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June 16, 2025

Kim Pierson
Forest Supervisor
1405 Hollipark Drive
Idaho Falls, ID 83401

RE: Grand Targhee Master Development Plan Project Draft Environmental Impact Statement

Dear Forest Supervisor Pierson:

The Teton County Wyoming Board of County Commissioners (Board) appreciates the opportunity to comment on the proposed Master Development Plan Draft Environmental Impact Statement (DEIS) for Grand Targhee Resort (GTR). We take our role as a Cooperating Agency very seriously. On October 5, 2020, our Board formally requested Cooperating Agency status and commented that "While the expansion lies outside of the County's planning jurisdiction per the Grand Targhee Resort First Amended Master Plan, the Teton County Commissioners seek confirmation that there is a nexus between an expansion of this scale and the expected service and growth requirements of GTR. In doing so, we must ensure that all possible adverse impacts concerning the area's critical alpine and subalpine environs, and wildlife habitats are properly vetted and weighed in the proposal." Additionally, Teton County Sheriff Matt Carr also noted that this proposal "could greatly expand side-country activity between GTR and Teton Canyon and could result in increased rescue services."

In the Jackson|Teton County Comprehensive Plan, updated November 2, 2020, we adopted a goal of "build[ing] and nurtur[ing] partnerships with Federal and State decision-makers so that they understand and can help us address the local impacts of regional decisions locally." Meaningful participation is essential to ensure that local concerns, expertise, and context are fully considered in the federal decision-making process. Under the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations (40 CFR § 1501.8), Cooperating Agencies are entitled to participate in the environmental review process, contribute local knowledge and technical expertise, and help shape the scope and substance of environmental analyses.

Local input is a cornerstone of the NEPA process, and the inclusion of county-level perspectives is particularly important when proposed federal actions have direct implications for land use, infrastructure, public safety, demand for public services, and community values. Collaborative and



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timely local input—consistent with the intent of NEPA and CFR guidelines—will lead to more informed decisions and better outcomes for all stakeholders.

Concerning this process, the Board did not receive a copy of the draft for review prior to its public release, contrary to our expectations created by NEPA and its implementing regulations. We also did not receive a response to our formal request for a 60-day extension for providing comments. Due to these process failures, we have not had an adequate opportunity to provide meaningful involvement as a Cooperating Agency. We request such an opportunity in the future; however, we acknowledge that future opportunities to participate meaningfully do not cure these process failures. As this process continues, we reaffirm our interest in participating in the ID Team meetings and maintaining active involvement in the development of the Final Environmental Impact Statement (FEIS). To that end, we have designated Chris Colligan, Project Manager with Public Works, as our representative for ongoing coordination.

Purpose and Need

In general, the process to establish the purpose and need creates questions for our Board. The purpose and need is apparently rooted in the 2018 Master Development Plan (MDP), but the MDP seems to be more a document of the applicants “wants” built around statistics and analysis that focus solely on guest experience and not around the full range of environmental and socioeconomic metrics that ultimately matter in finding the best alternative to balance between positive and negative impacts.

The applicant’s preferred alternative reflects the imbalance within the MDP. From MDP p. 9: “In essence, GTR must strive to improve its offerings in order to remain viable in the competitive destination skier/rider market.”

With this concept in mind, this MDP is dedicated to improving the opportunities for people to enjoy a single recreational use of public lands on the CTNF. Starting with this chapter and culminating with the Upgrade Plan in Chapter 6, this MDP identifies and capitalizes on GTR’s current recreational/operational assets and opportunities and addresses its constraints. According to the 2018 MDP and 2023 Recreational Technical Report (RTR), GTR’s on-hill guest capacity is 3,008 on 680 acres of terrain. The Comfortable Carrying Capacity (CCC) is 3,720 guests/day.

