

Statement of purpose and need. The statement of Need is incorrectly focused on what GTR wants to accomplish on federal land. The need for the EIS should instead focus on the Forest Service's obligation to assess whether granting the SUP would be in conformance with the Forest Plan and other requirements and would benefit public use and access to forest lands. Please revise the statement of purpose and need to describe the government's need for the proposed action, not GTR's.

No Action Alternative. It is clear that certain development activities are underway at GTR as this EIS process is ongoing. The no action alternative should describe what activities will be taking place at GTR under previous studies/agreements to provide context for the additional projects proposed under the action alternatives.

There are other spots in the DEIS analysis where the interconnectedness of the ongoing actions and proposed actions is not addressed. These include the analysis of transportation and parking impacts, vegetation disturbance (particularly WBP which was listed as threatened after the DEIS was commenced), and effects on wildlife. The project description for the ongoing approved development at GTR is sometimes included in the cumulative effects analysis, but it may not be current. There is a reference to a project agreement with Teton County WY that was to expire in February 2024. Please revise the analysis to address the interconnectedness between ongoing and proposed actions, and to conform it to current plans/actions.

Analysis of impacts to wildlife, specifically bighorn sheep. The monitoring for bighorn sheep done in support of the analysis was inadequate. The trail camera study was hampered by equipment issues. Nevertheless, the study documented use of the South Bowl by bighorn sheep, including use to access a mineral lick. This population of bighorn sheep is being monitored and protected through other ongoing efforts. To encroach on bighorn sheep habitat would be at cross purposes with these conservation efforts. Any impacts to this resource must be avoided and actions involving development in the South Bowl should not be part of the agency's decision because of these impacts. Impacts to bighorn sheep outweigh benefits to the public and cannot be mitigated.

Whitebark Pine (WBP). WBP is now listed as threatened. The impacts analysis under the no action alternative indicates that WBP may be lost through ski area management practices. This loss to WBP under no action should be quantified so that comparison can be made to the loss of WBP under the action alternatives.

The amount of unmitigated WBP disturbance needed to support development in the South Bowl is significant. These impacts should be avoided by deciding against any development into the South Bowl.

Transportation and parking. The impacts analysis for parking and transportation under the preferred alternative show that there will be a shortage of about 900 parking spaces. This means 900 cars on the road to GTR with no place to park. The indirect effects of the parking shortage are not analyzed adequately. There will be effects on (at least) traffic congestion,

employee access, public safety, emergency response, and pedestrian safety, No decision should be made until the significant effects of parking shortages are analyzed and mitigation of these significant impacts is identified.

The cumulative effects analysis for the parking indicates the effects would be less if certain planned projects are implemented, but these are not part of the proposed action.

Socioeconomic impacts. The analysis of socioeconomic impacts is inadequate. The indirect effects of implementation of the alternatives on development and growth in the area are not addressed. For example, what population increases and numbers of new housing units can be expected if the proposed action alternative is selected? The analysis should assume increased growth due to the attraction of a major winter/summer resort nearby and look at these additional impacts.

Environmental justice. The proposed actions could have disproportionate impacts to low income and minority populations in the area. The impacts of the proposed action and alternatives on low income and minority populations should be addressed, particularly with regard to socioeconomic impacts. This is a particularly important issue given the type of high cost recreational development being proposed, and the potential impacts on a small, rural community. If impacts are ignored, so is mitigation of those impacts.

General comment: use of Project Design Criteria (PDC) It is reasonable to include project design criteria into the description of the alternatives. However, in those cases where PDC are intended to provide mitigation of impacts, they should be made enforceable through a Mitigation Action Plan issued with the ROD. The public should be assured that the selected decision will be carried out in accordance with the necessary mitigation.

Description of proposed action and alternatives in DEIS. The proposed action and alternatives lack any type of timeline or sequencing for implementation. I commented during scoping that the alternatives were difficult to understand in terms of their impacts on the human environment because the actions were not presented as a plan, rather, as a collection of activities. This issue has carried over into the DEIS. It is difficult to understand impacts when no timeframe for project implementation is established. The final EIS must address timing and sequencing of proposed actions. This must be carried over into the detail provided for decisions made in the ROD.

In addition, I understand that ongoing actions under previous approvals are taking place at GTR, such as the Planned Unit Development. The final EIS and ROD must address the timing of these actions as they relate to actions within the purview of this EIS and ROD so that the public has an understanding of the full scope of development plans and their impacts.