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Comments: To Mr. Peterson and all copied:

My comments must be prefaced with my incalculable disappointment in the use of taxpayer funds to produce such a deficient Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD). The use of a consulting firm to prepare the Draft EIS and FEIS, SE Group, that had prepared the Grand Targhee Resort (GTR) master plans for decades, is inexcusable. Their deficient work began with the Scoping documents and continued through the FEIS.

I have standing, under 36 CFR 219.53, having submitted comments on Scoping, the DEIS, and on the FEIS and Draft ROD (7/13/26).

Clearly, the GTR FEIS failed to correct the many deficiencies that were called out by my self, and many other, comment letters to the DEIS. Actually, the deficiencies began with the scoping process. The Notice of Intent, published on 8/26/20, said that there would only be the need for one (1) Forest Plan Amendment (FPA) yet here we are with six (6). Procedurally, the FS failed to amend its Scoping and succeeding documents.

Knowing that other persons and organizations have delivered far more knowledgeable comments on the five Forest Plan Amendments dealing with birds and their habitat and the Aquatic Influence Zone, I will focus my comment only on the sixth dealing with expanding GTR's Special Use Permit (SUP). I'll add that all analysis for the Forest Plan Amendments related to the boreal owl, American goshawk, flammulated owl, and peregrine falcon are deficient.

Grand Targhee's drive to be a larger resort, and cause more financial and housing hardships for Teton County Idaho is no good excuse for damaging the habitats and viability of these important raptor species. Ignoring the role clean water that flows under the mountains, and from the snow melt, at GTR is just an abomination in its ignorance of how that clean water supports life and economic viability in Alta Wyoming and Teton County Idaho.

Let's be clear about this sixth FPA, the expansion of the SUP. There was no supplemental environmental analysis of the proposed changes from the DEIS to the Draft ROD. Without public comment or supplemental analysis made available to the public in a timely manner the entire expansion of the GTR SUP must be denied. Or a supplemental FEIS and Supplemental ROD be prepared.

GTR is a privately owned commercial entity that operates on the public lands of the Caribou-Targhee National Forest and one that lays adjacent to the Jedediah-Smith Wilderness. GTR sits under the iconic Grand Teton and is adjacent to the Grand Teton National Park. Many homeowners have sited their homes to look directly at these mountains. The placement of GTR does not give it free rein to destroy not only the viewscape, nor to propose uses that will permanently mar the mountains on which it operates or sits under.

The Forest Service must recognize that GTR is not well-managed. Folks in Teton Valley do not travel back up the hill to eat at restaurants at GTR because they historically have not been able to hold on to good chefs. Senior staff at GTR get tired of poor decisions and "management by screaming" and they quit. Holding on to staff becomes more difficult as finding affordable housing in Teton Valley or Alta is getting more and more difficult. The proposed GTR Master

Plan showed little serious to no interest in helping by building the needed housing at the mountain or in Alta or Teton Valley.

GTRs desire to be a major destination resort is a pipe dream. GTR will never be closer than an 80 or 100-minute drive from an airport with commercial service. The Driggs airport will never have commercial service.

GTR has dreams of building high-end housing on their 120-acre inholding. They have built a number of cabins and have been six months trying to sell the first two. Further, there are 600-700 short-term rentals in Teton Valley. Visitors these days, for the most part, do not want to stay in hotel rooms or even condo units [ndash] they want a full-size house with lots of bedrooms and bathrooms. They can get this on the valley floor, such that GTRs high-end housing dreams will simply never [ldquo]pencil out.[rdquo] They are killing their golden goose.

A meeting was held recently between both Teton Counties [ndash] Wyoming and Idaho. There is now universal recognition that the deficit that Teton County Idaho (TCI) runs in large part because of GTR and its visitors is in the \$2-2.5 million range.

Grand Targhee is known as [ldquo]the way skiing used to be.[rdquo] In good snow years, the powder at GTR has little match. Lower lift ticket prices are a big draw. Virtually non-existent lift lines are known far and wide. Now GTR wants to give all that up so they can become another [ldquo]Park City.[rdquo] A private equity fund from Salt Lake City has now given GTR a multi-million dollar mortgage, it is suspected they want to be the resort purchaser if GTR gets the desired expansion.