Neither the MDP nor the RTR suggest that new terrain is necessary to boost the effective skier yield per skier (undefined in the DEIS, presumably revenue per skier). Rather, the RTR focuses on deficiencies in four industry standard areas (rental/repair, kid’s ski school, restaurant/bar seating, and kitchen/scramble). These are areas the County anticipates future applications for



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development, to significantly improve services, as outlined in the 2019 Resort Master Plan ([see comments, page 6](#)). The RTR also identifies a dearth of beginner and low-intermediate terrain and a surplus of advanced-intermediate and expert terrain, as visitation increases. Expansion into the South Bowl worsens this imbalance rather than improving it. Alternatively, expanding beginner terrain around the Papoose Carpet, Palmer Platter, and Shoshone lifts could be achieved without expanding into South Bowl or Mono Trees, effectively addressing this imbalance.

Furthermore, while the North Boundary lift would increase the amount of low-intermediate terrain, access to this area would first require skiing terrain from Blackfoot lift, which is much more advanced intermediate terrain. Combined with the already low skier density, this lift seems to add little to the visitor experience while generating considerably increased impacts on the environment. The RTR also identifies a dearth of visitor services as a limiting factor on GTR's effective skier yield and competitive viability. Additional uphill capacity within the existing Special Use Permit (SUP) area and additional visitor services within the base area on private land are the most effective ways that GTR could improve visitor experience. The former (additional uphill capacity) could be accommodated within Alternative 3, while the latter (increased visitor services) will be considered under GTR's Master Plan approved by Teton County, Wyoming.

The RTR projects the need for:

1. 150 plus additional parking spaces (which may be avoided through an effective Transportation Demand Management Plan)
2. 600 plus additional seats for dining
3. Between 22,000 and 41,000 sf of guest services
4. Daily lift capacity of 3,720 for existing and proposed but not implemented projects

The private lands at the base area are more suitable than public lands at higher elevation for new visitor services requested by GTR on the CTNF. We recommend these services occur as development proposals on private lands, upon proper review and permitting by Teton County, with our established Plan Review Committee (PRC) process, which includes opportunity for review by CTNF.



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The DEIS does not adequately connect the proposal's purpose and need and proponent objectives to a preferred alternative.

Teton County Comprehensive Plan

Many of Teton County's local land use-regulations and Comprehensive Plan elements are connected to the proposed actions and Master Development Plan. Broadly, our 2012 Jackson/Teton County Comprehensive Plan¹ reflects our community's commitment to ecosystem stewardship and our connection to the Greater Yellowstone Ecosystem. It recognizes that the quality of this ecosystem attracts visitors and is the primary reason many of our residents live here. Simply put, our quality of life depends on the continued health and viability of the ecosystem. Staff from the Caribou-Targhee National Forest were recognized for their contributions in developing this Comprehensive Plan.

Within the Comprehensive Plan, the community committed to our legacy of responsible Ecosystem Stewardship to ensure that the abundant wildlife, quality natural resources and scenery, open space, and climate that we experience today last long into the future. While our community's popularity and location in this rare ecosystem heightens the importance of Ecosystem Stewardship, it also provides an opportunity to globally lead in implementing strategies for climate sustainability and protection of wildlife, natural resources, and open space. Because of these directives we are providing a thorough review of this proposal, to seek alignment with our community vision.

The Comprehensive Plan includes the following policy: Policy 3.1.d: Cluster nonresidential development in existing locations. Nonresidential development not associated with agriculture should be clustered in Complete Neighborhoods and Planned Resorts where nonresidential character already exists. Centrally locating resort, commercial, and public/semi-public development preserves wildlife habitat, habitat connections, scenic viewsheds, rural character and the viability of Complete Neighborhoods. No new Planned Resorts should be created, and *existing Planned Resorts should be limited to their existing footprint* (Emphasis added). Existing County resort, commercial, and civic uses outside of Complete Neighborhoods will be encouraged to redevelop in a manner that is more consistent with rural character.

The DEIS does not adequately analyze the proposal's compliance with Teton County's Comprehensive Plan.

