



June 20, 2025

Submitted Electronically

Ms. Kim Pierson
Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

RE: Grand Targhee 2018 Master Development Plan Projects (Project #58258)

Dear Forest Supervisor Pierson:

Grand Targhee Resort, LLC ("GTR") respectfully submits these comments on the Draft Environmental Impact Statement ("Draft EIS") for the Grand Targhee 2018 Master Development Plan Projects (the "Project").

GTR is the owner and holder of the special use permit for Grand Targhee Resort (the "Resort"). GTR appreciates its longstanding partnership with the Forest Service and appreciates the agency's efforts to prepare the Draft EIS for publication. The Draft EIS is the culmination of nearly ten years of work. It is a thorough and comprehensive analysis of the purpose, need, benefits, and potential effects of GTR's plans to improve the Resort.

The Resort has provided high-quality public recreation on public lands in the Caribou-Targhee National Forest ("CTNF") since 1969. The Resort is the home of public skiing on the west side of the Tetons. It provides uncrowded, abundant powder skiing in a spectacular setting. GTR purchased the Resort in 2001. GTR has kept the Resort independently owned while investing significantly in the Resort's operations and infrastructure, including planning for the Resort's future. During GTR's tenure, the Resort was named a top 30 ski resort in the West by Ski Magazine and a Top 11 ski area in the United States by Outside Magazine. The Project and the seven-plus years of planning and development supporting this effort represent a significant investment by GTR in the Resort's future.

The Project, and each of its individual elements, are critical to the Resort. The Project is needed to improve and enhance the guest experience at the Resort. It is needed to plan for the future of the Resort, to ensure that the Resort can provide the same quality of experience in the coming years as it does today. The Project is not designed to drive demand. It is designed to plan for and accommodate foreseeable future demand. The Project builds on the Resort's celebrated history and status as a beacon of uncrowded skiing in the shadow of the Tetons.

We appreciate you taking these comments under consideration and look forward to our continued collaboration. Please add these comments to the administrative record for the Project.

COMMENTS OF GTR ON DRAFT EIS

1. The Purpose and Need Statement should state that each of the Project's components addresses an identified need for the Resort.

The Purpose and Need Statement in the Draft EIS is to respond “to an application submitted under the National Forest Ski Area Permit Act of 1986 and Ski Area Recreational Opportunity Enhancement Act of 2011 (SAROE) by GTR to implement projects from their accepted 2018 GTR MDP.” Draft EIS at 3. That is an incomplete Purpose and Need Statement. The Purpose and Need Statement should more cohesively integrate the needs of the Resort as identified in the 2018 Master Development Plan (“MDP”) and the purpose of the Project components to address those needs.¹

GTR takes seriously its commitment to provide quality public recreation on the public lands it is entrusted to manage in partnership with the Forest Service. The Resort is the most significant developed recreation site on the CTNF. The Resort provides many thousands of public visitors, each year, with the opportunity to enjoy their public lands. For most visitors, it is their only means of accessing and enjoying the Forest.

The Resort is overdue for material upgrades. The Resort's natural setting allows it to provide an unmatched ski experience. But GTR cannot rely on its location alone, it needs to plan for both the present and the future to continue to provide public visitors with the highest quality guest experience possible.

GTR began planning the proposed upgrades almost ten years ago. GTR developed a comprehensive MDP update and submitted it to the Forest Service for review in 2018. GTR invested significant resources into the development of the 2018 MDP. It engaged with public stakeholders and the Forest Service. The Forest Service accepted the MDP in February 2019.

The 2018 MDP accepted by the Forest Service “identified a need to improve the recreational experience and address shortcomings in [the Resort's] terrain offerings and operations in order to remain viable in the competitive destination skier/rider market.” Draft EIS at S-1 (emphasis added). The needs identified in the 2018 MDP are enumerated in the Draft EIS. They include:

- The need for additional undeveloped, minimally maintained lift-served terrain and traditionally cleared alpine trails.
- The need for an uncongested beginner area and increased beginner, intermediate, and advanced-intermediate terrain.
- The need for more reliable and consistent snow coverage in key areas to improve skier circulation.

¹ A purpose and need statement “should take into account the needs and goals of the [applicant].” *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 196 (D.C. Cir. 1991).

- The need for improvements to the lift network to improve efficiency, provide operational redundancy, and enhance skier circulation.
- The need for improved facilities and services to meet current and evolving guest expectations.
- The need to expand and diversify non-winter activities to meet current and evolving guest expectations.

