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October 12, 2020

Mel Bolling, Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Cc: Rachel Franchina

Re: Grand Targhee Master Development Plan Projects

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

Dear Forest Supervisor Bolling;

Thank you for the opportunity to submit scoping comments for the Grand Targhee expansion DEIS. Teton Backcountry Alliance (TBCA) is a grassroots organization representing thousands of backcountry recreationists worldwide to regional decision-makers, and is dedicated to Teton-area winter backcountry recreation and its effects on our environment, wildlife, and people. After reviewing the Grand Targhee 2018 Master Development Plan Projects, we have identified significant concerns regarding the effects of permit area expansion in the following areas that we value:

1. Maintaining availability and access to backcountry skiing and snowboarding off Fred's Mountain, Peaked Mountain, Mary's Nipple, and Mono Trees
2. Maintaining existing wildlife habitat and minimizing disturbance to wildlife
3. Enhancing the quality of the backcountry experience in the Jedediah Smith Wilderness and Teton Canyon non-Wilderness surrounding the ski area

Based on the contents of the scoping document, TBCA concludes that expansion of the resort's permit area is decisively incompatible with all three of these values, and therefore TBCA asks that the following questions and subjects be addressed in the DEIS:

- Please defend how the purpose and need for Grand Targhee expansion, and the few it would serve, would outweigh the needs of the many people who enjoy the backcountry

experience of Teton Canyon and Jedediah Smith Wilderness, and the needs of animals who winter on the south face of Peaked and Mary's Nipple.

- TBCA asks for a study of the history, values, and traditions of backcountry skiing in South Bowl and Mono Trees. How can it be justified to displace this use and legacy? How would these values and traditions be honored and/or preserved if the permit area was expanded?
- TBCA asks for specific plans in each alternative for backcountry access gates and policies at Grand Targhee.
- TBCA asks that the USFS and Resort ascertain (perhaps by interviewing backcountry skiers and resort employees) the volume, qualitatively if not quantitatively, of backcountry skiing use (past, present, and future prior to planned expansion) within the proposed permit expansion areas.
- Expanding the resort into areas traditionally used for backcountry skiing will invariably lead to displacement of that use somewhere else. TBCA asks for an analysis of how the Forest system will absorb that use, and how the displacement and increased use will affect those alternate areas. Also, please include ways that this displacement would be mitigated. For example: 1) CTNF could ban snowmobiling (hybrid skiing) on Beard Mountain by making Commissary Ridge, Beaver Creek, and Beard a non-motorized zone; 2) CTNF could engage more with BTNF and WYDOT on parking issues at the top of Teton Pass; 3) CTNF could provide assistance to BTNF and TBCA in funding the Teton Pass Ambassador Program. Mitigation would need to be substantial to offset the loss of—and disturbance to—backcountry skiing in Teton Canyon. For most regional backcountry skiers, there would be no acceptable mitigation plan.
- TBCA asks for an analysis comparing the growth/decline of backcountry skiing and snowboarding in our region (Tetons, Snake River Range, Big Hole Mountains) with the growth/decline in lift-served ski area visits at Grand Targhee and other regional ski areas. These data should be used to assess the appropriateness of resort permit area expansion with regard to National Forest land-use policies.
- TBCA would like to see analyses of the impacts from permit area expansion on existing populations of bighorn sheep, mule deer, elk, lynx, wolverine, black and grizzly bears, song birds, and birds of prey (including owls), and how permit area expansion could be justified or not justified in light of these findings.
- With the present ski area permit area, audio and visual impacts to backcountry users in Teton Canyon and Jedediah Smith Wilderness are fairly low. TBCA would like to see a before and after comparison of impacts to the sound- and viewsapes, with an analysis of viewshed and audio impacts with an expanded permit area. For example, will the expansion into South Bowl be visible and audible from Wilderness summits like Table

Mountain, South Teton, Middle Teton, Grand Teton, and other areas (countless ridgeline, forest, and valley locations)? Please include details on the types of sounds (ie., explosives, snowmaking, cat engines, voices, lifts, construction) and visual impacts. How would these changes effect the Wilderness experience valued by such a large number of our populace, and how could the USFS justify or not justify allowing these impacts?

- Helicopter tours recently have started flying over the Jedediah Smith Wilderness in the space between Grand Targhee and the high Teton peaks. An expanded Targhee operation should consider cumulative effects with helicopter tourism on the region, especially on wildness, wildlife, and recreationists in Jedediah Smith Wilderness and Teton Canyon.
- With easy ridgeline access, TBCA is concerned about increased risks to public safety with regard to resort skiers dropping with great regularity into upper South Leigh Creek (ie., Steve Baugh Bowl, Little Mary's, etc) and having avalanche accidents, along with associated impacts to the Wilderness from increased number of rescues. Please speak to this potential problem and how resort expansion could be justified in this light.
- Snow depths and quality in South Bowl and Mono Trees are historically low and poor on the majority of days. Backcountry skiers have the ability to make the trip on the rare days when conditions are good. TBCA would like to see an analysis of the desirability of these areas for the average ski-area skier provided in forecasted skier-run-days on those aspects as a percentage of season duration. For example, 10% of resort skier-runs will find South Bowl enjoyable during 5% of the ski season. In light of those results, how could the costs to wildlife, backcountry skiing tradition, disturbance to habitat and natural conditions in those areas be justified or not justified?
- How would Grand Targhee stack up against other competing ski areas in total acreage with and without permit area expansion? In other words, would permit area expansion change Grand Targhee's regional ranking with regard to ski area acreage?
- Please compile an analysis of public interest in permit area expansion using scoping comments and past visitor survey data. In other words, compare how many people say the resort is now crowded and needs to be expanded to those that say lift lines and terrain are adequate within current permit area.
- Climate change studies show that within decades, the elevation level of viable snowpacks will rise considerably. How can the USFS and resort justify or not justify the development expense and environmental impact to the permit area expansion areas if there is a chance these areas will not be viable for skiing into the future. If climate change scenarios will require additional snowmaking operations beyond what would be permitted at this time, what would be the impacts on available water resources and overall hydrological and ecological systems?

- TBCA would like the USFS to provide an estimate of the number of trees and acreage of forest that would be cut down if South Bowl and Mono Trees areas became fully developed.
- Teton Valley is one of the few suburban areas where light pollution has had minimal impact on the visibility of stars in the night sky. TBCA would like to see an analysis of how increased lighting at the resort would affect the quality of night skies in Teton Valley, Teton Canyon, Jedediah Smith Wilderness, and Grand Teton National Park high peaks.
- TBCA would like to see an analysis of how expansion would affect backcountry skiers staying at the Teton Backcountry Guides yurt in Teton Canyon, and a statement about the effects on the business viability of this permitted CTNF outfitter. If this analysis shows considerable impacts, TBCA would like to know how expansion could be justified and/or mitigated.
- TBCA would like to see a range of alternatives, including at least three alternatives that do not contain any permit area boundary expansion. In other words, can Targhee meet its needs for increased visitation and economic growth without increasing its permit area?
- TBCA would like to understand how directives on developing more recreation opportunities on public lands from the Trump administration might influence a Record of Decision.
- TBCA would like to understand how the USFS would handle possible changes to NEPA policy, should such changes occur during the Grand Targhee projects process.

Thank you for the opportunity to comment during this scoping period. We look forward to reading how the DEIS will address our concerns.

Sincerely,



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