¹ Teton County Planning, *Jackson/Teton County Comprehensive Plan* (Nov. 2, 2020), <https://jacksontetonplan.com/DocumentCenter/View/1705/JacksonTeton-County-Comprehensive-Plan-Updated-November-2-2020>.



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Teton County Land Development Regulations

Teton Canyon is recognized by Teton County as a critical scenic resource and is protected under the Scenic Resources Overlay (SRO) established in the County's Land Development Regulations (LDRs)². This designation (5.2.2.B.3.g) extends along the "south side of Alta Road from Lake Nolo to the Targhee National Forest boundary." The area is valued for its broad, open meadow foreground framed by dense vegetation, which creates a dramatic visual setting for views of the western Teton Range. As such, Teton Canyon forms a key element of the scenic entry experience for visitors traveling through Alta to GTR. The preservation of these foreground views is central to maintaining the County's rural and western ranching character, which is a core intent of the SRO designation.

Under the SRO standards, developments within the Teton Canyon Foreground must be strategically located—at the rear or side edges of open meadows, behind existing vegetation, or integrated into natural topography—to minimize their visual impact. A visual resource analysis is required for any proposed project, including photographic simulations and assessments of visibility from scenic corridors. If a project is visible, the analysis must demonstrate how it will be visually absorbed into its surroundings through building scale, form, color, and supplemental vegetation. Native, endemic plant species should be used to maintain ecological integrity and visual consistency with traditional Western landscapes. These standards are critical to preserving the uninterrupted scenic vistas and open space character that define the Teton Canyon corridor and are considered second only to Natural Resource Overlay (NRO) standards when conflicts arise. This is the direction our community has adopted for regulating our private lands. The DEIS is inadequate in analyzing visual impacts to private lands in Teton Canyon and adjacent areas of Alta. We request that CTNF commit to the same standards for development on public lands as we do on private lands.

We are similarly concerned with scenic visual impacts from the development of a proposed Fred's Mountain Top Guest Facility that would be visible from locations noted within Grand Teton National Park and Jedediah Smith Wilderness as described in the Draft Scenery Technical Report. We disagree with the conclusion that the proposed facility would result in only a minor addition to an undeveloped landscape. Any addition to an increasingly scarce undeveloped landscape is significant. Further analysis of the impacts to these treasured landscapes is warranted by CTNF.

Teton County also has Exterior Lighting Standards established under Section 5.3.1 of the LDRs to preserve the County's dark skies as an essential scenic and environmental resource (LDR 5.3.1,

² Teton County Planning and Building Services. (n.d.). *Teton County land development regulations*. Teton County, WY. <http://jacksontetonplan.com/DocumentCenter/View/932/Teton-County-Land-Development-Regulations-PDF?bidId=>



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adopted 10/4/22). These standards are intended to reduce light pollution—such as glare, sky glow, light trespass, and impacts on the nocturnal environment—while allowing for reasonable lighting for safety and visibility. Additional regulations govern lighting for complex uses, outdoor sports facilities, and public infrastructure to ensure that night lighting does not compromise the rural character or scenic value of Teton County’s viewsheds and skies. Teton County made history on April 11th, 2025, by becoming the first county in the world to be designated as an International Dark Sky Community. This designation represents the unique opportunity Teton County is in to protect dark skies and reflects the value we put on the natural environment.

The DEIS does not adequately analyze the proposal’s compliance with Teton County LDR’s for scenic resources or lighting standards, nor the impacts to visual resources within the Jedidiah Smith Wilderness and Grand Teton National Park.

Resort Master Plan

The Grand Targhee Resort First Amended Master Plan³, approved by Teton County in 2019, outlines the development framework for GTR’s base area, including residential, commercial, and recreational facilities. This plan establishes zoning, development standards, and permitted land uses within GTR’s boundaries. While the Master Plan provides the development framework within Teton County’s jurisdiction, the Forest Service decisions on the DEIS are interconnected. GTR is dependent upon the U.S. Forest Service to provide skiing and other recreational activities that support GTR’s purpose and intent. GTR likewise exists to support the skiing and recreational activities permitted under Forest Service approvals. This interdependence between the services and amenities provided by GTR and the recreational activities permitted by the Forest Service requires a mechanism to ensure that the services and amenities within GTR are sufficient to support the recreational activities permitted by the Forest Service.

