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Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401
208-354-2312
Attn: Rachel Franchina, Project Lead

Dear Ms. Franchina, Mr. Bolling, Mr. Pence and CTNF Planning Staff,

Mountain Bike the Tetons is the flagship chapter of the International Mountain Bicycling Association (IMBA) for the Teton region. Founded in 2013, Mountain Bike the Tetons (MBT) works daily to carry out the following mission: *“To build a vibrant, healthy community by enhancing recreational and economic opportunities in the Teton region through development of our outstanding mountain biking resources.”*

Based in Driggs, Idaho but working on both the east and west side of the Tetons, MBT employs a professional, seasonal trail crew, facilitates ground-breaking youth programming, puts on exciting local events and engages regularly with partners in public land trails management and policy decision making. MBT hosts a 10-person Board of Directors, over 500 dues-paying members and 5 staff-members (one full-time, four part-time seasonal).

The Teton region has long been known for its high-quality recreation opportunities. In the last 20 years, the growth of mountain biking in these communities can be seen in myriad ways: through the proliferation of new bike shops (12 shops within a 30-mile radius), creation of dozens of miles of new trails, and construction of reroutes that improve ecological conditions, engagement of thousands of volunteers, and facilitation of countless new events and races. Local residents have chosen the mountain bike as a part of their daily lives during the summer season and regularly engage with agency personnel when access, trail sustainability, user conflict or stewardship issues arise (both positive and negative). It is in this spirit that MBT is grateful for the opportunity to engage in the Grand Targhee Resort Master Development Plan Projects EIS process via submission of public comment. Please find our comments below. We encourage your feedback as well. Please contact us at your convenience if you wish to discuss further.

MBT believes that Grand Targhee Resort has thoughtfully prepared a master-plan that addresses the long-term needs of community members, visitors and the Grand Targhee Resort entity itself. MBT has chosen to comment solely on the Proposed Summer Projects portion of the plan and trusts that Grand Targhee Resort, other local organizations and the agency will develop workable alternatives that will meet the needs of all parties involved here.

- MBT firmly believes that an expanded downhill and cross-country mountain bike park and multi-use summer trail system, consisting of beginner, intermediate and advanced terrain, located within the existing permit boundaries will provide a significant benefit to local community members and visitors alike. This includes youth, as these trail additions and improvements will provide an excellent teaching space for mountain bike riding skills for riders of all levels and ages.

- The number of mountain bikers of all ages, demographics and ability levels in Teton communities is increasing exponentially every year. This can be observed through growth of local, summer youth mountain bike camps and programs (Sprockids, Jackson Hole Youth Cycling, etc.), local mountain bike races, local clinics and the increasing viability of a number of local and regional mountain bike advocacy organizations.
- The number of visiting mountain bikers to the region is also growing exponentially every year. This is evidenced by local trail counter data, crowd-sourced Strava and Trailforks data and anecdotal data from local business owners, hotel proprietors and bike shop employees. This expanded summer use infrastructure will help to meet the increased demands of a greater population and shifting expectations of mountain bikers. It will also ultimately help disperse use within the resort boundaries.
- MBT hopes to work with Grand Targhee Resort summer trail staff in development of this expanded network.
- In addition, in order to promote connectivity of Grand Targhee Resort to the local communities of Teton Valley, MBT recommends an addition to the Master Development Plan Projects EIS: the construction of a 5.1-mile, non-motorized, multi-use, singletrack trail that follows along the Ski Hill Road corridor from the Teton Canyon junction to the Grand Targhee Resort parking lot. This trail would travel through Visual Quality Maintenance and Elk and Deer Winter Range. Please see Appendix 1 for a full project overview.
 - This proposal has been developed in coordination with Grand Targhee Resort staff and Teton County Wyoming Planning staff.
 - Project would allow summer seasonal travel via bike, hike or horse from Teton Canyon to Targhee and provide a safe alternative for hikers, runners and bikers who do not wish to travel on the road shoulder. The trail would also alleviate the increasing prevalence of user conflict on the Mill Creek Trail as non-motorized use in both directions grows each year.

On behalf of the board, staff and membership of Mountain Bike the Tetons, we appreciate the opportunity to comment on this project. We encourage you to contact us at your convenience with any questions or comments.

