

## Grand Targhee Master Development Plan Projects, Scoping Comments

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Note that your Project website (<https://www.fs.usda.gov/project/?project=58258>) became inoperable on the morning of Oct. 12, 2020.

I was unable to send my comments via the website.

**Please confirm that these comments (sent to Rachel Frachina and Jay Pense) were accepted.**

Also, please extend the project comment period so that people who were thwarted can submit their comments.

I am deeply concerned about the proposed expansion of Grand Targhee Resort (GTR). It portends extensive and intensive impacts on wildlife, watershed, wilderness, scenic qualities, and human safety.

I have been involved in struggles with GTR development proposals since the late 1980s. It has long been clear that CTNF officials have a deep and puzzling loyalty to the resort and its private owners. GTR states what it wants and CTNF goes to bat, even at the risk of law suits aimed at CTNF's shoddy analyses and obvious biases. Wilderness, wildlife, scenic values, human safety, non-resort Forest users—all typically take second seat to CTNF's ingrained preference for GTR, and citizen action has been needed to win some protections and delays. Citizens for Teton Valley won two federal lawsuits before CTNF finally achieved the creation of an unprecedented (for its time) private inholding deep within the Forest and at higher elevation than any other development in Teton County, but much smaller in size than initially proposed thanks to citizen action.

For this current proposal, local opposition seems solid, and USFS officials should be prepared for another bumpy ride if you hold fast to this expansion proposal.

### **Project Need is biased and insufficient**

GTR's need for a competitive boost may relate strongly to over-development of ski areas in the Western US permitted by the USFS. It is a vicious circle; you keep approving expansions, leaving the resorts to seek more development as a means to attract skiers away from other places, and to pay for the development. The loser here is the land, wildlife, and people that suffer from the developments, and the resorts who reach the end of the competitive race. CTNF/USFS needs to do a thorough study of actual 'need' for expansion at GTR, objectively, in the local, regional, and national context. It is quite possible that there is no rational need at all for GTR expansion, other than the ambitions of its owners and the complicity of CTNF. Enabling the GTR owner to sell higher-priced real estate at the privately-owned base area is not a valid reason!

It is obvious that the expansion proposal should be put on hold for now, given the crises our nation, federal agencies, financial institutions, and people are facing at this time. The corona virus has devastated the economy, and it is getting worse by the week. International tourism has almost vanished, and may not return solidly even if a vaccine is produced, given the new political conflicts with China and Europe. The increasing number of disasters in the US due to climate change erodes the likelihood of life going on as we knew it in previous years. The wealth and leisure needed for expensive ski resort recreation are likely to diminish as families and federal/state/local governments struggle with losses and disruptions. And, as climate change problems intensify, the enormous carbon footprint of ski resorts and their destination visitors will become unacceptable. As droughts in the West intensify, it will become untenable to take and use water for snow-making and leisure-time developments for the rich.

A focus on maintaining a GTR that is local and small scale may be the best recipe for survival. Expanding winter and summer facilities may be a disastrous course for developers and for CTNF.

### **Impacts and Issues to address**

I strongly object to expanding the SUP area in both 'South Bowl' and 'Mono Trees' (note: what a horrible name "Mono Trees"! Does it indicate your desire to transform the natural forested landscape to a set of lone trees? Or, is it a reference to the contagious disease that perhaps someone caught in the area?)

Note that Teton Canyon is already heavily over-used and rife with management problems. It is also dearly beloved and historically significant. Allowing GTR to spill over there has a cascade of issues.

### **Wildlife.**

--Teton Bighorn Sheep are at the brink of extinction, with less than 100 sheep left in the population, divided into two separate groups. A thorough examination of effects of this proposal on the sheep and their ability to persist is needed, with review by independent and knowledgeable biologists. The best available information must be used, including how sensitive these sheep are to the sight and sound of humans. Even if you reduce the size of expansion, work to understand and conserve Teton Bighorn Sheep is needed -- CTNF badly needs to examine its practices and conditions, and update it with new conflicts, such as mountain goats hunts that were implemented this fall and are expected to continue for some years.

I was disappointed to see how apparently flimsy CTNF participation was in the Teton Bighorn Sheep and Winter Recreation workshops this past year. Please be more serious and committed to this issue!

--Wolverines.

What is the condition of the small breeding population of wolverines in the Tetons? They used to live and reproduce near Grand Targhee, and were even the subject of 4-H club projects in the late 1990s. It now appears that resident, reproducing females are gone, (as per researchers Kimberly Heinemeyer and Jeff Copeland).

Have they been inadvertently eliminated by GTR and/or other Forest permittees and uses on the Forest? The EIS needs to document what has happened, and how much of the loss is due to recreation on the west side of the Tetons. How would the greatly expanded footprint and number of people in your proposal affect the precarious fate of Teton wolverines?

--Other species of great concern are Grizzly Bear, Canada Lynx, Great Gray Owl and other owls, Northern Goshawk and other forest and cliff-nesting raptors, moose and deer.

