

I love Grand Targhee (GTR). I have been a season's pass holder there for the last 25 years. It is safe to say I have enjoyed trillions of snowflakes at the resort, making me snow rich. I love the vibe of being up front in line on a powder day, giving hugs, high fives and talking s#@t with my friends who are standing in line with me. I love that my daughter has the same love for GTR and how she has grown to be such a beautiful skier who can gracefully beat the others to the bottom. There is always a familiar smiling face at the bottom waiting to ride the chair back up to the top. To do it all over again. From the top of DC you can choose your adventure down and meet back up to reload. Smiles from ear to ear, spitting out snow because the smile is so big and the snow is deep and always high fives. That is what makes GTR such a special place. That is what "Targhee Vibe" means to me.

GTR has plenty of opportunities to grow within its current boundaries. It does not need to add chairs past Black Foot or next to DC. DC does need to be replaced with a new lift, not with a chondola. I would like to see the Palmer Platter built with lights for the GTSSF race kids. Although GTR is known as a powder mountain, the ski race program GTSSF is crushing the competition. I have talked to parents from other clubs in the IMD and they all say GTR is their favorite place to come for a ski race. We all know it dumps on race day. Now that GTR is a four season resort, they have expanded their business model to include summer. They are also building out the private inholding and will be selling real estate. Although this is not my favorite thing to see 3,000 square foot "cabins" being built, they will be bringing in a pretty penny for GTR. They will not fold because there is a lack of funds. There has been no study of the building out of the private in holding, and the remaining two lifts and restaurant on Peaked. Until these are finished and studies have been conducted, I ask the USFS to choose Alternative 1 no action.

### 1994 Master Development Plan

On April 14, 1994 the Record of Decision was signed for the Peaked Pod. The USFS chose alternative 4 but also added parts of alternative 6. There was no land exchange. Bannock chair would be replaced with Dream Catcher. Shoshone will become a fixed grip quad, and Blackfoot would also become a fixed grip quad. Skiers at one time (SAOT) will be increased to 5,130. Snow cat skiing on Peaked would be eliminated and replaced with four chair lifts identified as Peaked #5, #6, #7, and #8. Since approval only Peaked #5 Sacajawea and Peaked lift #6 Coulter have been built. A 7,560 foot restaurant at the top of lift # 7 Lightning Ridge<sup>1</sup>. Peaked lift #8 would go from the bottom of Sacajawea back up to the base areas. Both lifts would be instrumental in evacuating Coulter and Sacajawea if they were to break down.

"Peaked Mountain Restaurants' location was moved from where it was shown in Alternative 4 to the location shown for Alternative 6. The reason for this change was that the addition of Peaked #7 lift provided easy access to the restaurant. This location is much less exposed and consequently less visible from both within and outside the

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<sup>1</sup> Grand Targhee Resort Ski Area Term Special Use Permit April 2011 page 3

permit area.”<sup>2</sup>. With this restaurant already approved and never built the USFS should deny GTR approval of a restaurant at the top of Fred’s Mountain and at the top of Sacajawea. Both of these proposed restaurants are highly visible. The already approved restaurant is hidden from the view of the valley and Teton National Park. This location has an extremely beautiful view of Table Mountain and the Tetons. Both of the proposed restaurants at the top of Fred’s and Sacajawea propose a new well, and a septic system or a black water pipe that will be tied into the current sewage lagoon. The DEIS is insufficient in the study of the wells or the disposal of human waste. Both of these restaurants should be denied approval until there is a detailed reports about the wells, septic tanks, and leach fields, and whether the current sewage lagoon can handle the sewage. There needs to be a study conducted with tracking dye to make sure groundwater is not contaminated with sediment or feces. Alta residents have already seen sediment in their groundwater since the Sacajawea lift was constructed.

