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Organization:

Title:

Comments: Kim Pierson

Forest Supervisor

Caribou-Targhee National Forest

1405 Hollipark Drive

Idaho Falls, ID 83401

Re: Grand Targhee Resort draft Environmental Impact Statement

Dear Supervisor Pierson,

1. Purpose and Need

"The purpose of, and need for, the Forest Service's action is to decide whether to grant a special use permit (SUP) for the project." The USFS Special-Use-Permit requires the land use must provide a benefit to the general public and protect public and natural resource values.

Grand Targhee stated the Purpose and Need: "to improve the recreational experience and address shortcomings in their terrain offerings and operations in order to remain viable in the competitive destination skier/rider market."

This does not meet the criteria of being in the public interest nor moving public land toward a desired condition.

Based on a comparison to Jackson Hole Mountain Resort there does not appear to be a need to privatize additional public lands.

2. Natural Resources / Environmental impacts

*Wildlife - the proposed boundary expansion would fragment critical wildlife habitat, threaten sensitive species, displace wildlife, escalate human-wildlife conflicts and undermine decades of successful conservation efforts.

oSouth Bowl is vital winter range for many native ungulates and supports birthing and summer range as well as pathways to lower elevation habitats and mineral licks. In particular it would be detrimental for the Teton Range bighorn sheep population already at risk of local extinction. On several occasions we have caught sight of big horn sheep in Teton Canyon.

Of note, backcountry skiers have been advised to limit travel in sensitive big horn sheep habitat and yet this proposal includes developed recreation and avalanche mitigation activities.

Expansion into this area would also diminish habitat for several other species; wolverine, black and grizzly bears, cougar, coyote, wolves and lynx.

oMono Trees portion of upper Mill Creek provides security habitat for deer, elk and moose and nesting habitat for several sensitive bird species. Conservation of old growth forests is a priority for the USFS making this expansion in conflict with the Caribou-Targhee Forest Plan.

*Wilderness - expansion in such close proximity to the wilderness boundary will result in a ripple effect of changing land use, displacement and increased access that endanger the character of the Jedediah Smith Wilderness, diminishing our public wildlands. Economic growth of a private resort should not take priority over the right of the people to experience and engage in these protected landscapes now and into the future.

*Wildfire - Grand Targhee is located within the "wildland-urban interface", areas where development results in greater risk of catastrophic wildfire. In this era of climate change there are more frequent wildfires across the West. Increased use and new facilities in and around Grand Targhee will raise the likelihood of wildfires while making it more dangerous and difficult for emergency services to respond and people to evacuate with only one access and egress on Ski Hill Road.

*Water - expansion as well as further development within bounds and base area will have multiple negative impacts on water supply and quality.

oIncreased water utilization for restaurants and other facilities and massive increase in snowmaking would diminish already stressed local aquifers with downstream impacts to the local community.

oThe need to expand the septic system for the proposed infrastructure developments will result in increased disposal of waste and wastewater which poses a potential threat to ground and surface water quality in Teton Valley. Waste management in general is likely to strain the capacity of local landfills, create new litter and pollution problems.

oSediment from road building, lift construction and glading will potentially adversely affect the water quality for Alta and Driggs municipal water supply which comes from the Teton Creek drainage. This could also result in diminished aquatic habitat for endangered Yellowstone cutthroat trout.

oScenic resources / visual impacts - would be permanently impacted by the large-scale new development, eroding the scenic values that residents and visitors cherish including dark skies, further undermining the rural identity of Teton Valley. Lights from the proposed restaurant on Fred's Mountain, night skiing and snowmaking would be visible from Teton Valley. Daytime scenery would also be impacted. The South Bowl lift, trails and a restaurant would be visible throughout the west side of the Tetons as well as from the Jedediah Wilderness area and peaks of Grand Teton National Park.

The amendment required for the expansion from "Visual Quality Maintenance" to "Special Use Permit" would remove the protection for these areas to be restored, maintained or enhanced to provide quality scenic settings.

oNoise impacts - would be significant both for wildlife and visitors. Initially during construction with heavy equipment and helicopter noise for roads and lifts, and after development is complete noise from avalanche control, lift services and increased recreationalists would displace wildlife and ruin the tranquility for visitors in Teton Canyon and solitude in the Wilderness area.

