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Comments: I have skied at Grand Targhee (GTR) for over ten years and am a season ticket holder. Additionally, I have skied at many other ski resorts in the US and Canada. I would like to see GTR succeed, and it is part of our community's identity.
A restaurant at the top of Sacajawea would improve congestion at the base of resort. Palmer Platter surface lift with lights on Palmer's raceway would be a benefit to the training of young skiers. I similarly support a new teaching carpet. Because Driggs and Teton Valley are dark sky communities, lights should be turned off by 630pm.
I support upgrades to the Shoshone and Dreamcatcher lifts. Additions such as a Canopy tour, fly line, zip line, adventure course and disc golf in a summer activity zone could help keep resort profitable during summer months.
While I am supportive of the changes at GTR described above, I strongly disapprove of Special Use Area (SUA) expansion into South Bowl and Mono Trees. A restaurant on Fred's Mountain should not be allowed. I am against the North Boundary lift and any guest facillities in Ricks Basin other than a vault toilet.
The current situation is that Teton County, Wy gets much tax revenue from GTR. Teton County, Id. receives no revenue but unjustly bears the burden of increased road maintenance, increased law enforcement and search and rescue costs. Expansion of GTR would place additional demands on sewage treatment and solid waste management, fire department, school and hospital costs, as well as unaffordable housing.
With GTR expansion there will be more road damage, traffic, and air pollution. Property taxes will likely increase, and two-lane highways will become more dangerous. The DEIS states that 18% of renters in Teton Valley, ID. have had to move because their place was converted to a short-term rental. The existing housing shortage will worsen. The impending base expansion of hotels, cabins, and retail space is a given. If the USFS approves a major on-mountain expansion and facillitates GTR becoming a destination type resort, it will change the character of Teton Valley, Idaho.
Prior to any USFS approvals for GTR, the USFS should suggest that the resort negotiate and pay an impact fee to Teton County, Id. This could be based on ticket sales or number of vehicles. It seems unprecedented that USFS approvals could cause one state to inflict economic hardship on another.
The rationale for my support of certain changes and opposition to others is as follows:
Purpose and need faulty - The lifts and runs at GTR are rarely crowded and even a 5-minute wait for a lift is rare. Visitation at GTR has shown persistent growth, and Targhee is remaining competitive. The DEIS documents that winter visits between 2016 and 2021 increased approximately 6% per year. Summer visits have increased 9% per year and there has been steady growth during the last 10 years. Lacking in the DEIS and what should reported in the FEIS is visitation data since Colter Lift was built. There is no documented need for expanding outside of the Special Use Area.
In the proposed action, Dreamcatcher will increase to a 6-person lift. This and the new Crazy Horse lift could easily accommodate any future increase in demand. GTR has more acreage than Jackson Hole Mt. Resort and one of the lowest skier densities in the business. I have skied at GTR approximately one hundred days over twelve years, and have never waited more than 7minutes in a lift line. Why then does GTR need to expand the skiable terrain and privatize more public land? Thus, there should be no approval for Mono Trees or South Bowl.
The USFS has a legal responsibility to manage land and resources with the future in mind. Any approval of Mono Trees or South Bowl would not be in the public's interest or move these USFS lands toward desired future condition outlined in the 1997 Forest Plan. Thus, approval of Mono Trees or South Bowl would require significant amendments to 1997 forest plan.

With all 5 alternatives in the DEIS, each with higher levels of visitation, the number of overnight visitors will increase. But the number of day visitors is relatively constant. In the five alternatives, overnight skiers estimated for 2032 vary from 64% to 68% in alternative two. My conclusion is that many people who live in the area have

difficulty affording skiiing because of higher lift ticket prices. My concern with major expansion is that GTR will become more expensive and price out locals. The detailed projections of growth at the resort are dependent on lift ticket prices which are not analysed or even mentioned in DEIS. In the proposed action (alt.2) an average growth of 3.4% occurs per year projected out to the 2032 season. This validates what Sportsports Industries America has documented since 2017/2018, which is that the demand for alpine skiing and snowboarding is flattening. (from Snowsports Industries America Participation Study: 2023-2024.)

