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Kim Pierson
Forest Supervisor
Caribou Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58258>

Re: Grand Targhee 2018 Master Development Plan Projects # 58258

Dear Forest Supervisor Pierson,

We appreciate the opportunity to comment on the Grand Targhee 2018 Master Development Plan draft Environmental Impact Statement (DEIS). Friends of the Teton River (FTR) works to restore and conserve clean water, healthy streams, and a thriving wild fishery in the Teton River watershed. For 25 years, our work has been grounded in sound science, community education, and cooperation with landowners, citizens, and agency partners. The purpose of this letter is to share our input on the DEIS, with a focus on the potential impacts to water resources in the Teton River watershed.

Our recommendations:

- Clarify and analyze all development activities that require amendment of the 1997 Forest Plan to ensure continued water quality monitoring.
- Provide a detailed study of water availability and impacts of consumptive use for proposed guest facilities, restaurants, and snowmaking.
- Conduct a comprehensive analysis of water quality impacts related to wastewater treatment systems.



FTR does not support Alternative 2 or Alternative 5, as currently proposed, due to the associated change in designation of the Aquatic Influence Zones (AIZs) from Management Prescription 2.8.3 (Aquatic Protection) to 4.2 (recreation) in the Mill Creek watershed, which is a source water area for the Teton Creek Spring, a public water source for the City of Driggs, Idaho.

Aquatic Influence Zones (AIZs) and Forest Plan Amendment Impacts

While the DEIS addresses hydrologic disturbance and offers general erosion control best management practices (BMPs), the analysis of specific risks to water quality from new development activities is insufficiently detailed. Given the steep terrain, erodible geology, and karst hydrogeology of the project area—as well as the project’s proximity to drinking water sources—these issues warrant more careful analysis and disclosure.

Specifically, development activities in the Mono Trees associated with alternatives 2 and 5 would require amendment to the 1997 Forest Plan and would remove protections for 125 acres that are currently managed as *Aquatic Influence Zone* (Management Prescription 2.8.3) with *Special Use Permit Recreation Site* (Management Prescription 4.2) superseding aquatic protections in this area. As noted in the DEIS “within the SUP, AIZ BMPs should be taken into consideration; however, the area is already subject to high human activity and impacts to the AIZ within the SUP are allowed” (p.337) This acknowledges the reality of significantly reducing protections in these sensitive areas that would be associated with a boundary expansion and amendment to the 1997 Forest Plan.

The DEIS fails to analyze the immediate or long-term impacts from the Mono Trees expansion on downstream water resources or clear justification for removing AIZ protections and includes plans to build a lower lift station in the current AIZ at the Mill Creek riparian area.

While BMPs are listed, the DEIS lacks detail on enforcement mechanisms for BMP implementation and monitoring. To ensure the project does not degrade water quality in the Teton Basin, we recommend that the Forest Service include a detailed water quality monitoring plan, clear thresholds and response actions if degradation is detected, and public reporting of monitoring results and mitigation effectiveness.



We strongly urge the Forest Service to:

- Retain AIZ protections wherever possible and justify any Forest Plan amendment with a detailed impact analysis
- Require enhanced setbacks or alternative facility siting outside AIZs.
- Provide a detailed water quality monitoring and reporting protocols for any change in Management Prescription, with clear responsibilities for Grand Targhee to carry forward best management practices, during a time of reduced capacity of Forest Service agency personnel.
- The FEIS should include site-specific watershed assessments (for the Mill Creek watershed and others impacted by proposed actions) and comprehensive mitigation strategies to address impacts.

Consumptive Water Use

We have concerns that the DEIS does not include analysis of consumptive water use, particularly in the context of ongoing water supply limitations and regulatory constraints in the Upper Snake River Basin. While the DEIS briefly discusses snowmaking and other development-related water uses, it does not sufficiently analyze the cumulative consumptive use of the proposed project and whether Grand Targhee Resort has secured the necessary legal and physical water rights to support long-term operation.

Under all action alternatives, including Alternative 3, the DEIS estimates snowmaking coverage over 57 acres requiring new groundwater wells, but fails to clearly quantify the net consumptive loss—that is, the percentage of diverted water not returned to the watershed. Peer-reviewed research indicates snowmaking can result in **6–30% water loss**, depending on environmental conditions and system efficiency.¹

¹ Grünewald T and Wolfsperger F (2019) Water Losses During Technical Snow Production: Results From Field Experiments. *Front. Earth Sci.* 7:78.



In October 2022, the Director of the Idaho Department of Water Resources (IDWR) issued a new moratorium order on processing new water right applications for surface and ground water in the Snake River Basin.² The order covers an area including tributary basins in the upper Snake region including the Henry's Fork/Teton watershed. In essence, the order determines that the Snake river, its tributaries and ground water aquifers are largely fully appropriated except in limited circumstances.

Approving new consumptive uses in the headwaters of an overallocated interstate basin may be inconsistent with broader water management goals and requires further study of physical and legal water availability.

We strongly urge the Forest Service to:

- Provide documentation of total cumulative consumptive use including snowmaking and domestic use in the Final EIS.
- Coordinate with the Idaho and Wyoming State Engineers, and include a discussion of how the proposed project impacts downstream water users and complies with the Snake River Compact (1949), Roxana Decree (1941), the Swan Falls Agreement (1984), and the Expanded IDWR Groundwater Moratorium (2022).

Wastewater Treatment Systems

The DEIS describes the karst geology of the project area and acknowledges “these areas are characterized by springs and underground caves in which hydrogeology can be vulnerable for contamination”(pg. 341). The DEIS does not adequately assess the potential for nutrient migration through fractured rock or karst systems to impact nearby springs or wells. The DEIS states that wastewater treatment systems will be designed based on “engineering recommendations”(pg. 29 & 30). We believe there is sufficient evidence about the vulnerability

² Idaho Department of Water Resources. (2022, October 21). *IDWR Director expands moratorium on new Snake River water rights from Upper Snake region to Swan Falls gage at Murphy, including tributaries* [Press release].



of the hydrogeologic setting to warrant a commitment from Grand Targhee to use sanitary sewer lines piped to a central wastewater treatment facility.

We strongly urge the Forest Service to:

- Request assurance that new wastewater infrastructure will meet **Wyoming DEQ** and **EPA** standards
- Request a commitment to sanitary sewer line systems connecting to the existing permitted and monitored central wastewater treatment system (WYPDES permit No. WY0024708) for proposed guest facilities.

Conclusion

Given the fundamental importance of clean water to ecological integrity, public health, and the viability of downstream water users, the Forest Service has a clear responsibility to ensure that Grand Targhee Expansion does not compromise water resources. We strongly urge the agency to include the following in the FEIS: site-specific analysis of water resource risks including monitoring and reporting protocols for areas that would see reduced protection through change in designation of AIZs identified in the 1997 Forest Plan, detailed study of consumptive water uses associated with guest facilities, restaurants, and snowmaking, and reporting on surface and ground water contamination potential from any wastewater treatment systems.

FTR does not support Alternative 2 or Alternative 5 as currently written, due to the associated change in designation of the Aquatic Influence Zones (AIZs). FTR is willing to work with the Forest Service and/or Grand Targhee to explore whether modifications can be made to alternatives that maintain AIZ protections and create reliable and transparent systems for water quality monitoring and reporting and provide clear actions plans for mitigation of water quality issues.



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Sincerely,

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