Thank you for considering my comments regarding the Grand Targhee 2018 Master Development Plan Projects (Proposed Action).

I am very concerned about the magnitude of this proposal and the potential impacts to the communities below, the wilderness beyond and the experience within Grand Targhee Resort. I am going to focus most of my comments on proposed expansion of Special Use Permit area to include the South Bowl and Mono Trees areas.

**South Bowl and Mono Trees**

I am opposed to changing the Special Use Permit area boundary and to changing the management prescription that currently applies in the proposed South Bowl sector. The Forest Plan applies a Visual Quality Maintenance prescription that calls for protecting the natural visual quality; managing in an environmentally sensitive manner to promote the production of non-commodity resources at varying levels; managing to provide various dispersed recreational opportunities; and providing interpretive opportunities to enhance visitors’ experience.

Why is this the natural visual quality in this management area no longer important? What is the justification for this proposed change to the Forest Plan?

Impacts associated with the proposed development of South Bowl and Mono Trees are significant. Displacement of wildlife, destruction of habitat, noise and the visual intrusions of groomed slopes, ski lifts, machinery and resort visitors skiing above Teton Canyon would substantially alter the environment and the visitor experience in Teton Canyon. Opportunities for dispersed recreation and backcountry skiing would be negatively impacted.

I request that the DEIS include alternatives that do not include the expansion of the of Special Use Permit Area and that Visual Quality Maintenance management prescription for this area remains unchanged in the Forest Plan.

**CEQ Guidance**

The Proposed Action must comply with the applicable requirements of NEPA as well as satisfy Council on Environmental Quality (CEQ) regulations associated with NEPA implementation. The Forest Service currently has the discretion to continue applying the old CEQ rule to an ongoing NEPA process that was initiated prior to September 2020. In this case, the notice of the Proposed Action was issued on August 26, 2020.

I request that the Forest Service applies the old CEQ rule to the Proposed Action.

**Wilderness Resources and Character**

The Proposed Action will dramatically increase the distance that GTR borders the adjacent Jedediah Smith Wilderness Area. With increased interest in side-country skiing, winter use is likely to increase in the wilderness area and impacts to wildlife and other wilderness resources are likely to occur. Search and rescue incidents are also likely to increase as more visitors access the wilderness from the ski area. With the overall expansion of the Grand Targhee Resort, day use and overnight use in the Jedediah Smith Wilderness will surely increase during spring summer and fall. The Forest Service is challenged with the substantial increase in recreational use and limited FS staffing to address the increased pressure on the resource.

I request that potential direct and indirect impacts of the proposed action on wilderness resources and wilderness character, be carefully evaluated in the DEIS. Management alternatives should include impact mitigation strategies for the Jedediah Smith Wilderness.

**Big Game**

The Proposed Action’s project area is recognized big game habitat, occupied by moose, elk, mule deer, and white-tailed deer. In Wyoming, moose are classified as a “Species of Greatest Conservation Need.” Winter travel restrictions for the CTNF issued by the Teton Basin Ranger District recognize that portions of Teton Canyon near the project area are critical winter range for big game species and subject these areas to seasonal wildlife closures for the purpose of protecting winter range, wildlife, and other natural resources.

I request that the DEIS evaluate the direct and indirect impacts of the Proposed action on big game winter range in Teton Canyon.

**Bighorn Sheep**

The Proposed Action’s project area is recognized bighorn sheep habitat, specifically habitat for core native herds of Teton Range bighorn sheep. These native sheep are a genetically unique and are at risk of local extinction as populations continue to sharply decline. The Proposed Action poses threats to this population by increasing human development and increasing human activity from recreationists that displaces or stresses individuals.

I request that the direct, indirect, and cumulative impacts of the Proposed Action on Bighorn Sheep be carefully evaluated and alternatives be developed to address potential impacts. The DEIS process should include consultations to address areas in which the Proposed Action is noncompliant with the applicable provisions of state wildlife management plans and the Forest Plan.

**Grizzly Bear**

The Grizzly Bear is currently listed as a “Threatened” species under the Endangered Species Act (ESA). The Proposed Action has the potential to impact Grizzly bear populations and the Proposed Action project area is classified as suitable Grizzly bear habitat. According to the CTNF’s Forest Plan, “forest management contributes to the recovery of federally listed threatened, endangered, and proposed species and provides for conditions, which help preclude sensitive species from being proposed for federal listing.”

I request that the DEIS process and the Proposed Action address potential impacts to Grizzly Bear habitat. With the anticipated increase in use (all seasons). Strategies to minimize bear-human conflicts should be addressed during planning.

**Canada Lynx**

The Proposed Action has the potential to impact Canada lynx populations. The Proposed Action’s project area is classified as Canada lynx habitat by the Forest Service and located inside the Teton Creek Lynx Analysis Unit, which includes 14,433 acres of lynx habitat. Canada lynx are currently listed as a “Threatened” species under the Endangered Species Act.

I request that the DEIS evaluate the direct, as well as indirect impacts of the Grand Targhee expansion proposal on Canada Lynx and identify alternatives to avoid or mitigate impact to Canada Lynx habitat. The DEIS should also address areas in which the Proposed Action is noncompliant with the applicable provisions of the ESA, state wildlife management plans, the Forest Plan, and the Northern Rockies Lynx Management Direction (NRLMD).

**Wolverine**

The Proposed Action has the potential to impact wolverine populations, and significantly impact individuals located on the CTNF and specifically in and adjacent to the project area.

I request that the DEIS evaluate the direct as well as indirect impacts of the Grand Targhee expansion proposal on wolverine and identify alternatives to avoid or mitigate impact to wolverine habitat.

**Expansion Within Current SUP Area**

The Proposed Action includes a vast amount of clearing for ski runs, ski lifts, structures, service roads and glading. The cutting of Whitebark pine should be avoided during the development of the area. An estimate of trees to be cut should be gathered during this process

The Proposed Action calls for mountaintop restaurant facilities and other visitor services. These structures should be located below ridgeline and with sensitivity to the potential visual impacts when viewed from alpine areas in wilderness and from the national park.