The sixth Forest Plan Amendment, to allow expansion in to Mono Trees and South Bowl must be removed from consideration.

Mono Trees

That GTR has proposed expanding further down the mountain into Mono Trees should have been stopped by the fact that this area does not hold snow well. This is ignored by the FEIS study.

The Forest Service has a responsibility to approve any expansion plans [ldquo]if the public interest[rdquo] is considered and it is proven. Expansion into Mono Trees should not happen for at least four (4) reasons [ndash] because of its low elevation and inconsistent snow, because of the loss of White Bark Pine and at least four bird specie habitats, because of the destruction to the viewshed from the valley floor when the lifts and runs are cut into the forest, and because of the number of XC skiers and hikers who use the Mono Trees area now. Many persons treasure their recreational experience in Mono Trees.

Perhaps give GTR the pieces of its [ldquo]wish list[rdquo] that lie inside its current SUP, but not Mono Trees.

South Bowl

The reasons for not allowing further expansion in to South Bowl are numerous. Few of what I will discuss here are adequately research or supported by the FEIS. Comments to the DEIS were ignored.

Avalanche control is not fully vetted. There was little to no discussion of how the sound from the avalanche bombing would impact wildlife and humans that are heavy users of the bottom of Teton Canyon during

the winter. There is no discussion of [ldquo]sympathetic[rdquo] avalanches across to other mountain within GTRs SUP or into the Jedediah-Smith Wilderness.

Take Fred[rsquo]s Mountain for example. A fairly large sinkhole developed a few years ago at the top of Fred[rsquo]s. Though now filled with [ldquo]poof[rdquo] foam and relandscaped, this is a clear demonstration of the karst formation that makes up much of Fred[rsquo]s Mountain. This karst formation cannot withstand a sympathetic avalanche much less the digging of water and waste water lines or the pounding in of more supports.

When the Coulter Lift was put in, GTR did not use non-reflective materials. The negative impact to the viewshed is on-going. Further, GTR did not follow FS prescriptions of where to lay communication and power lines. Instead, these lines were placed under the lift and the soil disruption never replanted [ndash] hence yet another visual scar for valley residents and visitors.

In places, the FEIS mentions that [ldquo]public safety[rdquo] would be increased by expansion into South Bowl. In fact, the expansion will entice many more less-experienced skiers to venture into the backcountry from South Bowl. Search and Rescue know this will mean more calls for their services.

Expansion in to South Bowl is not in the [ldquo]public interest.[rdquo] It is yet another item checked off GTR[rsquo]s [ldquo]wish list.[rdquo] Perhaps a future purchaser of GTR has asked for this expansion. It certainly adds nothing to GTR[rsquo]s statements about adding more beginner or moderate-skier capacity.

Expansion in to South Bowl will only contribute to more wildlife/skier interfaces, cause loss of habitat, loss of wildlife.

Grand Targhee does not have the parking or space available for additional parking and their attempts at even getting their employees to use transit have failed. GTR should not be allowed to expand its skier/rider capacity in the winter for these reasons alone. But then there are the reasons that expanding GTR[rsquo]s winter daily user capacity affects Teton County Idaho.

As explained above, it is now believed that the budget of TCI runs a \$2-2.5 million deficit [ndash] mostly at the expense of GTR and its winter and summer visitors. Roads, law enforcement, fire and EMS, schools, hospital [ndash] the list goes on.

Expanding GTR beyond making improvements within its current SUP is not in the public interest.

It is my hope that the Forest Service remembers as it reads and considers all comments that the proposed GTR expansion began under, and is still governed, by NEPA before this administration diluted it. The Caribou-Targhee NF, the Jed-Smith Wilderness, Grand Teton National Park, and the residents and visitors to Teton County Idaho all care about what happens on those hills. We demand that the version of NEPA this process began under be adhered to.

Kindly produce a supplemental EIS and a supplemental ROD and choose either Alternative 3 or a new alternative [ndash] such as the one I proposed in my DEIS comment.

Respectfully,