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Comments: Note: I am attaching these comments also as an Attachment, in case that facilitates their use.

Subject: Grand Targhee Master Development Plan Project Draft Environmental Impact Statement

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

Date: 20 June 2025

As a biologist working in the Greater Yellowstone Ecosystem and a long-term resident of Teton County Wyoming and formerly Teton County Idaho, I am deeply concerned about Grand Targhee Resort's (GTR) proposed expansion and increased development within the existing SUP. The Master Development Plan proposal points to issues that the non-profit, local group Citizens for Teton Valley worried about decades ago (1988-2004), as we tried to prevent the privatization of USFS land at GTR. We knew then, as is even more obvious now, that intensive commercial development and a large destination resort at this remote high elevation area posed multiple risks and adverse impacts for Teton County Idaho and its residents, and the natural resources and wildlife of the west slope Tetons, including the Jed Smith Wilderness and Grand Teton NP. We feared that the resort owners would push to use and control more USFS land, expanding ski terrain and summer recreation into the precious, wild landscapes and thus decimating wildlife and scenery. We worried that the Targhee National Forest would lack resources to manage or fairly evaluate and deal with the impacts. Finally, after years of struggle, we lost - GTR was privatized and became a lucrative prize for private ownership, and a rationale for intensive growth in the new private inholding and on National Forest lands. Meanwhile, the cost of huge growth in Teton Valley and Jackson Hole has impacts beyond what we imagined, as workers struggle to find affordable housing and traffic backs up for miles. Wildlands of the Greater Yellowstone Ecosystem have become ever more precious, but are increasingly at risk under the onslaught of back- and front-country recreation and previously unimaginable changes from climate change (severe wildfire threats, extended drought, increased wind) plus tree and wildlife diseases.

A constant theme through all these years has been the complicity of the Targhee National Forest (CTNF) with the desires of GTR resort owners. Repeatedly, the impacts to the environment and human communities have been glossed over by USFS decision makers and managers. Why would USFS be beholden to the destination ski resort industry, with GTR so highly valued as a local area amenity? "Remain viable" is a constant theme of the owner, despite consistent growth in skier numbers and summer users GTR. It is past time to defend the National Forest from the ski industry and its large ambitions. To quote a recent Opinion column in the Jackson Hole News&Guide (14 May 2025, p. A5), "The Teton Mountain Range is too special to be treated as just another cash cow for a wealthy resort owner".

CTNF's refusal to extend the deadline for comments, as requested by Teton County WY Board of Commissioners and likely others, is a troubling indicator of CTNF's continuing bias. The cited problems/safety issues in South Bowl indicates a disturbing failure of GTR and CTNF to foresee and deal with the issues there stemming from the Colter lift. With expansion to new areas and intensified development within the existing SUP, other unforeseen problems will certainly arise, with risks and costs for humans and the environment that we and future generations will all pay for in one way or another.

Following are my specific concerns.

Purpose and need.

The draft Environmental Impact Statement (DEIS) fails to provide a credible, objective Purpose and Need for the large investment of resources by CTNF to pursue this proposal. While the "Proponent's Objectives" are stated, what are the objectives of responsible Forest land managers?

Is there a need to increase GTR's SUP?

GTR has 2,602 acres of skiable terrain. (<https://www.grandtarghee.com/the-mountain/mountain->

information/mountain-stats, but not in the DEIS?)

Jackson Hole Mountain Resort (JHMR) has 2500 acres of skiable terrain.

Despite the similarity in size, JHMR hosts more than 3 times the number of skiers compared to GTR: JHMR had 715,100 skier visits in 2018-2019, while GTR's record is 231,309 in 2020-21, and has a five-year average of 207,090 (DEIS, p. 59)

CTNF needs to put this proposal into the context of ski resorts in the area (western Wyoming) and in the region including Wyoming and Idaho. Does the public benefit from increasing the size and capacity of ski resorts on USFS land? Does CTNF have an obligation to ensure that GTR's owner is securely competitive in the destination skier market? The focus on 'competitiveness' signals that there may already be too much National Forest land (or a fear of that) under permit to ski resorts.