A reasonable assumption is that lift ticket prices are a major factor. See p 127-132 of DEIS. Many people are unwilling to pay $100 to $300 for a day of skiing. The credibility is low for growth projections and much other data presented in DEIS. Where are standard deviations and statistical significance usually presented with data analysis? With the predicted climate change documented in the DEIS, there will be more low snow years, and the ski season could contract to Dec-Feb, P.233) In light of these climate change projections, further expansion on public lands is unjustified. My reasoning for picking none of the five alternatives will be presented as issues involving viewshed, wildlife, recreation conflicts, water, downstream impacts and loss of forest.

Downstream impacts- the section on air pollution states that the nearest population centers are in Idaho Falls and Jackson. It states that the increased visitation in alt. 2 would contribute less than .2% to highway vehicle emissions in Wy. and would not be enough to negatively impact air quality in the area. The section on air pollution does not even recognize local communities. What about the spike in air pollution in downtown Driggs when 20-50 cars are frequently backed up at the solo traffic light? An air quality data analysis needs to be done in downtown Driggs, Idaho via a supplemental EIS. This would be a reasonable because a Purple Air quality monitor could be installed in downtown Driggs to get baseline studies. The cost would be less than $300. Local air pollution baseline data should be included in FEIS.

The viewshed analysis is faulty with sampling omissions because the viewpoints picked are not from where people are maximally impacted. Because I am a professional nature photographer, alteration to Mono Trees and South Bowl areas with ski lifts would impact my business.

Mono Trees- Why are viewpoints picked for viewshed analysis from places where people are not impacted? There are obvious sampling omissions in viewpoints analyzed in DEIS. Cutting thousands of trees in Mono Trees to create ski runs is not consistent with the USFS legal obligation to manage forest lands for a desired future condition?

The DEIS states that the view of Mono Trees would not be impaired from the Coulter Bldg or for someone driving or biking on Hasting Lane because they are only looking that way for a few seconds. What about the view for hundreds of residents of Alta, Tetonia, and Driggs who would see this every day? A glaring omission is not studying the view of Mono trees from Alta Church, library, and school. See photo #1

The DEIS falsely states on p. 7 that Mono Trees would "not result in major change to aesthetics." From the scenic viewpoint on Highway 33, (Teton Scenic Byway), the first place that visitors have a panoramic view of the Tetons from the north, you would see ski runs under iconic Grand Teton. On P. 90 it is gross misinformation to state that "Most of the viewers from this location would be driving or biking and would experience this view for only several seconds..."

I have stopped at this viewpoint multiple times because the view of the Tetons with the river in the foreground is breath-taking.

From further north than 5000 North. between Driggs and Tetonia, folks would see cut ski runs below Grand Teton, the most recognizable mountain range in the lower 48 states. See photos #2 and #3.

P. 70 of the DEIS falsely states that "Mono trees area is not considered an area for hiking. This area is not a popular recreation destination in its existing state, so the proposed action is not expected to measurably displace users."

It omits the fact that some of the ski runs and the lift itself will cross the Millcreek trail which is very popular for hiking and biking. My partner and I hike on the Millcreek Trail frequently during the summer and fall. While it is common for us to see grazing cattle, they have not interfered with our hiking pleasure. The area does not appear to be trampled or overgrazed. I can only assume that the cattle grazing permit in this area is being managed responsibly. The FEIS should document the potential for recreation conflicts. A conservative estimate for the number of trees that would be cut for ski runs, lift, and a road would be 6000 to 20,000 trees. This estimate is derived by quoting the DEIS that 89.5 acres would be cleared. One can assume about 200 trees per acre.

