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Organization:

Title:

Comments: TO: 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

FROM: Bob & Deborah Malheiro

450 Yellow Rose Dr. Alta, Wyoming

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

DATE: July 27, 2026

Thank you for the opportunity to comment on the proposed changes to the 1997 Targhee National Forest Management Plan and the Special Use Permit (SUP).

We wish to submit our objection to the authorization of the six amendments proposed as part of the Draft ROD.

The Draft ROD provides the authorization of "the programmatic amendment to alter the management goals, standards, and guidelines on the 694 acres of NFS lands from Management Prescription 2.1.2 - Visual Quality Maintenance and 2.8.3 Aquatic Influence Zone to 4.2 - Special Use Permit Recreation Sites".

The goals of Management Prescription 2.1.2 are to manage "these lands in an environmentally sensitive manner to promote the production of non-commodity resources at varying levels with limited commodity production, for various dispersed recreational opportunities, and to protect natural visual quality" and the goals of Management Prescription 2.8.3 - Aquatic Influence Zone which are "to minimize adverse effects to aquatic and riparian dependent species from past, existing and approved management activities". Whereas the goals of Management Prescription 4.2 - Special Use Permit Recreation Sites are "to provide for privately operated recreation use, protect and enhance a natural appearing environment to the extent possible while providing for private and group recreation opportunities".

These programmatic amendments are necessary for the 694-acre expansion into the South Bowl and Mono Trees. The protections currently provided in the 1997 Targhee National Forest Management Plan for these highly sensitive and vulnerable public lands are critical for the maintenance of ecosystem integrity, air quality, soil and water quality and resources, protection of riparian areas, as well as diversity of plant and animal communities. In addition, the protection of "natural visual quality" would be severely compromised with road cutting, run cutting, glading, lift power lines and lift construction, impacting visual quality from Teton Valley, Teton Canyon, JSW and GTNP.

Adequate justification for abandoning these protections has not been provided despite the numerous PDC and BMP's stated in the Draft ROD.

It is the responsibility and duty of the Forest Service decide whether to grant a special use permit (SUP) for a project and determine "if the project is in the public interest and is appropriate, based on the 1997 Revised Forest Plan for the Targhee National Forest (1997 Forest Plan)". The FEIS and Draft ROD do not adequately explain how and why the expansion into the South Bowl and Mono Trees areas serves the public interest, citing only GTR's private operational objectives as the basis for expanding the Special Use Permit (SUP).

As far as the five project-specific amendments are concerned, these would weaken or modify existing habitat protections for:

*American goshawk

*Flammulated owl

*Boreal owl

*Peregrine falcon

Although these amendments only apply to this project, the Draft ROD specifies they "may impact individuals or their habitat, but will not likely contribute to a trend toward federal listing or loss of population viability determination" and "will not result in jeopardy, population level impacts, or likely adverse effects". This provides inadequate protections for wildlife and their habitat.

The proposed expansions contained in the Selected Alternative that would require the Forest Service to revise its Forest Plan would fundamentally change undeveloped National Forest land - public lands that are currently protected for scenery, aquatic health, and wildlife - now and in perpetuity.

We are not opposed to appropriate improvements to GTR services and infrastructure within its existing SUP boundary (with some minor modifications) however, we consider adverse impacts to wildlife, wildlife habitat, water resources, public land values, and the general public interest associated with the 694-acre SUP expansion to be unacceptable and unjustified.

We believe that a plan can be developed that meets GTR's demonstrated needs without compromising the integrity of sensitive habitat required to support vulnerable populations of wildlife, visual resources of the project area, or the best interests of the public.

We thank you for this opportunity to comment and count on your careful consideration of all of the serious ramifications for our community now and into the future.

Respectfully,

Bob and Deborah Malheiro

Alta, Wyoming