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First name: Laura

Last name: Margason

Organization: US Environmental Protection Agency, Region 8

Title: Environmental Protection Specialist

Comments: Dear Supervisor Bolling:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) notice of intent (NOI) to prepare an Environmental Impact Statement (EIS) for proposed projects at the Grand Targhee Resort (GTR). The USFS Caribou-Targhee National Forest (CTNF) intends to consider and disclose the potential environmental effects of implementing several proposed projects, which are consistent with GTR's 2018 Master Development Plan (MDP). The EPA provides these comments to assist with development of the USFS's EIS and in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

According to the NOI and the scoping notice package, the proposed GTR project includes the following components: 1) Expansion of the USFS Special Use Permit (SUP) area by 1,200 additional acres for two new ski areas with associated terrain, lifts and support infrastructure; 2) lift network improvements; 3) 57 acres of additional snowmaking coverage; 4) on-mountain infrastructure improvements, including two on-mountain restaurants/guest facilities, warming cabins, huts and yurts; 5) terrain enhancements to support alternative, non-winter activities, such as hiking/biking trails, zipline structures, aerial adventure course and re-location of a disc golf course; 6) construction of a snowtubing facility and expansion of existing Nordic, snowshoeing and fat biking offerings; and 7) road network improvements. The USFS proposes to amend its Forest Plan to add 1200 acres GTR to the SUP.

There are many components associated with these projects that will require extensive vegetation removal, grading, wastewater disposal, and a significant increase in water use to accommodate more snowmaking areas and new guest facilities. The EPA is primarily concerned with impacts to wetlands and waters of the U.S., including groundwater, from the proposed projects and expansion plans. We are specifically interested in seeing an analysis of potential impacts to water quality and how erosion and sedimentation rates would be managed to meet water quality standards over the course of implementing all the elements of the GTR Master Development Plan project.

We offer the following recommendations for your consideration in the preparation of the EIS for the GTR Master Development Plan projects.

Project Description and Alternatives

Purpose and Need

According to the USFS scoping documents, the GTR has identified a need to improve the recreational experience, and address shortcomings in its terrain offerings and operations in order to remain viable in the competitive destination skier/rider market. The scoping notice mentions evolving consumer demands and growth in Idaho and Wyoming skier markets. GTR's purpose and need proposal, particularly under the Ski Area Recreational Opportunity Enhancement Act (SAROE) of 2011, would be strengthened by including a discussion and analysis of recent visitation/skier data and associated trends in the EIS to document the level of demand for expanded terrain and facilities.

We recommend that Chapter 1 specify per SAROE that ski area operations must be "...harmoniz(ed) with the natural environment of the National Forest Systems land on which the activity or facility is located" [(16 USC 497b(c)(2)(B)(i)]. The impact analysis in the EIS should then document how the USFS is ensuring the proposed

facilities are able to be harmonized with natural environment and are consistent with USFS planning responsibilities under the Federal Land Management and Policy Act of 1976, as amended.

Range of Alternatives

We recommend the range of alternatives include options for avoiding or reducing the proposal's significant environmental impacts and maximizing environmental benefits. The EPA recommends that the EIS clearly describe the rationale used to determine whether impacts of an alternative are significant, including the development of thresholds of significance based on the context and intensity of the action and its effects.

We recommend the EIS evaluate a range of reasonable management alternatives that will meet the goals and objectives of the purpose and need; address significant environmental issues identified during scoping; and address resource/environmental needs and management concerns. We recommend that the EIS summarize all criteria, including environmental, logistical, technological and cost criteria, used to screen reasonable alternatives. Because this project may require a Clean Water Act (CWA) Section 404 permit, the EIS should include the CWA's regulatory criteria used to evaluate practicable alternatives. We also recommend that the EIS explain the reasoning used to eliminate alternatives that are otherwise practicable under the definition and criteria outlined in the preamble language of the CWA 404(b)(1) Guidelines (40 CFR § 230.10).

According to the scoping notice, additional wastewater management systems and associated infrastructure to accommodate the proposed additional guest facilities are needed. We recommend the EIS identify the various components required for such systems (e.g.: utilities, pipelines) and include a range of wastewater management alternatives for the two full-service on-mountain guest facilities to help identify and minimize impacts to aquatic resources, including groundwater.

Baseline Environmental Conditions and Impacts Analysis

When evaluating effects of project alternatives, we recommend that current existing environmental conditions be used as the baseline for comparison of impacts across all alternatives, including the No Action alternative. This is especially important when there are environmental protections in place that are based on current conditions. For all resources, we recommend that historical data (5 years or older) are verified as representative of current conditions.