The Resort Master Plan stipulates (pg.55): “The Resort shall inform the Teton County Planning Department in writing of any applications for new, additional, or expanded recreational amenities within the Forest Service Lands. Upon Forest Service approval of any new, additional or expanded recreational amenities, the Resort will apply to Teton County, Wyoming for new, additional, or expanded services (such as parking or transportation services) to support the new, additional or expanded recreational amenities permitted by the Forest Service. The application shall be processed as a Minor Amendment as described within the Master Plan. Approval of new, additional, or expanded services within the Resort to support the new, additional, or expanded

³ Teton County, *Grand Targhee Resort First Amended Master Plan – Planned Unit Development for Planned Resort (PUD-PR)*, February 12, 2019, <https://www.tetoncountyywy.gov/DocumentCenter/View/4666/Grand-Targhee-Resort-Master-Plan-PDF>.



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recreational amenities shall be based on the LDRs, or if the LDRs are silent or ambiguous as to the density, intensity or scale of services required to serve the new, additional or expanded recreational amenities permitted on Forest Service lands, the Resort shall provide an independent calculation based on the LDR requirements for independent calculations for the applicable standard.”

The DEIS does not adequately analyze the proposal’s interconnectedness and cumulative impacts of proposed growth from the 2019 Resort Master Plan to the proposed actions.

Community Wildfire Protection Plan

A significant amount of work has been completed in recent years in partnership with the Teton Area Wildfire Protection Coalition ([TAWPC](#)) and other partners. The following plans summarize this work and may be referenced through the corresponding organizations:

- **Teton County Community Wildfire Protection Plan (CWPP)⁴:** Identifies values at risk (including mountain resorts), assesses wildfire hazards, and provides recommendations on notification, protection, fuels management, and evacuation.
- **Grand Targhee Wildland Urban Interface Assessment and Fire Management Plan (2024):** Includes wildfire risk assessment, Wildland Urban Interface (WUI) evaluation, mitigation recommendations, and strategies for detection, notification, emergency response, and fuels management.

Teton County also has adopted the 2024 International WUI Code, which addresses defensible space, structure hardening, access/egress, water supply, and vegetation management.

The proposed expansion of GTR, as outlined in the DEIS, underscores the critical need for coordinated wildfire mitigation efforts, particularly considering the Teton County Community Wildfire Protection Plan (CWPP). The expansion plans include extending GTR's boundaries into areas identified as high-risk zones for wildfire due to dense vegetation and proximity to developed areas. The CWPP emphasizes the necessity of creating defensible spaces and implementing fuel reduction strategies to mitigate wildfire risks in WUI.

⁴ Jackson Hole Fire/EMS, *Community Wildfire Protection Plan 2024*,
https://www.tetoncountyywy.gov/DocumentCenter/View/36009/CWPP_Teton_2024-fully-endorsed.



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We are concerned that expansion into these areas would necessitate extensive new fuels reduction treatments, placing undue burden on the CTNF and conflict with current Forest Plan guidance, particularly in high-value habitat areas. The CWPP encourages public land managers to align their practices with the CWPP's recommendations to ensure cohesive wildfire risk reduction across the landscape. The integration of these strategies is vital for maintaining the effectiveness of wildfire mitigation efforts and safeguarding both public and private assets from potential wildfire threats.

The DEIS does not adequately incorporate Teton County's CWPP and new WUI code into standards for wildfire mitigation.

