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Title:

Comments: To: Mel Bolling, c/o Jay Pence Teton Basin District Ranger P.O. Box 777, Driggs, ID 83401.

Thank you for the opportunity to comment on the scoping of the EIS for the Grand Targhee Master Development Plan. Please consider the following for analysis in the EIS. Please note that I currently am a season ticket holder and enjoy skiing at GTR. I have enjoyed recreating in the Tetons since the 1980s.

1. More data is needed to evaluate GTR stated purpose and need. This analysis should include looking at skier densities at Jackson Hole Mt. Resort and Sun Valley and analyzing the number of skier days that could be accommodated at GTR without expansion into Mono Trees and South Bowl. I feel that GTR should report new visitors to the resort for 2020 -2021 as result of Mountain Collective pass. I am requesting that the draft EIS be held up till this data is obtained because it would likely show that GTR can attract many more visitors and have comfortable skier density without expansion outside of SUP. Included in any economic analysis should be the growth of backcountry skiing and snowboarding. Vs flatline of alpine skiing (baby boomers are getting old). According to Snowsports Industries America (SIA), skiing participation dipped 3.6 percent and snowboarding participation fell 5.7 percent in 2017/18, and the three-year average annual growth is also down for both sports. (ref. 1)

2. EIS should include a detailed analysis of impact to viewshed. Additional facilities- roads, lifts, restaurants, trails, will impact the views of the Tetons from the Teton Valley, Jedediah Smith Wilderness and the main peaks of the range. There need to be large photos of views in summertime from popular viewpoints. The Face trail to Table Mt., Devil Stairs Trail, and No Fork Teton Canyon are among the most popular hiking areas on the west side of the Tetons. A mock- up of proposed new ski runs and lift towers should be placed on photos. This Visual simulation would be the best viewshed analysis that is easily understood by the public. Now it is possible to hike or ski or snowshoe in above areas without even knowing that a ski resort is close by. My experience would be diminished if I looked at three ski lifts and ski runs and construction of above over many years.

3. Analysis of impact to dispersed recreation in Teton and South Leigh Canyons. There is extensive and growing dispersed recreation in North and South Fork Teton and South Leigh Canyons. The impacts of the SUP expansion and additional facilities on these recreation users should be considered including noise, and viewshed impacts. GTR should reveal future backcountry access gates and policies at GTR. Future dispersed recreation needs for a rapidly increasing population in Teton Valley must be considered. How would nordic and backcountry skiers and snowboarders and snowmobilers be affected by GTR expansion?

4. Impacts on wildlife- The expansion of the SUP on to the south slopes of the Teton Canyon and Millcreek would impinge on wildlife winter range. Bighorn sheep in Tetons are endangered. There should be analysis of elk winter and spring range. There are other species of concern (lynx, wolverine) This needs to be assessed in the EIS. What are number of Great Grey Owls that would be displaced by Mono trees expansion? I have seen elk and moose in these areas. There is good evidence that ski runs cause a fragmentation of habitat that is associated with loss of biodiversity of bird species. ( ref.2)

5. Please analyze cumulative noise and visual impacts of South Bowl expansion over the time period to build three proposed lifts. There will be noise from helicopters, road construction and creating new runs. Noise from Cat skiing and avalanche control bombing would be a further disruption to wildlife and winter dispersed recreation.

6. Given the proximity to wilderness, what is the likelihood that a person can enjoy a true wilderness experience in the North Fork or South Fork of Teton Canyon with a proposed major disruption of the area? Since Forest plan of 1997 please analyze what has changed in Jedediah Smith Wilderness in terms of popularity and opportunity to be away from sights and sounds of civilization. How would this be affected by South Bowl expansion? Many more people are visiting Grand Teton and Yellowstone National Parks and this visitation is "spilling over" to Teton

Canyon. Please analyse cumulative as well as summer and winter impacts in this EIS.

7. What is an estimate of the number of days the So. Bowl area would actually be open for skiing after cutting trees for ski runs and required avalanche control? Removing trees for ski runs will make this area more avalanche prone and sun affected.

8. Given impacts of climate change, can the DEIS estimate the number of days per year the South bowl area will actually be skiable in thirty years or 50 years?

"The amount of snow in the western United States has seen an average drop of 41 percent since the early 1980s, according to recent research. As a result, the snow season shrunk by 34 days." (ref. 3)

9. Please estimate the number of trees that would be cut down for South Bowl and Mono Trees proposed expansion. The major logging required will be a visual eyesore and unacceptable to most in the community.

10. Driggs currently has a Dark Skies ordinance. Please analyze lights on mountain from proposed restaurant, night skiing, and extra snowmaking. Please analyze light impact and loss of dark skies in Teton Valley and major peaks of Grand Teton National Park and Jedediah Smith Wilderness. (This is unacceptable to me and most locals.)

