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Kim Pierson

Forest Supervisor

Caribou-Targhee National Forest

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Submitted Online at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project-58258>

Dear Ms. Pierson:

My comment letter will focus on 1) the process leading up to and including the Draft Environmental Impact Statement (DEIS) for the proposed expansion of the Grand Targhee Resort (GTR) and 2) the deficiencies with in the document. Via this letter I am requesting that Alternative 1 be selected by you until a sufficient and satisfactory Supplemental DEIS (SEIS) can be delivered by GTR.

Process

The Forest Service (FS) thought it was being generous with a 90-day comment period for the GTR DEIS. I submit that the release of the DEIS on March 21 was not timed to the benefit of securing genuine and broad-based public engagement, a foundational tenant of NEPA process. The FS had to have known that bringing the DEIS out just before the Spring Breaks in both Teton County Idaho (TCI) and in Teton County Wyoming (TCW) was not a good call for the public. To my knowledge, there were no press releases to local print media nor to regional television and radio.

Along with little publicity that the DEIS had been released, it was released just as the GTR ski season was ending. Folks in the FS offices know that many in Teton Valley Idaho and in the Jackson, Wyoming area leave after ski season for a month and more in a warmer clime. They also know that many homeowners do not return to their area second homes until Memorial Day, or as late as mid-June. Hence, the timing of the release of the DEIS, which was some four years late by FS schedules, looks to had the de factor effect of limiting public comment. One must ask "who forced the release of such a weak document" - was it the FS or was it GTR? Interesting that this business of limiting public comment also occurred with the 2018 GTR Master Plan. Few of us on this side of the Tetons even knew it was being revised and neither Grand Targhee nor the FS did anything to seek out public comment on this side.

The same occurred with the 2020 Scoping Letter until some of us found out about it. The management of GTR cannot hide behind "Covid." There could have been multiple Zoom meetings to gather comment on the Purpose and Need and the Scoping Letter. These did not occur. Still, the community did submit over 300 comment letters.

Then there is the issue of both Teton Counties finding out they were to be members of the Interdisciplinary Team. It was through my calls to the FS that I learned that Teton County Idaho and the City of Driggs should be members of the Interdisciplinary Team. I informed TCI officials and they immediately notified the FS of their interest. The City of Driggs did not serve thinking this would limit their ability to comment on the DEIS and/or to file a lawsuit should the document be deficient.

Bottom line is that actions by the FS to include both counties, the City of Driggs, and the public were deficient in effort and timing.

Deficiencies

Then there are the significant deficiencies in the DEIS. Two letters found in the files at the FS offices in TCI are just the beginning of the warnings that the both TCI and TCW sent to forest supervisors at the time that there were several areas that would demand substantial research and study. These letters date back to the period when the Squirrel Meadows Land Swap was in process. Over two decades ago, the two Teton Counties knew the negative implications for each from growth at Grand Targhee on a private in-holding that was eventually granted and on the Special Use Permit Area.

In the August 12 2002 letter from Teton County Wyoming to then-Forest Supervisor Jerry Reese, their Board of County Commissioners (BoCC) pointed out an interest in "life safety and medical services, employee housing, transportation, and relationship to the surrounding communities." The August 12 2002 letter from the Teton County Idaho BoCC to Regional Forester Jack Blackwell called out the same infrastructure and service costs that growth at Targhee would foist on TCI taxpayers. It further stated "Simply put, more at Targhee means more demands for services in Teton County, Idaho." They continued saying two things must be addressed by GTR -1) TCI wanted a "seat at the table" (meaning at TCW) saying "this is the only way in which Teton County, Idaho will have the opportunity to protect its citizens from unfair cost burdens resulting from development at Targhee" and 2) The development of a specific mechanism which would allow for cost and/or revenue-sharing between counties."

Here we are 23 years later and still these issues have not been resolved and GTR is proposing not just a massive ski area expansion but they are now presenting TCW with pre-applications for massive building construction on the 120-acre inholding. Taken together, clearly the Forest Service must see that the impacts not only on the Caribou-Targhee National Forest and Grand Teton National Park and the Jedidiah Smith Wilderness and on the town of Alta, Wyoming and on all of Teton County Idaho will be not just massive, but will forever change the area culturally, physically, socially, and financially. We have known these effects would occur since the Squirrel Meadows Land Swap which is why many in TCI and those concerned about the Greater Yellowstone Ecosystem fought the swap so fiercely.

The Caribou-Targhee National Forest officials did recognize that the resort was moving quickly and that in their haste they would overlook important research and regulations. In a November 4, 2019 letter from then-Forest Supervisor Mel Bolling to Geordie Gillette, general manager for GTR, the FS pointed out multiple groups that the resort should consult with to "highlight potential issues and mitigations." The public and many wildlife and forestry groups were mostly not contacted. The FS had advised, in another communique, to contact the tribes associated with the forest. This contact has been inconclusive and deficient.