Emergency Services and Wildland Fire Mitigation

Jackson Hole Fire/EMS ([JHFEMS](#)) provides Fire and Emergency Medical Services (EMS) for Teton County, WY. Services include paramedic EMS transport, structure fire response, prevention and inspection services, wildfire mitigation and response, hazardous materials response, technical rescue, training, and fire investigation. Teton County, Wyoming contracts with the Teton County Fire Protection District-Idaho ([TCFPD](#)) for fire protection services, emergency medical services, and other related emergency response services to the adjacent Wyoming area on the west side of the Tetons, including Alta and GTR. JHFEMS maintains a close working relationship with TCFPD, which includes emergency response, training, and mitigation efforts.

The expansion of GTR and the build-out of the Master Plan for the private land will increase visitation and the overnight population at GTR and the surrounding area. Our concern is how this will influence TCFPD's emergency services call volume and raise demand for emergency services and fire prevention efforts. Additional building and development will likely also require additional prevention, inspection, and WUI mitigation efforts by JHFEMS.

The DEIS does not adequately analyze the proposal's impacts on emergency services and wildland fire mitigation impacts, particularly those services provided by JHFEMS.

Socioeconomic Impacts

To avoid overwhelming local government services from future development and expansion, particularly in collaboration with the Forest Service and Teton County, the DEIS should outline a coordinated and phased approach to planning and implementation. Establishing a joint phasing plan with the Forest Service would help ensure that any approved developments align with the County's capacity to provide essential services. This could be formalized through Memoranda of Understanding, or through a reopening of the Resort Master Plan, linking development approvals to



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measurable indicators such as road capacity, emergency response capabilities, and the availability of workforce housing. By using benchmarks and phased development triggers, the County can avoid costly surprises and ensure that public services scale responsibly with growth. Taken together, these strategies offer a comprehensive framework for managing the socioeconomic impacts of development in a way that safeguards public resources and maintains the character and livability of Teton County. A phased, data-driven approach—backed by updated financial tools and close interagency coordination—will ensure that infrastructure and services are expanded in a responsible and sustainable manner.

Key public service areas likely to be impacted include road maintenance, affordable housing, fire and emergency services, and the preservation of community character. Increased traffic volume and wear from service and delivery vehicles will put pressure on road infrastructure, necessitating funding mechanisms such as road impact fees and condition monitoring systems. The demand for workforce housing—exacerbated by seasonal population surges—will require strategies like inclusionary zoning, housing mitigation fees, and partnerships with private developers. Similarly, emergency services will need to expand their coverage and capacity, which could include new fire stations, updated equipment, and personnel training, funded in part through impact fees or developer contributions.

The existing impact fees and housing mitigation requirements compensate solely for the projected growth related to the private land development and not the development associated with expanding GTR's SUP and on-mountain services. An updated impact fee analysis is essential to ensure new development adequately contributes to the costs it imposes. This should include a legally defensible nexus study and potentially a fee structure specific to the Resort Master Plan area.

If reopening the Resort Master Plan becomes necessary, it could provide an opportunity to integrate these financial tools with broader land-use, housing, and infrastructure strategies. This would also allow the County to better align resort-driven development with long-term sustainability goals and to ensure that public revenues and services are equitably distributed.

In terms of transportation infrastructure, securing locations for future bus parking is a critical first step that is missing within the analysis of the DEIS. Sites for transit facilities should be identified and procured in advance along key transit corridors. Coordinating closely with START Bus, the County can plan for necessary expansions in fleet size, driver recruitment, and maintenance capabilities. The Transportation Demand Management (TDM) Plan included in the Resort Master Plan will need to be revisited. Additional TDM strategies that should be considered include, but are



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not limited to, implementing paid parking at GTR. This encourages transit ridership—an approach proven successful at Teton Village’s Stilson Transit Center – and associated parking revenues should be entirely used for transportation projects and programs, either in collaboration with or supplementing START Bus service. Combining paid parking with frequent and reliable shuttle services would incentivize visitors and workers to opt for public transportation. Free and/or preferentially located 3+ carpool parking should be implemented as a TDM strategy to encourage an increased occupancy of vehicles that drive to GTR.

