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Comments:

Proposed Grand Targhee MDP Projects Comments 10.11.2020

Thank you for the opportunity to review and provide comment on the proposed improvement projects at Grand Targhee Mountain Resort. I have reviewed the scoping document and the maps available for this project and I am very familiar with the area both during the summer and winter seasons.

#### Concern about Extent of Development

Many of the proposed projects within the existing SUP boundary appear to have some logical public need. Additionally, the need for expansion and development in the Mono Trees area makes sense. The one major issue associated with overall development of the resort is the likely effect on off-site areas, notably Teton Canyon, due to increased recreation use.

As the summer of 2020 revealed, dispersed campsites in Teton Canyon were full nearly all summer and trailhead parking was often over-flowing. With the proposed improvements, Grand Targhee Resort intends to attract an increasing share of the visitor population in the Teton Valley/Jackson Hole region. While the proposed infrastructure at the resort may be sufficient to handle increased use, there is a high likelihood visitors drawn to Grand Targhee during the summer for hiking and biking will be motivated to find free dispersed camping in Teton Canyon as well as in other nearby canyons. There will also likely be an increase in trail use outside of the Resort as visitors seek a variety of places to explore during their stay. Increasing the amount of use in areas that are already challenged with visitor impacts is not consistent with the agency's goal of achieving sustainable recreation. As you prepare the DEIS, I urge you to disclose these indirect effects and develop measures that would alleviate the off-site camping and trail impacts through design features such as requiring low-cost camping to be provided at the Resort. Additionally, the proposed development of the Mono Trees area may make the area more accessible to snowmobile use. Currently, illegal snowmobile use regularly occurs via the Cold Springs road after the resort has closed (late April through May). The allure of snowmobile-aided spring skiing will likely increase and expand to the entire SUP area (including Mono Trees, Peaked, and the South Bowl area). With declining budgets, the ability of the Forest Service to effectively enforce the prohibition on motorized access will decrease. This indirect effect should be disclosed in the DEIS and design features put in place that require Grand Targhee to actively partner with the Forest Service to prevent (or at least reduce) illegal intrusions post-operating season.

#### Concern about Proposed Glading, Hiking Trail, and Mountaintop Facility within existing SUP

The Grand Targhee environment contains many healthy whitebark pines. With 550 acres of glading proposed, there is high likelihood that whitebark pine would be removed. The West Slope of the Tetons has some of the healthiest whitebark pine stands in the GYE. Design criteria should be added to avoid cutting any whitebark pine and, if cutting some whitebark is unavoidable, then seedlings must be purchased and planted to mitigate the impact.

One proposed hiking trail will provide access to Mary's saddle. There is no purpose and need specifically identified for this trail. However, this trail will take hikers directly to trails that access the Jedediah Smith Wilderness. Trails from the saddle access the Beard's Wheatfield trail leading to South Leigh Canyon to the north and North Fork of Teton Canyon to the south. An informal trail takes hikers into South Leigh Lakes which is mapped as Opportunity Class I where the emphasis is on providing the highest degree of wilderness character available within the Jedediah Smith Wilderness (no system trails, very minimal evidence of visitors, and very high opportunities for solitude). Loss of opportunities for solitude and expanding visitor impacts is already an issue within the Jedediah Smith Wilderness. Attracting additional hikers will only aggravate the current issues in violation of the Wilderness Act's mandate to preserve wilderness character. Design features that include proactive boundary management may help lessen the impact. Likewise, the proposed 6,000 sq. ft. facility on top of Fred's Mountain will clearly be visible from many vantage points within the Wilderness leading to a loss of wilderness character. Unless the building is built into the west-facing slope so that it does not sit atop the mountain, it will be visible despite efforts to blend color and texture into the surrounding environment.

#### Concern about Environmental Effects associated with South Bowl Expansion

My primary concern with the proposed Resort projects centers around development of the South Bowl area. As noted, the area is currently mapped as 2.1.2 Visual Quality Maintenance, for good reason as this area contributes greatly to the scenic attractiveness of the Teton Front and the popular Teton Canyon. Unlike other proposed improvements, there is nothing in the scoping document that provides compelling rationale for improvements in this area. One can guess that the need has something to do with "increasing guest expectations" and "shortcomings in terrain offerings" but these vague statements are insufficient in the face of dramatic development proposed in what is now a completely undeveloped area. The high environmental impact combined with the eventual loss of cat skiing (the one unique winter opportunity Grand Targhee offered in contrast with other resorts) results in the inescapable conclusion that there is no net public benefit associated with this proposal.

\* Visual Impact - Nothing has occurred to date to alter the existing visual quality of the South Bowl area so one is left to wonder - is visual quality somehow no longer important? The proposed road, ski lifts, and ski runs will irreversibly impair existing visual quality and be visible from many vantage points in Teton Valley and in Teton Canyon.

\* Safety - The terrain in this area is considerably steeper than other areas of the resort with much higher avalanche potential. This will increase the risk of in-bounds avalanches as well as increase risk for ski patrollers conducting avalanche control.

\* Bighorn Sheep habitat - This area contains historic and likely current bighorn sheep habitat. With so much attention focused on the plight of the bighorn sheep population in the Tetons in the face of multiple threats including increased winter recreation use, it makes no sense to intentionally develop an area of habitat and risk further population decline for questionable public gain.

\* Wilderness character - The entire northern boundary of the proposed expansion is adjacent with the Jedediah Smith Wilderness including areas that are not bounded by cliffs. The rapid expansion of "side-country" interest in skiing combined with lack of proposed boundary management, suggests that development of the South Bowl will very likely lead to increased winter use within the Jedediah Smith Wilderness (both in the Beard's Wheatfield and Miles Creek/North Fork of Teton Creek areas).

\* Loss of snowcat skiing - Snowcat skiing has been the one unique experience Grand Targhee has offered for years that expands the winter recreational opportunities in the region. Eventually eliminating this opportunity seems contradictory to the stated objective to improve the diversity and quality of recreation experiences in an increasingly competitive market.

While design features/mitigation may be possible for some concerns, the impacts associated with the South Bowl development are significant and require alternative development. Specifically, I urge you to include an alternative that does not include boundary expansion in this area. Another alternative could allow boundary expansion but only permit guided snowcat skiing with snow roads built (no permanent roads), no lift development, and no cut ski runs. In conclusion, the following issues must be addressed as the environmental analysis process proceeds.

1. Effect on visual quality associated with proposed South Bowl developments and mountain top facility.
2. Effect on wilderness character due to increased use associated with proposed South Bowl development, the hiking trail to Mary's saddle, and mountain top facility.
3. Effect on whitebark pine associated with proposed glading.
4. Effect on bighorn sheep habitat associated with proposed South Bowl development.
5. Effect on safety of skiers and patrollers due to avalanche potential in proposed South Bowl area.
6. Effect of loss of snowcat skiing on range of recreation offerings in the region.
7. Indirect effects of increased use associated with proposed development on adjacent areas (e.g. increased dispersed camping and trail use, increase illegal snowmobile use)

Respectfully,  
Linda Merigliano