Fragmentation and habitat loss will surely result from the 29 new miles of trails, 6 miles of new roads, tree-cutting and glading, increase of infrastructure, and a doubling of the number of users.

Do not turn this area into a sacrifice zone!

The expansion will result in a huge band of human disturbance extending from Teton Canyon to South Leigh. This will surely impact many species and individual animals, and result in the disappearance of wildlife, a phenomenon that is so apparent over much of the world in recent years.

CTNF managers and decision makers should think very hard about the legacy they are leaving if they move ahead with this radical proposed expansion.

### **Wilderness**

Expansion into 'South Bowl' is likely to adversely affect the Jedediah Smith Wilderness. This rather small Wilderness already suffers heavy use impacts, particularly since Grand Teton National Park began charging backpackers for overnight stays within the adjacent Park.

The EIS needs to carefully examine and disclose current conditions and the many potential impacts on

Wilderness, including:

- increased human use, summer and winter;
- increased violations of Wilderness currently and under this proposal (mountain bikes, motorized vehicles)
- increased potential for wildlife-human conflicts;
- prohibitions on carrying backpacks on chairlifts for backpack trips into Wilderness (have former restrictions been abandoned?)
- commercial uses of the Wilderness, stemming from GTR and its partners;
- increased need for helicopter or other motorized incursions due to increased numbers of human accidents, avalanche victims, etc.
- effects on Wilderness character, including the solitude of visitors;
- light and noise pollution penetrating into the Wilderness.
- the spread of invasive plants and animals into Wilderness from the larger SUP.

### **Amendment of Forest Plan**

The scoping letter discloses that CTNF plans to revise its Forest Plan to accommodate the expansion, ditching ‘Visual Quality Retention’ for 1200 acres through amendment, and seeking any other amendments that “may be required as a result of the Proposed Action”. You have apparently pre-decided to change the Plan, doing ‘whatever’ GTR needs or wants. Is it that easy to change a Forest Plan, to suit one permittee? USFS credibility is seriously at risk here, and I hope this generates lawsuits should you go this route of cooking the Forest Plan for the benefit of a developer.

### **Watershed**

The Teton Range generates water for probably millions of downstream users, and local residents rely on the stability of the mountains and groundwater for their very lives. Analyze and disclose the impacts of water use, snow-making, forest clearing, roads, and any other factors that affect hydrological and watershed conditions.

### **Wildfires**

Most wildfires in the West are now known to be human-caused. How much will doubling the human use of this remote area, particularly in summer and fall, increase the potential for deadly wildfires? How will large numbers of people be evacuated if a fire blows up?

How much need for ‘fuels management’ will this proposal engender, and how will it affect wildlife and scenic values? Who do you expect to pay for it? How many acres and how many years of projects?

### **Safety**

Risks to human safety will be much expanded by this proposal, including increased wildfire risks, construction/maintenance activities, accidents, etc. At the end of a steep mountain road, this inholding is a disaster waiting to happen.

Can Ski Hill Road and the Alta community handle the increased amount of traffic that expansion will generate? Detailed analysis and disclosure are needed. Take into account the many traffic problems on-going in Teton County, WY and evaluate the likelihood that funding would be available for yet another road improvement in northwest Wyoming, especially for a problem so obviously self-imposed on our area by USFS decisions.

Recreation users within and outside of enlarged ski area boundaries are highly at risk, although most probably will not know this. Search and rescue is uncertain in this mountainous area, and resources are stretched by the large number of incidents on the east side of the Tetons (which gets higher priority than the ‘Idaho side’?). There is confusion between Idaho and Wyoming agents, who argue over who is doing what.

You must remember the lost GTR skier who died just a few hundred yards from a Forest road on the CTNF some years ago, due the negligence or spite of Idaho Search and Rescue, Wyoming's failure to know or care what the situation was, and CTNF's failure to see how skiers could become confused at the north boundary of GTR.

What reassurance can you give that CTNF and its partners will be able to deal with all the human safety issues of a much-expanded resort? It is obvious that National Forests are very short of money and staff. Relying solely on the non-profit ski owners and their contractors to be responsible has many limitations, as you must know. Your oversight of operations and conditions is necessary – do you have the resources for it? Will you take responsibility for the problems, death, and suffering that result from large expansion?

**Highly inappropriate development**

The proposal to build a fancy restaurant at the summit of Fred's Mountain and another at the top of Sacajawea Lift should be rejected outright. The existence and impacts of these buildings are not acceptable in the high Tetons where they will be visible for miles and will contribute a host of problems for this high-elevation environment.

In closing, I urge to drop or at least delay the proposed SUP expansion. In this time of uncertainty, planning for huge growth at GTR is reckless and a waste of your shrinking resources. If GTR needs improvement, it should be done within the boundaries of the current SUP, and with consideration of how to balance rather than compete with the Teton Village resort on the east side of the Tetons. We need, more than ever, careful consideration of the many pressing issues our region is facing and understanding of the complex context for development projects.

Debra Patla