The March 2025 Socioeconomics Technical Report (STR) accurately encapsulates the region’s economy and underscores the need for Grand Targhee to adequately provide housing for most new full-time employees (FTE’s) generated by GTR expansion, additions to facilities and new development. The STR identifies that a very large percentage of workers in Teton County, Wyoming, work in the tourism and travel sectors, that the average wage for these workers is well below the regional average wage and that the typical wage earner in this sector lives in rental housing, is often housing cost burdened and unable to afford the purchase price of market housing. As a result, most employees occupying the new jobs estimated by the STR to be created from an expansion of GTR’s boundaries and additions to lift capacity and on-mountain guest services won’t be able to find housing unless it is provided by the employer (GTR) or subsidized by the community.

Simple math demonstrates the problem. The STR estimates that in 2020 the economic activity generated by GTR resulted in 568 employees and \$20.7 million in labor income. Simple math suggests that the resulting average wage was around \$36,444/FTE, well below the wage level that could afford the typical rental rates or housing prices for the region. Most new employees generated from expansion would almost certainly be cost-burdened in the regional housing market.

The proponent’s proposed alternative 2 is predicted by the IMPLAN modeling software to generate the equivalent of 614 new FTEs. The bulk of these new employees, if not housed on private land at the base of GTR, would have to be housed in Teton County, ID. And the bulk of these new employees would work in the travel and tourism sector. The STR identified that in 2020 the average wage for workers in that sector was around \$40,500 and that due to the discrepancy between that wage level and housing costs, 51% of renters in Teton County, WY and 37% of renters living in Teton County, ID who reside in market housing are cost burdened. The report also estimated that roughly 65% of tax revenues generated by Alternative 2 would accrue to Teton County, WY, suggesting that it would be relatively more costly for Teton County, ID to subsidize the new housing needed to support employees generated from the expansion unless GTR shoulders a significant part of the cost. Teton County, ID, having seen a 58% increase in jobs between 2010 and 2021 and a 17%



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increase in residential units, is already facing an increasingly dire housing shortage, further emphasizing the need for GTR to either limit new-employee generation (likely meaning limiting expansion) or do more to ensure the burden to house the new employees does not fall on the public sector.

Notably, on-mountain improvements do not fall under Teton County, Wyoming's employee housing mitigation regulations that govern planned development on private lands at the base. Teton County estimates that 1,000 sf of new restaurant space requires housing for 1.35 employees. The need for new on-mountain dining facilities is questionable when there is more than ample available space at the base. The housing needed for new employees generated by development at the base has been accounted for under the Master Plan submitted to and approved by Teton County, WY. The housing needed for new employees generated by on-mountain dining facilities has not been accounted for but needs to be for reasons given above.

Once seen as important economic drivers, ski resorts have led to the creation of "amenity communities," with higher levels of income inequality and increasing costs on local government agencies burdened with managing the socioeconomic impacts of this inequality⁵. Most ski resort jobs are low-wage travel and tourism jobs. At the same time the resorts themselves are highly valued recreational amenities that attract relatively wealthy residents or part-time residents who earn much if not all of their income from remote jobs in fields related to finance and investment. Thus, ski resorts drive a challenging bar-belling of the local economy with more low-wage earners on one end and more high-wage earners on the other end. The high-wage earners consume the bulk of the new housing supply and drive-up housing costs, leaving the community to struggle with providing housing for ski resort employees. That is, unless the resort developer builds housing for those employees.

Lastly, Teton County, Idaho, Teton County, Wyoming and the Alta, WY Solid Waste District jointly funded a study to analyze socio-economic impacts stemming from proposed development at GTR and on private lands.⁶ The report makes recommendations to consider whether and how the region can continue to provide adequate public services and support healthy housing and labor markets.