There is no analysis of the loss of Co2 sequestration from taking out thousands of trees. Mono Trees borders a winter wildlife closure area and is used by moose and deer. It is habitat for Flammulated Owl and Boreal Owl nest sites and American Goshawk. Tree clearing within the proposed Mono Trees expansion area contradicts Forest Plan standards for protecting goshawk habitat. The forest plan also prohibits tree clearing within 30-acres of a flammulated owl or boreal owl nest site.
The Mono Trees expansion would ultimately remove protections for 125 acres that are currently managed as an Aquatic Influence Zone in the 1997 forest plan. Tree removal would result in marked erosion and sedimentation in Millcreek, a perennial creek. The power line and road needed for the Mono Trees lift, which is located very close to the creek and overlapping it, would result in further scarring, erosion, and sedimentation in this area. On p348 of DEIS, it states that "This does not align with Clean Water Act as roads and facilities are proposed to be located in sensitive areas including riparian areas, wetlands…." As stated on p.341 of DEIS, "projects adjacent to Mill Creek have a high probability of contributing sediment.

South Bowl- Here again are obvious sampling omissions and selection bias in viewpoints analyzed. There are four heavily used trails in Teton Canyon, which are some of the most popular on the west side of the Tetons. Why wasn't the alteration in viewshed analyzed from the popular South Fork, Face Trail, North Fork, or Devils Stairs trails in Teton Canyon? The DEIS states that only 1.3% of view is altered from Table Mt for several seconds. I have skied and hiked several times to Table Mountain. My experience is that during the hike down from Table Mountain, one looks at the South Bowl for over a mile of hiking. (See photo #4) It is complete nonsense that viewers from Grand and Middle Teton, and Hurricaine Pass only look at the South Bowl area for several minutes. (P88 of DEIS.). I can state that my view of the South Bowl would be significantly altered and deteriorated when I hike the popular Table Mountain and So. Fork of Teton trails. (See photo #5) showing the view of So. Bowl from one mile along So. Fork of Teton Canyon Trail.
The study states that "a lift in So Bowl is an opportunity to improve public safety". This is flagrant misinformation and not supported by any data in DEIS. There were no avalanches reported in South Bowl on Bridger Teton Avalanche Center for 24/25 seasons. I have skied South Bowl at least thirty times. I haven't heard of anyone caught in an avalanche in So Bowl in the 8 years that I have lived here, and Wy. Search and Rescue confirmed this. With the Colter lift, GTR provided easier access to South Bowl avalanche terrain. Lots of ski areas have high-avalanche adjacent-backcountry terrain, and it is not USFS policy to use ski area expansion as a means to improve public safety. If public safety is a concern driving the proposal to expand GTR's Special Use Permit into South Bowl, and the CTNF believes a South Bowl expansion would solve this concern, then the FEIS should provide data to support this. Page184 admits that a lift in So. Bowl would allow skiers easier access to uncontrolled terrain. Backcountry skiers displaced by a lift would move to Jedediah Smith Wilderness (JSW), thus further away from Search and Rescue. Backcountry skiing and snowboarding are growing at a much faster rate than alpine skiing, yet terrain would be taken away from backcountry users with a SB lift. Noise from the two South Bowl avalaunchers would ruin the tranquility for people nordic skiing and snowshoeing in Teton Canyon. In winter hundreds of users every week enjoy this groomed trail. In addition, Teton Backcountry Guides has a USFS permitted yurt in Teton Canyon. It would be very disturbing for their clients to wake up to the sound of avalauncher explosions. In the DEIS, the comparison of avalaunchers to thunder is faulty. The noise from avalaunchers most often occurs in the morning when wildlife are most active. Thunder most ofter occurs in the afternoon and in summer. Wildlife would similarly be disturbed by the noise of ski grooming machines all night and lift operators playing music during the day.
The 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/ .
The DEIS does not acknowledge or discuss the recommended volunteer winter recreation closures in the area from the working group. It is completely incongruous that one agency asks for voluntary avoidance, while the DEIS advocates for a ski lift. The issue is that the threatened Teton Bighorn sheep would likely avoid So. Bowl seasonally, and it will reduce their use of nearby rare mineral lick. If a small amount of backcountry use causes the sheep to change their behavior, it is likely that they will not use the area at all with the disturbance of a ski lift and road. On p.306 the DEIS acknowledges that a lift in So Bowl has the potential to decrease the population of already fragile BH sheep. The DEIS states that Pika could also be displaced by a SB lift. Given that the SB is

