

TO: Mel Bolling  
Caribou-Targhee National Forest  
RE: "Grand Targhee Master Development Plan Projects"  
October 5, 2020

Thank you for the opportunity to comment on the proposed Master Development Plan for the expansion of Grand Targhee Resort. This proposal will have significant, potentially devastating and far-reaching impacts on the mountain, adjacent Wilderness area and surrounding communities. The following environmental and social impacts should be included and subject to exhaustive analysis within the EIS.

### **Wildlife**

An in-depth analysis of the impact on wildlife with this expansion into environmentally sensitive habitat not only within the proposed SUP but in the adjacent Wilderness area, Millcreek area, and Teton Canyon is paramount. There are numerous species that reside in these areas that need to be considered including moose, elk, bighorn sheep (already endangered), bear, cougar, wolverine, ermine, bird species to name a few. Wildlife will invariably be impacted by habitat loss and further disruption due to the dramatic increase in noise that will accompany the expansion. The impact on wildlife habitats, migration routes and winter range for which there are current travel restrictions must be included.

The impact on Teton Creek and the tributaries that feed it such as Millcreek and Cold Springs should be evaluated. Erosion from construction and ongoing operation in the expanded SUP will significantly impact these tributaries. Teton Creek is the most ecologically significant tributary and riparian corridor in the upper Teton watershed that supports one of the last stronghold populations of Yellowstone Cutthroat Trout in their remaining range.

### **Water**

The availability of the necessary water resources to support the proposed expansion both within the real estate development and on the mountain must be assessed in detail. This analysis will require hydrologic studies to evaluate the impact of drilling several additional wells on ground water and surface water. The impact of this diversion of water that would have reached the springs that support water for Alta and beyond needs to be evaluated including an assessment of the impact not only on volume but also water quality. The impact of increasing erosion from construction and ongoing operation in the expanded SUP must also be considered in the analysis. The Alta community spring has already been affected by the development on the mountain.

The EIS should include an analysis of the potential need for and source of additional water resource from Teton valley.

### **Waste management**

The environmental impacts of waste management on watershed and water quality downstream (Alta and beyond) need to be evaluated extensively. Geologic considerations for waste disposal via septic systems on the mountain must be investigated. The history of sewage disposal issues in the past at Targhee should be included in the analysis.

The environmental and economic impacts of the potential need for having to pipe sewage to the sewage treatment plant in Driggs (already at capacity) which would require infrastructure upgrades should also be included.

### **Transportation and traffic**

There will be multiple implications for transportation and traffic with the proposed expansion which is intended to bring an increased number of people and therefore vehicles to the resort.

Traffic engineering speed studies need to be done on Ski Hill Road to analyze the impacts on both vehicular and non-vehicular traffic including cyclist, pedestrians and wildlife. Safety issues must be a major consideration. Increased traffic on the roads will necessitate more frequent and more extensive road maintenance. This analysis should include an evaluation of the economic impact this will have on both Teton County, Wyoming and Idaho.

## **Parking**

There is inadequate parking at the resort for the current volume with many days of “one out, one in” and cars being turned away. The proposal does not contain a realistic assessment of the future parking needs. An in-depth analysis of the parking situation is mandatory.

The use of public transit via the shuttle including utilization and the need for park and ride lots in Driggs and Alta needs to be addressed.

## **Noise pollution**

The proposed expansion will result in a significant loss of solitude and quiet. During construction there will be noise from heavy machinery including helicopters and during operation grooming equipment, snowmobiles used by ski patrol and lift maintenance, equipment to run power for the lifts and people will create ongoing noise particularly in the expanded SUP area. The impact both on the mountain, in Teton Canyon and the adjacent wilderness area should be evaluated including the detrimental impact on wildlife.

## **Visual impacts and light pollution**

Scenic views from Teton Canyon and Teton Valley from Pine Creek Pass to Felt will be significantly impacted with the building of roads, chair lifts and restaurant facilities on the mountain, forever changing the pristine environment. Light reflection off the on-mountain facilities and night time light pollution with snowcat headlights with night time grooming need to be evaluated. A viewshed analysis should be included in the EIS.

