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RE: Grand Targhee Master Development Plan Project Draft Environmental Impact Statement

Submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58258>

Comments: Grand Targhee Resort Expansion DEIS

Thank you for the opportunity to comment on the DEIS which analyzes proposed improvement projects within the current resort permit boundary and also permit area expansion at the Grand Targhee Ski Resort (GTR) in Alta, WY. I have lived in Teton Valley since May 1987, first in Alta, WY and later in Idaho near Packsaddle Creek where we enjoy a magnificent view of the Teton Range daily. Both for recreation and for my profession as a wildlife biologist in this area for over 35 years, I have hiked and skied extensively in and around the GTR resort and Teton Canyon area. In 1997, I completed a MS graduate study on Northern Goshawk nesting ecology focused on the Targhee National Forest. I retired in 2018 from my position as a nongame biologist for the Wyoming Game and Fish Department's Jackson and Pinedale Regions. After retirement, I continue to monitor peregrine falcon nest sites on the west side of the Tetons for WGFD and the CTNF. I submit extensive bird observation records to Cornell University's Ebird database and also submit observations on Great Gray Owl and Northern Goshawk to the Caribou-Targhee NF staff. I continue to enjoy hiking and wildlife viewing on the west side of the Tetons.

Please consider the following points:

1a. I strongly oppose any alternative that expands the resort permit boundaries including alternatives 2, 4, and 5.

This resort was originally created by local residents to bring more economic diversity to the Idaho side of the valley. The resort has been a valuable resource in many ways but also created public resistance when it chose to pursue the creation of private land at the base of the resort. A key point made by citizens in the 1990s who were involved in negotiations with the Forest Service over a revised resort management plan was that a buffer should be maintained between the resort and the popular Forest Service land in Teton Canyon. The resort and its associated activities should not be allowed to bleed into Teton Canyon either visually or audibly. The Canyon is an incredible public land resource that has been enjoyed by generations of families in Teton Valley and visitors from around the country and world. It is valued for its incredible scenery, abundant wildlife, and popular hiking trails. If the resort disappeared tomorrow, Teton Canyon would still draw in large numbers of visitors, summer and winter. I urge the Forest Service to maintain its former promise that it would keep the resort contained and out of sight and sound of visitors to Teton Canyon. I guess staff changes and revised management plans lost sight of this important objective. Visitor activities at the resort and in Teton Canyon are very different types of recreation that do not mix well. If the permit expansion occurs, the quality of a visitor's experience in Teton Canyon, especially in the North Fork and Milk Creek drainages and on the popular trail to Table Mountain, will be dramatically reduced. The resort will profit, and the public will suffer the loss.

1b. I strongly oppose the proposed expansions of the resort permit area due to the degradation of important existing wildlife habitat and displacement of the species that now use the Mono Trees and South Bowl areas throughout the year. This includes federally protected species, Forest Service sensitive species and all the other

species that occur there. The importance of these south facing slopes in the expansion areas for wildlife was not adequately described or analyzed in the DEIS. Of special concern to me as an avian wildlife biologist are the many species of birds that breed and raise young in and adjacent to the expansion areas. I have watched over the decades how valuable nesting habitat and wildlife security areas have been eliminated from the current GTR permit area. Since ski areas are now considered both winter and summer recreation areas, the spiderweb of trails for mountain bikes in addition to the continued glading of mature forest stands for skiers has literally removed any secure wildlife habitat that existed back in the 1980's and 90's. I expect the same will occur in the proposed expansion areas. These areas serve as important movement corridors for many wildlife species, especially during years of high snow fall and in summer, during times of high human visitor use in Teton Canyon and at the resort. From my own observations I know that the cliff faces below the current resort boundary (including the Apostles) have been used by nesting peregrine and prairie falcons, turkey vultures, red-tailed hawks, golden eagles, and swallows. I have watched moose and their young move below these cliffs up and down the canyon (undisturbed and out of sight of human visitors below along the canyon road). I have also observed abundant evidence of moose winter use especially in the mountain mahogany habitat stands. I have also observed big horn sheep using the historic mineral lick. I have found active fox dens near the base of these south facing slopes. There is an amazing chorus of bird songs in this habitat in May and June as they defend territories and raise young. This is irreplaceable habitat in the most important canyon on the west side of the Tetons. Once lost, local populations of many species will be reduced and displaced not only within the resort area but in the entire Teton Canyon complex.

1c. I strongly oppose the proposed extension of the resort permits into Mono Trees and South Bowl due to the loss of mature whitebark pine and Douglas fir stands as documented in the analysis. Recent declines in whitebark pine throughout the Greater Yellowstone area and elsewhere in the western US are of great concern. I have often observed Clark's nutcrackers, a symbiotic species with whitebark pine, on the high ridge above the north side of Teton Canyon. Removal of whitebark pine from South Bowl cannot be justified given the recent efforts by the Forest Service to conserve this tree species. Loss of mature Douglas fir in the Mono trees area would remove nesting and brood rearing habitat for forest mammals, owls and raptors including sensitive species such as boreal owl, northern goshawk and pine marten. It will also accelerate the flow of carbon into the atmosphere, adding to the already accelerating global warming. GTR has removed many acres of mature forest trees on its existing permit area already.

