

**From:** (b) (5)  
**To:** [Franchina, Rachel -FS](#)  
**Subject:** comment on Grand Targhee expansion proposal  
**Date:** Tuesday, September 15, 2020 7:10:58 AM

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I was unable to post this comment to you via the Forest Service website designed for that purpose so I'm emailing it to you. FYI, in addition to not being able to post this, many links on the site were not working.

Comment:

1.

Projections of population growth in eastern Idaho, based on current growth rates, predict that the Idaho Falls, Rexburg, Teton Valley corridor may closely resemble Utah's heavily populated Wasatch Front running from Provo up to Ogden by mid-century. This significant population increase will put great pressure on Teton area recreation lands and facilities-- as the Wasatch Mountains and their resorts are now experiencing. Grand Targhee already struggles to handle the number of skiers it gets on its busiest days. Locals and tourists can be heard complaining about the length of lift lines on busy days now. Imagine if lift capacity stays at its current level and the local population doubles, which it will. There will be lots of dissatisfied skiers, especially locals used to short lift lines. As much as many people would like to see Targhee and the Teton Valley remain small, the unfortunate fact is population growth is not going to stop and Targhee needs to prepare for this reality, so it will need to increase its ability to handle the inevitable increase in demand for ski and mountain bike recreation. Targhee's planning to handle increased numbers of skiers and bikers is warranted, if done sensibly.

2.

Global warming is only going to get worse over the next several decades even if the world belatedly decides to get very serious about fighting it aggressively. This means an ever shortening ski season for all ski resorts no matter where they are located. Targhee may be less impacted than many other resorts at lower elevations, or resorts located further south, but later opening dates and earlier closing dates due to lack of natural snow will be a reality. Targhee's proposal to expand snowmaking is therefore a reasonable one to help it maintain a reasonable length ski season, if water can be obtained without sacrificing that water for more important uses downstream. It's proposal to add ski lifts to the south facing terrain (the South Bowl expansion area) seems ill advised though. Snow quality and skiing enjoyment suffer on Targhee's existing south facing runs due to the impact of the sun heating the snow surface. Skiers already tend to stay off south facing runs such as Lost Groomer and Sunnyside once the sun's freeze-thaw cycles take hold after a storm. For decades ski resorts have tried to avoid placing ski runs on south facing terrain, for good reason. Targhee should avoid throwing money away placing lifts and trails on additional south facing terrain where snow melt is faster and the skiing surface is frequently unappetizing.

3.

One of the strongest trends in the ski business over the past couple of decades has been the explosion in popularity of backcountry skiing. Smart ski resorts have capitalised on this by attracting skiers to backcountry and sidecountry terrain within and outside their resort boundaries. Jackson Hole and Telluride come immediately to mind as resorts succeeding in providing great backcountry skiing terrain and experiences to their skier clients. Targhee, not so much. But Targhee now has an opportunity to provide the backcountry skiing so many skiers desire if, instead of putting lifts in the proposed South Bowl expansion area, they do what Telluride does and use the ski patrol to provide avalanche mitigation there and offer this terrain to backcountry skiers. Current backcountry users of this area may complain that avy control here will encourage too many other people to go where they currently are accustomed sharing it with few other users. They are right, but the reality is that once a lift starts bringing skiers up near the summit of Peaked many more people will have easy access to this terrain and will take advantage of it. It is avy terrain and with increased skier traffic more skier triggered avalanches will likely occur endangering not only the party triggering the avalanche, but skiers below as well. The ski patrol will be called upon more frequently. More avalanches equal more destruction of the mountainside and wildlife habitat downslope. Having Targhee and the Forest Service make an agreement that has the ski patrol do avy mitigation may save lives, reduce rescue costs and reduce destruction of the habitat. Telluride's success in doing this is marked by both an increase in client safety and an increase in skier visits because of the unique opportunity to ski backcountry terrain with reduced avalanche danger.

4.

The first three items above have looked at Targhee's expansion plans from a human/recreation perspective. Even more important is the impact the expansion will have on native wildlife. Wildlife, in America and worldwide, is in retreat, its numbers have been devastated by human population growth and human activities, with habitat loss a main contributor to wildlife losses. Targhee is located at the intersection of one of America's last great wildlife strongholds and a valley experiencing rapid human population growth. Many of the world's preeminent wildlife experts say we need to save half the Earth for nature and wildlife to preserve a healthy planet with all its working parts. Adding ski lifts to the proposed expansion on the South Bowl area will adversely impact wildlife there forcing many animals to retreat to even more remote locations and lead to population decreases from this loss of habitat. We need more wildlife and wildlife habitat, not less. Targhee already claims 2600 skiable acres, an acreage larger than more heavily visited Jackson Hole resort's 2500 acres. At the existing 2600 acres Targhee is currently larger than a host of other popular *and more heavily visited resorts* including Breckinridge (2385 ac), Snowbird (2500 ac), Alta (2200 ac), Telluride (2000

ac) Deer Valley (2026 ac), Crested Butte (1550 ac), Aspen Mtn (675 ac), Arapahoe (900 ac) Solitude (1200 ac), Brighton (1050 ac) and many others. Targhee doesn't need to expand its boundaries to be a competitive resort capable of handling a major increase in skier visits at the high cost of the loss of important wildlife habitat.

Grand Targhee needs to plan ahead to accommodate the inevitable growth in skier visits the increasing population of its region will bring. It is capable of doing this on its existing permit area. Expanding into the South Bowl area would be a mistake. Skiing quality there would be questionable much of the time, the loss of wildlife habitat, and the marring of the much appreciated natural beauty of the area, which would be easily visible from Teton Canyon, the Jed Smith Wilderness, and from Grand Teton National Park, are all sufficient reasons to reject unneeded expansion into this valuable area. Targhee needs to increase its uphill lift capacity, its on mountain and base area restaurant capacities, its parking and/or shuttle capacity, and skier services capacities to handle the inevitable growth in users and all of this can be done within its current boundaries.

Thank you for the opportunity to comment,

Fred Johnson  
Tetonia