## **South bowl terrain, snow conditions and safety**

Extensive excavation and deforestation will be required to develop the proposed expanded SUP including the building of new roads, stabilizing slopes in the steep terrain and providing the “smooth skiable surface”. The multiple impacts of this expansion will need to be assessed as noted above for wildlife, visual impacts and noise pollution. The feasibility of the proposed over-snow road on the steep slope along the top of the proposed south bowl needs to be evaluated as it would appear to be unachievable without even more extensive excavation.

The south bowl area is known to contain high avalanche danger terrain as well as the southerly exposure resulting in an isothermal snow pack with poor and potentially dangerous snow quality. Avalanche starting zones and terrain traps will require avalanche mitigation which will invariably involve the use of explosive detonations. The impact of this extensive mitigation on wildlife in the area, Teton Canyon and the adjacent wilderness area, as well as the impact on recreation in Teton Canyon needs to be analyzed.

Safety issues for opening this area to the public should be addressed in light of the need for extensive avalanche control, snow pack concerns, the impact of the many low visibility days that Targhee is known for and the need to provide additional search and rescue services.

## **Infrastructure in Teton Valley**

Teton Valley lacks the infrastructure to accommodate and support a “destination resort” as proposed with this expansion. A detailed analysis of the upgrades and development of infrastructure needed to handle the increase in employees including affordable housing and the overall increased number of people coming to the Valley. This needs to include a break down of who will pay for necessary expanded infrastructure.

## **Global warming**

The proposed expansion will undoubtable increase the carbon footprint for GTR with all of the new construction along with the long-term operation of lifts, grooming, snowmaking, restaurants and real estate development. The increased visitor traffic with more vehicles per day will also contribute. Carbon offsets should be required after detailed analysis determines the impact of increased carbon emissions in order to ensure the resort is environmentally sustainable.

## **Impact on Alta and Teton Valley residents**

The cultural, economic and social impacts on the Teton Valley community with the significant environmental changes, infrastructure development and influx of tourists and ski resort visitors need to be explored and taken into

consideration. Will it be possible to preserve the way of life that many local residents have had for decades and for some folks for generations. Alta residents in particular will be most adversely affected by the increase in traffic, noise and light pollution as well as the concerns over detrimental effects on water resources.

### **Validity of the purpose and need for the proposed expansion**

The purpose and rationale for the proposed GTR expansion should be examined in greater depth including an independent economic analysis. It is not clear why there is a "need" for more amenities and more skiable terrain at this time in order to attract and accommodate increased numbers of visitors. The resort has not been able to adequately handle the number of skiers/boarders, visitors and guests that have been evident over the last several years. And GTR claims to have nearly as much skiable acreage as JHMR. If the expansion really is necessary to remain viable and competitive in the destination ski/summer resort market, why has GTR not developed and expanded into the 600 acres on Peaked that was already approved years ago. Is there a plan and funding available to go forward with development? Full disclosure is of prime importance.

We implore the Forest Service to do their due diligence:

- Meet their obligations and mandates:
  - The agency's top priority is to maintain and improve the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of current and future generations.
  - Providing the greatest diversity of outdoor recreation opportunities in the world means working to balance the desires of recreationists with ensuring future generations have the same access,
- Accept no compromises, evaluate the entire proposal as submitted through the EIS.
- Require the EIS to be comprehensive and complete regardless of the time and effort necessary to conduct all of the research and studies.
- Consider an independent review of the EIS due to the potential conflict of interest with the SE Group having prepared the MDP and now responsible for conducting the EIS.
- Carefully consider whether the proposed expansion and development would contribute to the greater good for the entire community and the negative impacts would not outweigh any potential gains. The majority of local residents consider our ecosystem most important and a major contributor to our quality of life. The desire to preserve that ecosystem is strong even if that means limiting development and economic expansion.

Thank you for your time, effort and thoughtful consideration.

Respectfully submitted,  
Bob and Deborah Malheiro  
Alta, Wyoming