Please consider actual need, independent of the proponent's desires and biases. As the Jackson Hole News&Guide editorial, 18 June 2025, notes: "Ski resorts tend to have an insatiable hunger for growth, particularly for securing additional entitlements to increase value before a potential sale". Please read and consider this Editorial, which describes the values of GTR and urges the Forest Service to preserve the qualities that now make it a "gem".

Does CTNF agree with the goal of attracting wealthier people to GTR? How is that in the public interest? GTR's owner Geordie Gillett clearly explained his goal to the Jackson Hole News&Guide (4/09/2025); he wants more skiers, and more "lucrative" guests. And, we must conjecture, would likely make GTR a hot ticket for sale to a large or multinational resort corporation. These desires should not guide USFS decisions. Please, consider "serving the people". One of GTR's attractions is its lower cost to ski compared to JHMR, as the sport becomes ever more expensive for equipment purchase and rental.

Is there any information about how users of GTR feel about the expansion and developments, and possible price increases? Do users want what the owner of GTR desires? Shouldn't the CTNF acquire this information before making the decisions in this proposal?

USFS reduced capacity and future uncertainty.

Deep cuts to the USFS budget and workforce cast much uncertainty over this DEIS and the future. The fact that it took 5 years to move from public scoping to this point indicates that serious problems at CTNF existed even before the recent cuts. The proposed SUP expansion and the many projects within the existing SUP will require many kinds of USFS oversight and involvement, as is often stated in the DEIS. Can CTNF make these commitments? Can USFS ensure the public's safety and environmental protection? Given the extreme uncertainty about government staffing and abilities, how realistic is this DEIS? There is an argument to be made to stop this project now before throwing more money at it, considering the chaos in government and the considerable uncertainty about the nation's future economy.

#### Socioeconomic Issues

Please pay careful attention to concerns presented in comments submitted by Teton County Idaho and Valley Advocates for Responsible Development (VARD). As a former resident of Teton County Idaho from 1986-2006, I can see it is much more difficult to live in Teton Valley now, and hoped-for solutions are not effective. Piling more growth and burdens on the County from the ski area development at GTR spells trouble and suffering for workers and their families, and the cash-strapped County.

Teton County Wyoming Commissioners are sharing abundant concerns about the DEIS deficiencies with respect to transportation, emergency services, housing, and the well-being of the workforce. It is crucial for CTNF not to ignore the spate of issues being created by GTR growth. Coordination between Teton County Wy and the CTNF appears to have been less than satisfactory, such as CTNF not sending timely notices to the Commissioners and not responding to requests. I urge you to do better. GTR will have a hard time thriving if CTNF fails to cooperate with the Counties.

#### Wildlife and Habitat Concerns

There are abundant concerns about wildlife and their habitat. The DEIS fails to evaluate direct, indirect, and cumulative impacts, which non-profit conservation groups and Grand Teton National Park are likely trying hard to

specify and explain during this comment period. Below I present some of my main concerns, although there are many issues I wish I had more time to consider.

#### Wolverines

The DEIS draft Biological Assessment (BA, Western Bionomics Inc. and Alder), obtained from the USFS web site, does a poor job of describing impacts to wolverines in the SUP, proposed expansions, and surrounding area. Apparently, only opportunistic observations are available for the past 20 years, after which serious research efforts in the area were mostly abandoned, despite the listing of Wolverines as Threatened in 2023. The reported observation of a suspected wolverine den site by the Teton Basin Ranger District Biologist in 2020 just 0.5 miles east of the South Bowl expansion area (BA, p. 32) apparently received no follow-up or interest from CTNF? Ironically, disclosure of this information immediately follows the statement that dismisses habitat in the project area as a tiny portion of modeled denning habitat "across the CTNF" (DEIS, p. 281). It is crucial to understand how the existing SUP has affected wolverines in the Tetons in the past 20 years, and how the expansion into new areas will affect this species. It is not acceptable to state that ski areas are not effective habitat, and then to proceed with rationalizing extensions of the GTR ski area in the context of ignorance about how this species is faring in the Tetons. The lack of conservation measures, other than tasking a CTNF biologist to determine buffers if a den is accidentally found, is not adequate under USFS Sensitive Species Policy (US Forest Service, 2005)

