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**Subject: Grand Targhee Master Development Plan Projects - Scoping Comments**

Dear Mr. Bolling,

Thank you for the opportunity to comment on Grand Targhee Resort's (GTR) proposed Master Development Plan (MDP). I have a number of concerns with the proposal that I am requesting be analyzed during the EIS process.

Purpose and Need

I'm having a hard time understanding just what the purpose and need for this proposed expansion is. In the purpose and need section, GTR's MDP states, "In essence, GTR must strive to improve its offerings in order to remain viable in the competitive destination skier/rider market." That statement about the purpose and need raises more questions than it answers.

What does GTR mean by "viable"? Merriam-Webster defines viable as "having a reasonable chance of succeeding" or being "financially sustainable". Since GTR states they "must" do these things "in order to remain viable", that implies GTR would NOT have a reasonable chance of succeeding nor would GTR be financially sustainable if they don't get approval. Could that really be the case?

- The claim of need and viability needs to be fully analyzed and not taken as fact just because the GTR MDP makes the claim.

Since Grand Targhee is trying to make the case that it needs this expansion to remain viable (financially sustainable), the EIS and the public need to be able to evaluate Grand Targhee's financial situation by looking at their financial records – income, expenses and debt obligations. The claim of viability has a direct relationship to Targhee's financial situation so GTR's current income, expenses and debt obligations have to be made public and analyzed by the EIS. Has that information been published? If so, I have not been able to find it.

The parking lots at Grand Targhee have been full to overflowing over the past several years, even on weekdays, and at times GTR has had to turn people away, sending them back down the mountain. It's well known that skiers go where the snow is best. Grand Targhee often has some of the most reliable snow conditions in the West, and has had very good snowfall

the past several winters. Good reliable snow is what makes a ski resort viable, not amenities. With the amount of traffic and numbers of skiers in recent years, it's hard to believe GTR is not making money, but in order to be able to make an evaluation of their financial viability and stability, it's important that their financial records – income, expenses and debt obligations – be transparent to the public.

GTR is asking for a number of new lifts and for an extension of the ski area boundary to open up additional ski terrain. How can the need more skiable terrain be shown, when GTR has not yet developed the 600 acres of skiable terrain on Peaked Peak within the current boundary, and has not installed the already approved high speed quad on Peaked?

- Studies of the impact to the resort of opening up skiing on Peaked Peak to the general public through the installation of the approved high speed quad, needs to be included as part of this EIS.
- A reasonable person could conclude that GTR should develop what they already have approval for, before any expansion of the ski area boundary or more ski lifts are considered.

#### Real Estate Development on Private Land

Rather than the claim of viability of the ski area, as stated in the MDP, could the unspoken purpose and need be to make the ski area more attractive to buyers of their real estate development on their private land?

The claim of viability, or financial sustainability of GTR, is the primary claim for the purpose and need of this expansion. That claim of viability needs to be fully analyzed, not just in terms of destination skiers as the resort's MDP frames it, but also in relation to the unstated viability and profitability of GTR's recently approved real estate development.

- The question needs to be asked, what's really driving this proposal? Rather than "to remain viable in the competitive destination skier/rider market" as GTR claims, could it really be to spruce up the mountain and make GTR's real estate development more attractive to prospective buyers?
- The possibility of the recently approved real estate development on private land, driving this proposal on public land, needs to be thoroughly investigated and analyzed by the EIS. Please add this concern to the list of concerns the EIS needs to analyze.

The more one looks at this proposal, the more it looks a lot like a wolf in sheep's clothing.

To state the obvious, the real money will be made from selling real estate, not from selling lift tickets and hamburgers.

## Parking

The MDP has a table and discussion (Chapter 4, Section F) that claims “GTR has a comfortable surplus (109 spaces) of parking based on its existing CCC”. The Comfortable Carrying Capacity (CCC) uses a formula, applying an industry average multiplier to GTR’s roughly 10 acres of parking, to calculate that number. However, just ask anyone who has skied there in the past several years if that is an accurate assessment of existing parking capability – it’s clearly not. The on the ground facts from the past several winters tells a different story, there simply is no surplus, there’s a deficit.

I didn't buy a season pass for the 2019-20 season for the first time in many years, mainly because of how busy the resort has become and the lack of parking. Parking is already oversubscribed, often full, and sometimes Grand Targhee turns visitors away, sending them back down the mountain. Instead of a need to attract more tourists with more amenities, terrain and lifts, the real need is to provide adequate parking for the existing number of skiers.