Peaked Lift # 6 Coulter lift was built and completed in 2022. This lift added 600 acres of lift-access terrain that was once cat skiing. On April 20, 2021 GTR announced in the Teton Valley News that they were building a 6-pack lift and that it would be ready for the 2022/2023 season. According to 1994 EIS and ROD, this chair “would be a ‘downsized’ detachable quad...although it would be a high speed lift, it would be designed and built to operate at a lower capacity. Specific mitigation has been added to the FEIS to prevent capacity increases<sup>3</sup>. According to the Doppelmayr website, this chair can carry 4,000 skiers per hour. This is not a downsized high-speed quad. On May 28, 2021 GTR submitted a letter requesting to build the 6 pack chairlift. The USFS updated/revised the 2017 SIR to allow GTR to build the 6 pack lift. On July 30, 2021 the USFS approved the construction of the 6 pack lift. This lift is grandiose and was not needed. A high speed quad would have accomplish that same thing. There is rarely a line on this lift. On the busiest days I have maybe stood in line for 5 minutes. Most of the time I look around and I am riding this lift alone. Since the building of the Coulter lift, The lines at the other chairs have been dispersed. The addition of 600 acres has made a massive difference in the experience at GTR for the better. According to the 1994 ROD the “...5,130 skiers at one time provides enough capacity to accommodate expected demand for the next 25 to 30 years.<sup>4</sup>. Since this lift was just built and the effects of it are still unknown. The capacity had not been reached, and I ask the USFS to choose Alternative 1, no action, until there have been proper studies of the effects of this chairlift, the unbuilt restaurant, and the remaining 2 chairs in the Peaked POD.

## Socioeconomics

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<sup>2</sup> 1994 Record of Decision GTR MDP page 5.

<sup>3</sup> 1994 Record of Decision GTR MDP page 5

<sup>4</sup> 1994 ROD GTR MDP page 5

The socioeconomic effects are already being felt in Teton Valley, Idaho. Teton Valley, Idaho, does not get any revenue from GTR. Our roads are in bad shape, and many need to be rebuilt. The roads are becoming overcrowded also. Our EMS services are being spread out thin, and it is only a matter of time before an ambulance being sent to GTR and a medical emergency somewhere else in the valley leaves our EMS services without an ambulance to respond to another emergency in Idaho. GTR needs to have its own EMS to respond to medical emergencies at the resort. Until they have their own EMS, I ask the USFS to choose Alternative 1, no action, until these services can be provided.

### Wild Land Fire

With only one way in and one way out, GTR is a fire trap. With climate change and wind-driven fires, this could be a catastrophic scenario like the Paradise Valley Fire in California. Until there is a fire evacuation plan for wildland fires, I ask the USFS to choose alternate 1, no action, until this is implemented.

### Traffic and Parking

There is not enough parking up at GTR. When the private inholding is fully built out, GTR will provide 636 day skier parking spaces<sup>5</sup>. Folks who are riding the shuttle up to the resort on busy days are stuck in the stalled-out in a line of traffic. There is no incentive to ride the shuttle. There are no plans for a park and ride anywhere in Alta, Wyoming. Why should this park and ride be located in Idaho when Idaho gets no monetary compensation from GTR. There are also no plans for a park and ride in Idaho. Until there are park and ride parking lots, more parking, and the traffic issue is figured out I ask the USFS to choose Alternative 1 no action.

### Public Safety

“The scope of this analysis includes the extent of the existing and proposed GTR SUP area. In particular, this analysis would focus on the proposed South Bowl area. This section describes the existing conditions at GTR as they relate to public safety.”<sup>6</sup>

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<sup>5</sup> Planned Unit Development for Planned Resort February 12, 2019 page36

<sup>6</sup> GTR DEIS page 179-180

There is absolutely no need for GTR to expand its SUP boundaries into South Bowl for safety. If GTR wants to keep unprepared guests or powder seekers out of



GTR SUP fence. Note how easy it is to duck the rope.



South Bowl, they should build a better fence. Right now, the “fence” runs from the top of Peaked to the Al Dante gate. It is made out of 4x4 posts, and there are two loose ropes strung between these posts to create a “fence”. This “fence” can be easily ducked at any point between the top of Peaked and the Al Dante gate. If the resort wants to keep its guests safe and within the current SUP boundaries, GTR needs to install a more effective fence.



