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Organization:

Title:

Comments: October 8, 2020

To: Mel Bolling, USFS

? Jay Pence

cc: Teton Valley Wyoming Commissioners

Teton Valley Idaho Commissioners

RE: The Grand Targhee Expansion Master Development Plan and EIS

QUIET! Who is ready to give that up for years of constant construction and traffic?

Purpose And Need

I question the anticipated public demand mentioned.

From NPR Business 9/29/20 Ski Industry Prepares For The Season In A Pandemic. If Vermont's (to name one state) early closing earlier this year cost Vermont ski areas \$100 million and when they reopen they they may cut visitor visits in half, will other ski resorts follow? Also, mentioned that most of the food would be grab and go, outdoor seating, porta-potties, wearing a mask to ski reservations, reserved parking and bar closures. Could this change the ski industry for the future? Thus why would we expand to the proposed level with the knowledge that those changes could impact GTR too?

Please follow the NEPA Act regarding the positive and negative environmental effects of a proposed action with lifelong potential impacts on this community.

There has been insufficient time to notify and seek the input of all residents of Teton County Wyoming and Teton County Idaho. I respectfully request that you allow for additional time and continued virtual public discussions due to Covid limitations.

Why the acceleration now and not in 1997? The USFS is about to make a decision that can potentially have devastating impacts on the quality of life enjoyed by Teton Valley residents now and for future generations and I think making a quick decision without the further study and due diligence in connection with the many potential negative impacts would be a disservice to the entire valley.

GTR (Grand Targhee Resort) has failed to expand the existing 600 acres including the addition of the Peaked Lift? So why is an additional expansion being sought at this time? I'd like to see proof that what has already been approved can be responsibly developed first. Updates to the infrastructure, existing lodges and the addition of parking spaces should be a priority.

What financial assurances, financial statements, disclosures are required to guarantee the funding of such grandiose plans?

Please explain the relationships with the USFS, SE Group and Grand Targhee regarding who is contracted with whom for full transparency to our community. Is there a conflict of interest? What is our guarantee that we can trust the EIS results? Will a second opinion/analysis be done from an objective party?

What will be done to insure that lifestyles are not degraded for residents and visitors from the GTR expansion?  
The Caribou Targhee National Forest is a photographer and artists dream. Proposed changes will cause

At risk, majestic mountain views, wildlife, fishing, floating down the river, skiing, backcountry skiing, hiking, biking, stargazing, a brilliant moonrise over the mountain peaks, and access to public lands to name a few.

Please do not approve the USFS 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. Why would you give away general public access in place of snowcat skiing for the benefit of a select few? Why does the USFS think that giving up public land and access to a private party for profit is a benefit to the community and wildlife?

Is this about future real estate sales? As stated on Tributary's website, "Tributary's exclusive memberships, including access to its world class amenities, are only available through the purchase of real estate." "With your real estate purchase: a members-only ski lounge at the GTR base." However, visitors, seniors and locals would be outside on the decks with extra heaters and extra chairs.

How will ADA be addressed?

Concerns:

From Wikipedia, EIS, Limitations

Limitations

The differences that exist between science and politics limit the accuracy of an EIS. Although analysts are members of the scientific community, they are affected by the political atmosphere. Analysts do not have the luxury of an unlimited time for research. They are also affected by the different motives behind the research of the EIS and by different perspectives of what constitutes a good analysis. In addition, government officials do not want to reveal an environmental problem from within their own agency.[9]

Citizens often misunderstand the environmental assessment process. The public does not realize that the process is only meant to gather information relevant to the decision. Even if the statement predicts negative impacts of the project, decision makers can still proceed with the proposal.

From Wikipedia, EIS, Purpose

Contrary to a widespread misconception, NEPA does not prohibit the federal government or its licensees/permittees from harming the environment, but merely requires that the prospective impacts be understood and disclosed in advance.

The following are my EIS-related concerns.

Housing.

Please study the number of VRBO's in relation to the number of long term rentals, if any are available. Where will the housing be for all these employees that are required to support an expanded operation? Will the employees, contractors and purveyors be outsourced? Will employee housing be acquired for the benefit of employees? There are pages of GTR development improvements, but where is employee housing addressed?

