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Comments: Objection letter to Forest Plan Amendments Associated with the Grand Targhee Master Development Plan Projects Final Environmental Impact Statement and Draft Record of Decision, Caribou-Targhee National Forest (May 2026), submitted pursuant to 36 CFR Part 219, Subpart B-Commenter 457 Mr. Don M. Callison

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July 28, 2026

Attn: Brent Peterson, Deputy Regional Forester, Objection Reviewing Officer

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Via Electronic Submission: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=291095>

Kim Pierson, Forest Supervisor/Responsible Official

Caribou-Targhee National Forest

Teton Basin Ranger District

Subject: Supplemental Objection Elements: Forest Plan Amendments for the Grand Targhee MDP Projects FEIS and Draft ROD (May 2026) - Caribou-Targhee National Forest

1. Standing and Scope

Pursuant to 36 CFR Part 219, Subpart B, Mr. Don M. Callison (commentor) submits these targeted objection points. The following issues build directly upon my prior substantive formal comments submitted July 13, 2026. As Commenter, the objector has standing to file this objection based on timely, specific substantive formal comments submitted during the prior public comment opportunities provided for this project.

They address critical deficiencies in the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD) regarding localized ecological collapse, severe socioeconomic displacement, visual degradation, substantial negative and unmitigated transportation impacts.

2. Specific Issues, Regulatory Violations, and Technical Arguments

This objection specifically targets the Forest Plan Amendments proposed to facilitate the expansion of private resort infrastructure on public land, which fail to meet the substantive requirements of the 2012 Planning Rule (36 CFR Part 219).

A. Fatal Impacts to the Teton Range Bighorn Sheep Population (36 CFR § 219.9)

The proposed amendments directly threaten the survival of the small, isolated, and genetically unique Teton Range bighorn sheep (*Ovis canadensis canadensis*) population.

*Critical Habitat Encroachment: The expansion into the South Bowl area directly infringes upon documented winter and transition habitats. This population exhibits high fidelity to these specific high-elevation wind-scoured ridges.

*Biotic Disruption and Displacement: The introduction of winter recreation, downhill skiing access, and lift infrastructure into these sensitive zones creates a high risk of flushing behavior. During critical winter months, this energy expenditure leads to starvation or reproductive failure.

*Violation of Species Diversity Mandate: By amending the Forest Plan to permit high-density infrastructure in these areas, the Forest Service fails its substantive duty under the 2012 Planning Rule to maintain a viable population of this species of conservation concern within the plan area.

B. Destruction of Distinct Ecosystems: Mono Trees and South Bowl Areas (36 CFR § 219.8 & § 219.9)

The amendments strip protections from unique geographic features that define the ecological and recreational character of the Caribou-Targhee National Forest.

*Public Land Displacement: The amendments prioritize exclusionary, high-cost resort recreation over dispersed, low-impact public recreation, failing to provide equitable socio-economic benefits to the broader public.

*Mono Trees Area: The high-altitude whitebark pine (*Pinus albicaulis*) communities-a federally listed threatened species-in the Mono Trees area will suffer irreversible damage from glading, lift corridor clearing, and altered microclimates. The FEIS relies on flawed assumptions that mitigation can offset the loss of mature, cone-producing trees vital to grizzly bears and Clark's nutcrackers.

*South Bowl Area Ecosystem: Developing the pristine South Bowl destroys its roadless character, compromises alpine tundra vegetation, and permanently alters specialized headwater hydrology. The FEIS treats this unique geographic zone as a mere blank canvas for resort infrastructure rather than a delicate, irreplaceable alpine ecosystem.

C. Unfunded Public Services and Infrastructure Burdens on Teton County, ID (36 CFR § 219.8)

The Draft ROD violates the requirement to ensure social and economic sustainability by shifting massive financial burdens onto Teton County ID and accompanying cities of Driggs, Victor and Tetonia without a funded mitigation mechanism and committed program of specific initiatives

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*Socioeconomic Strain: The vast majority of the resort's workforce, housing pressure, and operational emergency services rely heavily on Teton County, Idaho, and its incorporated cities (Driggs, Victor, Tetonia).

*Unfunded Emergency and Public Services: The FEIS fails to account for the exponential increase in demand for local emergency medical services (EMS), law enforcement, and solid waste management. The project provides no federal or developer-backed funding to offset these localized county and city costs, leaving Idaho taxpayers to subsidize a private resort expansion in Wyoming.

D. Unfunded Transportation Infrastructure, Transit, and TDM Deficiencies (36 CFR § 219.8)

The transportation analysis completely decouples the reality of commuter and tourist traffic from the infrastructure capacity of Teton County, ID and its associated cities of Driggs, Victor and Tetonia.