See Draft EIS at 3-4.

The Draft EIS appropriately identifies the above objectives of GTR. The Draft EIS identifies that the Project components are intended to achieve these objectives. The Draft EIS should more directly and cohesively state, however, that the purpose of the Project and its individual components is to address the needs of the Resort identified in the accepted MDP. This is a reasonable and appropriate request because, upon acceptance of the MDP by the Forest Service, the MDP is deemed part of GTR's ski area special use permit.

Please clarify in the Final EIS that the purpose of the Project and its individual components is to address the specific needs of the Resort identified in the accepted MDP.

2. The Project is needed to plan for the future of the Resort.

The Project, and each of its individual elements, are needed to plan for the long-term, durable future of the Resort. The Project is not designed to drive demand or meet a current, non-existent demand. The Project's components, which have been thoughtfully designed and refined over the last seven years, are needed to intelligently plan for the future.

Skier visits at the Resort have steadily increased over the last decade. Draft EIS at 59. Similarly, the population of the surrounding communities continues to grow. *Id.* The Draft EIS predicts a conservative estimate of 1.1% annual population growth in Teton County, ID – without any improvements to the Resort. *Id.* at 126. In fact, the Resort is a “relatively minor” contributor to the “cultural and economic pressures driving” this predicted growth. Neher Socioeconomic Report, Appendix A at 9. Population is growing rapidly in resort communities across the West due to changes in cultural attitudes, the shift to remote work, fundamental changes to our economy, and other factors far beyond the control of GTR.² This is demonstrated by the population growth in Teton County, ID after 2010 without any expansion of GTR.

The Resort provides some of the highest quality and best uncrowded skiing in the United States. GTR takes pride in offering one of the best skier-per-acre ratios in the ski industry. The

² See, e.g., John Cromartie, *Net Migration Spurs Renewed Growth in Rural Areas of the United States*, U.S. Dep't of Agric. Econ Research Serv. (Feb. 22, 2024), available at <https://www.ers.usda.gov/amber-waves/2024/february/net-migration-spurs-renewed-growth-in-rural-areas-of-the-united-states>.

proposed boundary expansions are needed to continue this legacy and provide high quality uncrowded powder skiing in the future. The proposed adjustments are modest in scope.

In Mono Trees, GTR is requesting to add 600 acres of terrain, a portion of which will consist of developed intermediate and advanced intermediate terrain, with the rest consisting of undeveloped glade and meadow skiing. *See* Draft EIS at 24-25.

In South Bowl, GTR has significantly refined and reduced its proposal since the 2018 MDP. GTR is requesting a modest addition of 266 acres to support 60 acres of developed terrain and approximately 200 acres of undeveloped bowl skiing. Draft EIS at 23.

The Mono Trees and South Bowl terrain will provide public guests to the CTNF with a unique and exceptional ski experience in a majestic natural environment. It is logical and appropriate to add both areas to GTR's permit and managed terrain network. Each area borders GTR's permit boundary and, again, is skied now.

The Draft EIS makes clear that these additions will not result in adverse environmental impacts. *See* Draft EIS, Appendix D at 567, 573-74, 575-76,³ 601-02. Wildlife in these areas is already conditioned to consistent human presence as a result of the increased popularity of backcountry skiing. *See* Draft Biological Assessment at 13; *see also* Draft Biological Evaluation at 24. But these areas should not be reserved for those with the physical fitness and unique skill set to access this terrain in the winter. The ability to enjoy these areas should not be based on a physical fitness filter. GTR's proposal ensures that a broader and more diverse segment of the public will be able to enjoy their public lands, while the majority of the CTNF continues to remain open to backcountry skiers.⁴

The public comments that the Project, including the proposed boundary adjustments, are an attempt to drive demand and change the landscape of the local community – to convert it to Vail or Teton Village – are false. They ignore a critical tenet of responsible and thoughtful planning: to proactively plan for the future and not get caught reacting to foreseeable changes to use and demand. They ignore the timeline needed to plan for and implement this type of development. This process is over seven years in the making. And it will take at least a year for it to be completed. It is not feasible for the Resort to wait for the Resort to become overcrowded or wholly out of date to propose needed improvement or expansion.