#### Grizzly Bears

Developing Mono Trees and South Bowl for human use will take away nearly all the secure habitat that remains between the existing GTR SUP area and Teton Creek. Given the huge proliferation of human use that CTNF has allowed and promoted in Teton Creek, this is a striking blow to grizzly conservation and too high a cost for expanding commercial recreation.

#### Bighorn Sheep

The draft Biological Evaluation (BE) provides excellent information about how expansion of GTR in South Bowl will adversely affect the vulnerable Teton bighorns. Please respect the finding that the proposed action "has the potential to result in an overall decline in the population of the Teton or Targhee Herd" BE, p. 33). Despite the apparent understanding of how human uses and CTNF management is harming the remnant herd, CTNF does not suggest protective measures, such as control of backcountry skiing in important areas, or mitigating for the harms caused by constructing the Peaked lift and thus promoting access that harms wild sheep. I strongly urge the decision makers at CTNF to elevate protection of the Teton bighorns and join in the on-going efforts by multiple agencies, groups, and individuals to protect and recover this historic population. It is discouraging to see GTR, the Jackson Hole Mountain Resort, and commercial backcountry ski companies that increasingly exploit National Forest land seem to care so little for the wildlife that is so precious to residents, visitors, and other federal and state agencies. The USFS should take pride in conserving wildlife of the GYE, and be less responsive to resorts and businesses.

#### Other wildlife and their protection

Rather than abiding with the 1997 Revised Forest Plan, the proposal seeks Forest Plan Amendments to exempt a number of species from Standards in the Plan. These include Boreal Owl, Flammulated Owl, American Goshawk, and Peregrine Falcon. I strongly disagree with these relaxations of Standards, particularly given the context of climate change and increased wildfire and landslide risk, and conifer mortality due to diseases. The BE and BA consistently claim that there is adequate habitat elsewhere, sometimes citing data collected over 20 years ago and in distant parts of the CTNF or beyond, often just waving arms around estimates of suitable habitat. But isn't that the point of Standards, to protect known or suspected occupied habitat? Sacrificing CTNF's sensitive wildlife to comply with GTR's ambitions to be competitive with destination ski resorts is an ugly deal that reduces public confidence in USFS.

#### Amphibians

Two amphibian species classed as Sensitive by Region 4 are included in draft EIS and Wildlife Biological

Evaluation, Columbia Spotted Frog and Western Toad. Another amphibian species, Western Tiger Salamander is listed by Wyoming as a Species of Greatest Conservation Need and could occur in the project area is not included in the documents.

Information on amphibians in the DEIS and supporting documents is deficient. Wetland surveys by Alder in 2019 did not include searches for amphibians in likely habitat. There is a quick mention of Columbia Spotted Frogs and Western Toads not being detected in "vegetation and aquatic resource surveys" (draft EIS, p. 290), but finding amphibians and their breeding sites (where they are most likely to be detected) takes special training and effort and appropriate conditions/timing; casual observation as evidence of absence is ludicrous.

CTNF apparently has no information about the current status of amphibians in the project area nor in the surrounding area of the west slope Tetons. No references are provided for the statements "Western Toads occur throughout many areas of the Teton Range", and "Columbia spotted frogs have been detected throughout the Teton Range" (DEIS, p 290). If records from Grand Teton NP or private lands are being used to make this statement, that should be disclosed. Amphibian dispersal is limited by terrain features, and local breeding populations can be easily lost due to habitat loss and modification; the existence of a population on the other side of the mountains says little or nothing about their status and persistence on the CTNF.

