**To: Mel Bolling, c/o Jay Pence,**

**Teton Basin District Ranger,**

**P.O. Box 777, Driggs, ID 83401**

**RE: Grand Targhee Master Development Plan Projects**

**Environmental Impact Statement (EIS)**

Scoping Comments of

Michael B. Whitfield

**STATEMENT OF PURPOSE AND NEED for the Proposed Grand Targhee Resort (GTR) Expansion**

The statement of purpose and need appears to hold an inherent bias toward allowance of Grand Targhee Resort Expansion proposals; it appears to rationalize all the proponent’s demands for resort expansion. There are no data that support a need for permit expansion based upon available ski terrain. Skier density on current terrain is relatively low. The 2018 Master Development Plan (MDP) indicates that the existing terrain matches the market demand. There remains considerable unused opportunity for GTR to expand skier services within the currently permitted ski area boundary. Considerable approved ski lift and other resort infrastructure within the existing permit area and private land at the resort base has not been built. In recent years GTR skier visitation has been limited by parking lot availability, not by availability of ski terrain.

I suggest independent financial analysis through the EIS of the following questions regarding Purpose and Need:

Does skier demand justify resort boundary expansion as well as the newly proposed projects?

What is current skier density and terrain distribution in relationship to ski industry standards?

Does the proponent have the financial capacity to develop approved infrastructure within the existing permit boundary? What impact would completion of approved development within the existing ski area boundary have on resort viability?

Does the proponet have the financial capacity to develop the additional infrastructure requested in this proposal?

**WILDLIFE VALUES, TETON CANYON**

The EIS must carefully consider how the Proposed Action and other alternatives will impact wildlife. The terrain expansion proposals will impact native ungulates, wolverine, sensitive owls, and many other species. Teton Canyon’s south exposed slopes (north side of canyon) have long been recognized as vital winter range for many native ungulates including bighorn sheep, moose, mule deer, and elk. I personally monitored mule deer winter use transects in Teton Canyon 45 plus years ago for the U.S. Forest Service at a time when mule deer numbers in Teton Canyon were much higher than they are today. Teton Canyon winter range was considerably compromised by construction of the Grand Targhee Resort road in the later 1960s. In more recent years the canyon bottom has become extremely popular for cross country skiing and other winter and summer recreation activities. These past impacts place a premium on protection of the remaining wildlife winter and summer range opportunity on the canyon’s south exposure, including the area proposed for GTR boundary expansion. The proposed ‘South Bowl’ expansion area includes big game seasonal habitat for all these ungulate species, including winter range, birthing and summer range, and migratory pathways to lower elevation habitats and mineral licks.

The more heavily forested area in the ‘Mono Trees” area of upper Mill Creek is also winter range for moose and nesting habitat for sensitive species such as great gray owls and boreal owls, two species that I have personally tracked in that area during past studies.

I am particularly concerned about impacts on the sensitive native Teton Range Bighorn Sheep population. The Teton Range bighorn sheep population is small in numbers, has a restricted range, and lacks connectivity with neighboring herds. As such, the Teton Range bighorn sheep herd at risk of extirpation. Additionally, recent research has shown that winter recreation is an additional threat to long-term bighorn persistence. The proposed expansion of the Special Use Permit area would impact occupied bighorn habitat. The proposed area of proposed expansion into Teton Canyon is occupied by bighorns in spring and summer. Summer construction in this area would likely result in habitat nonuse and fragmentation for bighorns. Moreover, once the area is “developed” summer public use will inevitably increase due to the trails and roads planned for development of ski lifts etc., exacerbating the above disturbance. It can reasonably be anticipated that Grand Targhee Resort will eventually request authorization for full expansion of its summer recreational trails system into this area with all the resultant impacts to bighorn sheep. In addition, an important mineral lick exists below the project area in the Apostle cliffs area. Radio telemetry data document that bighorns access the mineral lick via the South Bowl, so development of this area will compromise an important bighorn movement corridor. Remote cameras have documented a significant portion of the bighorns in the area using this lick. Managers and researchers agree that such mineral licks are vital to wild ungulate health. With increased public use, access to the mineral lick will be severely compromised. There is documented high quality winter habitat on the south slopes of Teton Canyon. Development within this area would result in a direct loss of winter habitat, which is already compromised and minimized across the Teton range due to winter recreational activity. In recognition of Teton Canyon’s winter habitat value and potential, the Caribou/Targhee National Forest has entered into agreement with Wyoming Department of Game and Fish to complete vegetation treatments, specifically prescribed burning, in this area. We would encourage the Forest Service to optimize the value of the southern exposure of Teton Canyon for wintering bighorn sheep in consideration for this population’s habitat limitations. The proposed Grand Targhee Resort expansion into the southern exposure of Teton Canyon will extend to the Jedediah Smith Wilderness Boundary. This expansion will likely encourage incursion of recreation pressure into bighorn habitats within the Wilderness that is not compatible with the well-being of the bighorns and subsequently is not compatible with the Caribou/Targhee Naitonal Forest Plan.