Regards,



Tony Ferlisi
Executive Director, Mountain Bike the Tetons

Appendix 1

Ski Hill Rd. Right-of-Way Singletrack



The Ski Hill Rd. Singletrack will be a 5.1 mile-long 30" wide, singletrack trail, following the road corridor from the Teton Canyon Rd. turn-off (*Lat / Lon N: 43.76390°, W: 111.00075°*) to Grand Targhee Resort (*Lat / Lon N: 43.78400°, W: 110.96101°*). The main function of this project is to separate mountain bikers, walkers, runners and equestrians from the paved road surface during the spring, summer and fall months. Some of the trail-bed surface will enter and exit lands administered by the Caribou-Targhee National Forest, Teton Basin Ranger District. *Initial map proposal attached.*

The area is characterized by lightly graded natural surfaces, inhabited by native grasses, sage brush and sparse conifer stands (*Lat / Lon N: 43.76476°, W: 110.98700°*). Steeper cross-slopes do occur for four (4) sections of proposed trail (*see attached maps*) and trail will be required to be moved upslope (slightly more than 80' from the road center-line) in order to avoid the road cut.

Trail will be constructed through a joint partnership between Grand Targhee Resort and Mountain Bike the Tetons (the Teton-region chapter of the International Mountain Bicycling Association) in summer of 2020. Both paid staff and local volunteers will provide labor. Trail has been designed and laid out by Grand Targhee staff (summer 2019). Construction will involve some brush removal, machine work (in order to lay the trail bed surface) and hand finish work. Average trail grade will not exceed 7% in order to accommodate for adequate and appropriate drainage (road surface drainage and trail surface drainage). French drains and grade reversals, proper and out-slope and in-slope shaping techniques will be utilized in order to manage water both on the trail and off. Where Ski Hill Rd. drainage directs water across the trail, rock-armored rolling grade-dips will be employed so that no trail culverts are required. Trail will be constructed entirely of natural materials (native dirt, rock) aside from any signage materials. Minimal excavation will be required as all natural materials will be utilized for the trail bed surface. No more than 20" of topsoil would be removed (and only in cases where in-slope and grade reversal excavation is required).

During construction, silt fence will be utilized in order to keep excavated trail bed-surface debris from entering the road when trail construction occurs upslope of the road. Trail workers will post signage along the road that crews are working. Appropriate PPE will be utilized by crews to promote visibility.

Machinery and tools will not be stored within the road ROW during construction but rather hauled off-site or secured out of sight of roadway. Signage and fencing will be employed in order to keep the public off of the construction zone until trail is completed. Parking for trail workers will occur at Teton Canyon or along the road corridor, safely to the side of the road in areas of high visibility. The public will be notified of construction via on-site signage and through PSA's on Grand Targhee and Mountain Bike the Tetons channels.

Trail will be signed along the entire route to provide warnings of road crossings and other potential hazards as well as to provide way-finding at intersections. Right-of-way trail standards will be recommended. Trailhead maps will be installed at both the Teton Canyon Trailhead, Ski Hill Rd. overlook (*Lat / Lon N: 43.76818°, W: 110.99911°*), and at Grand Targhee Trailhead.

Trail will be maintained during dry months by Grand Targhee staff, by Mountain Bike the Tetons trail crew and local volunteers. Reclamation of trail disturbance areas will follow strict USFS guidelines: Revegetation can be accomplished passively or actively. Passive revegetation will allow for surrounding vegetation to colonize the abandoned trail. This

process works when erosion has been stopped, precipitation is adequate, the tread has been scarified, and adjacent vegetation spreads and grows rapidly. Disturbed soil provides an opportunity for invasive plants to take hold. Active revegetation ranges from transplanting propagated native plants to importing genetically appropriate seed. Successful revegetation almost never happens in a single season. In order to manage for this, dead and down native trees and vegetation will be relocated to large disturbances. Trail in-slope and out-slope disturbance will fill in through natural recruitment over 1-2 seasons and will be closely monitored by MBT and Grand Targhee trail crews for invasive species.