#### Water.

What monitoring will be required during expansion, excavation, and the blasting of miles of new roads? What is the plan to protect the Driggs and Alta water source, water quality and flow from contamination, destruction or reduction of any water source above or below the ground. Alta water contamination occurred after previous GTR construction. Is that a coincidence? Will community water be tested before during and after construction begins?

What are the protections for the Teton River watershed during expansion? I GTR has averaged in 10 years 300-400 inches of snow. Isn't snowmaking an unnecessary waste of precious water? How will any effects of climate change or drought impact water supplies to GTR and the residents below?

#### Roads/Traffic/Speed/Parking

What studies will be done to prevent increased wildlife collisions on Ski Hill Road, Highway 33 and Highway 22 with the road limitations? What protections will be added to decrease wildlife mortality in elk, deer, moose migration areas on these roads? What will be done to decrease excess speeds throughout the valley?

The majority of visitors will come from JH Airport (except during a pandemic) with the decrease in air travel there has been an increase in travel by car and other vehicles.

What will be done to keep traffic flowing on our already congested ID 33 and WY 22 roads at the same time as the Teton Valley Mobility Corridor Improvements project proceeds and with the addition of GTR development construction vehicles added to those roads?

What studies are planned to monitor the increase in CO2 levels during this before during and after the development from increased air traffic, passenger and construction vehicles and equipment? Will it be necessary to acquire buses for transportation (Is this an option during a pandemic?) and will buses/shuttles be purchased by who and at what cost to whom.

Will the life span of these roads (ID## and WY22) decrease with increased vehicle activity? Will tax increases be needed to cover increased costs? Are wildlife bridges needed for migration paths at a cost to whom? How much of that cost is the responsibility of GTR? Will community access to parking be limited due to development. Current parking inadequacies have existed for many years. Where will hundreds of vehicles park? Where will the school buses park?

#### Public Services Needed

Studies need to be done for the future need for expansion of emergency services (Wyoming and Idaho). What will be the response time? What is the natural disaster plan, fire evacuation based on road limitations?

#### Wildlife

This development could have devastating long term affects on all wildlife including, tanagers, blue birds, owls, sandhill cranes, hawks and Eagles that migrate through and live in the forest surrounding GTR. The winter range should not be developed.

#### Climate Change

Studies need to be done for carbon foot print impacts conducted on all portions of the GTR expansion plan.

#### Views

The grandeur views will be forever changed. I am against any sort of mountain top restaurant that would be visible on the mountain from afar. Everything done at GTR will be visible right next to the Grand Teton. Can you image putting a restaurant next to the Grand Teton in the Grand Teton National Park? Why is there a need for on mountain restaurants after 51 years when it only takes minutes to ski to the base?

#### County Transfer Station/ Waste Management

What will the impact be on the local Transfer Station? Will our fees increase due to the GTR expansion? What is the responsibility of GTR with regard to hazardous waste transport? Will it travel through our communities? Environmental impacts of waste downstream need to be understood.

#### Light, Air, Noise Pollution

I am against putting over 10,000 sq. foot of restaurants on the mountain which would cause significant impact to our majestic mountain vistas and dark skies. Interior and exterior lighting would be seen for miles. Would this be allowed on the other side of the mountain next to the Grand Teton? What will be needed to mitigate all light pollution?

If cement is a massive CO2 emitter. What will be done to mitigate that? How much noise is expected from 8 plus hours of construction equipment for the duration of any expansion? What are the impacts to wildlife, birds and our residents? How is wildlife danger communicated over construction noise. What level does damage occur to wildlife, birds and humans?

What prompted the USFS to allow GTR to relocate and construct their new 10,000 square foot maintenance building from private land to 4.5 acres of public land? What is the community benefit there? Is the land leased? Will the wetlands near it be affected? What will the old site be used for? Is this another concession to GTR if so, why? It all comes down to what will actually be the community benefit?

Thank you for your careful consideration.

Beverly Koller  
Alta, Wyoming