Anne W. Callison

October 12, 2020

To the US Forest Service:

RE: Comments on Grand Targhee Resort Scoping Document and Proposed Expansion

 We appreciate the extension of the comment period to today, October 12.

My husband and I have owned our property in Teton County Idaho since 2002. Our home was finished over a decade ago. My husband is a long-time season pass holder to Grand Targhee Resort (GTR). Both of us hold or have held positions as urban planners and worked extensively in policy making at the local and statewide levels.

 My comments are based on the review of multiple applicable documents and on my in-depth knowledge of the governance of Teton County Idaho (TCI) and its cities. My first comments will cover many general aspects of the proposed Grand Targhee Resort (GTR) expansion. This expansion is grossly out of character for its setting, and many proposed elements need to be removed or reduced in size and impact. As proposed, the GTR expansion should be scaled back prior to moving forward with the Draft EIS.

 One question that needs an answer is about meetings held with “key parties.” As directed by the November 4 2019 letter from Mel Bolling to Geordie Gillette of GTR, meetings with “interested parties to highlight potential issues and mitigations…” were directed to occur. Did these meetings occur prior to the issuance of the Scoping Document on August 26, 2020? I know from personal contact with the chair of the TCI county commission, that meetings to discuss the proposed GTR expansion never occurred. There were four (4) key issues which Mr. Bolling suggested in his November 4 2019 letter and many in his previous, February 5 2019 letter that needed to be discussed. It appears that few if any of the issues brought up by Mr. Bolling were discussed, or resolved, with the appropriate governmental units and/or agencies prior to GTR filing for its proposed expansion. If any meetings related to Mr. Bolling’s concerns exist, where can minutes be reviewed on these topics to see how they were resolved prior to the issuance of the Scoping Documents? The lack of involvement of key governmental units and agencies is clearly not in the spirit of NEPA and this needs to be addressed prior to proceeding with the preparation of a draft EIS.

 Also I must say how incredibly disappointing it was that the consultant, SE Group, referred to Grand Teton National Park as “Teton National Park” in the Scoping Document. This shows such a lack of understanding that one wonders why any of their work should have been accepted. SE Group speaks to protecting view of the Grand Teton, but only from the east. The Scoping Document makes no mention of potential negative impacts--socio-economic, visual, physical, or fiscal-- for Teton County Idaho and its cities. SE Group wrote the Scoping Document as if this proposal and its acceptance were a fait accompli and as if there is still no need to involve Teton County Idaho or its cities or the State of Idaho.

 Very clearly all the Scoping Documents and related correspondence are solely Wyoming-centric, yet nearly 100 percent of the negative impacts fall on Teton County Idaho, the State of Idaho, and their taxpayers and residents. This is unacceptable. With this in mind, there should be many Idaho agencies given Participating Agency Status in this process immediately and work sessions begun with these being open to the public. These should include Idaho Department of Transportation, Idaho Department of Education, Idaho Department of Natural Resources, Idaho Fish and Game, Idaho Department of Health, Idaho State Patrol and more.

 Also disappointing was the short notice given for the two virtual open houses, and it was completely not in the spirit of NEPA that citizens who took their time to participate were barred from asking questions or making comments during those virtual open houses. These should be repeated with the ability to ask questions prior to beginning the draft EIS. Or better yet, hold a physically-distanced in-person meeting in Driggs.

 My comments are divided into areas of concern. There are many impacts from the proposed expansion of GTR that will impact the fiscal and social health of Teton County Idaho. The drastic increase in population in TCI that will occur if the proposed GTR expansion is realized will result in overcrowded schools, decreased air quality, new demands for waste water treatment, new demands for electrical service, new demands for social services, to name a few. These impacts must all be addressed now, prior to the outlining of the draft EIS. As indicated by the letters from Mel Bolling, Grand Targhee should have called meetings with many agencies, governmental units, the school system, and others to understand these impacts and to have offered mitigation. Apparently, none of this collaboration with the above, or with the taxpayers of Teton County Idaho has occurred. This is a clear violation of NEPA law and shows the lack of involvement in directly impacted stakeholders and a fully adequate analysis of environmental resources.

 **Socio-economic Impacts**

 K-12 Schools

 An expanded GTR will increase demand for seats in the Teton County Idaho schools. Will the State of Wyoming and Teton County Wyoming cover all costs of building these seats in our K-12 system, will they cover a proportion of providing teachers, counselors, administration for our schools?

 Affordable Housing

 As proposed, GTR suggests that all affordable housing should be built in Victor and Driggs and in outlying areas of these cities in the county. None in Wyoming. This is not acceptable and there is no way that GTR should attempt to pass these costs off on the taxpayers of TCI. A study should be done to measure the predicted costs tied to inflation for varying numbers of affordable housing needed. These numbers should correspond with the new, more realistic expansion goals.

Noise

 There is no mention in the 10/2/19 application speaking to the increased noise levels nor decibel levels which would emit, for instance, from the “top-drive” proposed South Bowl West Lift, nor any of the other proposed lifts. Would the bottom-drive lifts located in canyons increase noise on the Idaho side? These questions are not addressed.

 Plus there will be the incessant noise from construction vehicles on Ski Hill Road and other feeder roads throughout TCI.

 Crime

 Should this expansion occur, the crime levels in TCI will only increase. Today, all crime at GTR is the responsibility of the Teton County Sheriff’s Office, some hour’s drive away. Is the State of Wyoming and Teton County Wyoming prepared to contribute proportionally to the financial costs this proposed expansion might cause TCI taxpayers to cover? Will they cover both an increased size of the sheriff’s office, need for attorneys in the prosecutor’s office, and help with victim’s assistance?

