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Comments:

Regarding Grand Targhee's expansion proposal, there are numerous issues I have with the current proposal that I hope to outline in a constructive manner.

In the 2020 Scoping Notice letter, the section titled 'Purpose and Need' on Page 1 states: "To address the growth in the Idaho and Wyoming skier markets and, to meet increasing expectations, GTR MUST continue to develop and improve its terrain and guest services offerings." The biggest issue I have with this statement is the idea that Targhee MUST continue to develop and improve in order to stay in business. What are the environmental and social costs with using this mindset of development? I would like to remind Targhee and the Forest Service that Grand Targhee already has expansion plans that have been previously approved yet have never been built, such as the Peaked expansion and the massive development slated for the Base Area. If they truly needed to expand and develop more skier services and amenities in order to stay viable, wouldn't they have developed their current entitlements already?

It's also helpful to use real estate developments as an example when considering GTR's expansion proposal. In Teton County, ID as well as other counties in the Rocky Mountains, developers must complete Phase 1 and the required infrastructure that is needed before they can begin selling or developing the remaining phases. Why can't GTR be held to this standard instead of just asking for what they claim they 'must have' in order to survive? They have clearly been able to survive and remain a great community ski hill with hardly any new development since the Great Recession of 2008, so it would be helpful if GTR could provide the community with numbers that SHOW in great detail a need to develop well beyond what has already been approved, but has yet to be developed or built. I hope the Forest Service requires Targhee to develop their approved Project Area BEFORE they can ask for Public Land in order to 'survive.'

Additionally, one of my biggest concerns is the expansion area in the Mono Trees area as well as the South Bowl. The Forest Service should be required to look into the the current health of the forests in these areas and also analyze how clearcutting and glading will impact these fragile ecosystems that are currently owned by the Public. I also hope to see a detailed analysis of not only the proposed ski runs in these areas, but also how these ski runs will be created and developed, such as the building of roads and heavy machinery. Also important, how will these new access roads and ski runs impact the scenic viewshed from the valley as well as backcountry users in the adjacent Wilderness? What about Whitebark Pines and other old-growth trees in this development area? This should also be extensively researched by the Forest service, and I will include a link to a page from the Forest Service website that talks in depth about Whitebark Pines and their importance, specifically Page 33: https://www.fs.fed.us/rm/pubs/rmrs_gtr279.pdf

Also important to consider is the impact of light pollution and how this development proposal will impact our dark skies. It's frustrating to me that the proposal on the website outlines new building such as the new restaurants and warming huts outlined in the new expansion, but fails to include the Base Area and the giant real estate development slated for that area as well and the impact that will have. The Base Area and the Real Estate/lodging component will have huge impacts on the night sky and I encourage the Forest Service to balance this component when assessing the impact of this 'new proposal.' For more info on Dark Skies, here's a link: <http://darkskystudies.org/importance>

How will the expansion and development address and deal with water issues? This is of great concern to me, specifically when you factor in growth and a warming climate. Equally important is how Targhee will deal with wastewater treatment. I'll include a link to the Yellowstone Club spill which contaminated and leaked effluent in the Gallatin River which is an important example to note since they are both similar in nature. Yellowstone Club received their property from a land swap, built a private ski resort and real estate development, and since its inception has paid millions of dollars in fines to the DEQ for violations including their wastewater pond leak. Here's the link: <https://www.gallatinrivertaskforce.org/2016/03/06/yellowstone-club-spill/>

How will Backcountry skiers be affected by this proposal? The South Bowl represents one of the best Backcountry ski experiences in the valley and if Targhee expands into this area this will be a huge loss for public land users who want a ski experience away from crowds.

I hope you consider all of my concerns and address all of the issues associated with the GTR expansion in a detailed and thorough manner. Again, this expansion proposal is on PUBLIC LAND and I hope you don't lose sight of that.

Best,

James Weber