³ The conclusion in Appendix D that the Project may affect and is likely to adversely affect individual grizzly bears and wolverines is common to all of the action alternatives. The Draft EIS analysis makes clear that the proposed boundary adjustments in South Bowl and Mono Trees will have an insignificant impact on grizzly bear and wolverine habitat as a whole. Draft EIS at 303-04.

⁴ *See* Draft Recreation Technical Report at 15 (“The adjusted SUP would . . . increase both terrain distribution and variety for a range of ability levels.”); U.S. Forest Serv., Caribou-Targhee National Forest, Winter Sports <https://www.fs.usda.gov/r04/caribou-targhee/recreation/opportunities/winter-sports> (noting significant backcountry skiing opportunities in the CTNF including in the Teton Basin and Big Hole Mountains).

Please state in the Final EIS that the Project, and each of its individual elements, including the proposed boundary adjustments, are needed to plan for the long-term, durable future of the Resort.

3. Alternative 3 does not meet the future needs of the Resort.

Alternative 3 would authorize the proposed Project components within the Resort's existing special use permit boundary, but deny authorization for the proposed boundary adjustments in South Bowl and Mono Trees. *See* Draft EIS at S-3. Alternative 3 does not meet the future needs of the Resort that are addressed by the boundary adjustments in South Bowl and Mono Trees.

The Resort is popular because it offers an uncrowded ski experience in one of the world's most spectacular natural settings. Crowded powder skiing is an oxymoron. That's why it's necessary to maintain uncrowded powder skiing at the Resort. The proposed boundary adjustments in South Bowl and Mono Trees are GTR's plan to preserve this experience for the future. Alternative 3 will degrade the high-quality skiing that GTR is known for. Alternative 3 will lead to more crowded skiing over time, and poor-quality skiing.

Public comment – including by those opposed to the Project – supports this. A consistent comment is that the skiing public and members of the Targhee community do not want the experience to change, to become crowded and overrun like its competitors. This makes sense. Crowded powder skiing does not exist. Those opposed to the Project, however, would prefer to keep the Resort a secret to preserve the unspoiled ski experience.⁵

The Proposed Action, including the boundary adjustments into South Bowl and Mono Trees, will help preserve the current Targhee experience for the future. Alternative 3 will have the opposite effect. It is backwards looking rather than forward. Freezing today's Resort boundary in a snow globe will not stop time, population growth, or increasing visitation. Regional population and skier visits at the Resort have increased without any action by GTR. This will continue. Crowds will grow. The ski experience enjoyed today will not be the ski future experience under Alternative 3. Alternative 3 arbitrarily rejects and denies GTR's ability to plan for this.

The Forest Service should reject the calls for it to adopt Alternative 3 as a "compromise" solution. Alternative 3 rejects two material and critical components of the Project: South Bowl and Mono Trees. GTR has invested significant time and resources into planning the proposed boundary adjustments. The proposed boundary adjustments support GTR's mission to provide an exceptional and unmatched ski experience for public visitors on the CTNF. The Draft EIS identifies no significant impacts from the proposed additions of Mono Trees and South Bowl.

⁵ *See* <https://pub-tetoncounty.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?Id=e1223a83-7f58-4ee2-8113-4b8565a09a5b>, at 1:59:45 – 2:00:00.

The Forest Service should reject requests to unreasonably preclude GTR from offering outstanding ski experiences in the future.

Please approve the Proposed Action (Alternative 2) and reject requests to adopt Alternative 3 because Alternative 3 does not meet the needs of the Resort.

4. The proposed boundary adjustment in South Bowl will provide public visitors with access to south-facing powder skiing with views of the Tetons while improving safety for Resort personnel and guests.

The proposed boundary adjustment in South Bowl meets the needs of the Resort by increasing the Resort's terrain diversity in aspect and pitch. The South Bowl terrain will add approximately 200 acres of high-quality lift-served open bowl skiing. Draft EIS at 23. The terrain is south facing with pitches ranging from approximately 30 to 60 degrees. *Id.* at 62.

The South Bowl terrain will allow the Resort to provide future guests with a ski experience not currently offered by the Resort. Some people have questioned whether the south-facing terrain in South Bowl is high-quality ski terrain. It is. Ski areas with outstanding south-facing bowl terrain include: Mineral Basin at Snowbird, the famous Back Bowls of Vail, the South Face of Lone Peak at Big Sky, and Rendezvous Mountain at Jackson Hole. South Bowl possesses terrific terrain in pitch and exposure. It is ideal for lift-served skiing. Adding the modest acreage proposed in South Bowl will allow GTR to meet the current and future expectations of public visitors to the Resort, and allow GTR to continue to offer the high-quality guest experience it is known for today.