It is stated that Columbia spotted Frogs "were observed in Teton Canyon" in 1992 (BE, p. 87). This is an amazing admission about the paucity of data or interest for this species on the part of CTNF and Region 4 USFS. Would USFS managers know if this species been extirpated from this part of CTNF in the past 30 years, or if just a few breeding populations are hanging on?

Western toads are said to "have been detected within 10 miles north, south, and east of the project areas in the past, as recently as 2014" (DEIS, p. 290). Ten years is a long time for CTNF to have no information about this sensitive species, and given the brief statement, one must assume there is not much known from 2014, perhaps not even the site location?

The lack of current knowledge about amphibians severely hampers the DEIS claim of minimal or no impacts. Amphibians are the most threatened vertebrate class globally, with climate change and human expansion intensifying on-going amphibian population declines in the last 20 years, according to recent assessment (Luedtke, J.A., Chanson, J., Neam, K. et al. Ongoing declines for the world's amphibians in the face of emerging threats. *Nature* 622, 308-314 (2023). <https://doi.org/10.1038/s41586-023-06578-4>)

USGS research describes an average decline of amphibian populations is 3.79 percent per year in the US, with even more severe declines in some regions of the West. (<https://www.usgs.gov/faqs/why-are-amphibian-populations-declining>)

The lack of information about sensitive amphibian species on the west side of the Tetons should not be used to assume they are resilient and persisting on the CTNF. While habitat loss, modification, and fragmentation have been major concern for decades, recent research has revealed that visitor use has had a negative effect on occupancy and persistence of amphibians in Rocky Mountain NP. As Visitor Use increases, the probability of persistence of amphibians decreases. (Kissel, Amanda M., Mary Kay Watry, Evan Bredeweg, and Erin Muths. 2025. Assessing the Effects of Climate and Visitor Use on Amphibian Occupancy in a Protected Landscape with Long-Term Data. *Ecosphere* 16(3): e70210. <https://doi.org/10.1002/ecs2.70210>)

The large increases in recreation use in the Teton-Leigh Cumulative Analysis area, coupled with a complete lack of information or monitoring of amphibians, need to (at the very least,) be disclosed by the DEIS.

#### Specific concerns about amphibian habitat

(a) Wetlands shown at the SE side of the proposed South Bowl expansion may be subject to adverse impacts from ski area construction and actions. Small ponds or pools near drainages provide breeding habitat for Columbia spotted frogs, and this may have become an important refuge for frogs displaced from development and heavy use in the Teton Creek drainage.

(b) Likewise, the small wetlands in Mono Trees need consideration. Small areas can be extremely important for the persistence of frog and toad populations, but are very easy for managers and resort contractors to ignore, despite knowledge that habitat loss is a prime cause of amphibian declines all over the world. (Patla, D.A., Peterson, C.R., The slow decline of a Columbia Spotted Frog population in Yellowstone National Park: a

cautionary tale from a developed zone within a large protected area. Ecological Indicators 136: 108606.  
<https://doi.org/10.1016/j.ecolind.2022.108606>

(c) Rick's Basin is the largest wetland area in the project area. The proposed several miles of new roads and 7 miles of new trails in this area, plus a new Guest Facility with a vault toilet, will likely add to habitat effects of existing modifications and frequent entry of large vehicles for construction and maintenance. The DEIS provides scant information about soil compaction, erosion, changes to water flow and groundwater in this area, but it does raise warning flags about erosion and sediment transport: erosion and soil movement are expected in Rick's Basin (DEIS, p. 41). It would be highly beneficial and rational to try to foresee and avoid problems rather than wait two years for a Drainage Management Plan.

Surveys for amphibians are badly needed in Ricks' Basin, along with a serious and sincere attempt to find any previous records of amphibians in or near the project area.

(d) Do amphibians persist in the existing water treatment area? I recall that western tiger salamanders were found in the sewage lagoon long ago in the past (1990s), which would likely indicate there are or were connections to other amphibian-inhabited areas in or near the SUP.