If the USFS and SE consulting are considering resort profitability, I feel that it is mandatory that they look at downstream social issues and quality of life impacts to the neighboring communities of Driggs, Victor, and Teton.

11. Please evaluate PM2.5 air pollution in downtown areas when many vehicles including diesel trucks are backed up at single traffic light in Victor and Driggs.

12. What are the impacts of excess traffic over Teton Pass and Ski Hill Road. This should include traffic from housing already improved by Teton County Wyoming.

13. What will be impacts to cyclists on Ski Hill Road which is one of the most popular cycling roads and one of the few that has a dedicated bike lane? How can these impacts be mitigated?

14. Please include in DEIS at least five alternatives including: A) No action- no new facilities and expansion of SUP B) Limited new facilities, lifts, restaurants within existing SUP C) All proposed new facilities within existing SUP D) Limited expansion of SUP boundaries and lifts and facilities limiting impact on viewshed E) All MDP proposed facilities and SUP expansion. One alternative must include all new ski lifts within SUP ie Ricks Basin and Peaked without any cat skiing into So Bowl. There should be at least three alternatives that maintain current SUP boundaries. With the present comfortable carrying capacity one rarely waits longer than 5 minutes in a lift line. Please specify what the comfortable carrying capacity would be with each alternative. Can one alternative include permanent protection for the South bowl area with wilderness designation? It is irresponsible of GTR and the USFS to consider boundary expansion when so much development can take place within current sup boundary.

In addition to having been a practicing ER physician for 35 years, I have been a backcountry skier for 45 years. I have skied into the South Bowl area from GTR on 6 different days. In places, this is steep avalanche prone terrain with several hidden cliff areas. Teton County Search and Rescue have expressed concern that opening up new terrain will increase the number of backcountry rescues away from the ski resort. They have expressed concern about long response time. "The Search and Rescue hangar in Jackson is 45 miles from Grand Targhee Resort. But Search and Rescue doesn't fly at night, can't fly in a snowstorm, and getting there by snow machines can take a couple of hours." Ref #4

Leaving the ski resort often allows skiers and snowboarders with limited or no backcountry experience to venture beyond the relative safety of ski resort boundaries. "Within ski areas, obstacles are marked, runs are groomed, ski patrollers come to the aid of customers, and certain terrain and snow features are made safe, such as avalanche zones and cliffs. The sidecountry, like the backcountry, is replete with a full cadre of mountain hazards, namely, avalanches, unmarked obstacles, cliffs, and routes of variable conditions like ice and deep snow." Ref #5

Over a 9- year period (1997-2006), 8 of 36 avalanche fatalities in Utah (22%) have involved skiers or snowboarders leaving a ski resort. Ref #6 (data from Utah Avalanche Forecast Center)

I know of 7 avalanche fatalities since 1998 after the 9990 lift was opened at the Canyons Ski Resort in Park City, Utah. None of these victims except one were equipped with avalanche beacons or shovels which resulted in

prolonged searches. Opening up the South Bowl area with lifts will result in more folks getting lost, injured, or becoming a fatality.

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In my opinion an important question is how did USFS acquire the right to make a decision that would change the quality of life in a community? Currently growth in Teton Valley, Idaho is explosive. Many folks have moved here from Park City and Jackson because these communities have become plagued by industrial tourism. Why don't folks ever have a say in how much tourism takes place in their area? Most folks in Driggs, Teton, and Victor would like to preserve the unique diverse and rural nature of this area. (instead of becoming a "ski town". I feel that the court of local public opinion should be heavily weighted in this decision. Elected officials in Teton County Idaho and Wyoming should have equal say as the USFS. in any decision. The need to compete with other ski resorts encourages indefinite development and privatization of public land, which should not be the policy of the USFS. Shouldn't the national forests be accessible to everyone and not just the affluent one percent? Given the controversial nature of any USFS decision, it is advisable for USFS to make record of decision at regional level. I look forward to reviewing updates in this process.

Ref: 1 SGB Media. Unity Needed for Snow Sports Industry to Boost Participation. Apr 30, 2019  
Ref: 2 Laiolo and Rolando. 2005. Forest Bird Diversity and Ski Runs: A Case of Negative Edge Effect.  
Ref 3 Snowpack Change From 1982 to 2016 Over Conterminous United States, Geophysical Research Letters Dec 16, 2018 Pages 12,940-12,947  
Ref #4 From Teton County SAR are Concerned that Terrain Expansion at Grand Targhee, WY Will Increase Backcountry Rescues from SnowBrains April 24, 2019  
Ref #5 WILDERNESS & ENVIRONMENTAL MEDICINE, 21, 100 -102 (2010)  
Ref #6 From Risk Assessment in Winter Backcountry Travel By Silverton, McIntosh, Wilderness and Environmental Med vol 20, #3 2009

Thanks for your time and consideration,

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