

Data Submitted (UTC 11): 10/8/2020 4:43:19 PM

First name: Amy

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Organization: Friends of the Teton River

Title:

Comments: To: Mel Bolling, c/o Jay Pence, Teton Basin Ranger District

Re: Grand Targhee Master Development Plan Projects

Please accept this written comment, on behalf of Friends of the Teton River, during the scoping phase of the Grand Targhee Master Development Plan Project.

The mission of Friends of the Teton River (FTR) is to restore and conserve the Teton River Watershed, ensuring a lasting legacy of clean water, healthy streams, and a thriving wild fishery. We implement programs and projects founded on sound science, community education, and cooperation with landowners, citizens, and agency partners.

As such, comments from FTR are often requested by our partners, stakeholders, and/or agency partners on land use changes that may have an impact on water resources. We approach these comments from a scientific standpoint, and try to ensure that our comments reflect the best science available to us at the time of writing.

Our comments on the scoping phase of the proposed Grand Targhee Master Development Plan Projects are as follows:

\*Teton Creek is an important tributary for native Yellowstone cutthroat trout (YCT). Teton Creek is one of the only tributaries in Teton Valley that has a remnant fluvial YCT spawning run and has the highest YCT juvenile recruitment in Teton Valley (Koenig, 2004). From 2010-2020, Teton Creek has been a major focus of FTR's fisheries monitoring program, and this monitoring data of tagged trout corroborates that Teton Creek remains the most important spawning tributary for fluvial YCT in the upper Teton River watershed. (Unpublished FTR data, available on request).

Due to its ecological significance for YCT, Teton Creek is a priority tributary for restoration efforts in the upper Teton Watershed (as identified in the Upper Teton Basin Model Watershed Plan, 2010-2020). FTR, state agencies, (Idaho Department of Fish and Game (IDFG) and Wyoming Game and Fish), federal partners (US Geological Survey, US Fish and Wildlife Service, US Forest Service) and the Bonneville Environmental Foundation have prioritized restoration and monitoring efforts on Teton Creek to promote overall watershed and fisheries health. This work has been supported by Grand Targhee Resort, through voluntary donations as well as through mitigation requirements associated with a previous phase of development.

According to the latest IDFG trout population survey, YCT densities per hectare on Teton River have increased by 30% since 2009, and an astounding 550% since 2007. YCT densities are back up to numbers that the Teton River hasn't seen since the late 1980's and early 1990's. According to IDFG this is in part due to conservation efforts, such as the Teton Creek restoration project, that improve available habitat, water quality and the health of the watershed.

Due to the importance of the Teton Creek sub-watershed for Yellowstone Cutthroat Trout watershed wide and range-wide, it is critical that future development in the Teton Creek sub-watershed is designed to minimize impacts on Yellowstone Cutthroat Trout.

Friends of the Teton River recommends that the EIS for the Grand Targhee Master Development Plan Projects should include a detailed assessment of the impacts of the development projects on YCT habitat in the Teton Creek sub-watershed, including Mill Creek, the North Fork of Teton Creek, and associated wetlands. This should

include, but not be limited to, potential impacts from road building, construction activities, forest alteration, and hydrologic alteration associated with proposed development projects. FTR recommends that proposed projects should be designed to minimize impact on YCT habitat to the greatest extent possible. Significant mitigation, to be applied within the Teton Creek sub-watershed, should be required for any impacts that cannot be avoided. FTR is willing to work with Grand Targhee Resort, the US Forest Service, and other partners to recommend appropriate mitigation if necessary.

\*Based on a review of the Grand Targhee Master Development Plan Projects materials, it appears that a portion of the proposed development activities will occur within the watershed boundary for the City of Driggs Teton Creek Spring Water Source (PWS#ID7410004) (<http://www2.deq.idaho.gov/water/swaOnline>).

Due to the importance of this drinking water source for residents of Driggs, Idaho, and the cost and challenges associated with remediating drinking water contamination, it is critical that future development within the watershed boundary of this public drinking water source be designed to protect drinking water quality.

Friends of the Teton River recommends that the EIS for the Grand Targhee Master Development Plan Projects should include a detailed assessment of the long-term impacts of the development projects on drinking water quality in the region. This assessment should be focused on, though not limited to, impacts on the City of Driggs Teton Creek Spring, as well as potential impacts to public and private drinking water sources in Alta, WY and the eastern portion of Teton County, Idaho. FTR recommends that proposed projects should be designed to minimize impact on drinking water quality to the greatest extent possible. Because appropriate mitigation for degraded drinking water is difficult to achieve and typically very costly, designing the project for minimal impact is preferable to mitigation.

\*The volume and timing of groundwater withdrawal for drinking water and snowmaking water have not been clearly specified in the application. Friends of the Teton River recommends that the EIS for the Grand Targhee Master Development Plan Projects should include a detailed assessment of the hydrologic impacts of increased groundwater withdrawal associated with development plans for drinking water, snowmaking, and all other intended water uses. This should include, but not be limited to, potential impacts on regional groundwater quantity, as well as potential impacts on the timing and volume of surface water runoff in the Teton Creek sub-watershed, including Mill Creek, the North Fork of Teton Creek, and associated wetlands. It should also be noted that the drinking water, snow making, and irrigation water plans, including a commercial water right application, should be reviewed and approved by all applicable regulatory agencies prior to the granting of any development rights.

Please contact me if you have questions or need additional information.

Sincerely,

Amy Verbeten  
Executive Director  
Friends of the Teton River