⁵ Lawson, Megan, and Kris Smith. *Amenity Trap: How High-Amenity Communities Can Avoid Being Loved to Death*. May 2023, Headwaters Economics, <https://headwaterseconomics.org/wp-content/uploads/2023HE-Amenity-Report-R3b-LOWRES.pdf>

⁶ ECONorthwest. (2022, July). *Effects of proposed Grand Targhee development on public services and housing markets in Teton County, ID: Final report*. Prepared for Teton County, Idaho. <https://bloximages.newyork1.vip.townnews.com/jhnewsandguide.com/content/tncms/assets/v3/editorial/6/75/675c2aa4-441d-5e3c-b6cc-23707c1169f5/62fc3fb23de46.pdf.pdf>



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Incorporating the results of this study into the Final Environmental Impact Statement (FEIS) will ensure more thoughtful planning of future growth.

The DEIS does not adequately analyze the proposal's socioeconomic impacts on transportation, affordable housing, fire and emergency services, and housing.

Wildlife Impacts

The Wyoming Game and Fish Department (WGFD) expressed significant concern regarding the proposed expansion of the Grand Targhee SUP boundary into the Mono Trees and South Bowl areas, particularly due to potential impacts on intact wildlife habitat and the small, isolated Targhee Bighorn Sheep Herd. Grand Teton National Park, Wyoming Game and Fish Department, Bridger Teton National Forest, and the CTNF have prioritized the Teton Bighorn Sheep herd through the Teton Bighorn Sheep Working Group and have worked cooperatively on projects to lessen the impacts of winter recreational use on bighorn sheep habitat. While WGFD recognizes that projects within the existing SUP boundary fall under a developed recreation management prescription and accepts some degree of impact, the expansion areas, especially South Bowl into Teton Canyon, would affect important bighorn sheep winter and summer habitat, movement corridors, and access to a rare mineral lick. The Department urged CTNF in their scoping comments to clearly justify the need for expansion and analyze alternatives that exclude or limit expansion beyond the current boundary.

The South Bowl area overlaps with critical seasonal habitat for bighorn sheep and lies within a former domestic sheep allotment that was retired to prevent disease transmission, using considerable conservation financial resources. The Targhee Herd, one of Wyoming's four core native herds, relies on scarce, wind-blown winter range and has limited ability to adapt to additional habitat loss or disturbance. Recreational development, including backcountry access and avalanche control, is likely to increase human use in sensitive areas and disrupt bighorn sheep behavior, potentially displacing them from high-value habitat and impeding access to the Teton Canyon mineral lick—a key nutritional resource. The Department highlighted decades of interagency conservation efforts and collaborative fire treatments aimed at restoring winter range in this area. WGFD emphasized that approving the South Bowl expansion would undermine these restoration goals and jeopardize the long-term viability of this vulnerable herd. Our Board shares the concerns of WGFD on the potential impacts to the Teton Bighorn Sheep Herd.

Teton County appreciates the modifications that were made to the proposed action since the August 2020 Scoping Notice, including reducing the South Bowl SUP boundary expansion from 600



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to approximately 266 acres. However, the County finds that the environmental and scenic costs to any expansion into South Bowl outweigh the specific benefits to the guest experience.

The DEIS does not adequately analyze the proposal's impact to wildlife.

Water Quality

The Caribou-Targhee National Forest's analysis fails to adequately assess whether existing wastewater impacts are occurring and affecting downstream water rights holders. The FEIS must include a comprehensive analysis of proposed future developments, specifically the water demands associated with snowmaking and the wastewater treatment implications of anticipated growth. The DEIS acknowledges the importance of the Aquatic Influence Zones (AIZ) identified in the 2003 Forest Plan for their emphasis as hydrologic connection to springs on the valley floor—a connection that is well known and recognized by local water rights holders. The Caribou-Targhee National Forest's 2003 Forest Plan identifies AIZs as critical areas for maintaining aquatic ecosystem health. These zones are essential for protecting water quality and aquatic habitats, particularly in areas with springs and wetlands. We request that the Forest complete a comprehensive analysis demonstrating how the proposed development within the SUP area is compatible with the AIZ management prescriptions.

The DEIS does not adequately analyze the proposal's impact on water resources.