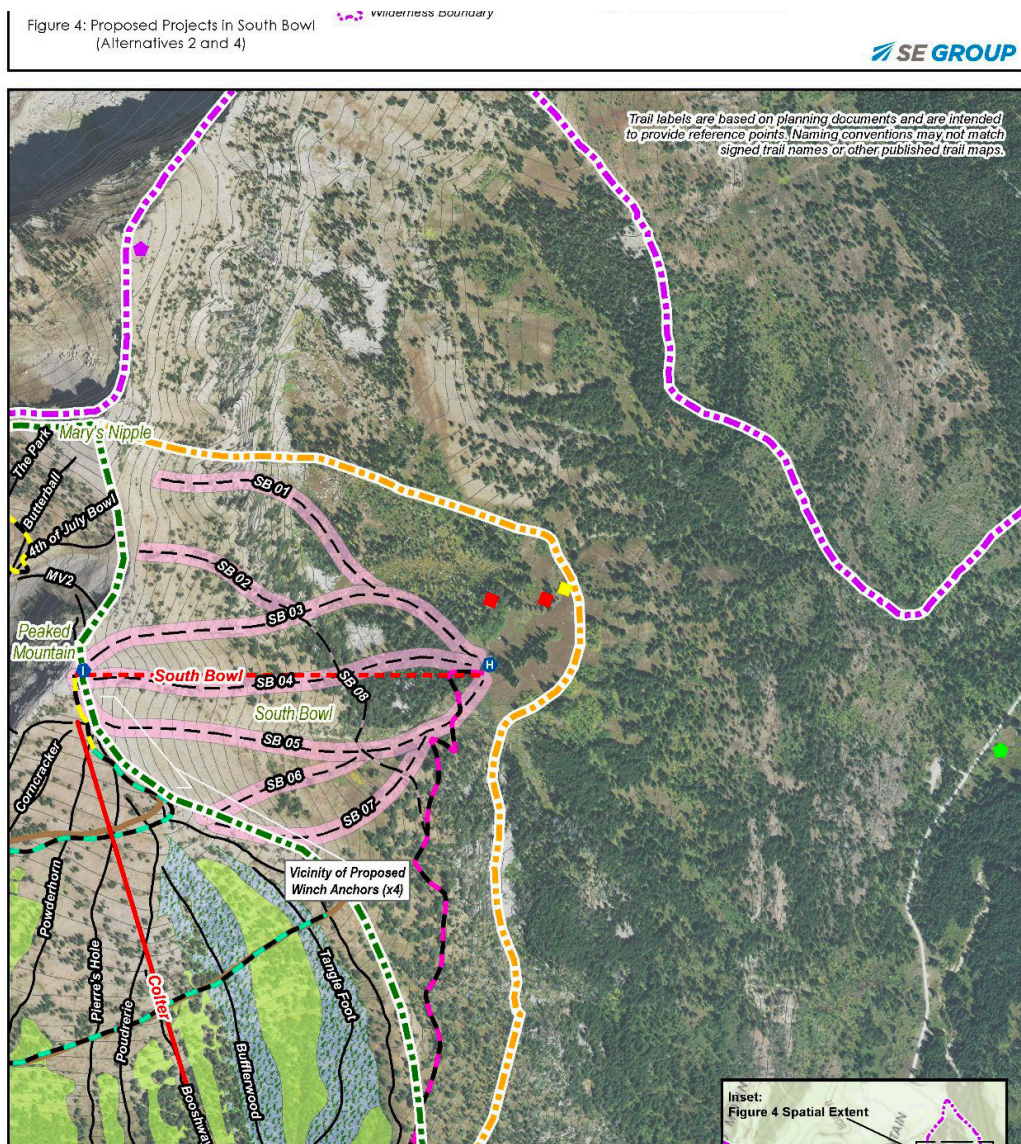
SUP boundary fence looking up towards the top of Peaked. GTR Ski patrol being towed via snowmobile to the top of Peaked before they all skied South Bowl.

The true scope of avalanche mitigation to ensure that the South Bowl area is “safe” to ski/ride is unclear in the DEIS. It is stated that “Additional safety practices in South Bowl include the use of avalaunchers to disrupt unstable snowpack, bootpacking applicable terrain, adding two rescue caches, providing adequate signage to inform users of avalanche hazards, and the use of machinery such as winch snow cats to pack and groom the snow. Two avalaunchers and a bomb cache that would store avalauncher rounds are proposed at the base of the South Bowl Lift”<sup>7</sup>. There is no mention of how many bombs, either hand charges or avalauncher rounds, will be detonated. From the map, the location of the two avalanchers is shown. It appears

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<sup>7</sup> GTR DEIS page 184

the GTR patrol will be shooting bombs towards the Coulter lift area. Will Coulter be closed until GTR Patrol finishes using the avalaunchers?



Red dots represent the avalauncher locations.

