
Megan Bogle

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October 11, 2020

Mel Bolling

%Jay Pence

Teton Basin Ranger District

PO Box 777

Driggs, ID 83422

RE: Proposed Expansion of Grand Targhee Resort

Dear Forest Supervisor Bolling,

Thank you for this opportunity to comment. Given the history of past NEPA efforts for Grand Targhee Resort operations and Land Exchange, I do not envy the work ahead for your employees.

PROCESS:

Please clarify the purpose of and need for action.

Where is the Forest Service directed to respond to a Permittee's desire to make significant upgrades to their operation on NFS lands in order to better meet "evolving consumer demands"? The last MDP was obsolete before it was approved (and very little was built as analyzed) so why go through this "Big Gulp" project-specific analysis?

Please clarify exactly what is being analyzed, and what will be approved with this analysis.

I was surprised at the scale of the proposal and number of specific projects included in the scoping document. Will the EIS actually analyze the site-specific effects, or is this a mid-level analysis with additional analysis to be required closer to implementation?

After studying information on the Project Website, it is not clear what a Master Development Plan actually is at this time. There are "MDPs" listed for the past several years (with no apparent NEPA) yet this analysis is for "MDP Projects". Did annual Operating Plans go away?

Please provide links to the USFS policy directives applicable to this analysis, including Forest Plan amendments.

Please ensure one alternative clearly considers a proposal that does not require a Forest Plan amendment.

I studied the Process information on the “Storyboard” which said “YOU ARE HERE” but the scoping document states the Forest is still working to determine necessary Forest Plan Amendments. A Prescription Change is much more than changing numbers on a map. The DEIS needs to fully disclose each standard, objective, monitoring requirements that will change in each alternative. It is impossible to provide comments on the Forest Plan Amendment without full disclosure of how the Erata will read.

Please ensure the No Action Alternative assumptions include the “MDP Mitigation Measures” specified in the Land Exchange FEIS and ROD.

Please ensure the development on the 120-acre private inholding is analyzed as a connected action in this analysis.

The contractor said they would find the information and post on the website, but I could not find it so cannot comment.

EFFECTS TO COMMUNITIES

Teton Counties Idaho and Wyoming are already struggling to address several unresolved critical issues:

1. Traffic and Safety (especially bottlenecks resulting from a lack of redundancy in the transportation system)
2. Affordable housing for the working class (seasonal and year-round workers)
3. Increased property taxes that result from a boom and bust real estate market
4. Water Quality from a growing number of unregulated septic systems

TRAFFIC AND SAFETY RELATED TO RESORT EXPANSION

NOTE: Need to consider increased visitor use, full-time residents and seasonal residents)

1. Increased traffic and pedestrian safety concerns through Alta during all phases of construction and build out.
2. Ski Hill Road is the only road in and out of Alta and Grand Targhee. Is it adequate to provide evacuation in the event of a fire or other

disaster? Does the Proposed Action need to consider a second access to Alta and/or Grand Targhee?

3. Effects of Increased traffic throughout Teton Valley and connecting routes to Airports in Jackson and Idaho Falls. Need to consult with WYDOT and IDOT.
4. Increased traffic and safety across Teton Pass (WYDOT)
5. Effects of Increased crime and nonpersonal violence on social services
6. How will Teton County provide adequate police, EMS, fire and SAR services with proposed increases in population and visitor use at the Resort and in the affected communities?
7. How will the Forest Service afford increased presence to monitor, prevent and regulate increased violations of CFRs, including fire prevention, at the Resort and in the affected analysis area?

AFFORDABLE HOUSING

1. Existing residents (especially those who rent) are already being displaced by the growing popularity of short term rentals promising lucrative earnings.
2. Additional employees will require affordable housing. If housing is provided at Grand Targhee, there will be additional recreation impacts to the Jedediah Smith Wilderness. If it's not provided at the resort, there will be additional traffic concerns.
3. Need to consider the cumulative effects of already approved expansions of other resorts including: Jackson Hole Mountain Resort, Snow King, Tributary, Teton Springs, River Rim, etc.... On infrastructure and housing.

WATER QUALITY

1. Proposed action needs to include specific plans and approval for waste water treatment. The Karst geology of the area makes monitoring difficult (or impossible) therefore expansion of the wastewater treatment facilities must be included for each alternative.

Sincerely,

/s/Megan Lyons Bogle

Cc: Teton County, ID County Commissioners

Teton County, WY County Commissioners

Mayors of Driggs, Victor, Teton and Jackson