Please acknowledge in the Final EIS that the proposed boundary adjustment in South Bowl meets the future needs of the Resort by increasing the Resort's terrain diversity in aspect and pitch, and will allow the Resort to provide world-class bowl skiing akin to that offered at other ski areas in the West.

The proposed boundary adjustment in South Bowl will enhance the guest experience by providing unparalleled views of the Tetons. There is currently only a small area of the Resort that provides skiers with views of the Tetons. This deprives guests of one of the area's premier outdoor experiences. Many of the ski area's guests only experience their public lands on the CTNF by visiting the Resort. The proposed terrain in South Bowl will allow the Resort's guests to experience the majesty of the Tetons during these visits and allow the Resort to fulfill its role as a partner to the Forest Service in providing high-quality public recreation on the public lands it is entrusted to manage in partnership with the agency.

Please acknowledge in the Final EIS that the proposed boundary adjustment in South Bowl will address a current shortcoming in the Resort's recreation experience by providing skiing guests with views of the Tetons.

The proposed boundary adjustment in South Bowl will help alleviate a significant operational burden and improve guest safety. The increase in side-country skiing of South Bowl adjacent to the ski area by skiers who leave the Resort boundary has caused continued and increasing operational and safety issues for GTR. GTR ski patrol frequently responds to calls from skiers that venture out of the boundary unprepared. Adding the proposed terrain in South Bowl to the Resort special use permit boundary for lift-served skiing will allow GTR to conduct avalanche mitigation and provide safe access to the area.

Some people have suggested that the Forest Service should add South Bowl to GTR's permit but prohibit GTR from adding a lift. Respectfully, that is an absurd and unreasonable idea. It would preclude the great majority of GTR's guests from enjoying South Bowl and prevent them from skiing with views of the Tetons. Most visitors do not have the equipment, the experience, the desire, or for some the level of fitness, to find their own way out of a place like South Bowl without access to a lift. Adding South Bowl without a lift would not accomplish GTR's objectives of improving the Resort for its guests as stated in the MDP, and would not accomplish the purpose and need identified in the Draft EIS.

Please acknowledge in the Final EIS that the proposed boundary adjustment in South Bowl will address safety issues at the Resort.

5. The proposed boundary adjustment in Mono Trees provides needed terrain for the progression of beginner skiers, gladed tree skiing for low-visibility days, and will reduce wildfire fuel by clearing beetle-killed trees in the area.

The addition of the proposed terrain in Mono Trees will add approximately 600 acres of needed intermediate terrain to the Resort special use permit boundary. The Mono Trees area provides lower-elevation, lower-angle lift-served glade skiing that will provide an opportunity for progressing skiers to move from the Shoshone beginner area to low-intermediate terrain and gladed tree skiing. GTR currently lacks "an adequate amount of beginner and intermediate terrain to provide an appropriate learning progression." See Draft EIS at 57. The proposed Mono Trees terrain helps fill this critical gap and will allow GTR to better facilitate the learning progression of new skiers and introduce them to a lifetime of public recreation on public lands.

Please acknowledge in the Final EIS that Mono Trees will add needed intermediate terrain to support the learning progression of new skiers.

The Mono Trees terrain provides needed glade skiing for low-visibility days at the Resort. The Resort receives significant snowfall, helping create its reputation as one of the premier powder skiing destinations in the world. But it also means that there are plenty of storm days and days with lower visibility throughout the season. The Resort also deals with challenging fog throughout the season due to the unique meteorological conditions at the Resort.

Adding lower elevation glade skiing to the Resort boundary will allow GTR to keep more of the mountain open on the most challenging weather days. This will in turn allow GTR to provide a better more reliable experience to the guests that visit the Forest Service lands at the Resort.

Please acknowledge in the Final EIS that Mono Trees will add lower elevation glade skiing that is needed to provide guests with skiable terrain on low-visibility weather days.

The proposed glading in Mono Trees will provide a public recreation benefit while simultaneously allowing GTR to clear beetle-impacted trees, support forest health, and reduce wildfire fuel. The Mono Trees area has seen an increasing amount of tree mortality due to predation from the mountain pine beetle. Implementation of the glading proposed in Mono Trees will support forest health and reduce wildfire fuels through the removal of this timber.