In an interview with the Jackson Hole News & Guide on 9-16-20, marketing director Jennie White said “One of our big problems is not the acreage on the mountain or what you get on the mountain, but where we are kind of handicapped is the limited amount of parking we have and how to get people there.” That publically acknowledges GTR currently has transportation problems and inadequate parking, which contradicts the MDP’s claim.

- The questionable claim that “GTR has a comfortable surplus of parking” when GTR has been turning guests away because of a lack of parking, shows a need for the EIS to carefully evaluate that and all other claims made in the proposal.
- The real need is for GTR to provide adequate parking and improved transportation options for their current number of visitors, not adding more terrain, lifts and amenities to attract more visitors for which parking isn’t available.

## Comfortable Carrying Capacity (CCC)

The MDP states “the accurate calculation of a resort’s CCC is the single most important planning criterion for a resort”. The CCC uses a formula, applying an industry average multiplier to GTR’s numbers, to calculate that that “GTR has a comfortable surplus (109 spaces) of parking based on its existing CCC”. That statement is questionable at best and even contradicted by the resort spokesperson, and begs the question of just how accurate the rest of the MDP is.

- If the “accurate calculation of a resort’s CCC is the single most important planning criterion for a resort”, and the calculated number for parking is so wildly off the mark, that brings into question of the accuracy of the whole MDP which is based on similar calculations.

- All claims made by the MDP should be considered suspect until thoroughly analyzed and verified independently, which means someone other than SE Group.

#### Shuttle Service – No Park and Ride location in Alta

There is no place in Alta to park and ride the Shuttle. To ride the shuttle, Alta residents would first have to drive to Driggs and park there just to catch a shuttle, which would take them back through Alta on its way up to the resort – that’s crazy and one reason why I never ride the shuttle. What compounds this for Alta residents is that our Teton County Wyoming taxes help subsidize the shuttle, yet Alta taxpayers have no reasonable way to ride the shuttle.

- Grand Targhee should find a place for and build a park and ride facility in Alta, even if that means purchasing land for it.
- The shuttle service should be able to help alleviate the parking problem, but there are some problems with it how it currently operates. This needs to be studied and ways to improve the ridership of the shuttle need to be found and implemented.

#### Global Warming

Grand Targhee recognizes that Global Warming is a threat to the ski industry through their involvement with Protect Our Winters (POW), an organization dedicated to fighting global warming and the existential threat it poses for the ski industry. The POW logo is prominently displayed on their shuttle vehicles.

However, Targhee’s proposal would increase their carbon footprint, adding to the global warming problem. All the new construction, diesel emissions from increased grooming, the electricity needed for new restaurants, snow making and to run the proposed lifts would all add more carbon to the atmosphere, amplifying the global warming problem.

- What studies have been done, or can be done through this EIS, to show the impact to atmospheric carbon from the construction of the proposed lifts, restaurants and other amenities, along with the long-term operation of those facilities?

The proposal would also increase CO2 emissions from increased visitor traffic – local/daily trips to and from the mountain, regional visitors driving from neighboring states and national visitors flying in to go skiing at Targhee. Also, GTR is part of the Mountain Collective program that encourages skiers/riders from other ski areas, nationally and internationally, to ski Targhee with discounted lift tickets, meaning pumping more carbon into the atmosphere to get all those people to Targhee.

Targhee used to have a slogan “Snow from Heaven, Not from Hoses”, but their proposal to add more snowmaking, top to bottom, is another recognition of the threat of global warming to their operations.

To mitigate the carbon emissions from anything approved in this EIS, GTR should be required to make carbon offsets, equivalent to the impact. Doing so is not only the right thing to do, it's also in Grand Targhee's self-interest as it would help address the threat of Global Warming. There are a number of ways that could be achieved including:

GTR should start installing EV charging stations and reserving those spots for electric vehicles. EVs are on track to become much more affordable and common over the next 2-5 years and can have a meaningful positive impact on our global warming problem. To incentivize and encourage EV use:

- Create reserved EV charging stations/parking spots, located close to the main plaza and be some of the most desirable parking places at the resort.
- As more EVs take advantage of this, more EV charging stations/EV only parking places need to be built to accommodate all EVs that wish to park and charge at the resort. This building of charging stations should continue as long as needed to accommodate any EV that wishes to park and charge at Targhee.