south- facing, expected climate change would certainly limit the use this area would receive in future winters without snowmaking.
Regarding both the Mono Trees and South Bowl: The Targhee Forest plan of 1997 gives clear direction for these areas. - protect scenery (Visual Quality Maintenance) and aquatic resources (Aquatic Influence Zone). Adding these areas to a ski resort does neither, and any SUA expansion is not in the public's interest.
Wildlife issues- The DEIS documents several wolverine sightings and fresh tracks from 2019-2023 and acknowledges that wolverine are likely to be adversely affected by Alt 2 and alt 4. It states that SB expansion will adversely affect individual wolverines. All action alternatives will adversely affect Grizzly Bears. The DEIS predicts decreased moose habitat and increased disturbance to mule deer winter range if Mono Trees lift is built. There will be more vehicle-wildlife collisions as resort expands with more hotel rooms and increases in visitation. Wildlife will be displaced from Mono Trees and South Bowl by noise from helicopters, construction, and avalaunchers. There is no evidence presented that wildlife habituates to recreation, helicopter, or avalauncher noise.
Rick's Basin and North Boundary Lift- I am strongly opposed to the proposed road, guest facilities and chairlift in Rick's Basin. As discussed on pages 18-20 of DEIS, the Ski Area Recreation Enhancement Act of 2011 and the Forest Service Manual 2343.14, "activities should harmonize with the natural environment and not require extensive new support facilities such as chairlifts" and "be located in developed part of ski area". This is completely inconsistent with cutting down trees and putting a road, warming hut, chairlift and small restaurant in Rick's Basin. Ricks Basin does not need 7 new trails and 31acres of disturbance with associated erosion in Dry Creek, a perennial stream.
As stated on p.341, "projects adjacent to Dry Creek have a high probability of contributing sediment". I question the assertion on p.70 of DEIS that "the development of additional and improved trails in the Nordic Ski and fat biking network would improve access into Rick's Basin and would provide a more desirable winter experience for guests who seek alternate activities". I have enjoyed the current winter and summer trail network in Rick's Basin and don't see the need for any improvements other than a restroom. It is currently a peaceful, multiple use area for hikers, bikers, snowshoers, nordic skiing and horseback riding. While the North Boundary lift would increase the amount of low-intermediate ski terrain, access to this area would first require skiing terrain from Blackfoot lift which is much more advanced intermediate terrain. The DEIS does not include any viewshed analysis for the No. Boundary Lift which would be very close to the wilderness boundary. The lift will be visible from many places in South Leigh Canyon and from the top of Beards Mountain. The FEIS should include a formal viewshed analysis of this lift.
The proposed 11,000 sq. foot restaurant at top of Fred's Mt. would be an eyesore from all directions. It would be unprecedented to put a structure like this on a ridgeline and 100 feet from the wilderness boundary. Introducing a man-made structure onto an undeveloped skyline is not allowed in Teton County Wyoming's Land Development regulations. While these regulations do not pertain to activities authorized on National Forest lands, the CTNF should be consistent with local land use regulations intended to protect scenic resources. Garbage from outdoor diners and wastewater could easily spill into the wilderness. On p. 89 of DEIS, it states that for hikers in Jedediah Smith Wilderness (JSW) and South Leigh Lakes area, their view would only be disturbed for several minutes. Please see photo #6 which would be location of restaurant taken from near the popular Beard's Wheatfield Trail in JSW. The Steve Baugh area in JSW is a popular place for backcountry skiers and for skiers who leave the resort. Their view of Fred's Mountain would be similarly altered. This restaurant would also cause a great change in the soundscape to JSW. It is certainly an understatement (on P206 of DEIS) where it states that a Fred's Mountain Restaurant and So Bowl Lift "may create visual impact for users of JSW". If a restaurant is still considered in FEIS, it should be moved off the ridgeline with a thorough analysis of water source and wastewater.