Please acknowledge in the Final EIS that the proposed glading in Mono Trees will support forest health and reduce wildfire fuel while providing a public recreation benefit.

6. The proposed boundary adjustments are modest in scope and represent a relatively tiny percentage of public lands on the CTNF.

The proposed adjustments are reasonable in scope. GTR is requesting the Forest Service to add 866 acres of additional terrain to GTR's special use permit boundary. *See* Draft EIS at 23-25. The terrain in South Bowl is already heavily impacted by recreation, much of which originates from the Resort. There are approximately 2.7 million acres of public lands on the CTNF.⁶ There are significant backcountry skiing, hiking, and other recreation opportunities on that acreage.⁷

⁶ *See* U.S Forest Serv., Caribou National Forest, Revised Forest Plan FEIS Record of Decision at ROD-3 (Feb. 2003) (listing Caribou National Forest as 986,987 acres); U.S. Forest Serv., Targhee National Forest 1997 Revised Forest Plan FEIS at S-1 (1997) (listing Targhee National Forest at approximately 1.8 million acres).

⁷ U.S. Forest Serv., Caribou-Targhee National Forest, Recreation Opportunities, <https://www.fs.usda.gov/r04/caribou-targhee/recreation/opportunities>.

The proposed boundary adjustments thus account for a relatively tiny percentage of the public lands on the CTNF (about 1/30th of 1 percent of the CTNF). But that relatively tiny amount of land will provide significant public recreation benefits for thousands of people for decades, all under managed conditions that protect the environment.⁸ With the 866 acres added to GTR's special use permit, the overwhelming balance of the 2.7 million acre CTNF remains available for backcountry recreation.

Please acknowledge in the Final EIS that the proposed boundary adjustments represent a relatively tiny percentage of land (about 1/30th of 1%) of the 2.7 million acres of public lands on the CTNF, and that the addition of South Bowl and Mono Trees has no effect on the 99% of the CTNF available for public backcountry recreation.

7. The restaurant on Fred's Mountain will provide needed on-mountain dining, offer a unique experience to non-skiing guests, and is similar to facilities that have been approved at ski areas across the country.

The restaurant on Fred's Mountain provides needed on-mountain dining at the Resort. The Resort currently does not have any on-mountain dining facilities. This can impede guest enjoyment. Depending on where a skier is on the mountain, returning to the base area to dine or use facilities can be time consuming and cumbersome, and can have a negative impacts on a visitor's ski experience. This can also lead to unnecessary skier congestion and demands at the base area. The need for additional on-mountain dining is the most frequent guest comment. The proposed restaurant on Fred's Mountain solves this issue, provides a needed dining option and other facilities, and will help spread out guests and reduce skier congestion.

The Fred's Mountain restaurant will provide non-skiing guests with the ability to enjoy the natural beauty of the CTNF and surrounding views of Grand Teton National Park. The restaurant on Fred's Mountain will provide the non-skiing public with the ability to enjoy the same natural beauty enjoyed by skiing visitors to the Resort. Non-skiing visitors to the Resort, during both the winter and summer, will have an opportunity to access the upper reaches of the mountain and enjoy the natural beauty of the CTNF and surrounding vistas of Grand Teton National Park. Destination visitors to the Resort often travel with non-skiing family members. There are many public visitors in the summer that do not have the opportunity or ability to enjoy the Resort in the winter or to access the top of the mountain via hiking. The restaurant on Fred's Mountain will provide these guests with the opportunity to enjoy the spectacular setting and vistas the Resort has to offer.

The Forest Service has routinely approved mountain-top restaurants at ski areas on Forest Service lands. On-mountain dining is ubiquitous across ski areas, both on and off National

⁸ The Forest Service has previously authorized similar permit area expansions that are reasonable in scope, but add material benefits to the ski experience. *See, e.g.*, 2024 Monarch No Name Basin Decision Notice, 2019 Crested Butte Teocalli Expansion Record of Decision, Loon Mountain South Mountain Expansion Record of Decision.

Forest System lands. It is difficult to identify one example of a prominent ski area without any on-mountain dining. Mountain-top dining facilities are common. Examples of mountain-top restaurants approved by the Forest Service include: The Summit at Snowbird, The Roundhouse at Sun Valley, Rendezvous Alpine Kitchen at Jackson Hole, the Aurora Summit Restaurant at Snow King, Summit House at Whitefish Mountain Resort, Eleven53 Café at Mammoth Mountain, and Summit House Restaurant at Crystal Mountain. Many of these restaurants have existed for decades. The Forest Service has routinely approved these projects. GTR should not be treated differently. It should not be put at a disadvantage in the market, and public visitors to GTR should not be provided with an inferior experience.

