**Comments on scoping letter Grand Targhee proposed expansion**

**Purpose and need.**

Much of the purpose and need statement is based on responding to ‘ever-increasing’ public expectations. I wonder at what point considerations other than keeping up with regional resorts and making a profit for the permittee will drive an environmental analysis. The CTNF forest plan for example, would have to be amended to accommodate proposed expansion of the area, such that a management prescription emphasizing visual quality would have to be changed. Has scenic preservation next to a classified wilderness become less important than it was in 1997? Why would any proposal be considered in an action alternative if it doesn’t meet forest plan direction?

Ski areas don’t have to have all the same features such as on-mountain restaurants and bars, zip lines and other rides. What makes Targhee unique that should be enhanced if necessary? While there isn’t anything specifically wrong about how the P&N statements are written, the reader isn’t told why they are necessary and what is lacking in the existing condition. The P&N statement is meant to answer the question of why here, why now. It should show how the existing condition needs to be changed in order to meet a desired condition.

I find no mention in the P&N Statement about the USFS Framework for Sustainable Recreation. Is there not a need for any permitted resort on national forest land to help support this framework as a major USFS partner and permittee?

**Issues with the proposed action.**

I did not find a list of known potential issues in this scoping document. Was this omission intended? Here are some issues that I think ought to be addressed.

In addition to the proposal’s conflict with forest plan prescription 2.1.2, other issues arise about the effect on scenic quality and the level of intrusion on the natural landscape. The developments will be visible from high-use destinations in the wilderness such as Table Mountain, and lights at night will be visible from the valley. Structures are likely to be more visible than currently from other places in the national forest nearby from which you can already see the lifts etc. What can be incorporated into the proposed action to minimize these scenic intrusions?

Safety. If the proposal includes more than doubling the comfortable carrying capacity of the resort (from 3,000 skier days to 7,000), how will this increase traffic on the access road, especially after dark, when potentially large numbers of vehicles will be descending? The concern is increased by the proposed addition of an on-mountain restaurant and bar—do we really need to fill people will apres-ski alcohol before sending them down the mountain? With added enhancements to summer recreation, is there a concern about conflicts between increased traffic and bicycle use of the road? Can this be reduced by building a separate bike lane, or is there not enough room in those switchbacks?

Compliance with Forest Service direction on what’s appropriate at a ski area. FSM 2340.3 states that the forest should deny proposals by the private sector to construct or provide outdoor recreation facilities and services on National Forest System lands if these facilities and services are reasonably available or could be provided elsewhere in the general vicinity. Food service and restaurants belong at the base (where they already are and can be easily serviced via existing roads).

Proposals to increase the number of guest service facilities such as restaurants and additional snowmaking bring up the issue of whether there is an adequate water source to serve these facilities. This is a known problem, as the resort has run dry in the past. Availability of a proven local water source for supply to the resort and for potential firefighting is a significant limiting factor for what can reasonably be done here. Expansion of facilities can’t be allowed to the point of exceeding the water available to support them (and with climate change this is an increasing issue).

Also having to do with water is an issue around waste water disposal. Is there a reasonable way to dispose of sewage without polluting the highly permeable limestones in the resort area?

Protection of wildlife in and around the area is a concern. Issues include increased traffic on the ski hill road and potential for collisions with animals. Some mitigation could occur in the form of low speed limits, but there would still be an increased hazard. Bighorn sheep need a way to travel between winter and summer ranges. Would this proposal create any problems for the bighorns?

Also, adding public use on the mountain during extended evenings and hours of darkness in winter (the yurt for instance) would likely displace wildlife which benefit from quiet and lack of disturbance when people aren’t around. Web cams at resorts show how much more wildlife use the area without human presence. I don’t see any real justification for having permanent structures such as the yurt and warming huts where they are proposed. Temporary structures if needed for skier safety would suffice.

Disregarding proposed boundary adjustments, there is a proposal to add lifts to the existing resort. Just looking at the map of where these are proposed, some seem to be placed on already-lift-assisted slopes and is there not an issue of overcrowding the same slopes? This could be a safety problem and the need for such lifts is not clearly articulated.

Thanks for the chance to comment.