plan Projects Draft Record of Decision (ROD) and the Final EIS (FEIS) based on my comments submitted on 6/18/2025 on the DEIS. (Comment ID #724, Table E-1 FEIS).

The decision and rationale provided in the ROD fails to prove that the selective alternative is consistent with the Forest Plan. The fact that this decision requires one programmatic and several project specific forest plan amendments illustrates that the project proposal fails to be consistent with the Forest Plan. Although Forest Plans can be amended, as often stated in the ROD and FEIS, these particular amendments will result in serious long-term environmental and social/visual impacts that have not been adequately described or addressed.

The Forest Service, in this decision, appears to be acting as an advocate for Grand Targhee Resort. The Teton Range is one of the most iconic landscapes in the United States of America. The Forest Service has failed to adequately address the history of debate over resort expansion or the importance of Teton Canyon, Jedidiah Smith Wilderness and Grand Teton National Park as separate but affected public recreation areas. It is obvious from my own experience and from other people's comments in the FEIS Appendix E that the Forest Service has a history of management decisions that have been either lost or ignored by the current administration.

The conversion of 694 acres from Management Prescription 2.1.2 Visual Quality Maintenance and 2.8.3 Aquatic Influence Zone to Management Prescription 4.2-Special Use Permit Recreation Sites is not in line with the Forest Plan. This will remove the "buffer" between 1) the ski resort and Teton Canyon which will hugely impact the experience of visitors to the Canyon and 2) remove valuable wildlife habitat in the Teton Canyon corridor between the high intensity use areas at GTR and the floor of Teton Canyon. The modifications to Alternative 2 are superficial and unlikely to protect big horn sheep, moose and mule deer habitat in any significant way. These modifications will not reduce conflicts between human use and wintering big game as stated in the ROD (p. 5). The wildlife activity area borders as mapped by WGFD are old and do not likely reflect the current usage of this area by wildlife from what I have observed. If Mono Trees and South Bowl are developed, future summer use of these areas by humans will likely increase. Mountain bikers will be clamoring for increased access and likely pioneer new trails, even if not permitted by the resort. It is not difficult to predict that the FS would allow new trails in these areas in the future.

The "Effects to Scenery" in the ROD (p 8) is particularly weak. It states, "impacts will be minor, incremental, and consistent with the character of an existing developed ski area". The ROD completely ignores the fact that one must drive up almost to the top of Ski Hill Road to see the developed ski area now. Very little is currently visible from Teton Canyon as well. That is one of the great virtues of GTR. It is hidden away. It does not detract from the magnificent view of the Tetons.

The visual separation of the resort from Teton Canyon and Alta, WY has always been a consideration in past decisions regarding the resort.

As a past member of Citizens for Teton Valley (CTV), I was present at meetings where Targhee NF officials acknowledged and agreed that the resort should never visually or physically "bleed" into Teton Canyon. This is a very "big deal". The decision to approve Alternative 2 with development of South Bowl and Mono Trees, even with modifications, plus the construction of a large restaurant on top of Fred's Mountain, will forever alter the landscape and soundscape of Teton Canyon and surrounding wilderness and national park areas. It will also

affect wildlife populations on surrounding public lands. The fact that nighttime use is not approved of at this time for the high elevation restaurant provides no assurance it will not be in the future. The conclusion: "I do not feel that the Selected Alternative will negatively impact scenery resources or dark skies" (ROD, p9) is a personal decision, not one based on years of living and recreating on the west side of the Tetons.

Grand Targhee Resort has not completed many projects that are already permitted by its current SPU (special use permit) or on the private land it owns at the base of the resort. It is not obvious why additional development and an increase in its SUP is needed at this time, especially given the current growth pressures on local communities as clearly identified in the FEIS and by many commentators. The number of people recreating in Teton Canyon year round, below the resort, has increased greatly also, probably more than the increase in winter skiers at GTR.

The failure to address cumulative effects and the relationship between public and private land development at the resort is a major flaw in this ROD and FEIS. In the FEIS, the statement is made many times in response to concerns that "As detailed on page 142 of the Final EIS, the implementation of the private lands project is not dependent, reliant, or connected in anyway to the approval of the proposed action alternatives." This is a ridiculous statement. The USFS approved the land exchange to support development at the ski resort. What happens on private land owned by the resort and on the public SUP lands are intimately connected. Why was this not addressed? Many of us continue to believe that the request to expand the current SUP will be used as a major marketing tool to sell real estate on the private land. Also unresolved parking and traffic issues should have been addressed in the FEIS and ROD.