#### Whitebark

I strongly protest the proposal to remove nearly 20 acres of WBP in South Bowl, and over 50 acres in the current SUP, with an approximate total loss of about 450 WBP trees. Furthermore, it is hard to have confidence in the numbers presented for young and old WBP that would be actually lost -- how accurate is this estimate? Who will have oversight and control over how many trees are cut down, damaged by machinery, knocked down by avalanche control, or lost due to various circumstances? How many of the remaining WBP will be lost due in increased wind and soil disturbances in thinned areas? How will early snowmelt caused by exposure due to tree removal reduce the health and longevity of remaining WBP?

The admission that about 25% of the WBP in the project area had blister rust in 2019 suggests that this species already faces large threats to persistence. Furthermore, the technique of identifying 'cone-bearing trees' with a single season of what sounds like erratic and insufficient efforts --binoculars and some surveys (BA, p. 35-36)- is problematic. (See the information form biologists in the Jackson Hole News&Guide article, 4 June 2025). In South Bowl, the placement of a ski lift in or near one of the highest-density WBP stands should have been dismissed from consideration.

#### Old Growth and mature forests

The DEIS is very confusing on the topic of Old Growth; page 246 cites Old Growth Forest Assessment, "available on the project web site", but I could find no such document. The Botany BE page 7 states that "The Forest Service has recommended an amendment to Vegetation Section Standards and Guidelines #6, Old Growth and Late Seral Forest Stages, Guideline A (page III- 12) that would deem the guideline unapplicable to the project. The guideline states:

A: In each principal watershed, the combination of old growth and late seral forest stage acres will be 20 percent or more of the forested acres. Where it exists, at least half of this (ten percent of the forested acres) should meet old growth characteristics."

This at least deserves explanation. I am alarmed how casually CTNF may discard the Forest Plan standards and guidelines when they conflict with GTR's ambitious 'Needs'.

I expect more responsibility from USFS, and am discouraged by the apparent flippancy.

The loss and degradation of mature mixed-conifer stands in the Mono Trees area is of great concern. The DEIS fails to examine the future consequences of forest removal here. With south and west-facing slopes, this zone will be increasingly vulnerable to high winds and early snowmelt brought by climate change and extreme weather events. Remaining trees may have poor chances of survival. It seems a needless sacrifice, since early snowmelt will render this area increasingly less valuable for GTR.

The DEIS documents outline the many impacts to wildlife habitat of USFS Sensitive Species that will occur as the mature forest (and its regrowth potential) is degraded or lost, and human activities overtake and overwhelm

natural systems. Of particular concern are boreal owls, flammulated owls, goshawk, and three-toed woodpecker, and possibly Columbia spotted frogs (see section above). Human manipulation of this area is a serious blow to habitat and habitat connectivity needed by lynx and other species including highly valued ungulates (moose, elk).

It is particularly important to be prudent and conservative about habitat losses now, with scant information from USFS monitoring on west slope Tetons in the last decade, and the possible dismantling of all or most safeguards and monitoring under current and future USFS and other federal agencies.

#### Hydrology and Water Quality

Impacts to surface and ground water, the most essential resource, are deeply concerning. Mill Creek supports drinking water for Driggs, ID, and has vital functions as a tributary of the Teton River. Exposing the Mono Trees area to more sunlight and wind along with erosion from the lift, road and trails, soil compaction and increased impervious surfaces, will have adverse effects to the hydrology of Mill Creek, and downstream water users. Development in the current Aquatic Influence Zone of this proposal is rash and risky, certainly water resources are far more critical to current and future generations than GTR's worries about the resort's future competitive financial status. CTNF needs to use the best available, recent science to evaluate not only local effects in the project area, but also wider hydrological context. The analysis should include current and future impacts of development inside the existing SUP, particularly conditions above Ricks Basin. If CTNF proceeds with the proposed action, please consider making GTR post a large bond for the ensuing future damages to critical water resources and downstream users.