GTR should also install a large solar PV system to offset some of their electricity use. Since most solar production is during the summer months anyway, solar PV can work well in snowy mountain environments if they are properly designed, sited and maintained.

Any element of this proposal that gains approval in the EIS should be required to:

- Offset the carbon footprint of any new construction – impacts of CO<sub>2</sub> emitted or consumed during construction - transportation, building materials, heavy equipment work, daily commutes of workers, etc...
- Offset ongoing carbon use from powering all new permitted use – lifts, snowmaking, fossil fuels used for grooming, electricity for the new building's heating, lighting, and other needs.

There are a number of contradictions between GTR's recognition of global warming as an existential threat to its future, and this carbon producing proposal. If GTR was truly concerned about global warming, as advertised by the POW panels on their shuttles, they would withdraw this proposal and instead work to reduce their carbon footprint, and work to make the resort environmentally sustainable.

They would be doing things like installing a solar PV system, installing EV chargers, and making changes to existing operations and programs to reduce the amount of carbon they produce, not proposing to produce even more carbon. If they did that, they could become a leader in the ski industry for doing the right things, the things needed to combat Global Warming. Doing those things should draw people who want to support responsible recreation.

## Traffic

What would be the impact of the increased traffic the proposal would generate through Alta and into Driggs? A thorough traffic and speed analysis of the impacts to wildlife and the safety of vulnerable non-motorized users from this proposal needs to be done as part of this EIS.

Concerns that need to be studied:

- Many people heading to Targhee speed through Alta and all the way up to the resort, with out of state visitors, i.e. Targhee's guests, being some of the biggest offenders.
- Teton County Wyoming does not have the resources for regular traffic patrols on Ski Hill Road. Sherriff Carr has done the best he can to have traffic patrols, like having deputies patrol it during summer festivals and authorizing overtime for additional patrols, but that is simply not enough to slow down all the speeders.
- There is likely no reliable data available on the number of speeding vehicles or how fast they are going, but as someone who lives in Alta and drives and bicycles the road frequently, I can attest that many if not most people drive over the speed limit, with some driving very, very fast.
- There are Bike Lanes on Ski Hill Road from Driggs to the turnoff to Teton Canyon that get significant use. From Teton Canyon to the resort Ski Hill Road is a Shared Road that also gets significant bicycle and pedestrian use. Increased traffic would be a danger to these vulnerable users that share Ski Hill Road with fast moving vehicles.
- Speeding vehicles, which is basically all vehicles on the forest section, also endangers wildlife – there are deer, birds, squirrels, marmots and other animals killed on the road every year. More traffic will cause more wildlife fatalities.

## Visual Impacts

GTR claims the proposed mountain restaurants will not be visible from the Wilderness, which may or may not be true depending on their design and siting, but the restaurants would certainly be visible from the valley. Even if the restaurants are designed to “blend in” to the mountain, if that’s even possible, they will have windows that reflect sunlight and shine back to Teton Valley. We already see the sun reflecting from the glass on the lift terminals on the mountain. Consider those impacts and multiply them many, many times. This potential impact needs to be studied, please initiate a study as part of this EIS.

- A thorough study of the reflective light impacts, in all directions, needs to be completed and studied during this EIS.

The snowcat headlights from existing grooming operations are quite bright. The new lights (Xenon?) are so bright they cast shadows inside our house at night in Alta, 5-miles from Targhee as the Raven flies. Plus we also see lights during the night from the top lift terminals. The proposed restaurants will also have lights that will be seen from the valley.

We wish we didn't have to close our curtains at night, we love looking at the night sky, but we have to just so we can get some sleep. We don't want any more lights from the mountain polluting our Dark Skies.

- Grooming and Cat Skiing in the proposed South Bowl will shine the newer very bright snowcat lights into the Wilderness.
- These visual impacts to the valley and the threat to our Dark Skies need further study, documentation and remediation of existing impacts.

### EIS Consultant – Conflict of Interest

I'm sure the SE Group is a very capable EIS consultant, but they simply should not be allowed to evaluate their own work. Grand Targhee hired SE Group to prepare its MDP, then apparently GTR recommended that the Forest Service hire SE Group to write the EIS, and SE Group was subsequently hired by the Forest Service for that task.

