

## Grand Targhee Master Development Plan Project DEIS comments .

May 19, 2025  
David Susong  
2410 Falcon Creek Dr  
Driggs, ID 83422  
[dkmilsong@gmail.com](mailto:dkmilsong@gmail.com)  
435-640-0453

The subject DEIS is exhaustive and Grand Targhee Resort (GTR) and the Forest Service are commended the substantial effort that has gone into preparing it. I have some specific comments on various analyses and a preferred alternative based on the my review of the analysis.

### Hydrology:

GTR is located on top of a large karst aquifer system. The most significant hydrologic impacts from the proposed actions will likely be to groundwater systems. The springs from this aquifer system are used for public water supplies as noted in the EIS. Anecdotal reports indicate that sediment reached the Alta spring following the installation of the Sacajawea Lift. Karst aquifers are characterized by cavernous flow systems that respond rapidly to surface inputs. To protect water supplies dye trace studies should be conducted to examine flow paths and travel times before any work commences. Extensive BMPs will be required as noted in the DEIS. I am uncertain why they are not recommended for areas underlying by the Madison Limestone. Surface disturbance will likely affect it as well as other units. Any on mountain sewage treatment systems for new facilities have the strong potential to impact groundwater. Over much of the GTR area there is a thin veneer of soils over bedrock. Engineered septic systems will also likely be problematic. Alternatively, constructing sewage lines across the mountain to the base sewage treatment plant will create a linear infiltration trench for enhanced flow into the underlying karst aquifers. The proposed Mono Trees lift will be in the bottom of the Mill Creek drainage which will increase the likelihood of impacts to the streamflow, water quality and potentially the groundwater system. The DEIS minimizes these potential impacts with proposed simple engineering solutions which are difficult to maintain and often fail over time. This could contaminate municipal water supplies.

### Scenic view analysis:

Scenic view analysis were conducted locations in GTNP, the CTNF, and in Teton Vally. With each view, a time is associated the view, ie. the view would be seen by a viewer for seconds to minutes. These times seem to be grossly underestimated In many of the view analysis. For example, the view analysis from Table Mountain in the JSW indicates the view of the South Bowl infrastructure for would be for a few minutes. In reality, if one is walking down the trail from the summit of Table Mountain you will be looking directly at the South Bowl area for a few hours depending upon your hiking pace. The Hastings Lane analysis has a viewing time of seconds. This true if you are driving on Hastings Lane. However, what if you are walking your dog or live Hastings Lane? Residents will see that view continuously through the day from their bedroom, kitchen, living room, deck or lawn. This will be a much more significant impact. The time of day is also extremely important in the visual analysis. GTR is in the shadow as the sun rises and illuminated in the afternoon and at sunset. The visual analysis needs to be revised to account for actual use in each view. If this is done it will significantly increase the impact of the proposed infrastructure. The expansion of the ski area boundaries appears to be in conflict with the existing Forest plan's scenic protections and encroachment on the JS wilderness.

#### Improvement of public safety in South Bowl

The DEIS suggests that public safety will be improved with the construction of the South Bowl lift. This is a strange argument that is logically challenging. Current users of the South Bowl area are back country skiers and yes, there are avalanche hazards and other risks injury. But does this justify the installation of a lift in the area to improve public safety. What public are we talking about? A similar analogy might be: there is a mountain trail with rocks and roots and people could slip, stumble or fall and be injured. Thus in the name of public safety to prevent this risk of injury, we should pave the trail. I suggest removing this discussion from the DEIS. Is is nonsensical.

#### Uncertainty of model predictions and forecasts:

There are numerous model projections in the DEIS for future resort growth (annual skier visits), daily traffic volumes, parking, and economic impacts and there is no uncertainty associated with the projections. These numbers are used to support or justify the proposed development without any evaluation of the uncertainty of the numbers. If annual skier visits are projected to be 270,342 for a future year, this implies that the uncertainty of this number is plus or minus 1. In reality, the actual number could be plus or minus 1,000, 5,000, 10,000 or 50,000. The reader has no context of the uncertainty in these numbers and thus rendering the number difficult to assess and compare. At a minimum the numbers should be rounded appropriately and uncertainty explicitly expressed. It is nearly impossible to comment on the validity of the projections without associated uncertainties.

#### Socioeconomics - Job creation:

It is important to differentiate between types of jobs created to assess socioeconomic impacts. Permanent full time, permanent part time, full time seasonal, part time seasonal, and J1B visa seasonal jobs all have different socioeconomic impacts. If the analysis is only on full time equivalents then this glosses over many of the community impacts. For example, there are different housing or transportation needs for a full time permanent employee than for a J1B visa holder.

The socioeconomic effects of the GTR on Teton Valley are substantial and discussed at length in the DEIS. I will leave comments on them to others but my comments on uncertainty above applies widely to the socioeconomic analysis.

#### Bighorn Sheep:

The interagency Teton Bighorn Sheep Working Group is advocating voluntary winter recreation closures for the north side of Teton Canyon including the South Bowl area, <https://www.tetonsheep.org/>. Although sheep habitat is identified in the SB area in the DEIS, the DEIS does not acknowledge or discuss the recommended volunteer winter recreation closures in the area from the Working Group. This is a significant conflict between the DEIS and the recommendations of the Working Group that needs to be resolved. It is discussed in the supplemental biologic analysis section but not mentioned in the main body of the DEIS. This is a significant oversight. To recommend on disbursed recreation group voluntarily not use an area and propose expanding a ski area into the same area is at best nonsensical.

#### Preferred Alternative: Alternative 3, No SUP expansion

I have attempted to review the DEIS and synthesize the results and evaluate the Alternatives. Based on my review, I strongly support Alternative 3 - SUP no expansion as the final preferred alternative. Alternative 3 allows for some continued development of visitor services and attractions and lifts at the resort while also minimizing the environmental impacts. Alternative 3 minimizes wildlife impacts, surface disturbance, hydrologic impacts (see exception below), impacts on wilderness and GTNP, and visual impacts. It requires the least number of amendments to the Forest Plan. With Alternatives 3, the socioeconomic impacts will continue to grow with growth in resort use but these can be minimized with coordinated phased

development. In Alternative 3, I have serious reservations about the mountain top restaurants. There will be significant visual impacts. Also, the difficulty of installing septic systems or sewage lines over a karst aquifer system is glossed over in the DEIS. Relying on vault systems for 6,000-10,000 sq/ft buildings seems impractical and opens up number of other issues like the disposal of grey water. Please consider these issues carefully and perhaps remove mountain top restaurants from Alternative 3. The GTR base area needs considerable investment and upgrading and new food services could be placed there and minimize impacts on the mountain.

The statement of need for proposed alternative justifies the project because it is necessary to maintain competitiveness with other destination ski areas. In this justification it notes that Jackson Hole Mountain Resort currently has about 2500 acres and Targhee Resort has 2600 while JHMR has about 750,000 skier visits and Targhee has about 250000. Targhee has of plenty of ski able terrain to compete with JHMR yet is sorely lacking in modern base infrastructure. The base area has been described in news reports as run down. Alternative 3 allows Targhee Resort to improve its infrastructure to maintain competitiveness while minimizing impacts to Teton Valley and the Caribou Targhee National Forest and adjacent wilderness.