

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 and Forest Supervisor Pierson:

Thank you for the opportunity to object to the Forest Amendment Plan. I have been engaged in this project since the Notice of Intent was published and submitted a comment during the scoping period as well as the draft EIS. I am strongly opposed to Grand Targhee expanding beyond the boundaries of its current Special Use Permit (SUP) area as well as many of the in-bounds expansions which will put so much at risk. This includes amending the Forest Plan so a private business can proceed with their expansions and alterations of our public lands for their profit.

This objection addresses the Forest Plan amendments only. I previously submitted a separate, companion objection under 36 CFR Part 218 addressing the underlying project-level decision.

The draft ROD confirms that the Selected Alternative (for the GTR expansion project) requires a programmatic amendment converting 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 Sites¹. A 36 C.F.R. §

¹ Draft ROD

219.13 does not allow the Forest Service to use plan amendments as an option if they conflict with a private developer's proposal. The Forest Service must identify the amendment's purpose and scope, apply the directly related substantive requirements of the 2012 Planning Rule at the appropriate scope and scale, rely on the best available scientific information, and provide a reasoned explanation for reducing protections.² The current record of decision instead appears to do all this backwards, and uses the project to rewrite the plan, rather than using the plan to guide the project.

The Forest Service should NOT amend the Forest Plan to accommodate GTR's preferred expansion. The private business profiting off public lands should guide their development project to fit into the current Forest Plan. The Forest Service must uphold its own Purpose and Need statement, use the Forest Plan to guide this project rather than allowing this project to rewrite the Forest Plan. I firmly request that the Reviewing Officer instruct the Responsible Official to withdraw or revise the draft ROD; deny the programmatic Forest Plan amendment and SUP boundary expansion.

I understand that Grand Targhee Resort (GTR) is a business and upgrades and improvements are necessary to stay relevant. However I STILL believe that can be accomplished with a modified Alternative 3. This would solve the conundrum of having to amend the Forest Plan for a For Profit business.

This amendment would set a dangerous precedent for future alterations of our public lands for the benefit of permittees (businesses). If a Forest Plan amendment can be justified simply because a commercial project would otherwise be inconsistent with the Plan, and there was no record that any project modification or avoidance was even considered, then no protective management prescription on ANY National Forest is safe against ANY future permit application that is brought forth. You have a commitment to protect our public lands and listen to its owners (US not the permittee) and WE have spoken!

Respectfully,
Emily Sadow
Driggs, ID

² 36 C.F.R. Part 219.