Ski Hill Rd. Singletrack
ROW singletrack trail following Ski Hill Rd. corridor

Legend
Ski Hill Rd. Singletrack

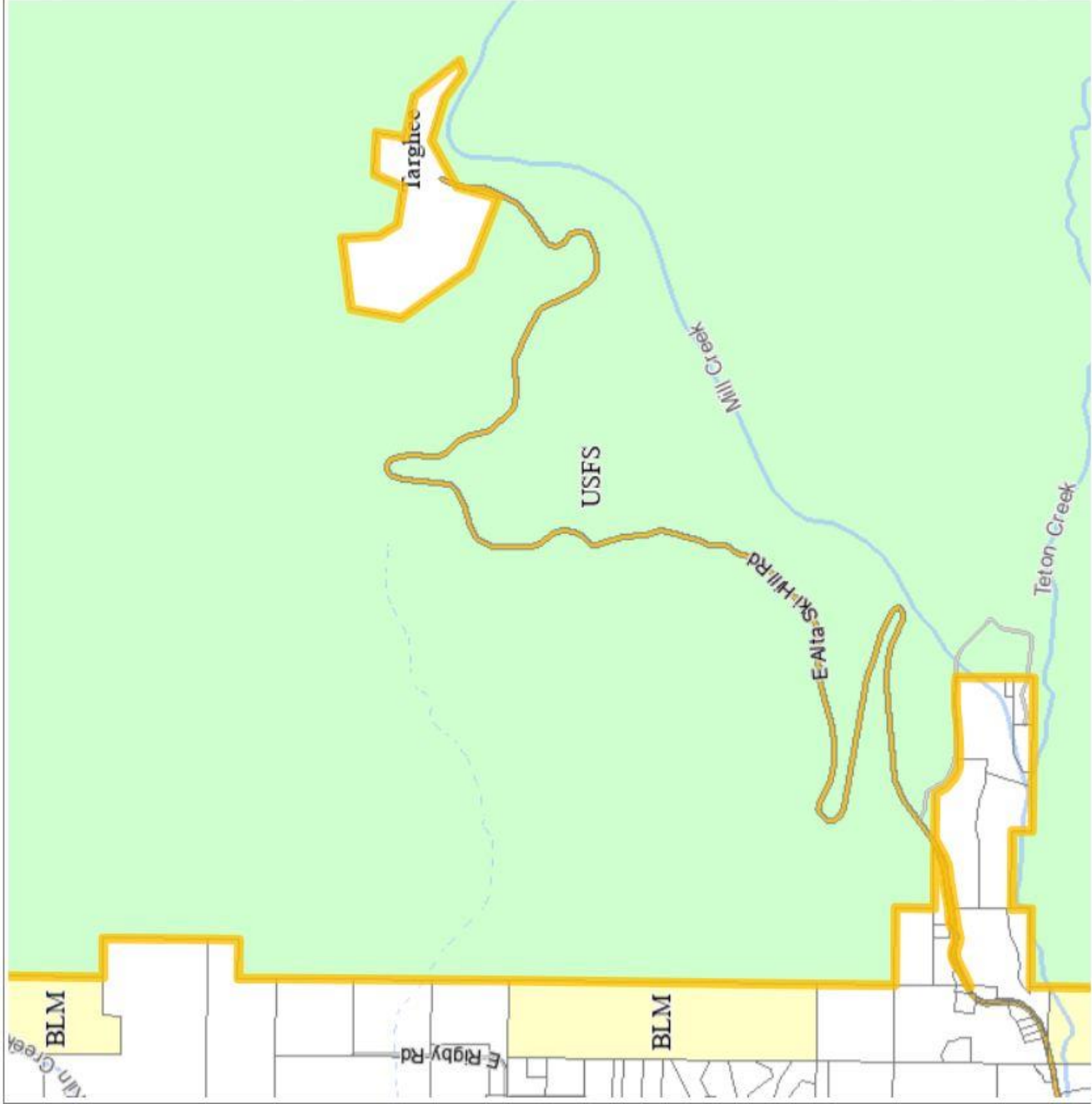
Google Earth

5000 ft



Teton County Wyoming MapServer

Ski Hill Rd. Ownership Map



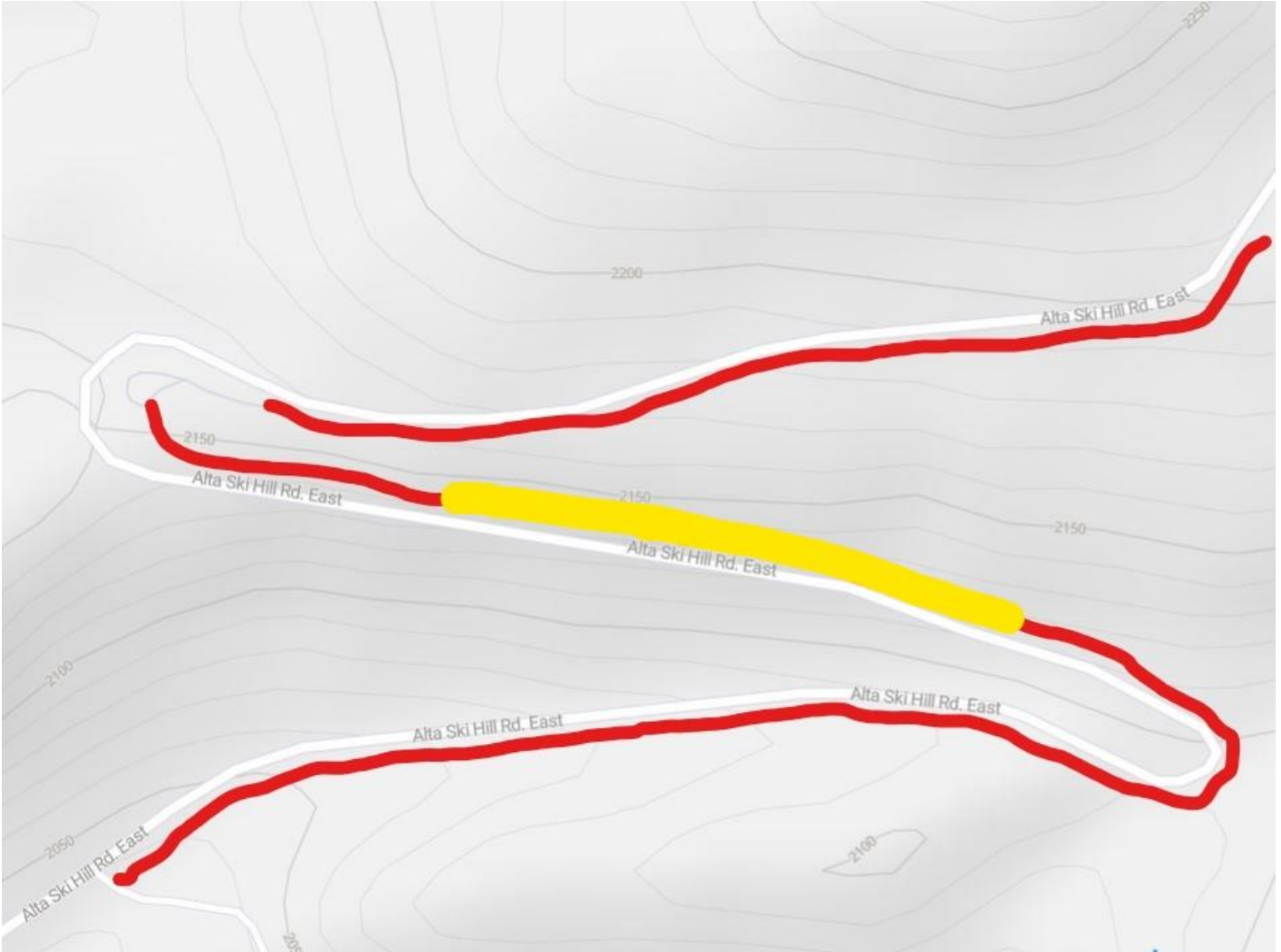
Topo Maps (South to North)

RED – 30" singletrack layout

Yellow – Steep Cross-slope requiring trail surface location greater than 80' from road centerline

BLUE – use of old road bed surface

PURPLE – Ski Hill Rd. Crossing



Map 1



Map 2



Map 3



Map 4

TRAIL CROSS SECTION