3. Socioeconomics and Infrastructure / Community impacts

*Public services - the Grand Targhee expansion threatens to overwhelm Alta, Driggs and the broader Teton Valley Community putting unsustainable pressure on community services. Teton County, ID will receive no direct revenues from economic activity and has limited ability to generate revenues from property tax, however will be responsible for the majority of the cost of public services.

The 2022 ECONorthwest study analyzing the effects on public services and housing concluded that revenue from future development at Grand Targhee would not outweigh the cost impacts on Teton County, ID's roads, traffic congestion, solid waste and recycling, emergency and health services and affordable housing.

*Housing - resort expansion would worsen the critical shortage of affordable housing for workers in Teton County, ID including the additional work force needed for Grand Targhee. Conversion of rental properties from long to short term would result in displacing local residents. Escalation of second-home purchases driving up real estate prices would further marginalize local families.

*Transportation - the mobility and transportation impacts of the proposed expansion are of critical concern with the increase in skiers, guests and workers. The impacts will be predominately on Ski Hill Road however the regional transportation network will be impacted as well. Traffic congestion on Ski Hill Road, which is already significant, will increase creating safety hazards, deteriorating air quality and at times creating gridlock. Access for emergency vehicles will be extremely challenging during peak travel periods. The planned increase in use of transit will result in additional costs for Teton County, ID and require locations for in-town parking.

4. Access to Public Lands and Recreation

*Access to Public Lands - the privatization of public lands with expansion into the South Bowl and Mono Tress with Grand Targhee's SUP would limit access for private interests during ski season. These lands currently open to everyone would only be open to those who purchase an expensive lift ticket/pass. This loss of public lands and resulting impacts based on socioeconomic class becomes an environmental justice concern.

Expanded resort boundaries would limit public access to favorite backcountry skiing, hiking and biking trails traditionally available to the community. Opportunities for backcountry skiing, which has become the fastest growing winter sport, will be significantly diminished.

*Recreation - in addition to limiting public access, the recreational experience would be significantly impacted as an ever-expanding human footprint encroaches further into the wildlands of the Tetons. Teton Canyon and the higher elevations of Teton Canyon with glorious vistas, wildlife habitat and tranquil soundscape are precious resources. Expansion beyond the current resort boundaries will dramatically change the character of Teton

Canyon. This raises the question of whether in this instance should society elect to limit growth and preserve a sacred place that nourishes the human spirit? The answer should be YES.

5. Research inadequately addressed in DEIS

- *Comprehensive traffic impact study that assesses year-round congestion and safety implications on Ski Hill Road and the Hwy 33 intersection in Driggs
- *Comprehensive evaluations of community and public service demands with resort expansion for Teton County, ID
- *Detailed housing analysis to address the impact on local housing affordability and availability with expanded lodging and employee demands
- *Assessment of cumulative regional impacts of resort development and increased tourism combined with other regional growth pressures facing Teton County, ID
- *Analysis of long-term water availability to sustainably support snowmaking and resort operations with changing climate conditions
- *Detailed studies of public recreation displacement impacts such as loss of access to traditional hiking, biking and backcountry skiing areas adjacent to the resort

Conclusion:

We support a MODIFIED ALTERNATE #3, which allows some upgrades within the existing resort boundaries without expanding into South Bowl or Mono Trees.

Modifications:

- *Remain consistent with the Forest Plan
- *Address water use concerns and viewshed issues
- *All proposed on-mountain restaurants be limited to the base area with the exception of environmentally sound consideration for the top of Sacagawea, not at the top of Fred's Mountain
- *Glading within the current SUP be limited so as to not require the removal of such vast numbers of endangered white bark pine
- *Proposed North Boundary lift and on mountain guest facilities in Rick's Basin will ruin a pristine multi-use fragile area and require removal of valuable aspen forests which are beautiful and critical wildlife habitat. Not to mention a rope is all that separates people from skiing off cliffs into South Leigh canyon. There has been one death already.

We thank you for this opportunity to comment and count on your careful consideration of all of the serious ramifications for our community now and into the future.

Respectfully,

Bob and Deborah Malheiro
Alta, Wyoming