2. I strongly oppose the development of a restaurant on top of Fred's Mountain. This is also an idea that many citizens have been against since the 1990s. That mountain top is located in one of the most magnificent view-sheds in the country. Jackson, WY prohibits such skyline development on private land in the county for a very good reason. Lights and reflection from a restaurant would decrease the quality of this view-shed for thousands of people who live in the valley, climb the Grand, hike the Jedidiah Wilderness, or hike to the top of Fred's Mountain to enjoy the pristine views of the Tetons. The effort required to supply a restaurant at this elevation would create additional environmental costs and disturbance on the mountain. Please do not approve this proposal as part of Alternative 3. If the resort wants to pursue this idea, it should be proposed in a separate EIS that carefully evaluates all the costs and impacts in much greater detail than the current DEIS addresses.

3. How many of the 29 new miles of trail construction proposed in Alternative 2 and 3 will be for hikers compared to mountain bike and mixed use trails? Please note that recently the quality of the popular Bannock hiking trail has decreased from being crowded by ever more biking trails. The current GTR trail map looks like a bowl of spaghetti now. Can the FS direct that new trails for hikers be created and that they are insulated from the high speed down hill biking trails? Many people of all ages enjoy the downhill and/or uphill hike at GTR for the magnificent views of the Teton Range and the valley. It feels like hikers are being squeezed out at the resort. Also, the current density of trails appears to have eliminated any "security" habitat for wildlife. Please include an analysis of trail density and its effects on wildlife in the FEIS for both the current and proposed permit areas.

4. It appears that both time and funding ran low for completing the Cumulative Effects (CE) section of this DEIS.

CEs are often minimal but this one only addresses water quality issues in a rudimentary fashion. I request that the CE be rewritten. As part of the cumulative effects section of this DEIS, I request the CTNF and the resort summarize total acres of forest harvested or already approved to be harvested. This analysis should also include the volume of harvesting currently underway to construct cabins on private land at the resort. In the past, by the way, I have heard both boreal and northern pygmy owls vocalizing in that private land area.

5. For Teton County ID the DEIS should analyze cumulative and projected effects on Teton Valley infrastructure including roads, medical services, schools, and housing in the CE section or another section of the DEIS. These major impacts need to be addressed. The flow of tax dollars from the resort to the state of WY and the flow of most impacts to Teton County ID has been an issue of concern for years and a hot public topic. How can the DEIS justify not addressing these very real impacts from increased development at the resort?

6. Co2 emissions according to recent news are increasing again worldwide. In the draft air quality report for this DEIS, it is stated:

"The addition of new trails, snow-making capability, and infrastructure at GTR represent irretrievable contributions to air quality, because the emissions that would be generated from the construction of the proposed projects and increased visitation cannot be retrieved. However, these emissions are not considered irreversible due to offsetting and mitigation that could possibly occur in the future."

Why does the DEIS not include mitigations for reducing emissions through either offsetting or mitigation? What will happen if air quality standards are exceeded in adjacent Forest Service Wilderness areas or in Grand Teton National Park? What mitigation can be included to reduce vehicle traffic to the resort? Why was a traffic study and plan not included in this DEIS? Increasing temperatures it should be noted also will decrease favorable skiing conditions especially on the proposed expansion areas on south facing slopes.

7. Can the DEIS offer guidance and recommendations on how GTR can be managed to obtain and maintain a Green Resort rating? See: <https://suitcasemag.com/sustainable-ski-resorts/> or <https://onebreckenridge.com/community-recognition>

8. Construction has finally started on the public land that the FS allowed to be created as an inholding at GTR. Disturbance from that construction is impacting resort visitors now. I suggest it is not timely to approve more expansion and construction until the full impacts of creating private residences at the resort can be evaluated over the next few years. Is the request for expanding the ski area now a means to promote real estate sales? How will this current real estate development possibly affect the future financial stability of the resort? Does the resort have the financial means to complete the requested improvements within the current permit area in a timely fashion given the ongoing construction on private land?

9. The purpose and need written in the DEIS for this project, especially for expanding the resort boundaries, is superficial at best. The FS needs to explain the necessity for expanding the permit area based on a thorough evaluation of regional skier trends, recreational activity trends on the west side of the Tetons, development and economic pressures in Teton County ID and WY, and future regional climate trends. The purpose and need of an environmental analysis should not be a reflection of what the private sector developer desires. What future conditions on the west slope of the Tetons should the FS be managing for? Recreation pressures, from what I have experienced in all of the accessible canyons on the west side of the Tetons, have increased astronomically over the past decade. Giving up more public land for private commercial use does not make sense at this time. Please address this as you revise and update this DEIS.

Thanks again for the opportunity to comment on this DEIS. I am hopeful that the public input you receive is carefully considered so the best possible decision is made. Teton Canyon and the west slope of the Tetons is such an amazing part of our national forest service lands. It has become known now across the country compared to 1987, when few people ever heard of Driggs, ID. Please manage it so future generations can

experience the beauty, the quiet, and the wildlife that visitors and residents currently cherish. Keep the resort constrained to its current permit area, please.