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Forest Supervisor Mel Bolling

c/o Jay Pence, Teton Basin District Ranger

Teton Basin Ranger District

P.O. Box 777 Driggs, ID 83401

Re: Grand Targhee Master Development Plan

Dear Forest Supervisor Bolling,

I am submitting these comments on the Grand Targhee Resort Master Plan development project scoping proposal. As a retired wildlife biologist and resident of Teton County, Idaho since 1987, I have monitored wildlife on the west slope of the Teton Range, and spent countless hours recreating and enjoying the beauty and wildlife on the Caribou-Targhee National Forest, the Jedidiah Smith Wilderness area, and the Grand Targhee Resort. I was involved with Citizens for Teton Valley, a broad-based citizen's group that organized over concerns in regard to efforts to privatize lands at the resort in the 1990s. Unfortunately, the CTNF continued to pursue those efforts against the will of most residents in the valley, and later sold off land at bargain prices to the resort developer. These private lands have not yet been developed, but I suspect the current proposal is being driven by future real estate plans at the resort, rather than the stated needs to address skier demands.

The resort plays an important role in the valley's economy but I remained concerned that unless managed properly by the Forest Service in balance with the other irreplaceable natural scenic and wildlife values, resort expansion could greatly degrade not only local natural resources but also the very quality of life that residents and tourists come to Teton Valley to enjoy. We have seen this scenario played out across the western USA where popular resort communities are crowded, and average working people can no longer afford to live anywhere close to where their jobs are located. National Forest trails are overrun with visitors, and sensitive wildlife populations decline. I encourage you and your staff to listen carefully to all the concerns citizens are raising in regard to this current proposal, and rather than play handmaiden to commercial interests, fulfill instead your duty as managers of National Forest lands to preserve the natural resources and the natural beauty of this iconic mountain range for future generations.

My specific comments follow.

--The proposal to amend the CTNF Land Management Plan needs to be completed first, prior to the evaluation of any expansion proposal that includes 1200 acres of SUP expansion areas. The Forest Plan amendment is to downgrade the Visual Quality Maintenance standards for the areas surrounding the resort. I believe that these scenic vistas were to be preserved as part of the mitigation for the privatization of lands at Targhee. At least that is what was presented to us by Forest Service staff at the time. It would be a complete waste of time and money to evaluate the expansion proposal as written without first evaluating and completing the needed Forest Plan amendments on such an important issue. Scenery is everything to the residents and visitors of Teton Valley! Teton Canyon is one of the most visited sites on the Caribou-Targhee NF. Development of ski runs, removal of vegetation would cause irreversible impacts to the visitor experience in Teton Canyon. Noise and lights would also impact visitors who come to the Canyon and climb Table Mountain to experience the natural world and its beauty. This is one of the most beautiful canyons in Idaho. The issue goes far beyond the needs of one resort. Analyze the amendment first, before proceeding with the environmental analysis of the resort expansion.

--It is premature to analyze this expansion proposal also considering the current impacts of the worldwide Covid virus on the ski and travel industry. Like other resorts GTR, must have suffered a serious financial set-back from having to close early last year. Given the rising number of cases worldwide including in eastern Idaho, the status of ski resort operation this coming winter must be in question. What will ski resorts be like in the future? Does the current owner have the financial ability to complete any of the projects proposed in this new expansion plan? Why have they not completed many of the projects that have been already approved? Is this current expansion proposal merely an attempt to make money on a future sale of the resort? I recommend that this expansion plan be tabled until the future effects of the pandemic becomes clearer and the current financial soundness of the resort is determined. The main reason for this proposal is to address the growth in the regional ski market which is currently under decline until people feel safe to travel again and be in crowds.

--The effects of climate change on future resort operations must be included in any environmental analysis of proposed expansion projects. A recent report in Geophysical Research Letters showed that the duration of the ski season overall in the western USA has declined by 34 days since the early 1980's. Increases in temperatures and drought in the western United States have been dramatic in recent years, exceeding past predictions as to the expected rate of climate changes. The two proposed SUP expansion areas are at lower elevation areas and 600 acres are located on the south side of Peaked Mountain. How long will such areas retain snow, and how much snow making will be required to keep them open in the future?

--The proposed South Bowl SUP expansion area should be dropped completely from the proposal or an alternative should be developed that does not include this area. I discussed visual impacts above. The impacts to wildlife habitat will be severe as the south side of Peaked mountain above Teton Canyon provides an important buffer area for wildlife where they can avoid the crowds of people both below in Teton Canyon and above at the resort. Major canyons such as Teton are hugely important for wildlife movements and for wildlife populations of many sensitive species and important game species in the area. Project effects on Moose, Bighorn Sheep, Mule Deer, Golden Eagle, Peregrine Falcon, forest owls, Northern Goshawk, and Wolverine populations must be analyzed. Given limited budgets, I doubt if the FS has been able to monitor impacts on wildlife adequately in recent years at the resort or from recreational users adjacent to the resort. I have spent many hours monitoring wildlife on the north side of Teton Canyon located below the current resort boundary.

