

Mr. Jay Pence, Teton Basin District Ranger
Mr. Mel Bolling, Forest Supervisor
Caribou-Targhee National Forest
Driggs, Idaho 83422

October 12, 2020

Re: Grand Targhee Master Development Plan Projects

Submitted electronically: <https://www.fs.usda.gov/project/?project-58258>

Gentlemen,

Thank you for the opportunity to submit Scoping Comments regarding the upcoming Environmental Impact Statement (EIS) for the proposed expansion of Grand Targhee Resort (GTR) located in the Caribou-Targhee National Forest (CTNF). I appreciate that the CTNF is conducting an EIS review of this proposal. A project of this magnitude deserves nothing less than a full, comprehensive analysis with ample opportunity for public involvement afforded by an EIS process.

I have been involved with the development and expansion of GTR for several decades, first as a Board member of the Jackson Hole Conservation Alliance, then for 13 years as the Alliance's Executive Director (now retired) and recently as a private citizen and Board member of Wilderness Watch- a not-for profit wilderness advocacy organization dedicated to keeping wild the nation's 111 million-acre National Wilderness Preservation System. Wilderness Watch is based in Missoula Montana with offices in Idaho and Minnesota.

These comments are also being submitted on behalf of Wilderness Watch and I ask that they receive all future documents and announcements concerning the GTR EIS process. Please do so by adding Wilderness Watch to your correspondence list via George Nickas, Executive Director: gnickas@wildernesswatch.org.

I am opposed to GTR's requested 1,200 acre expansion of the current Special Use Permit (SUP) area as well as many of the upgrades GTR is requesting for their existing 2,500± acre SUP.

The Setting

The 120 acres GTR base area is family-owned and managed and operates under the jurisdiction of Teton County, Wyoming. The current "on the mountain" SUP is defined by a lease agreement between the CTNF and GTR and consists of approximately 2,500 acres of ski and summer recreation terrain and is therefore subject to NEPA processes whenever significant use changes are proposed, as in the current request.

The complete 2,620-acre GTR is situated in a very unique location and environment within the Greater Yellowstone Ecosystem. This unique situation is verified by the designations of the lands surrounding the resort and the native wildlife occupying those lands.

First, as described in the 09.22.2020 "GTR EIS Scoping Letter" the two, 600-acre expansion areas, Mono Trees and South Bowl are currently designated as "*management prescription 2.1.2: Visual Quality Maintenance.*" (p.3.) This prescription emphasizes: "*maintaining the existing scenery within major travel corridors with high quality natural vistas,...*" and its goal is to:

1. *Manage travel corridors to protect the natural visual quality.*
2. *Manage in an environmentally sensitive manner to promote the production of non-commodity resources at varying levels, and limited commodity production.*
3. *Manage to provide various dispersed recreational opportunities.*
4. *Interpretive opportunities are provided to enhance visitors' experience."*

As stated in the Scoping Letter, to accommodate the change in use of these two areas a Forest Amendment will have to occur. I (and wilderness Watch) look forward to being informed of and taking part in this endeavor as it proceeds.

The existing SUP and the proposed South Bowl expansion area also share a boundary with the Jedediah Smith Wilderness (JSW). A conservative estimate puts the length of the current boundary separating the SUP and the JSW at about 2.7 miles. The proposed expansion would add another 2 miles, putting the total shared boundary at approximately 4.7 miles.

GTR also lies less than four miles west of Grand Teton National Park (GTNP), with the land between the two being a remote, rugged portion of the JSW.

The 1984 Wyoming Wilderness Act prohibits Buffer Zones around the newly designated Wilderness Areas, including the JSW. However, it should not mean that the expected increase in human entry to the JSW can be ignored and likewise, it should not mean that a consideration of offsetting mitigations should not occur. Proper land and resource stewardship should always be the goal of any federal land management agency.

The existing GTR SUP and its 1,200-acre proposed expansion areas lie within occupied grizzly bear habitat and within the threatened grizzly bear's Demographic Monitoring Area (Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem. 12/2016, p. 17).

Likewise, GTR and the proposed expansion areas lie within the range and predicted distribution of the threatened Canada lynx (Wyo. Species Account. 2000. 9 p.). GTR also lies within occupied wolverine, gray wolf, mountain lion and black bear habitat.

In addition, the resort and the proposed expansion areas exist in historic bighorn sheep range and are immediately adjacent to currently used bighorn winter range overlooking Teton Canyon. These bighorns are part of the Teton Range Bighorn population described by the Teton Range Bighorn Sheep Working Group as a population *"at a breaking point where the management agencies must take conservation actions soon or risk losing the population."* (The Teton Range Bighorn Sheep Herd Situation Assessment. 01/2020).

The point of this is that the current 4.1 square mile GTR and the proposed 1.9 square miles expansion areas are carved out of extremely important, if not critical habitat for a number of iconic native wildlife species.

To put GTR's expansion proposal into a social perspective, the new GTR would occupy approximately 6 square miles of land with critical wildlife values. By comparison, the nearby town of Driggs Idaho occupies approximately 2.9 square miles of land and had a 2018 population of about 1,900. The amended master plan for the privately owned 120 base acres permits a residential build out of 450 units (Grand Targhee First Amended Master Plan. Teton County, Wyoming. 02.12.2019 p. 5). Assuming 2.0 or 3 people per unit, the resort base could house upwards of 900 to 1,350 people, or a "community" half- or a bit larger than half the size of Driggs- a developed recreation-based community several miles deep within the midst of some of the most pristine and ecologically intact wildlands in the region.