More comment on proposals within SUA: P. 30 of DEIS suggests a guest facility at top of Shoshone Lift with "potential as dinner destination". I don't see how that is compatible with Driggs and Teton Valley, ID being dark sky communities.
Whitebark Pine-Since Dec 2022, the U.S. Fish and Wildlife Service determined that Whitebark pine is a threatened species under the Endangered Species Act of 1973. Currently, the whitebark pine population in the

Teton region is experiencing a second epidemic of mountain pine beetle mortality since the early 2000's. In 2022, focused surveys revealed that 54% of overstory whitebark pines have died in the Tetons, and that 35% had died since 2019 (Bockino et al. 2023). This second epidemic has the potential to "result in so few whitebark pine that the delicate mutualism between the tree and the Clark's nutcracker, it's only means of seed dispersal, could collapse" (Bockino et al. 2023). Grading and Tree clearing within the permit area should protect Whitebark Pine. Why is there so much impact to WBP in alternative 3? On p.264, it states 59 acres of WBP (within SUA) would be impacted by alt 3. See p 310 "Under alt 3- there are 45.7 acres proposed of impact including 10.7 acres of glading and tree clearing. There would be 40% tree removal for ski glades on 35 acres. Why Is this needed? The FEIS should clearly state what areas have planned removal of WBP. WBP should be carefully marked to avoid disturbance. Are there enough USFS personel to help identify WBP so they can be protected during proposed glading? Please specify the planned mitigation for any loss of Whitebark pine in the FEIS. If the proposed glading occurs near the bottom of the Colter Lift, it is not necessary. I enjoy skiing in this area, and there is no need to remove a threatened, iconic species. Whitebark pine removal also goes against the intent of the Targhee Forest Plan, which instructs the forest to "maintain, and where possible, increase unique or difficult-to-replace elements or habitats such as whitebark pine, and areas of high species diversity." (From Targhee Forest plan 1997)

Hydrology- Alternative two and three propose snowmaking on 57acres. In the FEIS, SE Group needs to quantify the amount of water required for snowmaking. If ground water is required for snowmaking, the location of ground water wells and associated water rights must be disclosed in the EIS. Impacts to the aquifer need to be analyzed via ground water modeling in a supplemental EIS.

P344 of DEIS documents the potential for deterioration of water supply for Alta and Driggs via sedimentation from Mono Trees and So Bowl development. Dry Creek and Millcreek are perennial streams. Under the section on ground water impacts, it states on p.344 "that the most critical hydrologic effects occur in Papoose Creek watershed at south end of SUP ….contributes ground water to Alta Spring which serves as community water source for Alta, Wy". Roads proposed in Ricks Basin and in Teton Canyon are parallel or intersecting to intermittent creeks. The proposed road in So. Bowl crosses an ephemeral stream. From P348- "These do not align with Clean Water Act". P. 341 of DEIS states, "the other threat to water quality is nutrient loading and contamination to the nearby public water system from the proposed wastewater treatment for on-mountain facilities." Driggs has relied on a spring at the mouth of Teton Canyon as a major culinary water source. This spring is fed by ground water sources. In September 2022, the City of Driggs discovered that this spring had a leak which made it susceptible to ground water contamination. It had to be taken offline temporarily. Local and downstream agricultural uses require vast quantities of water, and there are no local reservoirs or major water storage facilities. Given the population growth of Teton Valley Id., this all adds to future water insecurity.

How could the USFS allow a for-profit business the possibility of contaminating and reducing essential water sources for downstream communities?

This is further justification for denying the proposed building of the mountain top restaurant and developments in South Bowl, Mono Trees, and Rick's Basin. I may be submitting another comment later.

Thank You,

Howie Garber M.D.