Please acknowledge in the Final EIS that the Resort needs on-mountain dining, the restaurant on Fred's Mountain will offer a unique experience to non-skiing guests, and that the restaurant is consistent with others that have been approved at ski areas on Forest Service lands.

8. Please add the socioeconomic report in Appendix A to the Project record and acknowledge the conclusions in the report in the Final EIS.

GTR asked an independent economist, Chris Neher, to review the potential economic effects of the Project on Teton County, Idaho. Mr. Neher is a former instructor and research specialist at the University of Montana and has decades of experience working as an economic consultant specializing in environmental and natural resource economics and policy. Mr. Neher's study, Review of Potential Economic Effects of Grand Targhee Mountain Improvements Project on Teton County, Idaho (April 2025) ("Neher Socioeconomic Report"), is attached to this letter as Appendix A.

Please add the Neher Socioeconomic Report attached as Appendix A to the administrative record for the Project.

9. The Draft EIS and Neher Socioeconomic Report demonstrate that the Project will not negatively impact social services or housing in surrounding communities.

The Resort is a social and economic hub of Teton Valley. The Resort has a material, beneficial impact on the local economy in Wyoming and Idaho. *See generally* Neher Socioeconomic Report, Appendix A.

Winter visitors to the Resort spend approximately \$38.9 million annually in direct spending. Draft EIS at 119. GTR's summer visitors spend approximately \$4.5 million annually. *Id.* This direct spending generates a total annual economic output of almost \$63 million in Teton County, Idaho; Teton County, Wyoming; Madison County, Idaho; and Bonneville County, Idaho. *Id.* This economic output "supports approximately 568 [full-time employees ("FTEs")]

and \$20.7 million in labor income and summer spending supports approximately 70 FTEs and \$2.4 million in labor income.” *Id.*⁹

GTR is a material employer in the local community. GTR constructed and operates sixteen employee housing units in Driggs, Idaho that provide a total of 96 bedroom units and house 112 employees. Draft EIS at 123. GTR will build additional employee housing in the future. *Id.*; Neher Socioeconomic Report, Appendix A at 9.

GTR supports the community and its residents. Public commentary that the Project will negatively impact local communities, specifically Teton County, Idaho, are inaccurate. The Project is not anticipated to have a measurable impact on the cost or need for additional community services. Neher Socioeconomic Report, Appendix A at 6-7. Similarly, rising housing prices in Teton County, Idaho are “much more heavily influenced by statewide and national trends, dislocated workers from WY, and short-term rental conversions than from operations of GTR either past, current, or future.” *Id.* at 9.

The assertion by some that Idaho does not benefit from GTR is ridiculous and false. It is like saying that West Yellowstone, Montana does not benefit from Yellowstone National Park because it does not receive tax revenue from the Park. Of course GTR benefits Teton County, Idaho.

Economic and cultural factors, outside the control of GTR, have contributed to an increase in population in the communities surrounding the Resort.¹⁰ The answer to these complex socioeconomic issues is not to preclude GTR from making critical improvements to plan for the future. Population and visitation to the Teton Valley is expected to increase at roughly the same level under all of the action alternatives. *See* Draft EIS at 125-27. The Proposed Action is the only alternative that will help GTR provide the same quality of skiing and the same guest experience that it does today, in the face of this projected increase in demand.

Please state in the Final EIS that the socioeconomic analysis demonstrates that the Project will not negatively impact social services or housing in surrounding communities.

10. Forest Plan amendments are an appropriate and important tool that are consistently relied on by the Forest Service.

The Draft EIS proposes one programmatic Forest Plan amendment and three project-based Forest Plan amendments. *See generally* Draft EIS, Appendix C. This is not unusual for projects on Forest Service lands. Forest Plan amendments are routinely used by the Forest

⁹ *See also* Socioeconomic Technical Report at 19-21.

¹⁰ John Cromartie, *Net Migration Spurs Renewed Growth in Rural Areas of the United States*, U.S. Dep’t of Agric. Econ. Rsch. Serv. (Feb. 22, 2024), available at <https://www.ers.usda.gov/amber-waves/2024/february/net-migration-spurs-renewed-growth-in-rural-areas-of-the-united-states>.