The South Bowl expansion has 4 well known avalanche starting zones that will have to be controlled by avalanche mitigation methods. In addition to the starting zones, many areas will also need to be controlled due to the nature of the many small terrain traps in the area. These bombs, when detonated, will reverberate up the North Fork of Teton Canyon and Teton Canyon, which are part of the Jedediah Wilderness. This will greatly disturb and redistribute the wildlife that is already in the area. There is no way to contain the noise that is created when using bombs. I have heard bombs



detonate at the back of Teton Canyon on the road/groomer when GTR Patrol drops bombs at the top of SE Bowl. The concussion from these bombs shatters the silence of Teton Canyon. You can feel and hear the bombs detonating. It feels and sounds the same every time; nothing can prepare anything living for that. Animals that live in Teton Canyon are going to be deeply affected by these bombs. Folks who want to enjoy the silence of Teton Canyon are going to be deeply affected by these bombs.

“In 2005 Burlington Northern Santa Fe (BNSF) railway requested a special use permit for Glacier National Park (GNP) to allow for a permanent explosive avalanche reduction program including military artillery”. They wanted to bomb the avalanche areas that were located above their railway in Glacier National Park. GNP did an EIS for the proposed avalanche mitigation that BNSF wanted to conduct. They would have been able to use “hand charges, Avalaucher, helicopter delivery, or Avalhex or blaster box systems.” According to the EIS, the use of explosives “charges in natural avalanche processes would have an impact on soil, erosion, or vegetation caused by the changes in natural avalanche disturbance levels. Sporadic disturbance from explosive use would have a range of impacts on wildlife and threatened or endangered species. Direct impacts include mortality or injury from an explosion or triggered avalanche, physiological changes, flight response, deafness, seismic disturbance, and/or behavioral changes. Indirect impacts include vegetation changes, food or prey availability changes, decrease in reproductive success, habitat fragmentation, loss of habitat connectivity, and changes to critical habitat for threatened or endangered species.” “Explosive use would introduce major, adverse, short-term, site-specific impacts on natural sound. The quiet of the wilderness would be interrupted by short bursts of loud explosions.” After the EIS was complete, Glacier National Park told BNSF to build snow sheds over their railway at the expense of BNSF.<sup>8</sup>

Long and short term noise pollution includes avalanche mitigation, the building of the road using heavy machinery; the removal of trees using chainsaws and heavy machinery to load and remove the trees; the construction of the lifts, which will use heavy machinery, helicopters, concrete trucks and helicopters to move the concrete and lift towers, the possibility of explosives to build the lift pads; the running of the lift; the use grooming equipment at night; snowmobiles used by ski patrol and lift maintenance, heavy equipment to run the power to the lifts, and the people skiing and snowboarding in the area.

Does this make the area safer? No, it does not make the area safer. Developing the South Bowl will only increase injuries because the planned lifts will put 1,800 skiers to the top of the mountain per hour. The more people that are in the area increases the higher the likelihood of injury or death. Grand Targhee or Grand Fogee has many days of low light visibility. The South Bowl is not an area you want the public in during these low light days. There is a series of couloirs in the area that have a microclimates of their own. The massive cliff band there creates thermal heating of the snow that causes wet slides even during freezing temperatures. The entire area is south-facing, receives ample sun, causing thermal heating of the snow. This thermal heating can cause unexpected, destructive wet slides. Inbound avalanches happen. Two in-

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<sup>8</sup> Avalanche Hazard Reduction By Burlington Northern Santa Fe Railway in Glacier National Park and Flathead National Forest, Montana: Final Environmental Impact Statement.

bounds avalanche deaths were located on the new Kachina Peak expansion area at Taos Ski Valley on January 17, 2019. Kachina Peak opened from a popular backcountry area to lift access February 12, 2015.<sup>9</sup> Five patrollers and snow scientists have died in in-bounds avalanches. On Dec. 1 2019, 5 people were buried in an in-bounds avalanche in the Experts Chutes of Jackson Hole Ski Resort. In the 20 years that I have been snowboarding in the “South Bowl,” we have not had any lost skiers, major or minor injuries that would require search and rescue. The expansion will also push the backcountry users that are currently in the area further up the canyon, making it harder for Search and Rescue respond. If the SUP boundary line is moved to include Split Decision, ducking the rope will have greater consequences. There are massive cliffs and couloirs with mandatory airs at the exit. This poses a significantly greater hazard to the public. This can all be avoided by GTR building a better fence to keep the public safe and from entering avalanche terrain. An expansion is not needed to keep people safe; a better fence will suffice.