*Failure of Mitigation Capitalization: The FEIS outlines various Transportation Demand Management (TDM) goals and transit programs but leaves them entirely unfunded and not programmed. There are no legally binding, front-loaded financial commitments to support expanded public transit lines up the canyon or regional transportation

infrastructure on the capital and annual operations & maintenance cost basis.

*Gridlock and Safety Hazards: State Highway 33 and the local access roads will experience severe degradation, increased crash rates, and gridlock. Approving plan amendments without a fully funded, operationalized TDM infrastructure plan fails to maintain the safety and socioeconomic viability of the human environment within Teton County, Idaho and its associated cities of Driggs, Victor and Teton.

E. Permanent Visual Blight Impacts on Scenic Integrity (36 CFR § 219.10)

The visual resource management analysis drastically undervalues the permanent scarring of the Teton landscape.

*Degradation of Scenic Integrity Objectives (SIOs): Amending the Forest Plan to downgrade SIOs from "High" or "Moderate" to accommodate massive mechanical infrastructure, cleared ski runs, and ridgeline lift terminals creates irreversible visual blight.

*Loss of the Wild Character: These intrusive human structures will be highly visible from key backcountry vantage points, wilderness areas, and the Teton Valley floor. The resort expansion permanently morphs a pristine public viewshed into a highly industrialized, commercialized landscape.

F. Insufficient Best Available Scientific Information (BASI) (36 CFR § 219.3)

The decision to amend the Forest Plan does not utilize the best available scientific information regarding climate change and changing snowpack dynamics in the Teton Range.

*Outdated Modeling: The FEIS relies on historical snowpack averages rather than downscaled climate modeling for the 2030-2080 timeline.

*Ski-Season Viability: Expanding infrastructure without accurate climate projections risks stranded capital assets on public lands and unnecessary ecological degradation for short-lived commercial viability.

3. Requested Remedies and Solutions

To resolve this objection, the Reviewing Officer must direct the Responsible Official to integrate the following requirements prior to executing the Final ROD:

*Remedy 1: Total Exclusion of South Bowl and Mono Trees. Modify the selected alternative to completely exclude the South Bowl and Mono Trees areas from the expanded ski area boundary to preserve bighorn sheep winter habitat and whitebark pine stands.

*Remedy 2: Binding Public Services Funding Agreements. Condition the final approval of any MDP projects on the creation of an escrowed comprehensive infrastructure capital, maintenance and operations fund, financed by the developer, dedicated to Teton County, Idaho, and its cities to cover emergency services, roadway capital and maintenance, and municipal infrastructure expansion other associated provision, delivery and growth of public services

*Remedy 3: Fully Funded TDM and Transit Mandate. Require a legally binding, front-loaded transit plan and program that guarantees funding for bus/shuttle infrastructure, park-and-ride facilities, and operational TDM programs before any ground-disturbing resort construction begins.

*Remedy 4: Preservation of SIO Standards. Maintain strict, baseline Scenic Integrity Objectives across the project area. Deny any amendments that lower visual standards for ridgeline development or lift placement. Deny any lift top and/or ridge top guest facilities including restaurants, storage areas, and any associated structures.

*Remedy 5: Best Available Scientific Information (BASI). Require a supplemental analysis utilizing downscaled

climate change data to justify the long-term viability of the proposed resort expansion areas.

5. Conclusion

The proposed Forest Plan Amendments systematically weaken protections for public resources to accommodate a private commercial enterprise. The Caribou-Targhee National Forest must uphold its mandate under the 2012 Planning Rule to protect ecological integrity and ensure transparent, science-based management of our public lands.

The current Grand Targhee Master Development Plan Projects package is the product of a selfishly crafted scheme of seeking approval for a mega private business resort expansion. This by definition, is clearly not a community scaled, context sensitive to our public lands and respectful of the Teton Valley community. The current proposal is not fitting for Teton Valley.

The current FEIS and DROD rely on voluntary, non-binding mitigations that fail to protect the irreplaceable natural resources and community stability of the Teton Valley region. I strongly urge the US Forest Service to revise its draft decision and adopt an alternative that scales back the resort's footprint to protect public land users, local taxpayers, and critical wildlife.

It is my fervent hope and expectation that the US Forest Service will issue a call for a Supplemental EIS given the magnitude of omissions and errors evident in the current FEIS and Draft ROD. This action must be closely watched by US Forest Service staff to ensure that the inadequacies, errors, omissions, and illogical conclusions associated with this proposed action analysis are fully cured and is tempered with robust and effective community engagement.

Thank you for your time and careful consideration of all the items articulated in this communique.

Teton Valley Idaho and our associated public lands and resources are far too special and a unique place to risk having intended and unintended negative impacts materialize from these proposed GTR projects via a Forest Plan Amendment and forever cast indelible and damaging marks on our public lands throughout this community. Respectfully submitted,

Don M. Callison