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

FROM:Ron Pfeiffer

Driggs, Idaho

RE:Concerns re: Proposed Expansion Plan - Grand Targhee Resort (GTR)

Dear Supervisor Bolling:

Please accept the following comments/concerns in regard to the Grand Targhee Resort (GTR) proposal to the U.S. Forest Service (USFS) to include expanding their operations on both Fred's and Peaked mountains. While I have a number of concerns regarding this proposal, please be advised that I am a repeat GTR season pass holder and over the past several years have averaged 60+ visits to the ski area during the winter annually. In addition, my wife and I are avid mountain cyclists and we visit GTR resort on average 3x/week in the summers as well. We live a short distance from Ski Hill Rd. approximately 2 miles south of Stateline Rd. I'm an avid cyclist and I ride Ski Hill Rd. virtually every day during the spring, summer and fall. In short, I am acutely aware of the changes in traffic flow in Skill Hill Rd., both related to seasonal use, as well as, in recent months, related to the explosive residential growth that is presently occurring in and around Alta, WY, as well as, Driggs, ID. Finally, I also wish to state that I am not opposed to expansion of GTR, however, I believe there is much they can do to improve the recreational experience of their patrons, WITHIN their currently approved boundaries.

SPECIFIC COMMENTS/CONCERNS

Wildlife Impacts - Evidence strongly suggests that development and/or expansion of ski resorts in mountainous areas presents an array of negative impacts, including on associated wildlife.(Beaudry, 2019) Both the proposed expansions into the Mono Trees and S. Bowl portions of Peaked Mountain will impact wildlife that presently use both these areas as critical habitat, including: large mammals (Bighorn Sheep, Grizzly & Black Bear, Lynx, Mule Deer, Moose, Cougar, Wolverine); predatory birds (Great Gray Owls [designated in Wyoming as a Species of Greatest Conservation due to limited and vulnerable habitat-see Bedrosian, et al.], Great Horned Owls, and Bald Eagles). It is critical to note that the proposed GTR expansion into S. Bowl will infringe into an already busy corridor along the north side of Teton Canyon. Teton Canyon provides an array of year-round recreational activities including hiking, mountain biking, back-country (BC) and Nordic skiing, snow shoeing, and snowmobiling. With the planned, as well as, unanticipated growth (massive influx of new residents fleeing COVID in major metro areas) in the surrounding region, recreational demand in Teton Canyon will only increase, thus placing more pressure on the wildlife that inhabit this area. Developing ski runs, lifts, and access trails over hundreds of acres in both Mono Trees and S. Bowl represents a significant loss of habitat for a host of species if approved. This area is geographically located near existing "Winter Range" acreage at the mouth of Teton Canyon and will likely be impacted indirectly by major development, particularly in the S. Bowl area. There are additional concerns regarding wildlife impacts of the GTR proposal, these are:

*Significant increase in motor vehicle traffic on Ski Hill Rd. as it is the only access road to the ski area. As numerous game animals (primarily Mule Deer and Moose) travel across this road year-round, is it logical to assume there will be an increase in vehicle/animal collisions. This will have obvious impacts on the local population of these animals, and in addition, it will exert an economic impact specific to the costs associated with

vehicle damage, medical costs (in the event of driver/passenger injury), and law enforcement management of the accidents.

*If the S. Bowl portion of the GTR proposal is approved, this will necessitate daily assessment of avalanche potential, and in some cases, mitigation that will have a negative impact on wildlife. Presently GTR employees utilize hand-thrown explosives as a tool for avalanche mitigation. This technique, while effective, produces considerable noise. It is incumbent upon both the USFS and GTR to consider these impacts before approving expansion into the S. Bowl area.

*GTR needs to explain how they plan to mitigate wildlife impacts of snow grooming equipment in both the Mono Trees and S. Bowl areas if approved. Specifically, slope grooming is typically done at night which requires artificial illumination on the grooming machines, this is in addition to the noise and exhaust fumes generated by the diesel-powered vehicles.

Other Concerns

*Housing for Increased Number of GTR Employees - While perhaps the strongest argument in favor of approving the GTR expansion proposal is positive economic impacts, these MUST be viewed in-light of economic realities of the surrounding communities, particularly Alta, WY, as well as, Driggs, Teton and Victor, Idaho. Assuming there will be an increase in the employee roster at GTR, what plans are in-place to address the housing needs of these new residents? Given the dearth of affordable housing in Teton Valley, Idaho, where will these new residents live? It would be interesting to see the data regarding average salary of employees at GTR vs. the cost of living in the surrounding region. Have these data been collected and evaluated?

*Loss of Public Lands - If the S. Bowl component of the GTR proposal is approved, it will eliminate access to hundreds of acres of public lands directly adjacent to Teton Canyon. As stated above, Teton Canyon is an extremely high demand recreational area that provides for an array of activities, year-round, including hiking, mountain biking, BC and Nordic skiing, snow shoeing, snowmobiling, and camping. All of this is available within just a few miles of rapidly growing population centers including Alta, WY, Driggs, Teton and Victor, ID. Given the anticipated growth of the Teton Valley, Idaho, does it make sense to remove hundreds of acres of public land from the area on the north side of Teton Canyon?

