

Data Submitted (UTC 11): 10/5/2020 6:56:41 PM

First name: Kathleen

Last name: ONeil

Organization:

Title:

Comments: (Note: I have included this letter as a file attachment also, in PDF format)

I am writing as a resident of Teton Valley, Idaho. I have closely reviewed the Grand Targhee Resort (GTR) expansion proposal and have numerous comments, questions and concerns. I will begin with generalities, then move on to specifics pertaining to environmental, cultural and social impacts. There is much overlap across different items but I believe it bears repeating if impacts are likely to be far-ranging. In addition, I realize that I am preaching to the choir (Forest Service officials) but I believe if these concerns are also voiced by the public, then the Forest Service is not alone trying to uphold its mission of "sustaining the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations". This should be everyone's mission.

General:

1)Springboarding from the mission statement, it is therefore my belief that proposals having to do with and likely to impact precious public lands - in this case, Forest Service lands - must be completely about the needs of the public and the health of the forests, rather than the wishes of a particular corporation or industry. I have read through GTR's entire project proposal and find little to no substantiation of their expressed "needs" (with the exception of their current shortage of food service seating). Their goal to 'remain viable' in their competitive market is a corporate wish, not a need based on greater good or demand. Skier/snowboarder participation in the US has plateaued and in many recent years has decreased (NSAA data). GTR itself does not even reach its current carrying capacity of 2980 guests/day, except perhaps on peak weekends. So they are not in need of expansion based on past utilization or demand. Nor is there need based on future projections for the ski industry - as most analyses do not see a significant increase in demand, particularly as the majority of current users (aging baby boomers) will be leaving the ski slopes in upcoming years.

2)Environmental and cultural impact is guaranteed with any project like this. And mitigation is just mitigation, it is not restoration or environmental improvement or continuity of community fabric. So we and the Forest Service should consider the GTR proposal not as a need (as discussed above) but as a corporate "wishlist", which is what it is. With that knowledge guiding us, then environmental and cultural impacts become paramount and should be the winning factor in any analysis.

3)Forests are finite and any project that could fragment a forest or disturb the wildlife (as this proposal definitely would do) must be held to rigorous standards - which I am sure the Forest Service is planning to do, with our public support. This is of increasing importance as we experience greater loss of forests from conflagration and development. Regrowth is a slow process.

4)Climate change is already impacting the ski/snowboard industry and is likely to accelerate. Any investment in enlarging existing or developing new ski resorts is short-sighted and will likely create a significant increase in carbon footprint and pollution as ski areas will depend more and more on water extraction and snowmaking and other artificial enhancements - particularly on south and east facing slopes as would be the case in this GTR proposal.

Environmental Impact:

Operations:

1)Water and Pumps: GTR would drill 2 new wells with a capacity of 576,000 gallons/day. What would be the impact on the groundwater and the surrounding forest as well as flow and quality of the watershed? If on-

mountain restaurants are approved, water would traverse from base to summit in pipes with pump stations. Please address the noise and impact on nearby wildlife.

2)Sewer: Similar question regarding piping sewer down from on-mountain restaurants (if approved) and risk of spill and contamination of groundwater. Or if leach field and septic tank used, what protections would be in place to protect against failure and contamination of fragile high altitude vegetation.

3)Snowmaking: GTR is requesting a 10-fold increase in snowmaking acreage (from 10 to 104 acres). Snowmaking utilizes a tremendous amount of water (ballpark of 200,000 gallons/acre/foot of snow). In this proposal of >100 acres of snowmaking, that would equate to 20,000,000 (20 million) gallons/foot of snow if all the requested acreage undergoes snowmaking. Is this amount of water extraction in this region sustainable? Machine-made snow also frequently contains additives (not specified in the GTR proposal), some of which have proprietary formulas and do not specify their ingredients, nor guarantee their safety. In addition, the snow from snowmaking is highly compacted and can result in freezing of the underlying soil, with detrimental effect to soil health. Importantly, the question of downstream contamination leading ultimately to Teton Creek and the Teton River or to the wells of residents of Alta, WY, cannot be underestimated. Lastly, the noise from snow guns and the stress on wildlife; as well as the pollution generated by snowmaking equipment need to be carefully evaluated. The last things we need are more noise, water pollution and fossil fuel air pollution.

