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June 12, 2025

United States Forest Service
Caribou-Targhee National Forest
Kim Pierson, Forest Supervisor
1405 Hollipark Drive
Idaho Falls, ID 83401

RE: Grand Targhee Resort Master Development Plan Projects Draft Environmental Impact Statement (DEIS) Public Comment

Dear Supervisor Pierson,

Thank you for the opportunity to comment on the Grand Targhee Resort Master Development Plan Projects Draft Environmental Impact Statement (DEIS). These comments reflect the consensus of the Victor City Council (not personal views or city staff) and are offered with the intention of supporting thoughtful, balanced decision-making for our region's future.

Our Position: Growth Must Pay Its Way

We are proud to be a community of skiers and outdoor enthusiasts who value Grand Targhee Resort as a regional asset and venerated partner of the City of Victor. We want to see Grand Targhee Resort thrive, but not at the expense of the communities that support it. The DEIS clearly documents that the proposed expansion would bring significant socioeconomic burdens to the residents, non-profits, and government bodies in Teton County, Idaho, without adequate mechanisms for compensation or mitigation. We cannot support any alternative that does not address this fundamental imbalance.

Victor's Vision: Community and Conservation First

The City of Victor's *2021 Re-envision Victor Comprehensive Plan* sets a clear standard: any tourism or development must **protect our rural character, dark skies, and environmental resources and must not undermine the well-being of local residents**. Our plan is not an outlier—it is echoed by the Teton County, Idaho and Wyoming Comprehensive Plans, the Teton Regional Transportation Plan, Teton County Housing Needs Assessment, and the Jackson Hole Sustainable Destination Management Plan. All of these frameworks place **environmental integrity and community health above visitor satisfaction and unchecked economic growth**.

This approach contrasts with the United States Forest Service's traditional multiple-use mandate, which does not explicitly prioritize community or environmental values above recreational opportunity. We urge the Caribou-Targhee National Forest to recognize and honor the clear priorities established by local and regional planning: responsible, sustainable growth, not growth for its own sake.

Key Concerns with the DEIS Alternatives

- **Socioeconomic Impacts:** The DEIS projects increased traffic, housing pressures, and infrastructure strain for Idaho communities, while most economic benefits accrue to Wyoming. This is on top of existing issues in our community that have not been solved, nor is a viable path in sight. While Grand Targhee is not responsible for the current community strain, execution of previously approved expansion at the resort outside these new proposals will certainly exacerbate issues. This is not a sustainable or fair model.
- **Environmental and Visual Impacts:** We oppose any expansion into the South Bowl or Mono Trees areas, which would irreversibly alter critical wildlife winter range habitat (currently protected by the Caribou-Targhee National Forest) as well as Teton Canyon's invaluable character and viewsheds. As proposed, the mountaintop restaurant and Lightning Ridge facility could compromise internationally recognized dark skies and scenic integrity with impacts visible from Teton Valley and Grand Teton National Park.
- **Transportation, Parking, Housing, Public Safety, and Affordability:** Other "outdoor amenity" mountain towns such as Breckenridge, Park City, Bozeman, and Jackson Hole offer cautionary tales of excessive resort growth and the impacts of catering to a high-value clientele leading to housing and traffic crises and a loss of community character. **The DEIS acknowledges these risks but does not propose sufficient safeguards.**

What We Can Support

We are not opposed to Targhee's continued success or improvements within the existing permit area. **We could support a modified version of Alternative 3 with new and improved amenities within the existing boundary if, and only if, robust compensation mechanisms are established.** These could include a resort transfer tax, impact fees, or revenue-sharing agreements to offset the real costs to Teton County, Idaho citizens, government entities, emergency services and civic organizations for identified negative impacts such as transportation infrastructure, public services, and housing availability and affordability.

Recommendations

- **Honor Local Plans:** Align the Caribou-Targhee National Forest's decisions with the priorities set forth in Victor's and the region's comprehensive plans, which place community and environmental values first.
- **Require Compensation:** No improvements or expansion should proceed without enforceable mechanisms for Grand Targhee Resort, Teton County, Wyoming or the State of Wyoming to compensate Teton Valley, Idaho communities for documented impacts.
- **Protect Sensitive Areas:** Do not allow boundary expansions into South Bowl or Mono Trees. At a minimum, ensure any mountain restaurants and facilities in any approved alternative are below ridges and that sufficient design modifications minimize visual and night sky impacts. Ensure any approved alternative includes strong environmental protections and seasonal wildlife safeguards.



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We want Grand Targhee Resort to succeed while stewarding our public lands, but not at the expense of our community's future. We have the incredible gift of hindsight to identify mistakes other communities made before they became overdeveloped and lost their community character and environmental integrity. As we collectively preserve and protect the Greater Yellowstone Ecosystem—one of the most cherished places on the planet—we urge the Caribou-Targhee National Forest to require comprehensive mitigation and compensation before approving any further expansion on public land. We stand ready to work with all stakeholders to find solutions that ensure both resort viability and a flourishing environment and community.

Respectfully Submitted,

Victor City Council

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