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Comments: The Grand Targhee Resort (GTR) Master Development Plan (MDP) published in 2019, specifically the South Bowl Expansion, will create countless negative impacts to the critical wildlife ecosystem of Miles Creek and Peaked's South Bowl. Grand Targhee Resort's (GTR's) Master Development Plan (MDP) would also result in unnecessary environmental impacts, increasing the risk of avalanche incidents, accidents, and evacuations in Miles Creek and Peaked Mtn's South Bowl. These negative impacts to wildlife and increased environmental consequences due to avalanche hazard and mitigation are unacceptable. Therefore the adjustment of GTR's SUP boundary and the associated projects within the proposed SUP boundary adjustments should be denied.

The Miles Creek drainage which includes South Bowl is a critical wildlife ecosystem. Species like wolverine, grizzly bear, bighorn sheep, elk, deer, golden and bald eagles, numerous species of hawks and owls, peregrine falcons and kestrels, among others call this area home. Developing this area for lift service and cat serviced skiing (allowing avalanche mitigation with explosives) will destroy the habitat and populations of the aforementioned species and their ecosystem. Further study is necessary prior to granting access to GTR, in order to quantify the magnitude of impacts that expanding ski terrain could have on wildlife populations in this critical ecosystem. At this point granting permission for expansion into Peaked's South Bowl should be denied.

Grand Targhee Resort's (GTR) Master Development Plan (MDP) will further enhance pre-existing environmental hazards in the Miles Creek Drainage specifically tied to the terrain encompassed within Peaked Mountain's South Bowl. The terrain of Peaked's South Bowl is a labyrinth of 50 degree couloirs and hanging snow fields, punctuated by vertical cliffs all facing South. South Bowl is a 30-40 degree southern bowl, whose snowpack is prone to the effects of the sun and therefore prone to failures in the snowpack, resulting in avalanches. Natural avalanches historically can result in D1-D4 size avalanches which have released wall to wall east to west from Peaked Ridge (W) to Little Mary's (E) and run over 1500 feet in length. The South Bowl avalanche path and associated couloirs are repeat offenders, which annually create avalanches after substantial snowfalls of substantial size (D1-D4). There is no comparable location in the country, with similar aspect, elevation, and vertical inclination contained within a ski resort boundary where control work (explosive mitigation, is being performed). This is back country terrain. Attempting to operate a ski area in this location without the consideration for avalanche incidents, accidents, and evacuations is short sighted to say the least. There is no ski operation globally that would attempt to take guests into terrain like this, let alone put lifts in a location that is so prone to avalanches and unstable snowpack. Grand Targhee Resort's (GTR) Master Development Plan (MDP) for expansion into South Bowl of Peaked Mountain is careless and short sighted with regard to avalanche hazard, aspect, and the vertical nature of the terrain (slopes between 45-55 degrees) which will invariably lead to a wide spectrum of problems. Therefore we must deny the application for the adjustment of GTR's SUP boundary and the proposed SUP boundary adjustments.

Due to the negative environmental consequences the USFS must deny the application for the adjustment of GTR's SUP boundary and the associated projects within the proposed SUP boundary adjustments. Because Miles Creek and South Bowl are critical wildlife habitat for wolverine, bighorn sheep, golden and bald eagle, and peregrine falcons, further protection of these lands is needed. In addition, the area of the South Bowl Expansion is hazardous avalanche terrain, that, if opened, will lead to countless avalanche incidents, accidents, and evacuations. Therefore we should NOT approve a forest wide forest plan amendment changing the management area boundaries for the SUP adjustment, as well as any other forest plan amendments necessary identified in the EIS.