 Healthcare

 Are the State of Wyoming and Teton County Wyoming prepared to help fund Teton County Hospital and all its related partners who serve to treat those injured at GTR? Currently, GTR contracts with TCI’s Emergency Medical Service. As our county grows, we may find that our EMTs do not have the capacity to serve GTR.

**Physical Impacts**

 There is little question but that the expansion of GTR into the South Bowl and into Teton Canyon have not been studied well enough. These parts of the expansion should be denied in their entirely. Perhaps rearranging the small children’s learning area, placing a restroom facility mid-mountain with no lights, and expanding the Shoshone lift are acceptable, but nothing else.

 Visual Impacts

 In no uncertain terms is building two restaurants that will shine lights into the Idaho sky acceptable and these should not be included in the outline for the draft EIS. We have a very serious dark sky policy imbedded into our TCI zoning code. This allows the residents and visitors to Teton County Idaho to see the Milky Way as an incredibly dense smear across our dark night sky. Seeing meteor shows here has a quality perhaps unsurpassed in the vast expanse of our lower 48 states. Further the 2018 GTR Master Plan should be revisited and all mention of single family or duplex dwellings removed. Having full-time residents will only make controlling their night lighting harder and will add light pollution in Teton County Idaho.

 As all light pollution will only affect TCI, how does GTR propose to completely mitigate its damage to our dark skies? To wildlife?

 Wildlife

 Teton Valley Idaho hosts the largest migration corridor for wildlife in the Greater Yellowstone Ecosystem. There can be little question but that the negative impacts on wildlife already struggling to deal with more human development and interaction are sharply reducing their numbers. There is no mitigation which can be offered by any party that can compensate for the loss of wildlife in our fragile Greater Yellowstone Ecosystem. There should be no development in any new area at GTR and these proposals should be withdrawn prior to outlining the draft EIS.

 Please put all the wildlife studies that have been completed in the Caribou-Targhee National Forest on the grandtargheeresorteis.com site. What other studies are planned regarding habitat loss by specie, effects on migration corridors? How will the public be able to participate and comment on these studies?

 Parking/Transportation

 As early as the February 5, 2019 letter from Mel Bolling to Geordie Gillette, it was clear that the Forest Service recognized there were problems with transportation and parking at GTR. How were these issues resolved prior to the issuance of the 8/26/20 Scoping Document? Are there minutes from meetings, consultant reports available for review?

 Paving new parking lots at GTR will only add to storm-water runoff and the need for treatment of this run-off. The Scoping Document proposes below grade parking garages. These will only serve to redirect more storm water run-off and could affect private wells downstream.

 Construction traffic will spoil any currently enjoyed quality of life in the cities of Driggs and Victor and for all residents who live within earshot of highways leading to GTR. Who will pay to keep these roads, including those roads (Idaho Highways 33, 32, 31) that feed into our valley at a safe level of maintenance? Has the State of Idaho Department of Transportation been consulted so that the effects of going from just over 2,000 skiers per day to 7,000 per day been studied for its costs and impacts?

 The documents speak to a “Road Impact Fee” being charged users, but only beginning at Ski Hill Road. This is unacceptable. All fees should be shared with TCI and the State of Idaho.

 The Scoping Document suggests that park and ride facilities will be built in Victor, Driggs, and Tetonia. Has a storm run-off study been done to see if those areas can absorb and/or treat more run-off?

 All of these issues require more study. The study should include a fiscal note for TCI, the cities within Teton County, and the State of Idaho. This study must not be done by a local-Wyoming or Idaho- consultant nor by any of the usual choices by ski areas seeking expansion.

 Air Traffic

 While the valley has an excellent General Aviation (C-II) airport, we also want it to remain as such. Aircraft with wingspans greater than 79 feet are not permitted, and while air charters are, there is no tolerance or desire on the part of Teton County Idaho residents to expand allowable use beyond these. We do not want Grand Targhee to be seen as a national or international destination resort.

 A study must be done on potential air quality degradation and noise impacts depending on the expected increase in air traffic.

 **Quality of Life**

 There are many “refugees” from Colorado, Utah, and California now living in Teton County Idaho. These residents have witnessed what happened to the towns serving ski areas in those states and how they were devastated by ski area expansion and then growth, crowding, and higher taxes. It should not be a foregone conclusion that what Geordie Gillette and GTR ask for should be approved. Grand Targhee Resort is located in a unique, geographically challenged area. It is not served by interstates; it is near an airport that will never see regularly-scheduled service. It is located in a valuable wildlife area. It is near Teton County Idaho that is constrained by available water and limits to septic system capacity.

 It is clear that this expansion has not been discussed with appropriate governmental units and related agencies. This proposal has been flying under the radar. Even the attempt by the Forest Service to have such a short comment period on the Scoping Document has been disappointing—as were the two digital meetings where participants were not allowed to comment or ask questions.

 Our GTR was formed by a local family to serve local skiers. Expansion of GTR is not desirable. Mentioned above are the few acceptable proposed changes. Turning Grand Targhee into another Breckenridge or Park City is not acceptable. Thus, it is requested that Grand Targhee must return to the planning stages and hold the work sessions with applicable governmental units and agencies that should have been held over the last two years prior to the issuance of a Scoping Document.

Sincerely,

Anne W. Callison

Tetonia