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July 28, 2026

USDA Forest Service, Intermountain Region
Attn: Objection Reviewing Officer
Hansen Federal Building, Room 4016
324 25th Street
Ogden, UT 84401
Responsible Official: Kim Pierson, Forest Supervisor, Caribou-Targhee National Forest

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=291095>

RE: Objection to the Forest Plan Programmatic Amendment for the 2018 Grand Targhee Master Development Plan Projects (#58258)

Dear Reviewing Officer,

The Jackson Hole Conservation Alliance (JHCA) files this objection to the United States Department of Agriculture (USDA) Forest Service, Intermountain Region (Forest Service), regarding the Caribou-Targhee National Forest's (CTNF) Programmatic Amendment to the 1997 Revised Targhee National Forest Land and Resource Management Plan (Forest Plan) for the 2018 Grand Targhee Master Development Plan Projects (#58258) (2018 Master Development Plan), noticed May 29, 2026. This objection is submitted pursuant to 36 C.F.R. Part 218, Subparts A and B, and 36 C.F.R. Part 219.¹

JHCA has been engaged with this project since the Notice of Intent (NOI) was published in August of 2020 regarding the proposed Grand Targhee Resort (GTR) expansion. JHCA submitted timely substantive comments at each respective stage of the planning process, including the NOI, Proposed Action, and Draft Environmental Impact Statement (DEIS). Jenny Fitzgerald is the Executive Director of JHCA and has been the leading signatory on JHCA comments throughout this process. Ms. Fitzgerald will again serve as such for the following objections:

¹ See 36 C.F.R. §§ 218.8(c), (d)(5)-(6), 218.10(a)(4)-(5), 219.53(a), and 219.54(c)(5)-(7).

Objection 1:

The following pertains to our DEIS substantive comment document beginning on page 16 and FEIS Response to Comments (RTC) 5.7 and 18.5:

JHCA objects to the programmatic Forest Plan amendment converting approximately 694 acres from Management Prescriptions 2.1.2 Visual Quality Maintenance and 2.8.3 Aquatic Influence Zone to Management Prescription 4.2 Special Use Permit Recreation Sites for the life of the Forest Plan. The programmatic amendment is broader and more durable than a project-specific construction approval. It changes the management baseline for the affected lands and should not be treated as an incidental housekeeping step needed to accommodate GTR's preferred expansion alternative. The FEIS and draft ROD do not adequately explain why the full 694-acre conversion is necessary, why a narrower amendment would not suffice, why Alternative 3 or another reduced-footprint alternative would not better preserve the 1997 Forest Plan's resource-protection functions, or what limiting principle prevents future conversion of protective management prescriptions whenever a private permittee seeks expanded development authority.

The amendment is especially problematic because it would convert lands managed for visual quality and aquatic-resource protection to a recreation-development prescription before the Forest Service has adequately justified that conversion under the public-interest and Forest Plan consistency standards that govern the project decision. To the extent the amendment converts Aquatic Influence Zone (AIZ) lands, the Forest Service should not approve that conversion before completing and disclosing the groundwater, dye-tracer, and public-water-system analysis necessary to evaluate whether the amendment is consistent with aquatic-resource protection. In practicality, this rezoning away from an AIZ would also remove requirements to maintain dead and defective tree habitat and minimize hydrologic alteration. This shift inherently represents a fundamental weakening of ecological safeguards for the drinking water of Driggs and downstream communities. This is yet another indication that this project is moving land further away from a desired condition. The amendment therefore confirms, rather than cures, the core defect identified above: the Forest Service is allowing the applicant's preferred development footprint to drive Forest Plan changes, rather than using the Forest Plan to guide the project.

The proposal to amend the Forest Plan to accommodate the proposed Special Use Permit (SUP) expansion demonstrates inconsistencies with management direction previously adopted through the Forest planning process. Further, the FEIS acknowledges that the proposed Selected Alternative would result in the greatest direct impacts to the Aquatic Influence Zones (AZIs) of all action alternatives (FEIS pgs. 372-375). However, rather than analyzing the ecological effects of removing Forest Plan protections from these areas, the FEIS concludes that adherence to project design criteria (PDCs) and best management practices (BMPs) will achieve compliance with the Clean Water Act and Executive Orders 11988 and 11990. This response does not

address the substance of the concern. Compliance with PDCs and BMPs is not a substitute for NEPA's "hard look" requirements related to environmental consequences.

Remedies:

- Withdraw the Part 219 programmatic Forest Plan amendment; select Alternative 3 or otherwise deny the South Bowl and Mono Trees SUP expansions.
- At a minimum, narrow any amendment to the smallest footprint supported by the record and provide robust explanation and supported rationale for how the amended management direction remains consistent with the 1997 Forest Plan's resource-protection purposes.

Objection 2:

JHCA continues to support the FEIS's concise statement that the purpose of, and need for, the Forest Service's action is to decide whether to grant a special use permit (SUP) and to determine whether the proposed use of National Forest Service (NFS) lands is in the public interest and appropriate under the Forest Plan. JHCA objected to the Forest Service's conflation of its Purpose and Need statement with GTR's private 2018 Master Development Plan objectives. The FEIS and draft ROD did not provide a remedy to this issue. By treating GTR's market-positioning, guest-experience, and growth objectives as the operative Purpose and Need, the Forest Service's analysis improperly narrows the range of reasonable alternatives and screens out lower-impact options that would satisfy the Forest Service's actual decision question. The Purpose and Need should not be defined by regional visitation growth or the applicant's preferred growth model; it should focus on whether the requested use of NFS lands is in the public interest and appropriate under the Forest Plan. Substantial public opposition documented in the comment record, and the need for one programmatic and five project-specific Forest Plan amendments, demonstrates that the Forest Service has not adequately tie the Selected Alternative to the Forest Service's stated Purpose and Need, nor to the Forest Plan. This also demonstrates the proposed project is not in the public interest and should not be approved as is.

Remedies:

- Revise the FEIS to state the Forest Service's Purpose and Need as the decision before the Forest Service: whether to grant the requested SUP and whether the proposed use of NFS lands is in the public interest and appropriate under the Forest Plan.
- Provide robust supporting documentation to explain how forest-wide management needs require amendment of the Forest Plan independently of GTR's Purpose and Need regarding commercial viability.

JHCA understands that GTR has an interest in remaining viable within the broader ski industry. However, the Forest Service must uphold its own mandates and Purpose and Need statement, while utilizing the Forest Plan to guide the outcome of this proposed project. JHCA requests that the Reviewing Officer instruct the Responsible Official to withdraw or revise the draft ROD, and deny the programmatic Forest Plan amendment and SUP boundary expansion.

We look forward to a meaningful response that addresses our concerns and protects the long-term coexistence of our local communities, wildlife, and public lands. We are available to discuss this objection and to participate in any objection resolution meeting under the applicable regulations.

Sincerely,

A handwritten signature in black ink, reading "Jenny Fitzgerald". The signature is written in a cursive, flowing style.

Jenny Fitzgerald, Executive Director
Jackson Hole Conservation Alliance