

October 11, 2020  
Mel Bolling  
c/o Jay Pence  
Teton Basin District Ranger  
Caribou-Targhee National Forest  
P.O. Box 777  
Driggs, ID 83401

Submitted via the online form at: <https://cara.ecosystem-management.org/Public//CommentInput?Project=58258>

**Subject: Grand Targhee Master Development Plan Projects - Scoping Comments**

Dear Mr. Bolling,

The Jackson Hole Conservation Alliance (Alliance) appreciates the opportunity to comment on the public scoping notice for the proposed Grand Targhee Resort (GTR) Expansion. The Alliance represents over 2,000 community members who value the wildlife, wild lands, and community character of Jackson Hole, Teton County WY, and the greater Teton area. We have followed the planning process around GTR's proposed development since the '90s and hold with high regard the opportunity to provide insight as to how this proposal may have far reaching social, economic, and ecological impacts to our community.

The GTR Expansion Proposal is unique in that it will deeply impact both the Teton County, Wyoming and Teton County, Idaho communities. I write today as both a resident of Teton Valley, Idaho and a professional in Teton County, Wyoming, as the conservation program manager for the Alliance. While we support connecting people to nature, we want to ensure that we recreate in ways that respect wildlife and habitat and uphold our communities' character. We also believe that there are ways to achieve balance among recreation, smart growth, business, and conservation.

Upon review of the submitted Grand Targhee Resort Master Development Plan (MDP), we believe the proposed base area and public lands development stands to have a significant impact on the local landscape, wild inhabitants, social-economic resources, and community character of GTR and the surrounding area. We believe many aspects of the proposal are problematic and warrant in-depth analysis. We ask the Caribou-Targhee National Forest and the contracted SE Group to undertake a comprehensive, full, and fair analysis for the Draft Environmental Impact Statement (DEIS). Our specific concerns regarding this proposal are:

**1. Community**

The current Comfortable Carrying Capacity (CCC) of Grand Targhee is ~3,000 guests/day; the proposed expansion would increase the CCC to ~7,000/day. Please analyze what will happen to the community character of GTR, Alta, and Driggs if Targhee expands to the size of Jackson Hole Mountain Resort and Teton Village. Targhee's charm (and marketing strength) is in being a community ski hill, not a mass-produced corporate resort. This major development increase on Grand Targhee will clearly increase future development throughout Teton Valley and decrease

housing affordability for the community. We also believe the aspects of the proposed expansion would significantly impact our visual and noise resources, like our dark quiet skies and undeveloped mountainous views. Please conduct a viewshed analysis in accordance with FSM §2343.14(1)e1, that states ski resort expansion will be “visually consistent with or subordinate to the ski area’s existing facilities, vegetation and landscape.” As well as a soundscape analysis that addresses alternatives included in the DEIS.

The GTR MDP Proposed Action includes building additional lifts and realigning existing lifts, terrain enhancements and road/trail improvements for both winter and summer seasons, developing on-mountain restaurants and guest amenities like warming huts, yurts, and restrooms, and increasing lodging and base services significantly. Please analyze how these developments align with FSM §2343.14 g1, which states development will “...not require extensive new support facilities, such as parking lots, restaurants, and lifts.” You stated in the MDP acceptance letter “we remain concerned about the potential increase in base amenities, parking and transportation needs the 2018 MDP may generate. We currently receive complaints related to transportation and parking and know you share our concern. We look forward to your understanding and implementing the necessary ties between this 2018 MDP and your base area development.” We appreciate your concern and look forward to a full analysis on the new infrastructure needed to support this development, like the already congested traffic and parking issues along Ski Hill road, at Targhee, and over Teton Pass. We also request an analysis of potential solutions such as Transportation Demand Management, transit, and housing affordable to a wide range of community members.

As a result of the expansion, skiers and riders will have increased access to what is now backcountry terrain and remote public lands, causing Teton County Search and Rescue to be apprehensive of a possible increase in backcountry accidents.<sup>1</sup> As well, expansion into Teton Canyon and the Mono Trees will open the area to paying resort goers and displace backcountry skiers and split boarders who currently enjoy the solitude and remoteness of these public lands. Backcountry skiers are an important stakeholder group in Teton Valley and this expansion would affect the quality of life, please address the value of backcountry skiing within the DEIS and address a wide range of alternatives for access/use.

