October 12, 2020

Caribou-Targhee National Forest

GTR Master Development Plan

Attention Mel Bolling, c/o Jay Pence

Teton Basin District Ranger

P.O. Box 777, Driggs, ID 83401

Re: Comments on Grand Targhee Resort Master Development Plan Projects

Dear Caribou-Targhee National Forest Management,

As Teton County (Idaho) residents, I and many of my peers are deeply concerned about the impacts of the proposed projects. I am an avid skier and snowboarder. Last winter, I worked fulltime at Grand Targhee Resort (GTR) as an instructor, and I plan to continue doing so for the foreseeable future. This will be my partner’s eighth winter working fulltime at GTR. In addition to my job at GTR, I work for a local nonprofit organization dedicated to protecting and preserving the native wildlife of the Greater Yellowstone Ecosystem, and I care deeply about these issues. I believe I can bring a unique perspective to this comment pool. I feel profoundly connected to the GTR community—They are my teachers, my friends, and my family. I sincerely appreciate the need for adaptation to meet the demands of a growing customer base, and to “keep up” in a transformative period in the ski industry. I do, however, have several concerns that I would like to respectfully express about the details of the proposed projects.

Caribou-Targhee National Forest (CTNF) is a critical part of the Greater Yellowstone Ecosystem (GYE) and part of one of the last intact mountain ecosystems left on earth. Most of the major megafauna associated with Yellowstone National Park can be found in CTNF. Black bear, grizzly bear, wolf, elk, moose, mule deer, mountain lion, pronghorn, and many more species are found on these forest lands. This land is a national treasure.

The Caribou Forest Plan, revised in 2003, acknowledges that the National Forest Management Act (NFMA) diversity provision and the fish and wildlife resource regulation “establish a goal to provide habitat for the continued existence of vertebrate species in the planning area.” Further, the plan states that “These areas are critical deer and/or elk winter ranges where available forage and winter security is emphasized. They represent the winter range areas that contribute to a population's ability to maintain itself over the long term.”…”Access is managed or restricted to provide security for wintering elk and deer.” I fear these commitments would not be honored in GTR’s present plan.

Habitat linkage and connectivity through ecological corridors is the **best** current method of effectively restoring native wildlife communities. Animal movement and migration is a relatively new field of study. We are still learning about the epic journeys many species make annually to survive. The geographically and ecologically diverse nature of the Caribou National Forest make it a very vital, fragile and distinctive link between the northern and southern Rocky Mountains. Once these migrations are destroyed, they cannot be brought back. The GTR plans include adding 1,200 acres to the current 2,517-acre permit area, expanding its federal land lease area by nearly 50%. The new acreage would include four new ski lifts and have nearly 280 acres of cleared runs. This expansion is a huge threat to this critical space, and would destroy another 1,200 acres of habitat for a multitude of species whose home is dwindling.

In addition to the potential expansion impeding on their habitat, wildlife will also face more severe barriers on the roads. GTR estimates that this expansion, along with the multitude of other proposed additions, would increase its “comfortable carrying capacity” from 3,000 to 7,000 skiers. So, expanding GTR will certainly increase traffic volume. As is, nearly every person in our community has been impacted by wildlife hit on the road. I hit a deer with my brand-new car in December near Mike Harris Campground on SH-33 even though I was traveling only 20mph. My community members have friends who were injured or killed in collisions with wildlife nearby. This is a human-safety hazard, an economic issue, and a threat to our healthy wildlife populations as is, and will worsen with increased traffic if this plan moves forward.

I truly do appreciate the difficulty of the situation at hand. GTR is an economic driver in our community, and it needs upgrades. It needs more parking and improved infrastructure. But there is a balance. In summary, I encourage CTNF to work with GTR to build a compromise that will give back to the ecosystem, community, and the economy. Any changes *must* be coupled with comprehensive efforts to mitigate negative environmental impacts and help our population’s most vulnerable members. I ask that we do not allow our magical family-friendly hill to become another corporate resort giant.

Thank you.

Respectfully,

Sarah Cubells