Wastewater treatment is not considered in the DEIS, other than a statement on p. 341 about a "proposed wastewater treatment for on-mountain facilities"? This seems a striking omission. Sewage and wastewater pose issues that are crucial to understanding future effects to the watersheds and to human and animal health.

According to Figure 2 in the Wetland Technical Report, there is a sizeable wetland connected to the sewage lagoon area via an intermittent stream. Has water quality been tested here? Is there leakage from the sewage area? Have tests been conducted for contaminants in water and soil?

Figure 3 is hard to read, but it shows a new multi-use trail around the sewage lagoon? Is this a suitable and safe area for a new trail and recreation activities? Will kids and dogs play in the lagoon? Please consult how wastewater areas are managed in communities and national parks. My guess is that putting trails next to such facilities and attracting people there is not acceptable to most land managers.

#### Wilderness

I am concerned about impacts to the Jedediah Smith Wilderness (JSW) that would result from the proposal, including:

(a) increased human use of JSW facilitated by the South Bowl lift. Bringing commercial access to nearly the border of JSW in this remote area will result in adverse changes to JSW, with the loss of solitude, the addition of noise and air pollution, extremely adverse changes to scenery due to the ski lift and runs, and the loss of quality wildlife habitat for animals that typically avoid humans (bighorn sheep, wolverines, lynx, grizzly bears, wolves)

(b) Increased use of other remote areas in the JSW as wilderness users try to get away from this new intrusion at South Bowl.

(c) human-caused wildfire may could result from the development and maintenance of South Bowl and new development within the existing SUP, and from increased summer use by visitors. Intrusions into Wilderness with motorized equipment will occur as agencies try to fight or constrain the fires. (If on-going federal budget cuts and agency changes do not curtail wildland fire-fighting efforts in the Tetons)

(d) Increasing the burden and risk of emergency rescuers as naive visitors get lost or injured wandering away from the developed area and into the Wilderness. Search and Rescue efforts will further degrade Wilderness qualities.

(e) visual and noise impacts from the North Lift to JWS in Leigh Canyon. This lift should be not be permitted.

#### Emergency Services

The remote GTR area is very challenging for search and rescue operations. In 2010, the death of a lost skier from GTR, revealed deep problems with Teton County ID and WY coordination in their rescue efforts.

(<https://www.spokesman.com/stories/2010/aug/09/rescuers-sued-skier-death/>)

Have coordination problems between the counties been resolved, or are there even more issues now with the large growth of both counties and the number of visitors? Are there adequate services now for search & rescue and emergency medical care, and will there be in the future?

#### Visual Impacts

As a long-term resident of the area, I can attest that we never get used to the scars and lights on the upper elevation landscape resulting from ski area developments, as seen both from the valley, and from within the Wilderness and Grand Teton National Park. The proposal to put a restaurant on Fred's Mountain, visible for hundreds of square miles, is outrageous. CTNF's willingness to even include this in the proposed action is an insult that testifies to the alarming propensity to accommodate GTR's extreme desires, and a blindness to the sense of place that so many of us cherish.

#### Closing

I strongly urge you to reject expansion into South Bowl and Mono Trees, and to reduce or eliminate the proposed increased development in the existing SUP, particularly the North Boundary Lift, and the new roads and spaghetti-like dense set of trails.

I strongly support Alternative 1: No Action. This is a crucial time for the Greater Yellowstone Ecosystem; how we care for the land in the next decade could determine the fate of many kinds of wildlife, the forests, the livability of local communities, and the extraordinary qualities of this internationally beloved area.

As summarized by the Jackson Hole News&Guide editorial (18 June 2025), "it is imperative to keep a small footprint ... The Forest Service already has been more than generous in allowing the Targhee land swap to privatize the base for development ... Grand Targhee is a gem. It's a throwback, downhome, family ski hill with incredible terrain within its existing boundaries."

Thank you for considering these comments.

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