This expansion would significantly impact the scope, frequency, and type of visitors to our public lands, possibly causing illegal trail use in adjacent public lands and negatively affecting traffic and parking, county road repairs along Ski Hill road, and the community character and cost of living in Teton Valley. We ask that the impacts to the valley and the threat to the community character and quality of life be thoroughly studied and documented within the Draft EIS.

## **2. Wildlife**

We see the proposed expansion as deeply problematic to the area wildlife and their habitat. The Master Development Plan includes a 52% increase to their current Special Use Permit (SUP) boundaries (1,200 acres) to border the Jedediah Smith Wilderness Area, which has been identified as within the Canada Lynx area of influence and as critical habitat for isolated

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<sup>1</sup> Mieux, Emily. “Targhee plans new lifts, terrain. Search and Rescue worries about an increase in backcountry accidents.” *Jackson Hole News and Guide*, 24 April 2019.

populations of bighorn sheep, wolverine, and grizzly bears, among other species. We ask to see a full analysis of not only the project components on their own but also of the cumulative effects—including an overview of species-specific and cumulative impacts—that this footprint expansion and increased visitor use will have on wildlife habitat and connectivity.

Please analyze the impacts on both summer and winter ranges for known area wildlife in Teton Canyon and the greater CTNF, with emphasis on the threatened bighorn sheep population which utilizes a mineral lick in the canyon. Given the significant actions being taken to protect the native Teton bighorn sheep population, such as potential voluntary skier closures and the mountain goat removal project, we believe that all relevant management decisions must use a “how can we best protect the bighorn sheep” lens and analysis. *We respectfully ask that protecting bighorn sheep be a paramount goal and Purpose of this project.*

The South Bowl (Northern Teton Canyon) expansion proposal, with potential interim cat skiing, is of highest concern for the expansion impacts on wildlife and habitat. Two new lifts in this area would greatly increase encroachment and use next to the wilderness area that is currently unused except by wildlife and human-powered travelers. South-side terrain is sunny and windswept, which results in more available forage for wildlife. Please describe any impacts of proposed tree clearing and glading, ski run grading, and new trail construction in both summer and winter on birds, particularly raptors and songbirds, as well as on other species including mule deer and other ungulates. Please also describe the impacts of expansion and construction into the mono trees proposed expansion, which is important habitat for great grey owls, wintering moose, and more. There is a plethora of research that suggests wildlife is sensitive to the effects of human disturbance, specifically recreation.<sup>234</sup> *Please develop an alternative that specifically prioritizes minimizing impacts to wildlife, habitat, and natural resources, separate from the required no-build option.*

### **3. Natural Resources and Surrounding Area Impacts**

Grand Targhee Resort sits in both public lands of the CTNF and private lands under the jurisdiction of Teton County, WY and beyond this is a part of the Teton Valley communities and the Greater Yellowstone Ecosystem. The ski area does not exist in a vacuum. Please evaluate the impacts of development on downstream water quality and stormwater runoff, wildlife-vehicle collisions, pollution and energy use, unexpected uses within Forest Service lands, and climate change. Please include how interstate collaboration between Wyoming and Idaho will be addressed in order to attend to these impacts.

Southern ski terrain receives more sunshine and often less protection from weather events like high winds, which causes difficulty maintaining desirable, skiable snow conditions and depths.