The gate that is located on the saddle between Mary’s Nipple and Peaked should be moved back to where the Mary’s hike ends. Before the Coulter lift, you could hike to the top of Mary’s from this point. Now, there is a rope line, and the gate to access Steve Baugh and beyond is located on the saddle. Now you have to ski downhill to go back uphill. Before, there was a backpack to the top. From the top of Mary’s, you can easily traverse over to Steve Baugh, or you can properly ski cut Split Decision. From the saddle, you can not ski cut the top of Split Decision, and having the boot pack simplified the hike to the top because you do not have to transition split boards and put on skins. The only benefit I see for the gate at its current location is for the Ski Patrol to access that area. If there were an emergency, I do not see a problem with them ducking the rope.

I do not see a great benefit for the Al Dante gate. From that access point, you get to take around 8 good turns, and then the “traverse” begins back to the Coulter Lift. The traverse traverses across the top several avalanche bowls, and if the skier or snowboarder gets too low, they will become easily lost or cliffed out. I have watched lots of inexperienced skiers leave the resort from that point. “At approximately 11:30 a.m. on Saturday, February 8, TCSAR was notified of three snowboarders stranded out of bounds in the Grand Targhee backcountry. The group—one adult male, one 18-year-old female, and one 16-year-old male—was uninjured but unable to return to the resort or find a safe descent through complex terrain. They were reportedly not carrying backcountry safety equipment.”<sup>10</sup>

South Bowl and the surrounding areas are already open to skiing. It is not closed. If the expansion is allowed to happen, GTR will put a rope line around the area and close it to public access until it deems it safe to ski. The public will also have to buy a lift ticket to access already open public land. These public lands are treasured by backcountry skiers and snowboarders. It is one of the most beautiful places to backcountry ski in the Tetons. If this expansion is allowed, the beautiful untracked powder will be a thing of the past. Ski Patrol will have to bomb the area, then “ski cut”

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<sup>9</sup> After an Avalanche, Questions About Safety. By Biddle Duke Feb. 20, 2019

<sup>10</sup> <https://www.tetoncountysar.org/latest-news/tag/Short-Haul>

it, and finally decide to open it to paying customers. They will bomb the area to tame it from a beautiful, peaceful backcountry experience to a controlled inbounds experience. “This would allow more skiers to utilize the unique terrain in South Bowl without as great a risk, but would change the character of the area from unmanaged backcountry to a lift-served skiing experience.”<sup>11</sup>

The DEIS for Public Safety should be sent back to SE Group and rewritten. This section of the document is poorly written, and the references are not accredited or scientific. There are so many publications describing avalanche terrain, direction of slopes, etc, that could have been used. The references used for this publication include: REI, an outdoor recreation retailer, and Snowbrains, an online ski blog.

### Wildlife

Big Horn Sheep, Grizzly Bears, Black Bears, Wolverines, Cougars, Canadian Lynx, , Great Gray Owls, Boreal Owls, Flammulated Owl, American Goshawk, Peregrine Falcon, Moose, Mule Deer, Pine Martins, Squirrels, Clark Nut Crackers, Yellow Stone Cutthroat trout and every other creature big to small will all be affected by the expansion of GTR’s SUP boundary line. Alternative 1, no actions will be the best alternative for the wildlife in the area

### Visual

Any expansion of the SUP boundary will forever change the landscape. Cut runs and a chairlift in the Mono Trees Pod will be highly visible from the vast majority of Teton Valley, Idaho. In South Bowl, a road, cut runs, and a chairlift will be highly visible from the Jedidiah Wilderness. From the Table Mountain parking lot, you can already see the fence posts marking the SUP boundary line and the backcountry gate at the top of Peaked. Cutting of trees for ski runs, roads, and chairlifts cannot be reversed. See attached photos.

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<sup>11</sup> GTR DEIS pg. 183





Coulter's power line ditch scar. Photo taken on Cedron and 7000s. That is 16.67 miles away as the crow flies. From this point, you could see a road, cut runs, and a chairlift on South Bowl.



Table Mountain trailhead parking lot. A bright, shiny object at the top of Peaked is the Noodle backcountry gate. The posts on the left side of the photo are the posts for the current SUP boundary rope line. This view could have a chairlift and a patrol shack in it.





Targhee Town and State Line. Mono Trees would show cut runs and a chair lift.



Stateline Road and Dry Creek. Mono Trees Pod would show cut runs and a chairlift in front of this beautiful view of the Tetons.