Elements Aligned with County Priorities

The Board recognizes that there will be growth within the boundaries of the SUP and that some of this growth is consistent with our planning documents. For example, Section 14.3 of our Comprehensive Plan states, "the focus of this TRANSITIONAL Subarea is to create a year-round, small scale resort community that is pedestrian-oriented. A primary objective is to enhance year-round visitation and to provide recreation and job opportunities for the local community."

The Board wants to emphasize that there are many areas within Alternative 3 that the County does support and that GTR provides excellent recreation and job opportunities to the local community. We recognize that we benefit from the collection of sales taxes with these year-round activities.

Below is a list of proposed activities that our Board can support the CTNF analysis and request remain in the FEIS decision. The Board understands how these elements support the proponents'



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objectives.

- Snowmobile rescue cache in Teton Canyon
- Non-winter and alternative activities, including 29 miles of downhill biking, hiking and multi-use trails
- Alternate winter activities including snow tubing and improvement of Nordic, snowshoeing, and fat biking
- Increasing beginner terrain accessibility within the current SUP boundary

Additionally, the Board anticipates proposed developments on the private lands at the base area that are consistent with the Grand Targhee Resort First Amended Master Plan. The private lands at the base area are more suitable than public lands at higher elevation for new visitor services requested by GTR on the CTNF. These development proposals on private lands will have proper and timely review and permitting by Teton County. Our Resort Master Plan also ensures that impacts on private lands or expanded recreational amenities permitted on Forest Service lands will be addressed through the Minor Amendment process.

Modified Alternative

Generally, our Board supports a modified version of Alternative 3 that limits the growth of Grand Targhee to within its current SUP boundary. We also ask that CTNF consider further analysis of safety considerations for avalanche control on South Bowl that do not require SUP boundary expansion or lift access expansion. During our conversations with U.S. Forest Service staff, it came to our attention that there are safety issues currently occurring with backcountry users and ski patrol. Analysis of a modification of this alternative should look at the impacts of increased avalanche control on bighorn sheep and other wildlife and weigh those impacts against safety needs.

We request the modified version of Alternative 3 includes that all proposed on-mountain restaurants be limited to the base area on private land, not on public land. A restaurant at the top of Targhee will require a new well and an elaborate wastewater treatment line, and the benefits do not outweigh the costs to the scenic viewshed and threats to water quality.

A modified Alternative 3 strikes an appropriate balance between our local planning regulations, while still creating the amenities needed to provide for the kind of visitor experience GTR is famous for and should continue to provide in the future. Importantly, Alternative 3 best meets the purpose and need and proponents' objectives while not further burdening the local communities in Teton



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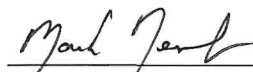
Mark Newcomb, Chair
Wes Gardner, Vice-Chair
Luther Propst
Natalia D. Macker
Len Carlman

County, Wyoming and Idaho, with costs to transportation, housing, fire and EMS, and other critical services provided by the taxpayers of these communities.

Conclusion

Teton County, Wyoming remains committed to a constructive and transparent partnership with the Caribou-Targhee National Forest and Grand Targhee Resort. Our 2012 Jackson/ Teton County Comprehensive Plan is a guiding document that very accurately describes the balance and interconnectedness between our natural and economic capital in Principle 6.1 "A healthy ecosystem is our community's most important economic asset. For our economy to be sustainable long-term, prosperity will not only be measured in economic terms, but also by how well the community preserves our natural capital. To preserve our natural capital, economic development must be consistent with all three of the community's Ecosystem Stewardship, Growth Management and Quality of Life Common Values." For these reasons we have taken an active role in providing these comments. We respectfully request that the FEIS incorporate the concerns, policies, and priorities outlined in this letter. Our shared goal is to support sustainable recreation, protect ecological and scenic resources, and maintain the character and livability of Teton County for future generations. We look forward to continued dialogue and collaboration as the planning process moves forward.

Sincerely,



Mark Newcomb, Chair
Teton County Board of County Commissioners



Attest: Maureen E. Murphy
Teton County Clerk