*Increasing Demand for BC Skiing -- BC skiing is growing nationally in popularity (Duke, 2019), and the Teton Valley, on both sides of the Tetons, is no exception. BC skiing will be negatively impacted if the S. Bowl expansion is approved. Presently a growing number of BC skiers recreate in the S. Bowl area each winter. With growing demand for more access to public lands for BC skiing, the S. Bowl area will likely experience an increase in demand in the future. This represents a positive effect in that it provides an alternative venue to BC skiers who might otherwise visit the very crowded Teton Pass area. How will this negative impact be mitigated? Another important aspect related to BC skiing is the risk to those skiers who access the S. Bowl via the ski area if the S. Bowl expansion is approved. By making the S. Bowl area accessible via chairlifts, GTR will be encouraging in-bounds skiers, typically with little or no BC experience or training, to venture "out-of-bounds" into Teton Canyon. This area is high risk for avalanches and as such, there will likely be an increase need for rescue services into this area when avalanches occur. Presently the responsibility for BC rescues in this area falls on the Teton Valley Search and Rescue (Teton County SAR). However, in response to the GTR expansion proposal, Teton County SAR has expressed concerns about anticipated problems associated with rescues on the GTR side of the Tetons (Snowbrains, 2019). It is a public safety issue that needs to be addressed clearly by GTR before their proposal is approved.

*Visual Impacts -- The proposed GTR expansion will be significant and include a proposed 6000 sq. ft. restaurant near the top of Fred's mt., as well as, a smaller facility on Peaked mt. Both of these facilities will likely be visible for miles, particularly the structure proposed for Fred's mt. Presumably there will be some night lighting required

which will expand the visual impacts beyond daylight hours. In addition to the proposed new buildings, there will also be new lift towers, access roads/"Cat Tracks," clear cutting of forests for ski runs and lights for night skiing. Presumably much, if not all, of these impacts will be visible for miles to the south and west of the resort. As a case in-point, the lights for night skiing at Bogus Basin, near Boise, Idaho are visible for more than 40 miles to the west and south of the ski area.

*Carbon Footprint -- What will be the impacts regarding GTR's carbon footprint if the proposed expansion is approved and completed? Adding more ski lifts and groomed ski runs will significantly increase the energy consumption of the resort. Nationally, many leading resorts are taking proactive steps to reduce their reliance on traditional energy sources and shifting towards renewables (Brown, 2018). GTR should demonstrate clearly their plan for reducing their carbon footprint if their proposal is approved.

*Impacts on Surrounding Communities -- A massive expansion of GTR will undoubtedly impact the population growth of Teton Valley, Idaho. While some level of growth is inevitable, what evidence is there that officials from GTR have considered the anticipated impacts of their expansion relative to the current Comprehensive Plan of Teton County, Idaho? (Comp Plan) Are they working with local officials in Driggs, for example, to mitigate what will assuredly be a major increase in motor vehicle traffic through their community as a result of increased number of visitors to the ski area? As mentioned earlier in this document, what considerations are there for increased demand for affordable housing for new resort employees? What about increases in law enforcement required as a result of increase traffic flow to/from an expanded GTR? What will be the impacts on existing, and planned, neighborhoods that border Ski Hill Rd. between the City of Driggs and Alta, WY?

It is my sincere hope that these concerns will be considered and addressed and, at the least, various alternative approval options will be formulated and considered by the USFS. For example, there should be a range of alternatives for expansion of GTR operations within the existing boundaries. If the USFS determines that boundaries can be expanded, alternatives should be identified that exclude sensitive areas such as S. Bowl and Mono Trees. As I've stated at the start of this letter, I am not opposed to GTR expanding the scope and scale of their operations. Clearly GTR represents a significant benefit to the surrounding communities and to the skiing/riding public. However, as with any benefit, the risks associated with attempting to increase those benefits must be considered. It is my sincere hope that a reasonable balance between the benefits of expansion of GTR and preserving the existing characteristics of the surrounding regions of both Wyoming and Idaho can be achieved. If not, I fear GTR will become just another upscale "destination resort" that provides recreation to a relatively small number of economically advantaged skiers/riders. The costs will include long-term collateral damage to the surrounding ecosystems, as well as, to those who call the area their home.

Thank you for the opportunity to share my concerns on this proposal.

Electronic References in order of appearance:

(Beaudry) < <https://www.thoughtco.com/ski-resorts-and-the-environment-1203969> >

(Bedrosian) < https://tetonraptorcenter.org/assets/media/files/2013-2015_GGOW_Project_Report.pdf >

(Duke) < <https://www.nytimes.com/2019/11/28/travel/skinning-ski-aspen.html> >

(Snowbrains) < <https://snowbrains.com/grand-targhee-terrain-expansion-increase-rescues/> >

(Brown) < <https://www.powder.com/stories/ski-resorts-getting-utility-business/> >

(Comp Plan) < <https://www.tetoncountyidaho.gov/codePolicy.php?type=3> >