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Comments: To Rachel Franchina,

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Mountain Resorts Team Lead, USFS

I appreciate your many years of service to the USFS and taking a leadership role in the Grand Targhee Resort (GTR) EIS process. I see that you have a special interest in sustainable recreation and visitor capacity relationship to environmental impact. I recognize that this letter is outside of the scoping period, but I would like it added to the public record.

I enjoy skiing at Grand Targhee and am a season pass holder. While I enjoy alpine skiing, I also enjoy hiking, backcountry and nordic skiing, and wildlife photography. I am part of a group of folks living in Teton Valley who have serious concerns about the impacts of potential GTR expansion. We also have mistrust in this EIS process because of the questionable and atypical way that the USFS is handling this EIS. The GTR EIS considers 50 different actions in this massive development proposal including two expansions outside of the existing permit area requiring an amendment to the Caribou Targhee Forest Plan. These are listed as an attachment to this email.

This proposal includes 5 new ski lifts, elimination of 1200 acres of dispersed backcountry recreation, road and trail building, snowmaking, summer amusement park features, restaurants on ridge-tops, trail-cutting, and lights for night skiing. GTR rarely has lift lines longer than 5 minutes and there is much opportunity to accommodate more skiers within permitted boundaries. The Peaked lift has been approved since 1994 but not built. It has been well documented that lift-based skier days have been steadily declining in the US in the last 20 years. While living in Utah, I participated in 6 USFS ski resort EIS processes. They typically involved building or re-aligning a ski lift plus a ridgetop restaurant and a new mountain biking trail etc. This EIS considers well over quadruple the number of actions considered in any previous ski resort EIS that I have seen. How can environmental impacts be analyzed for this number of projects especially in the short time frame proposed?

Other USFS missteps include failing to invite in a timely manner Teton County Idaho, the National Park Service and local indigenous tribe to be cooperating agencies. It seems like there is major political pressure on the USFS to push this GTR project through the EIS process.

There are major wildlife concerns with this possible expansion into the North Fork of Teton Canyon. Biologists have documented the occurrence of the following wildlife species on the north side of Teton Canyon in October and November with fixed trail cameras and tracking: big horn sheep, mountain goats, mule deer, moose, elk, mountain lion, black bear, coyote, fox, pine martin, and other small mammals and birds. The proposed South Bowl expansion area includes movement corridors for all these species. One wildlife biologist told me that he felt

that expert wildlife data was being "suppressed" in this EIS. I am concerned about user conflicts to the most heavily used trails on the west side of the Tetons. There are also viewshed and dark sky concerns as well as social justice issues when middle income folks and resort employees can no longer afford to live within 50 miles of a ski resort. The impact on Driggs and Victor would be more traffic, noise, and air pollution. Because the Teton Mountains are a national treasure, there are over ten national, regional and local conservation, wildlife, quality growth and environmental organizations monitoring the EIS process

The USFS could restore some of our community's faith in the process if you considered only development proposals within the existing SUA in this EIS. If so, most of the public's opposition would disappear. GTR will have new skiers this year because they joined the Mountain Collective. Mt Collective, Ikon and Epic programs have demonstrated that ski resorts can attract many new customers without adding infrastructure or expansion. If GTR is willing to provide this data on new customers, it will not be available until the end of the ski season. An independent financial analysis of GTR's development proposal might show that the true factor driving this expansion proposal is to maximize real estate sales in the 120acre inholding at the ski resort base and give the applicant a permanent place for cat skiing outside of his current permitted area. If cat skiing operation moves to the So. Bowl area, the public loses access to this area. We would like to see a broad range of alternatives considered in the DEIS. One alternative could consider a Mono Trees expansion without considering the South Bowl. At least one alternative should exclude any South Bowl or Mono trees expansion.

It would be very helpful if each different alternative gave the projected capacity for the ski area in people at one time. This capacity in each DEIS alternative can provide an indirect measure of some of the "downstream effects" that the communities of Driggs, Victor, Tetonian and Alta might expect.

Happy Holiday Season!

Thanks for your consideration and lending expertise to this project!

Howie Garber MD