CWA Waters of the U.S., including Wetlands

The scoping notice provides some detail on the design and footprint for the individual projects that would likely involve considerable earth work associated with their construction. These activities could potentially impact wetlands and waters of the U.S. Therefore, we recommend that the environmental review and alternatives analysis meet the requirements of both NEPA and CWA Section 404, if applicable.

We recommend the EIS identify existing aquatic resource baseline conditions in the proposed project area, such as wetlands (including peatlands or fens), springs, streams and ephemeral drainages. Specifically, we recommend describing watershed conditions, streambank conditions, vegetation cover, soil conditions, and wildlife and fish population health and habitat. We also recommend that the EIS include a map that identifies all waters of the U.S. (e.g., streams, wetland delineation) within a minimum of 500 feet from any construction activities, with dominant plant community types identified. The EIS would also benefit from more detailed analysis of potentially impacted resource areas that are identified in the scoping notice. Assumptions regarding wetland quality and function should be field verified using a functional assessment methodology and the results included in the EIS.

To ensure that wetlands are protected, it may be necessary to consider exclusion of road/trail construction, underground snowmaking and utility lines, and grading, in areas where wetlands or riparian areas would be adversely impacted either directly or indirectly from adjacent construction activities, thus changing supporting wetland hydrology. The EPA recommends the USFS ensure impacts are reduced through avoidance and Best

Management Practices (BMPs) to protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat. We support the establishment of riparian habitat buffer zones to avoid adverse impacts to streams and riparian areas.

We recommend all analyses consider the most recent water quality data available (i.e., past 5 years) to ensure that potential project-related changes and associated impacts are assessed using an appropriate baseline. When defining baseline conditions, please consider the following:

- *Provide a hydrologic baseline analysis for receiving waters of potential project effects to enable the assessment of biological and geomorphic impacts on future hydrology. At a minimum, include wet, average, and dry year analyses at a daily time-step.

- *Include resources directly impacted by the project footprint within the geographic scope of analysis as well as the resources indirectly (or secondarily) impacted by the project. These indirectly impacted areas may include downstream segments and any other resource areas which may be affected by changes in water management or operations.

Surface Water Quality and Groundwater Management

The GTR project proposes to add up to 57 acres of snowmaking to improve lower-mountain circulation routes and high use trails. Water for the additional snowmaking and new visitor facilities would come from new groundwater wells that would need to be developed. To evaluate this project proposal, we recommend that the EIS include:

- *A map with both current snowmaking coverage and proposed new coverage;

- *A discussion of the existing snowmaking operation and why the proposed additional amount of snowmaking is needed;

- *Water quality analysis of the water to be used for snowmaking, as well as an assessment of water quality in the receiving waters to which the snow melt will flow;

- *An assessment of whether snowmaking water is likely to adversely impact streams, soils, plants or wetlands on or below the ski area; and

- *An assessment of water quantity issues associated with the snowmaking and groundwater withdrawals to serve the project area;

- *When planning ground water wells, identify any Source Water Protection areas and how the project will be consistent with Source Water Protection planning measures; and

- *An analysis of additional spring runoff to streams in the project area resulting from increased snowmaking and the potential for stream bank erosion and spawning habitat degradation resulting from increased flow.

The scoping notice also indicates that groundwater wells would be needed to facilitate water demand associated with new visitors support facilities. When deciding specific locations for the facilities, we recommend that they be located where water wells will not cause significant depletion of surface water in the Teton Creek watershed that could affect rivers, streams and springs. We also recommend such facilities not be located where development could negatively affect groundwater. For example, facilities with septic systems should be sited in areas with appropriate soils, and in areas away from water resources that could be impacted. We recommend that the EIS include a general discussion of the following:

- *A range of estimated water demand per well developed; and

- *Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources).

Most of the West is experiencing a trend toward less snowpack and a shorter snow season. We recommend the EIS assess the potential need for additional groundwater wells and expanded water usage to maintain the same level of existing snow coverage. We recommend the EIS include the project adaptation measures that could be employed to address recent climate shifts and trends of increasing storm intensity, and the impacts of such contingency measures on the environment.

The scoping notice mentions the construction of several on-mountain guest service facilities, including two large full-service restaurants, a yurt, cabin and small warming huts. The notice indicates that water would be supplied

from onsite wells and that wastewater would be either septic, vault toilets, or have sanitary sewer lines. We recommend the EIS discuss the potential groundwater impacts associated with increased septic infiltration resulting from these new facilities in addition to viable alternatives to address wastewater management. Similarly, where sewer lines are proposed, the EIS should identify the specific proposed location of sewer lines and impacts to wetlands and other aquatic resources.

The GTR project plan proposes expansion of two new ski pods with newly developed terrain. Development and use of these new areas may cause or exacerbate drainage problems and increase direct surface flows to streams. We recommend that adverse impacts from this additional expansion (including past, present and reasonably foreseeable development) be fully evaluated and disclosed in the EIS.