Suggested questions for the EIS regarding wildlife:

How will the EIS address the cumulative impact of the proposed GTR expansion activities in addition to other recreation activities in Teton Canyon on the area’s wildlife?

How will the proposed terrain expansion impact wintering and summering bighorn sheep within the highly threatened Teton Range Bighorn Sheep population? Will these actions threaten bighorn population viability and/or opportunity for bighorn population expansion and recovery?

How will GTR expansion projects impact sensitive species? How will the Forest Service ensure that sensitive species do not become locally threatened or endangered because of Forest Service actions?

Will the GTR expansion projects impact local biological diversity?

How will the proposed GTR expansion projects impact the Caribou/Targhee National Forest’s specific Forest Plan requirements regarding bighorn sheep to:

1. Maintain or improve big game winter range

2. Coordinate with Grand Teton National Park and the Wyoming Game and Fish Department in the

 management of the bighorn sheep population and habitat

3. Provide for recreational activity while maintaining the integrity of crucial wildlife habitats

4. Work with the Intermountain Research Station to establish a research project to study the effects

 of recreation on bighorn sheep in the Teton Range subsection

What steps will the Caribou/Targhee National Forest take to monitor conflicts arising from the GTR expansion projects on wildlife within and adjacent to the proposed expansion terrain?

**ADDITIONAL QUESTIONS TO CONSIDER IN THE EIS:**

**Roads and Transportation**

Will increased vehicle traffic on Teton County, Wyoming and Teton County, Idaho roadways lead to congestion, air pollution and degradation of state highways and county roads.

Will increased use of alternate routes to Grand Targhee Resort lead to higher traffic counts, dust, accidents, and degradation of rural roads as well as the quality of life for the community members living along those routes.

Will increased traffic result in increased wildlife-vehicle collisions and greater barriers to wildlife crossing of transportation corridors.

**Recreation Impacts, Teton Canyon**

Teton Canyon currently receives a high level of year-round recreational use.

How will the proposed expansion impact existing recreation opportunity and quality and will it increase recreational use impacts to visitor experience, wildlife and other natural resources.

**Wilderness Impacts, Jedediah Smith Wilderness**

GTR expansion into Teton Canyon will greatly expand the resort boundary with the Jedediah Smith Wilderness without natural barriers like the substantial cliffs currently protecting the adjacent Wilderness along the backside of the resort.

Will GTR expansion place new and inappropriate pressure on the Jedediah Smith Wilderness and Wilderness resources?

How will the Caribou/Targhee National Forest meet Forest Plan guidelines for Wilderness protection, to include maintenance of the natural diversity of wildlife species with no displacement of wildlife during critical periods (winter and birthing), and only temporary displacement during noncritical periods?

**Affordable Housing, Teton County WY and Teton County, ID**

Both Teton County, WY and Teton County, ID have a critical lack of affordable housing for working families.

What will the impact of a major resort expansion at Grand Targhee be on the affordable housing shortage?

How will Grand Targhee Resort house its expanded workforce?

How will this major resort expansion impact housing opportunity for current workers who are employed in county government, the hospital, school district, businesses, and non-profit organizations when there is already a housing shortage?

**Air and Water Quality**

Both Alta, WY and Driggs, ID depend upon drinking water sources in Teton Canyon.

What will the impact of runoff for construction and wells for snow making and resort infrastructure have on residents of Teton Valley, ID and WY?

What will the impact of increased wastewater at the resort be on downslope water users and the overall water quality in the Teton River watershed? What cumulative impact with facility expansion at Grand Targhee Resort and the increased off-site development it motivates have on the Teton River watershed?

Will increased water usage impact water availability and aquifer recharge in the Teton River watershed?

What will the increased traffic and enhanced carbon footprint at Grand Targhee have on Teton Valley’s air quality?

**Teton County, ID and WY County Services**

What will the impact of increased solid waste (construction materials, household and hotel/food service waste, recycling, hazardous waste) be on Teton County, Wyoming, and Teton County Idaho?

How will the GTR expansion impact the Teton County, Idaho Transfer Station during construction and as a result of higher visitation, overnight accommodations, food services, and increased numbers of area residents?

How will the GTR expansion impact Teton County emergency services in Teton County, Idaho and Wyoming, to include visits to the Teton County hospital, calls for ambulance/fire, calls for life flights, search and rescue efforts, particularly in the expanded area in Teton Canyon with associated avalanche hazards, and increased services from both County Sheriff's offices?

**Night Skies, Light Pollution**

How will GTR’s proposed actions with anticipated increases in light pollution impact Driggs and Victor are Dark Sky Community provisions, the integrity of the night sky in Teton Valley, and uninterrupted dark skies at night on nearby National Forest and National Park lands?