Many commentators on the FEIS (Appendix E) noted that one of the rationales for creating private land was to concentrate development at the base of the resort rather than on public higher elevation land in the SUP. To keep the resort from visually impacting the view of the Teton Range from surrounding private and public lands has always been a major concern by the residents of Teton Valley regarding resort development. The analysis provided of visual points is superficial and fails to capture how much of an effect the development of Mono Trees and South Bowl plus the restaurant on top of Fred's Mountain will impact visitors from all over the country and world who come to see the Teton Range. As someone who views the range daily from our home across the valley, and from Teton Canyon, Table Mountain, the Jedidiah Wilderness or Grand Teton National Park over the past 30 years, I can attest to the huge impact on one's experience it is to see obvious signs of human development, even at a distance in this iconic mountain range. The irony is that GTR will continue to exist and flourish without these "improvements", if it continues to have adequate snowfall. That factor will always be the main driver of resort visitors in the winter. How climate warming might affect winter snowfall and future skiing conditions should have been a major consideration in this EIS.

The ROD emphasizes that impacts of the proposal will be balanced by the development of PDC. "Grand Targhee has committed to implementing the PDC to address additional measures and concerns raised by the community." (p. 8 ROD) How will the FS make sure that these commitments are met? Given recent and ongoing FS staff reductions plus the decimation of environmental protection by the current Executive Branch in Washington DC, this statement does little to reduce my concerns over future impacts of this decision. Who will monitor the PDC? Currently the CTNF does even have adequate staff to keep its office in Driggs open. How the PDC will be monitored and enforced in the future by the CTNF needs to be addressed. With no clear oversight process identified, the PDF approach to addressing impacts seems meaningless, a mere paper exercise. As I have already described, many promises in the past that have been made by CTNF staff regarding the SUP seem to be forgotten quickly.

Effects to Wildlife and White Bark Pine

As described in the ROD, this proposal may affect threatened White Bark Pine (WBP) in the existing SUP and in the South Bowl and Mono trees expansion areas. There was no analysis of how many acres of WBP has already been removed in the SUP. Under Alternative 2, 78 acres would be affected. The statement in the FEIS

that "maintaining open areas around the species might promote its success and regeneration in some areas." (p.263) seems absurdly optimistic given the ongoing threats of blister rust and mountain pine beetle. The FEIS also states that "Despite PDC, the Proposed Action would not meet the intent of Vegetation Guideline 8". Continuing decline of this species may result in a status change from threatened to endangered for Wyoming. Construction of the restaurant on Fred's Mountain may be particularly impactful on this species, but this area was not specifically addressed in the Affected Environment Analysis. How many WBP will be removed for construction of the restaurant? Because the Proposed Project would not affect WBP population viability forest wide, the FEIS does not seem to care that this action would not meet the intent of Vegetation Guideline 8. Potential reduction and loss of local Clark's Nutcracker populations will exacerbate the loss of WBP in the future in the Teton Canyon area. I monitored peregrine falcon nests in Teton Canyon for over 20 years. I have always observed nutcrackers in the proposed new SUP area. The loss of WBP in lower Teton Canyon would be an irretrievable loss of biodiversity with effects beyond the SUP boundary. How many possible Plus trees will be removed before they are identified also? It is not at all certain that WBP will continue to survive in the future in the GYA. The analysis should have provided population and disease trend data on the regional WBP population given its importance for survival of the grizzly bear.

