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Comments: Grand Targhee Scoping 2020

Dear Mr. Bolling,

Below are my comments related to the GTR scoping document. I appreciate the CTNF extending the comment period.

#### Purpose and Need

In reviewing the purpose and need, "To address the growth in Idaho and Wyoming skier markets and, to meet increasing guest expectations, GTR must continue to develop and improve its terrain and guest services offerings. These developments are in direct response to evolving consumer demands and the competitive regional destination skier markets", this is the standard "boilerplate" which can rationalize any demand by the proponent for resort expansion. Absent are any supporting data that can support increased visitation/demand, increases in skier density per acre or need for permit expansion based on terrain distribution.

In reviewing the skier visitation the numbers found in the MDP 2018, skier visits have remained relatively stable, not indicating an increasing trend of visitation/demand. When examining skiers per acre, it is noted in the MDP 2018 (pg. 37) that skier density is 4 skiers per acre, a standard that is at the low end of the ski industry standard. Finally it is argued that there is a need for increased terrain variety but this assumption is contradicted in the MDP 2018. It is stated, "Table 4-3 illustrates a close match between Grand Targhee's existing terrain distribution and the market demand for most abilities"(pg.34).

Finally, in reviewing the MDP 2018 it is noted that the build out of lifts and approved restaurant at Lightning Pod (addressed in the 2nd EIS for the land exchange) along with additional trails has not occurred. Also the 2003 land exchange which was approved to ensure financial stability to the resort and support on mountain development has not been implemented.

How can the USFS consider increasing the resort's footprint when they have not completed existing approved projects and base development. It appears that this proposal is speculative given that skier demand has remained relatively stable, density is in the low end of the industry standard, terrain distribution matches market demand and approved projects including base development have not been realized. In reviewing this proposal, one would wonder if the proponent is unable to finance approved projects and is seeking to sell the resort. By increasing GTR's boundary as well as on mountain amenities the USFS may unwittingly be supporting a financial windfall for the present owner at the expense of the best public interest.

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I request that the following be addressed in the DEIS:

Analysis of skier demand to justify resort boundary expansion as well as newly proposed projects.

Analysis of skier density and terrain distribution in relation to skier demand in relationship to ski industry standards.

An examination of the proponent's financial capacity/stability. In particular, can he/she secure financing and service loans necessary to ensure the viability of the resort given the scope of development.

#### Access

Public access to the Mono Tree and South Bowl will be impacted by restrictions implemented through the resorts permit. What type of restrictions can be anticipated?

Mono Trees: Access from Teton Canyon via the Mill Creek trail is used by a variety of interests-mountain bikers, horse riders, hikers, dog walkers, etc. How will limitations imposed by the resort's permit limit use of this resource?

South Bowl: Winter use by backcountry skiers will be lost. Hikers, hunters and other users will lose use/access.

#### Wilderness

The South Bowl expansion is adjacent to the wilderness area. The development of lifts and service roads has the

potential to degrade the wilderness experience of users during all seasons. How does this development proposal support or degrade this area of the Jedediah Smith Wilderness? Is this development in conflict with the Wilderness Act given its proximity to wilderness area?

#### Visual Impacts

View sheds from Teton Valley, national forest/wilderness lands and Grand Teton National Park must be considered and not degraded.

Palmer Raceway lights: Lights will be visible from Teton Valley, the surrounding national forest/wilderness area and GTNP. Is this proposal in conflict with night sky style ordinances in Teton County Wyoming and Teton County Idaho? Also, are there requirements in the CTNF forest plan and GTNP regulations to protect night sky values?

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Fred's Mountain Restaurant: This facility will be visible from Teton Valley, the wilderness area and GTNP. As a result, users of our federal lands may have a negative experience. Also given the tendency to expand use over time, will this restaurant be open in the evening? As with the raceway lighting, this would impact night sky values and may be in opposition to ordinances in both counties.

Sacajawea Restaurant: The restaurant will be visible from the valley. Also if utilized in the evening, issues with lighting will arise; refer to concerns referenced for the Fred's Mountain restaurant. As an aside, based on the previous two EIS's related to the land exchange, it was my understanding that the restaurant was to be in the Lightning Peak area, below tree line in order to preserve view sheds to national forest lands south of the resort.

South Bowl: This portion of the resort expansion will require at minimum, the development of access roads for maintenance and cat skiing. If lifts are installed, such development will further degrade the view shed.

Specifically, development will be visible from the south Teton Canyon trail, Table Mountain and other forest/wilderness lands. Visitor experience related to wilderness values will be impacted.

Mono Trees: Access road development, the lift and run clearing will impact the view shed from Teton Valley.

Elevation and Exposure: The South Bowl faces southeast. Noted in the MDP 2018, such an exposure regarding snow retention is rated as "fair". Given the issue of climate change how viable is this area for developed skiing? The base of the Mono Tree area is at a low elevation. Again snow retention and use of the area over time, given issues of climate change need to be evaluated.

Socio-economic Impacts: The permit expansion and proposed developments will require additional workers. While increased employment opportunities appear positive, the majority of workers will be in the lower paying service sector who will reside in Teton County Idaho. As a result, many will have difficulty participating in the local economy where prices for housing, healthcare, food, etc. are inflated due to growth associated with the pandemic and other factors. Affordable housing for employees will become an issue along with accompanying demand on state, county and private social services. While state funding may be available to cover housing and healthcare needs, Idaho taxes will be used to mitigate such concerns. This creates an imbalance in funding given that the resorts tax revenues will be paid in Wyoming.

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Will the resort pay a wage and provide benefits that will allow their employees to participate in the local economy and mitigate noted concerns? Will the proponent provide employee housing so as to mitigate increased demand for affordable housing? Access to healthcare is important especially now due to the pandemic. Will the proponent provide health insurance to all employees?

Wildlife: Winter range in Teton Canyon is a primary concern. Previous EIS's have addressed Peregrine Falcon nesting along the south facing slopes in Teton Canyon. Also it is my understanding that south facing slopes are closed to the public in the canyon during winter in order to preserve the integrity of the winter range. Will South Bowl development negatively impact winter range due to increased human activity?

COVID-19 Pandemic: While skier visitation has not shown an appreciable increase based on information from the MDP 2018, this proposal seems to be based on a "build it and they will come" scenario. Given the potential risks of contagion associated with increased visitation from out of region/state individuals, a risk analysis should be preformed. Consultation with East Idaho Public Health and its counterpart in Teton County Wyoming is requested.

In summary, my review of the Scoping document leads me to oppose the resort's proposal. This is based on the extent of the proposed developments and expansion of the permit area.