What was the process that led to hiring SE Group to write the EIS? Was a Request for Proposals (RFP) advertised to solicit different bids? Was a Request for Qualifications (RFQ) advertised? If so, was one qualification that the EIS consultant not be the firm that wrote the proposal to be evaluated? Was an effort made to find an independent consultant, one without such close ties to the subject of the EIS? It's important that the EIS consultant not have a cozy relationship with the proposal being evaluated.

Choosing this company to write the EIS is a potential conflict of interest and cannot be allowed, or this EIS will, at the very least, be perceived to be biased toward an outcome that favors GTR.

Warren Buffet has a way of distilling topics to their essence, to what's most important. When asked what qualities he looks for when hiring people, he famously said "Three things – Intelligence, Energy and Integrity – and if they don't have the last one, don't even bother with the first two."

Hiring SE Group to evaluate the MDP they wrote puts them in the difficult and conflicted position of evaluating their own work, and creates the potential of bias towards GTR. The consultant who prepared GTR's MDP cannot be an objective and honest arbiter of their own work – they would have an inherent interest in validating their work on the MDP, otherwise they would be putting into question the quality of their work, something very few would be willing to do. Having the same consultant evaluate the MDP they wrote brings into question the integrity of this whole process and is a potential conflict of interest, much like the fox guarding the hen house.

- I'm sure there are other highly qualified consultants who could do a very good job writing this EIS. The Forest Service should immediately look for and hire a different consultant to write the EIS. If they don't, this conflict of interest could be challenged

in court, putting into doubt this whole time-consuming and expensive exercise that has been stressful to the community.

- It's inappropriate for the consultant who wrote Targhee's MDP to also critique and review their own work. SE Group should not be involved with writing the EIS.
- Getting a second opinion is always considered a best practice, whether for a doctor's opinion before surgery, or for a major decision about use on public lands that will have significant long-term impacts.

### Conclusion

The adoption of the purpose and need statement is one of the most consequential decisions that the lead agencies make in the National Environmental Policy Act (NEPA) process, because the purpose and need provides the foundation for determining which alternatives will be considered and for selecting the preferred alternative

It's important to factually determine what the actual purpose and need of this proposal is, and if the claimed need is valid.

This EIS needs to take a hard look at all the claims stated in GTR's MDP, especially since at least one of those claims, the claim that there's "a comfortable surplus of parking", is simply not accurate. Even GTR itself has publicly acknowledged the resort is handicapped by the limited parking at the resort. With that in mind, all claims in the MDP should be treated as suspect until independently verified, which means by someone other than the SE Group, who wrote those claims.

It's hard to understand just what the purpose and need for this proposed expansion is, when:

- Targhee is already so busy with visitors that the parking lots are often full, even on weekdays that they sometimes turn guests away, sending them back down the mountain.
- Existing parking is inadequate for the existing number of visitors, let alone the additional ones this proposal would encourage.
- They have not yet developed the 600 acres of skiable terrain within the current ski area boundary, nor built the already approved high speed quad for that terrain.
- A reasonable person could conclude that GTR should develop what they already have approval for first, before any expansion of the ski area boundary or more ski lifts are considered.

As Grand Targhee marketing director Jennie White told the JH News and Guide "One of our big problems is not the acreage on the mountain or what you get on the mountain, but where we are kind of handicapped is the limited amount of parking we have and how to get people there".

That publically acknowledges:

- 1) GTR does not need more skiable acreage
- 2) GTR does not need more amenities on the mountain and
- 3) GTR currently has transportation problems and inadequate parking

So by their own admission, Grand Targhee contradicted the supposed adequacy of parking claimed in the MDP, and contradicted the whole purpose and need for this proposed expansion.

Is it really the case that the claimed viability (having a reasonable chance of succeeding) of the ski area is dependent on the approval of this proposal? That is the basis of the purpose and need as presented in GTR's MDP. That claim needs to be fully analyzed, not just in terms of destination skiers as the resort's MDP frames it, but also in terms of the unspoken viability and profitability of GTR's recently approved real estate development.

- Why was this obvious linkage between GTR's real estate development and this proposed expansion not addressed in the MDP?
- The relationship between GTR's real estate development, and the purpose and need of this proposal, needs to be closely examined before the Purpose and Need Statement for the EIS is formally adopted by the Forest Service.

To state the obvious, the real money will be made from selling real estate, not from selling lift tickets and hamburgers.

Thank you for your consideration of my concerns.

Respectfully,

Chi Melville

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