The November, 2019 letter went on to speak to research needed for winter range management, complying with the Jedidiah-Smith Wilderness boundary, changes proposed for Teton Canyon (a much valued recreation area for Teton County Idaho residents), travel modes to and from the resort and "anticipated heavy use of the Mill Creek Trail" which is in the proposed Mono Trees expansion area, and effects to active grazing and solutions.

The research done on all these areas is deficient in the DEIS and thus a Supplemental DEIS is required.

Before speaking to specific deficiencies in the DEIS that demand a SEIS, let's talk briefly about the choice of SE Group to prepare the DEIS. SE Group had produced the past two master plans and many other documents required by the FS or by Teton County Wyoming for Grand Targhee. The conflicts of interest seem so obvious to the public, why did the FS not also perceive these conflicts of SE Group preparing the DEIS. And why did the FS not prevent what now appears to be not only a waste of the public's time, but financial resources of GTR and a loss to the American taxpayer due to the time of federal employees locally and regionally spent on a deficient process and document.

Perhaps one of the most egregious deficiencies with both the DEIS and its related Technical Report pertains to visual impacts. In its entirety, the Scenery Technical Report of the DEIS would not pass a master's candidate's faculty committee.

To have the gall to say that the changes to the GTR landscape would only be seen by those on foot or on a bicycle for a few seconds, or at most a few minutes, is offensive. SE Group did not have a viewpoint from one of the hundreds of homes in the north end of the valley who sited their homes with a front porch, family room, or living room focused squarely on the Grand Tetons.

What about the multiple "stripes" of new or newly-gladed trails or runs that will be seen by anyone living or traveling north of Ross Avenue in Driggs. No, SE Group took their viewpoint from the roof of the Coulter Building in Driggs where Geordie Gillette has his offices.

For ourselves and our visitors, few do not stop at the Scenic Overlook at Harrop Bridge on Idaho Highway 33, a designated Idaho Scenic Byway. From there, should this expansion be allowed, we will see nothing but "stripes" in the forest under the Grand Tetons and in the Caribou-Targhee. We all watched two summers ago as the Coulter Lift was installed. Not only did GTR do nothing to mitigate the scar in the earth under the lift, but they apparently did not pay for non-reflective, non-glare coatings, and hence, the lift looks like a shiny knife. It does nothing but mar the viewshed.

Air quality is another area that SE Group has been allowed to gloss over. Between DEIS pages 211 and 227, SE Group states that growth in skier visitation should the resort be allowed to expand would lead to an additional 59,000 vehicle miles traveled on an average day. Not only did SE Group not develop an air emissions testing plan, they then had the gall to say the closest air quality monitoring site is at a school some 20 miles away and that the nearest population centers to GTR are Jackson Wyoming and Idaho Falls Idaho. What about the City of Driggs some eight miles from Targhee's gate and the entire Teton Valley Idaho? This is laughable and needs to be completely redone through a SEIS.

There is some discussion among those of us closely following this process that the Mono Trees Old Growth Analysis fails to comply with decisions made by Federal District Judge B. Lynn Winmill. In 2000, Judge Winmill initially rejected the Squirrel Meadows Land Swap saying the Forest Service failed to accurately predict the effects of the growth the swap would entail, that the public was not fully engaged with the FS in receiving adequate and accurate information and being allowed to comment, and that the whole process violates the Targhee Forest Plan.

The word "gloss" is perhaps the best descriptor of the research and writings of SE Group. This was perhaps ordered by GTR. At any rate, it was allowed by the Forest Service.

Whether it is the myriad of problems with the process leading to the DEIS or it is the myriad of deficiencies in the DEIS, one only has to read the document and the 12 Technical Reports to see that SE Group and therefore GTR which was paying the firm, did in fact "gloss" over so many common sense and peer-reviewed research approaches and documents.

Many have called the 2019 GTR Master Plan and the 2020 Scoping Document the Grand Targhee owners' "wish list." Over and over again, Grand Targhee has shown little regard for the fact that they operate their ski area on public land - land owned by the American people.

Well before the Final EIS (FEIS) is begun, it is my hope that you, Forest Supervisor Kim Pierson, will order GTR to prepare a Supplemental DEIS.

Without this occurring, the notion of lawsuits on both process and deficiencies will most likely abound. No one wants to see this happen.

The lack of revenue sharing aside, everyone in Teton Valley agrees that it is great to have a recreational amenity in GTR available to them. But we also know the growth of Targhee will destroy our valley and the resultant growth downstream from the resort will force many of us out of the valley as we will no longer be able to afford to insure our homes or to cover property taxes and fees - both of which will soar should this proposed expansion go forward.

As early as next month, July 2025, I look forward to your decision to order a Supplemental EIS. If this means initially selecting Alternative 1, so be it.

Respectfully yours,

Anne W. Callison
Tetonia Idaho