When selecting stream reaches for the impact analysis, ensure that critical resources are considered, and the scope of analysis is appropriate. Critical resources include species recovery areas, recreational areas, critical habitat for threatened or endangered species, segments impaired per Section 303(d) of the CWA, segments for which TMDLs have been established, receiving waters for permitted dischargers, and source water areas.

To the greatest extent possible, the EIS should also quantify the potential environmental impacts of each alternative (e.g. additional depletions to groundwater, etc).

Air Quality

To characterize baseline air quality conditions, we recommend that the EIS include:

- *Identification of sensitive receptors (such as population centers and Class I and Sensitive Class II areas in the vicinity);

- *Ambient air quality data including air quality trends of Class I areas in the vicinity over the past several years. Such data can be found on the EPA website (www.epa.gov/airdata/); and

- *A description of current and projected vehicle data use and trends associated with resort visitation.

We recommend including an assessment of the potential for impacts on National Ambient Air Quality Standards and air quality related values. Specifically, we also recommend assessing particulate emissions from construction activities, ongoing operation of the roadways and any impacts related to a projected increased visitation as a result of the project. We suggest that the EIS include an emissions inventory of predicted emissions that may result under the various alternatives so the decision-maker and the public can better understand the magnitude (large or small) of air quality impacts resulting from construction activities and any increased traffic resulting from project build-out. We recommend the EIS include an estimate of the increase in vehicle use associated with the project and assess whether local impacts from re-entrained road dust (PM10) or vehicle emissions are expected. We suggest including, at a minimum, a qualitative discussion of direct or indirect impacts from any increases in electricity use from the project based on emissions from on-site generation and from power plants on the grid.

Measures to Address and Minimize Impacts

We recommend that each alternative include appropriate measures intended to address unavoidable projected impacts to the extent possible. Ski area expansion can have the potential to cause water quality and quantity impacts, wetland and aquatic resource impacts, air pollution from increased visitor and/or resident populations, permanent vegetation change and permanent habitat loss. We recommend that the USFS seek alternatives and measures to avoid, minimize, and mitigate, as appropriate, for those unavoidable impacts associated with the proposed expansion of GTR's current operational boundary. We recommend that USFS propose BMPs as a component of each alternative to address impacts from increased water use for both recreational activities and human consumption, construction of additional infrastructure including buildings roads and trails, and ground disturbance from the various earth moving activities associated with the projects that comprise GTR's proposal.

Other Considerations

Transportation

The scoping notice also proposes "(i)mplementation of a Mountain Road Rehabilitation Program" (at 85 FR

52543) that would include construction of new roads, improvement of existing roads or removal of unnecessary roads. The EPA understands that new or improved transportation infrastructure is proposed to provide residents, visitors and GTR employees access to new facilities and recreational opportunities proposed on USFS land. It is not clear from the notice, however, if this program of roadway construction activities is currently developed or would be developed and discussed in the EIS. It is also not clear where information about this program may be found by the public. As a subset of actions that have potential for significant direct and indirect impacts to land, water, air, and wildlife resources, we recommend that all components of the transportation network necessary to support the GTR proposal be discussed and analyzed as a part of the alternatives in the EIS in order to fully support USFS's decision and associated forest plan amendments.

Wildlife, Special-Status and Threatened and Endangered Species

The GTR project area may contain special status species, including Endangered Species Act listed threatened species, endangered species, and/or their designated critical habitat, as well as candidate species. We recognize that the USFS will discuss the Proposed Action with the U.S. Fish and Wildlife Service (USFWS) as it relates to potential impacts to these species if present in the project area. To best inform the decision-maker and the public, we recommend the NEPA documentation include:

- *Summary of the status and trends of threatened, endangered, and sensitive (TES) species and potential suitable habitat acreage in the proposed project area;
- *Disclosure of any impacts to TES species and habitat resources (including habitat fragmentation) associated with the proposed project; and
- *Any USFWS recommendations to reduce potential impacts to TES species from the proposed project, including project design criteria, mitigation, conservation and monitoring measures.

An increase in summer activities in the area may also result in increased human-wildlife interactions and impacts to wildlife found within and adjacent to the project area which would not normally occur in winter months (i.e. bears). We recommend working with USFWS to include an analysis on wildlife impacts from increased off-season (non-winter) activities including project construction, long-term operations and increased visitor usage during those times.

We appreciate the opportunity to provide comments at this early stage of the NEPA process. These comments are intended to facilitate the decision-making process; thank you for considering our input.

If we may provide further explanation of our comments, please contact me as the NEPA lead reviewer for this project.

Regards,

Laura Margason
Region 8 NEPA Branch
Office of the Regional Administrator