Although human use has increased somewhat over the past 20 years, this side of the canyon still provides secure and nutritious habitat for many ungulates and other wildlife species. Extending the SUP into the South Bowl will have major impacts on the area's wildlife populations.

--It was clear in the 1990s that the Forest Service was committed to keeping a hard boundary between the resort operations and Teton Canyon. It did not want the resort operations to leak over into the canyon. Increasing numbers of backcountry skiers now leave the resort and are picked up by snow machines in the canyon, creating more crowding in this popular recreation area. By increasing the SUP into the South Bowl, the impacts of skiers and others leaving the resort and going into the wilderness areas and into Teton Canyon will increase. What is the current Forest Service policy on keeping the resort from impacting Teton Canyon and the Jedidiah Smith Wilderness area, and what will be done in the future as the resort operations expand? This needs to be thoroughly investigated in any future NEPA analyses.

--An alternative should be included in the analysis that does not continue future cat skiing at the resort. The Teton Valley/Jackson area provides some of the best opportunities for back country skiing in the country either with guides or on one's own. If the resort wants to build additional lifts where they currently conduct cat skiing, that is their decision. It is not the responsibility of the CTNF to supply them with additional areas for cat skiing as there are plenty of other opportunities to experience lift-less skiing outside of the resort. Ski resorts do not need to monopolize all aspects of winter recreation businesses.

--An alternative location to placing a large restaurant on top of Fred's Mountain needs to be included in future analysis. This restaurant needs to be placed lower on the mountain where the visual impacts will fall mostly on resort visitors. When the Dreamcatcher Lift was built, the Forest Service and resort assured us that it would not be visually disturbing. To this day, the reflection near sunset on top of the lift building is visible for many miles-a violent glare. A large building that is used at night for dining with the lights required both on it and the running lift will degrade the view of the Teton Mountains forever. People pay large prices to have homes with a view of the Teton Range. People climb the Grand and Table Mountain and other peaks in the Teton Range to see one of the most wonderful natural views left in the world. This proposal to build a restaurant on top of Fred's is a desecration, and the amount of traffic needed to keep it supplied will also degrade visitor experiences at the resort year-round. It is completely unnecessary. Even at the Jackson Hole Mountain Resort, they located a restaurant in a much more suitable location. How can GTR advertise itself as a "sustainable" green resort and propose such an inappropriate location? Money does not have to rule the world or the decisions made by CTNF. No development should be permitted on the ridgeline of Fred's Mountain.

--The total of new proposed trails is excessive. Alternatives need to be analyzed that have fewer trails and roads that allow for adequate buffer areas for wildlife, and for more areas of solitude and quiet for resort visitors. Do multi-use trails mean that mountain bikes will be allowed? If so, they will not be truly multi-use as most hikers feel unsafe on trails used by fast moving mountain bikes. The resort itself does not want hikers on downhill bike trails currently. The information provided on locations for "multi-use" trails indicate that most will just be extensions of bike trails already developed.

-- A huge expansion of the resort will have major impacts on private lands in Teton County ID. Already, the county is facing an affordable housing crisis. The EIS needs to carefully analyze resort impacts on the schools, housing, hospital and the economy of Teton Valley, ID. It also needs to consider regional patterns of growth and how a major resort development will affect regional transportation and housing.

--The EIS needs to carefully analyze increases in traffic and parking needs both at the resort and on the access road given projected resort expansion. What improvements will be needed to accommodate thousands of new visitors in summer and winter? Who will pay for the road improvements? How many accidents currently occur in the winter on Ski Hill road?

--It does not seem appropriate to have the same firm that wrote the Master Plan to also write the EIS. As anyone who has reviewed environmental reviews knows (including many FS staff that I have talked with), environmental documents prepared by private firms are often inadequate in breadth and depth of their analyses. I urge the CTNF to hire the best possible firm that has local knowledge of the environment and can interact with local Forest Service staff directly to identify and analyze the real impacts of this massive expansion of the resort.

Much of the past charm and visitor delight in GTR has been its smaller size compared to mega resorts. Why do you want to approve development and expansion that will mimic what other much larger ski resorts are doing? Why can't we have a new vision that will emphasize nature over canned recreation? Emphasize regional users rather than try to attract far-flung visitors? Given the climate crisis and Covid crisis, the world is telling us that we all need to travel less if the human species is to have a future. Business as usual is no longer the answer for a secure future. During my lifetime, every place I have ever lived has declined in terms of quality of life for humans and other species. It is time for a new vision with an eye on preserving the wonderful character of the Teton area that still exists.

Thank you in advance for considering these comments.

Susan Patla