In addition, the proposed expansion would boost the current 3,000 daily Comfortable Carrying Capacity (skiers comfortably supported on the hill) to 7,000. On a great snow day the resort could easily have a population several times greater than the Town of Driggs. And very likely, the summer's daily visitor numbers will produce a population rivaling that of Driggs. By comparison, these expanded numbers would put GTR at nearly the same levels of use as The Jackson Hole Ski Resort on the east side of the Tetons, in Jackson Hole. And let us not forget that besides the expanded GTR being

surrounded by an outstanding scenic and ecologically critical landscape, it will be sharing a 6-mile border with a Wilderness Area. These factors alone make it difficult- if not impossible to mitigate or justify the requested expansion.

Clearly, GTR's expansion proposal is incredibly significant and deserves a complete, thorough and deliberate EIS process- **not one restricted by numbers of pages or by time to prepare.**

Scoping Specifics

Base issues that require analysis-

- * Provide detailed information on **current** winter and summer visitation/use and how this relates to current infrastructure capacity
- * Provide best estimates of increases in **future** winter and summer visitor uses based on the proposed build-out of the two proposed expansion areas and the proposed new developments within the current SUP area
- * How will build-out of the current proposal impact:
 - Visitor parking space and the increase in impermeable surface and runoff
 - Traffic on Ski Hill Road- trips per day
 - Mass transit capacity
 - Water and sewer capacity and treatment within the SUP and within the proposed expansion areas, particularly regarding restaurants, the yurt, the on-mountain cabin(s) and other proposed South Bowl facilities
 - How will construction of restaurant facilities and other structures impact visual experiences of visitors in the JSW and GTNP- "visual sky lining"
 - Fire protection capabilities
 - Law enforcement capabilities
 - Workforce housing capacity, both on and off-site
 - Electrical power supply capabilities (will this require new or enlarged transmission corridors across public lands?)
 - How will the build-out of the proposed elements impact "dark skies" within the resort, from the JSW, GTNP and Teton Valley Idaho
 - How will build-out and subsequent uses and events at GTR impact the sound-scape of the surrounding public lands, particularly the JSW
 - How will anticipated build-out impact air quality on site and beyond
 - How will anticipated build-out impact down stream water quality, volume and water users
 - How much land will be modified to accommodate new ski runs and how will run-off be managed
 - How much land will be disturbed to construct new trails and roads
 - How will disturbed sites be rehabilitated
 - What plant species will be used to re-vegetate disturbed areas
 - How will invasive plant species be controlled- short and long-term
 - What will be CTNF's staff and resource level commitment (financial cost) required to oversee development and long-term use of the new and complete SUP
- * What type and level of public use currently occurs on the two proposed expansion parcels (South Bowl and Mono Trees) and how will converting them to GTR SUPs impact those uses
- And how will build out impact adjacent public lands beyond the JSW

Broader landscape issues requiring analysis-

- * Provide detailed analysis of **current** winter and summer visitation/use and how this is, or is not impacting the ecological integrity of the lands beyond the current SUP
- * Provide analysis of what impacts can be anticipated with build out at the proposed levels
 - What are the anticipated impacts of the increased visitation and use to the trails, camping areas, human refuse and to the wildlife within the JSW and beyond
 - What, if any mitigation plans can be implemented to offset these impacts
 - Will GTR provide personnel and funding for these off-site mitigations

Wildlife species that require analysis-

There are an unknown number of organisms that inhabit the landscape within and surrounding the GTR and clearly not all can be addressed. However, there are a number of species that act as “umbrella species” in that how they prevail often portends how other species will prevail because of their existence under the larger landscape umbrella provided by other species. Therefore, only a few that rise to the level of “umbrella species” or “species of concern” will be mentioned. These will require detailed analysis, perhaps reaching the level of full Biological Assessments. For those species listed under the Endangered Species Act (ESA), a U.S. Fish and Wildlife Service Consultation will be necessary.

* Species listed under the ESA:

- Canada lynx (particularly in regards to: “Northern Rockies Lynx Management Direction Final Environmental Impact Statement (03.2007)”)

- Grizzly bear

* Species of concern:

- Bighorn Sheep

- Moose

- Elk

- Mule Deer

- Wolverine

- Gray Wolf

- Mountain Lion

- Black Bear

- Pine Martin

- Goshawk

- Great Gray Owl

- Golden Eagle

- Peregrine Falcon

- White Bark Pine

* Conduct plant, small mammal, bird, amphibian and reptile surveys of the two 600-acre expansion areas

I have a request specifically dealing with the economics of GTR’s proposal. What is the current annual lease fee (percentage of gross and dollar amount over past five years) that GTR pays to the U.S Forest Service and how is this anticipated to change with full development/build out of the current proposal? These are public lands and how they are managed and the economics of management are of public interest and this information needs to be made available to the public- the owners of this extraordinary land that a private entity wants to further develop in order to increase their own, personal income stream.

These comments and recommendations should not be considered all-inclusive, but only a highlight—a beginning point from which other concerns need be included.

In conclusion, please address at minimum the above mentioned concerns in the most thorough and credible means possible. I have grave concerns that no mitigation can offset the anticipated impacts posed by GTR’s proposed expansion plans, consequently I look forward to a comprehensive Draft EIS.

Respectfully,

/ signed /

Franz Camenzind Ph. D. (Board member, Wilderness Watch)

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