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<sup>2</sup> Heinemeyer, K., Squires, J., Hebblewhite, M., O'Keefe, J. J., Holbrook, J. D., and Copeland, J.. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. *Ecosphere* 10(2):e02611. [10.1002/ecs2.2611](https://doi.org/10.1002/ecs2.2611)

<sup>3</sup> Squires, J. R., Olson, L. E., Roberts, E. K., Ivan, J. S., and Hebblewhite, M.. 2019. Winter recreation and Canada lynx: reducing conflict through niche partitioning. *Ecosphere* 10( 10):e02876. [10.1002/ecs2.2876](https://doi.org/10.1002/ecs2.2876)

<sup>4</sup> Coppes J, Burghardt F, Hagen R, Suchant R, Braunisch V (2017) Human recreation affects spatio-temporal habitat use patterns in red deer (*Cervus elaphus*). *PLoS ONE* 12(5): e0175134. <https://doi.org/10.1371/journal.pone.0175134>

Opening additional terrain for skiing in the south bowl could require increased snowmaking, a potentially significant financial responsibility and a strain on our water supply, in addition to the consequences posed to wildlife. Snowmaking is planned to expand from 10 acres to 104 acres in the MDP, a 94 acre increase that would require two new reservoir locations and additional groundwater wells. Please address the impacts of this development to the area wildlife and local water supply. Additionally, as the effects of climate change become more severe and the natural snowpack could potentially lessen, more snow making will be required. Please include climate trends and weather/snowpack projections while evaluating the purpose and need of this proposal and if it is viable far into the future. We would also like to see an in-depth analysis of the role that increased energy use and emissions from this expansion will have on climate change. There should be alternatives presented in the DEIS, such as public transportation, offsetting the carbon footprint, or renewable energy operations, to address the impact of development on climate change.

Along with the clear impacts this proposal will have on wildlife and natural resources, please evaluate the effects increased visitation (through expanded opportunity to access backcountry terrain) and an expanded footprint to border the Jedidiah Smith Wilderness Area, will have on wilderness character. Please describe this in relation to the stated purpose of “preservation of wilderness character and wilderness resources in an unimpaired condition,” in the Wilderness Act of 1964.

#### **4. The NEPA Process**

The Alliance, among other organizations, are concerned about the recent Council on Environmental Quality (CEQ) changes in the National Environmental Policy Act (NEPA) process that could influence this Draft Environmental Impact Statement. Since 1978 federal agencies have been required to follow CEQ regulations when implementing the NEPA. Over abounding objections from members of Congress, states, conservation organizations, and the general public, CEQ recently issued a new rule rewriting the entirety of its 1978 regulations.<sup>5</sup> The new CEQ rule overturns significant aspects of NEPA and its longstanding practice, contradicts decades of court interpretations of NEPA’s mandates, and undermines the confidence placed on NEPA by decision-makers, project proponents, and the public. As of September 14, 2020, agencies are required to apply the new rule to *new* NEPA processes. However, agencies have discretion to continue applying the previous CEQ regulations<sup>6</sup> to ongoing NEPA processes begun before September 14, 2020.<sup>7</sup> Given the uncertain fate of the new rule – with pending legal challenges and a potential change in administrations and with respect to this process, which was noticed on August 26, 2020, the Caribou-Targhee National Forest should not apply the new CEQ rule. Doing so would create significant confusion for all involved and harm to the public’s interest. *In short, we believe continuing to apply the 1978 regulations is the clearer more certain path, especially with respect to this process, which was clearly initiated before September 14, 2020.*

Additionally, we would like to raise the concern of a potential conflict of interest that exists with the SE Group being contracted to write the EIS, given that they were also hired by GTR to

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<sup>5</sup> 85 Fed. Reg. 43,304 (July 16, 2020), codified at 40 C.F.R. Part 1500

<sup>6</sup> 40 C.F.R. Part 1500 (1978)

<sup>7</sup> 40 C.F.R. § 1506.13 (2020)

prepare the MDP. *We recommend hiring a different firm who is not already contracted by GTR, to remove the current actual or perceived conflict of interest.*

Again, we would like to thank you for the opportunity to comment on the public scoping notice for the proposed Grand Targhee Resort Expansion. We look forward to an assessment that includes a full analysis of the environmental, social, and economic impacts of private projects on public land. We hope that analysis will provide data that allows our community to have an honest conversation about our impacts so that we can make decisions that help us live in balance with nature.

Sincerely,

A handwritten signature in black ink that reads "Chelsea Carson". The script is cursive and fluid.

Chelsea Carson  
Conservation Program Manager  
Jackson Hole Conservation Alliance  
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Jackson WY 83001