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Organization:

Title:

Comments: I previously submitted a comment on the Grand Targhee Resort Draft Environmental Impact Statement. I am now writing to formally provide an objection to the Grand Targhee Master Development Plan Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD).

The draft ROD authorizes expansion of the Grand Targhee Resort Special Use Permit (SUP) footprint by 694 acres to develop lift-served skiing in South Bowl and Mono Trees. I do not believe that this Selected Alternative adequately balances resort recreation with wildlife interests and dispersed recreation. See my main objection points below.

Wildlife

Objection: The Selected Alternative does not adequately protect wildlife, including bighorn sheep and forest-nesting raptors.

The Issue: The Caribou Targhee National Forest (CTNF) plays an important role as habitat for a variety of different species. Allowing resort expansion, as the Selected Alternative does, will result in direct and indirect habitat loss for wildlife. The Selected Alternative is expected to have the following key impacts on wildlife: South Bowl contains high-quality winter habitat for bighorn sheep. Even with the adjustment to create additional separation between resort activities and an active bighorn sheep mineral lick, the Selected Alternative will still have significant consequences for these sheep. Loss of habitat and increased disturbance from human activity and avalanche mitigation in South Bowl threaten an already at-risk population.

The Forest Service is requesting several updates to the 1977 Forest Plan to accommodate the impacts of the Selected Alternative on forest-nesting raptors including American goshawk and two owl species. The objectives laid out in the 1977 Forest Plan are intended to safeguard biodiversity of the forest. Resort expansion is not warranted if it comes at the expense of wildlife.

Requested Remedy:

The Forest Service must deny the project-specific Forest Plan amendments related to wildlife. The Forest Service must select a modified version of Alternative 3 with no SUP expansion and reconfigure proposed trails, lift lines, and gladed areas to sufficiently protect wildlife.

Recreation

Objection: The Selected Alternative fails to adequately address the loss of backcountry skiing associated with the decision to expand into South Bowl.

The Issue: Expansion into South Bowl will displace backcountry skiers that currently use that area into other areas. The draft ROD suggests that the decision to expand into South Bowl comes with great safety rewards due to resort management of the avalanche terrain in that zone, however, it is not clear that avalanche accidents in South Bowl have been an issue. Thus, safety does not seem to be a clear need or valid argument for expansion. Additionally, backcountry recreation is growing at a faster rate than ski resort visitation which further suggests that expansion, especially at the expense of backcountry ski terrain, is unwarranted.

Requested Remedy: The Forest Service and Grand Targhee Resort should honor the growing interest in backcountry skiing by denying resort SUP expansion into South Bowl.

Water

Objection: The Selected Alternative relies on insufficient water data to support the decision to authorize

expansion and construction.

The Issue: As noted in my DEIS letter, there was inadequate information about where water to support new projects would come from and how wastewater generated from new construction would be disposed of. The draft ROD relies on a confidential water sufficiency letter from Jorgensen Engineering and states that final selection for wastewater systems (septic vs. sanitary sewer line) will be based on site specific analysis, implying that the decision has not been made yet. The success of NEPA hinges on a transparent, democratic process. By relying on a confidential water feasibility study and not being fully transparent on the project scope and final decision regarding wastewater systems, the Forest Service is violating the intent of NEPA.

Additionally, the Forest Service is requesting a Forest Plan Amendment converting Aquatic Influence Zones (2.8.3) to Special Use Permit Recreation Sites (4.2) and has provided Project Design Criteria (PDC) to try and mitigate the impacts the Selected Alternative will have on aquatic influence zones within the Mono Trees area. Relying on the enforcement of aggressive best management practices and 100% compliance with PDC gives little certainty that hydrological impacts of the Selected Alternative will be avoided and the request for a Forest Plan amendment suggests that these impacts do not align with the intent of the 1977 Forest Plan.

Requested Remedy:

Select Alternative 3 (no SUP expansion) and deny authorization for Fred's Mountain Top Guest Facility to constrain Grand Targhee Resort's footprint to its current size and protect connected drinking water sources disturbance and contamination.

Do not allow the conversion of Aquatic Influence Zones (2.8.3) to Special Use Permit Recreation Sites (4.2) with a Forest Plan Amendment.

Thank you for your consideration of the objections, concerns, and remedies I present here. I am also open to meeting with the Reviewing Officer at a mutually convenient time to discuss objections, concerns, and remedies. Please inform me in writing of any responses to these objections or of any further opportunity to comment on this decision.

Sincerely,
Richard Kite