As I noted in my previous comments, I have observed Big Horn Sheep (BHS) at the known mineral lek site in Teton Canyon at the Apostle cliffs. As the FEIS states: "Research suggests that Teton Range bighorn sheep avoid winter recreation routes even at low levels of intensity" (FEIS, p 293). No information is provided on how loud avalanche control efforts might affect long-term use of this area by BHS. Given the vulnerability of the existing Teton Range herd, CTNF should not allow development in South Bowl, but instead establish a winter closure in known BHS use areas. There are enough recreational users in Teton Canyon who could report violations of the closure to make enforcement possible. This would be a great teaching opportunity and help conserve prime habitat for this vulnerable species. As the climate warms, safe skiing days in South Bowl are likely to decline and sheep use may increase, if the area remains protected and outside of the SUP. Please reconsider this decision. The data provided in the FEIS clearly indicates the need for management protection for this lower elevation use area. There is no justification for ignoring available data and the long-term effort that has gone into conserving this population. Such a closure would also help to keep skiers safe from high avalanche areas.

The occurrence of Flammulated and Boreal Owls is documented in the FEIS in the Mono trees area. We do not know how many territories have already been lost for these species in the current SUP area. I recall hearing Boreal Owls near the end of Ski Hill Road some years ago, just above the resort. Since then many suitable nesting tree stands have been removed. Flammulated Owl was thought to be a rare resident in the Teton Range area until recently (see surveys by Teton Raptor Center). Survey data included in the FEIS indicates that the Mono tree area is occupied and valuable for this species. Loss of this area will affect the local breeding population. This south facing slope may provide limited skier opportunities in the future given climate warming trends. It would be much more valuable for the general public and wildlife diversity in Teton Canyon to not develop Mono Trees. Please reconsider that decision. It is estimated there are 96 million bird watchers in the United States (USFWS 2022) compared to 30 million snow sports participants (Snowsport Industries America (SIA)).

American Goshawk have been studied on the CTNF. I completed a MS at Idaho State University in 1997. Nesting ecology and habitat of the Northern Goshawk in undisturbed and timber harvest areas on the Targhee National Forest, Greater Yellowstone Ecosystem. I also published a paper in 2005: Monitoring results of Northern Goshawk nesting areas in the Greater Yellowstone Ecosystem: is decline in occupancy related to habitat change? Journal of Raptor Research 39:324-334. Neither of these references were included in the analysis for the FEIS. This makes me wonder what other references were overlooked in regard to the wildlife analysis section? It is clear from the Wildlife Biological Evaluation report that development of the Mono trees will impact this species to a greater extent than Alternative 3. This conclusion applies to other forest nesting raptors including Boreal and Flammulated Owls.

For Peregrine Falcons, which have nested for many years in the Teton Canyon area, it is clearly stated in the Wildlife Biological Evaluation that effects to this species would be most severe under alternatives which include expansion of the SUP boundary further into Teton Canyon (p.76). I conducted monitoring of peregrine falcon nest sites for Wyoming Game and Fish Department between 1999 and 2018 as part of my job as a nongame biologist in the Jackson Region. I observed peregrines every year in the Teton Canyon area but falcons did not always have successful nests. In the last 2 years as a volunteer for WGFD, I have observed disturbance at two different nest sites on the west side of the Tetons on CTNF lands including Teton Canyon by rock climbing activity where climbers are pioneering new routes. I recommend that the Apostle cliffs and the cliffs behind the old Boy Scout Camp be closed to rock climbing from April 15-July 15. This would be the most effective management tool to ensure that peregrines continue to use Teton Canyon for nesting. It would also have the effect of protecting other cliff nesting species from disturbance such as Prairie Falcon and Turkey Vultures. As bird watching is becoming even more popular than winter skiing or climbing, this would help provide additional recreational opportunities in the Teton Canyon area.

In closing, I want to state my objection to the ROD decision to approve Alternative 2 with modifications. This alternative will cause irretrievable losses to the Teton Canyon area while providing only limited benefits for winter skiing opportunities. It is entirely possible that within a decade the newly developed areas in Mono trees and South Bowl may provide little opportunity for winter skiing as winter temperatures continue to rise. The risk to reward ratio is too small in this case. If the trend in climate reverses sometime in the future, the CTNF can always reconsider this decision. Once made, the loss will be great for current and future users of Teton Canyon. I disagree completely with the statement that impacts to scenery will be "minor, incremental, and consistent with the character of a an existing developed ski area". Whoever wrote that needs to camp and hike in Teton Canyon for a few days. There are few visual impacts from a developed ski area now. If approved, Alternative 2 will change the character and wildlife in Teton Canyon for thousands of human visitors forever.