4)Graded runs & road construction: Impact goes without saying but should be addressed. More detail below regarding wildlife.

5)On-mountain restaurants: Really?? Whatever happened to carrying a peanut butter sandwich? And does it really take that long to get to base from anywhere on Peaked or Fred's? And let's not forget the guaranteed impact they would have on the mountain view from Teton Valley; the darkness of the night sky; the stress on nearby wildlife communities and the impact from ongoing maintenance, activity, traffic and utilities. All of these things should be carefully addressed.

Wildlife & Forest Health:

1)Habitat loss, modification, and fragmentation: Impacts are certain, particularly on species with specialized habitat requirements. Specifically, the "effects of habitat fragmentation are most severe for species that have large area requirements, poor gap-crossing ability and are intolerant of edge effects". (Effects of Mountain Resorts on Wildlife; Allan M. Strong et.al.)

2)Edge effect and bird diversity: Human built ski runs create abrupt transitions between open ground and forest and these transition zones have been shown to cause a negative "edge-effect" resulting in diminished avian biodiversity in these zones (Animal Conservation (2005) 7, 9-16). GTR's proposal would result in many more of these situations with the number of new runs they are requesting. Can this be quantified?

3)Aerial adventure/canopy tours/zip lines, etc.: There is no place for these theme park activities in this national forest with this ecological richness. Removing trees, drilling trees, running cables, building platforms, and managing humans in the upper reaches of trees all will result in driving wildlife away and damaging the forest. To me, this is a no-brainer.

4)Other summer activities: The Forest Service already provides ample recreation opportunities for summer recreation. The GTR proposal does not provide compelling reasons for more.

5)New SUP area requests: GTR has yet to develop any of the previously approved runs, lifts, etc. on Peaked Mountain in their current SUP. I see no need for them to obtain more acreage. Their current carrying capacity of 2980 riders/day is rarely achieved (as noted earlier). Building out just the previously approved lift and run projects on Peaked would increase the carrying capacity to 3720, quite an increase and clearly more than enough given present demand and the outlook for the future. In addition, there would appear to be significant encroachment on wildlife range (winter range, in particular) in these new proposed areas - especially the south facing slopes. Is there any good argument to approve this?

Cultural and Social Impact:

1)Grand Targhee Resort as a 'Niche' resort: The GTR proposal emphasizes how GTR is an 'intimate, uncrowded

experience' allowing guests to experience "how skiing is supposed to be". It touts how it has a 'strong local following'. However, nowhere in this proposal do I see compelling evidence of GTR respecting these attributes. In fact, I suspect that were this upgrade plan approved, that GTR would in fact alienate many of those in its 'strong local following'.

2)GTR as the 'decider' of the future of Teton Valley: If this proposed expansion were to be developed in even close to its requested form, it would dramatically change the character of Teton Valley and would saddle the valley communities with the burden of being primarily support units for an overgrown ski resort. I, as a resident of Teton Valley, do not wish for either GTR or the Forest Service to have that power to determine our destiny. We are bigger than that. This cultural impact likely cannot be quantified but minimizing any potential impact is vital to maintaining the rural, agricultural, small-town character of this valley and its communities.

3)Views, noise, traffic, pollution, crowds, etc. etc.: Need to be given thorough review and consideration.

4)Burden of failure or abandonment: There need to be safeguards in place with acceptance of any or all of this proposal that would hold GTR and its owners, now and in the future, accountable for restoration, remediation, and damage correction in the event that they do not follow-through on plans, create unexpected negative impacts, or abandon a highly impacted ecosystem and its communities. How could this be done?

Summary:

This GTR proposal, if approved, has the potential to create marked changes in the local ski resort experience, the Targhee National Forest health, and the communities of Teton Valley. It deserves the most attentive and careful analysis possible. I appreciate the opportunity to participate in the scoping process regarding this project. I would like to continue to support the Forest Service to the best of my ability as it proceeds with further evaluation of this proposal.