Service to approve a variety of actions. They are an important tool and intentional tool for the agency.

The Forest Service’s planning regulations explicitly allow the Forest Service to issue a Forest Plan amendment when “a proposed project or activity would not be consistent with the applicable plan.” 36 C.F.R. § 219.15(c)(4). The point “is to allow a project that would otherwise not be consistent with the plan to be authorized and carried out in a manner appropriate to the particular time and place of the project, without changing how the plan applies in other respects.” National Forest System Land Management Planning Rule, 77 Fed. Reg. 21,162, 21,239 (Apr. 9, 2012). Forest Plans are programmatic in nature and infrequently revised. This makes it foreseeable that specific projects may require an amendment of the applicable plan when appropriate. The United States Supreme Court has endorsed this approach and the agency’s use of amendments to revise Forest Plans “in response to an appropriate proposed site-specific action that is inconsistent with the Plan.” *Ohio Forestry Ass’n, Inc. v. Sierra Club*, 523 U.S. 726, 735 (1998). The Forest Service has utilized this important tool to approve Forest Plan amendments at many ski areas, including in the 2019 Crested Butte Teocalli Expansion Record of Decision, the 2021 Steamboat Resort Improvements Decision Notice, the 2019 Aspen Mountain Decision Notice, and the 2012 Breckenridge Peak 6 Record of Decision.

The Forest Plan amendments proposed in the Draft EIS are modest in scope and limited in impact. They have been thoughtfully prepared and are being applied appropriately and consistent with Forest Service practice.

Please acknowledge in the Final EIS that Forest Plan amendments are appropriate, authorized by Forest Service regulations, and are routinely utilized by the Forest Service.

11. GTR requests that the Forest Service adopt the Proposed Action.

GTR has proposed each of the Project elements for specific reasons to address the specific needs identified in the Resort’s accepted MDP. Each Project element is important. In aggregate they are critical. GTR requests that the Forest Service adopt the Proposed Action as proposed in the Draft EIS, without modification.

Please approve the Proposed Action (Alternative 2) in its entirety without modification.



GTR thanks the Forest Service in advance for its work preparing the Final Environmental Impact Statement and looks forward to continuing to work cooperatively with the Forest Service and other stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "Georgie Gillett", is written over a horizontal line.

Geordie Gillett
President & General Manager
Grand Targhee Resort

Appendix A

REVIEW OF POTENTIAL ECONOMIC
EFFECTS OF GRAND TARGHEE
MOUNTAIN IMPROVEMENTS PROJECT ON
TETON COUNTY, IDAHO

Chris Neher

Resource Economist

April 2025



INTRODUCTION

The primary purpose of this report is to identify the potential economic effects of Grand Targhee's mountain improvements project on Teton County, Idaho. These potential effects are outlined in the Draft Environmental Impact Statement for the Grand Targhee Master Development Plan Projects (DEIS) and supporting documents.^{1 2} This report also comments on an earlier report commissioned by Teton County, Idaho and prepared by ECONorthwest, and provides the context needed for evaluating that report along with other pertinent observations.

This report has been prepared by Chris Neher, and independent natural resource economics consultant (vita attached).

SUMMARY FINDINGS

- The Grand Targhee Resort (GTR) has been operating as a ski area for over 50 years. Over that time, it has steadily increased both winter and summer use levels. While GTR is located in Wyoming, the communities of Driggs and Victor Idaho, along with Teton County Idaho (TCI) have greatly benefited from the ongoing spending by GTR visitors in the local economy as well as from infrastructure investments by GTR in TCI.
- TCI and Driggs/Victor are "gateway communities" to the amenities supplied by GTR and other nearby recreational attractions. Gateway communities and their adjacent natural amenities have a symbiotic relationship: the amenities (such as ski areas or national parks) provide a natural draw to visitors, and the communities provide economic goods and services to supply them. This relationship plays out in a positive way in many communities across the West and beyond.

SUMMARY OF CURRENT ONGOING ECONOMIC IMPACTS OF GTR OPERATIONS

- The DEIS estimates that a 5-year average annual impact of GTR visitor spending to three Idaho counties (Teton, Bonneville, and Madison) from current operations contribute 323 full time equivalent (FTE) jobs to the area. This activity also contributes \$9.8 million in personal income and

¹ Caribou-Targhee NF. "Draft Environmental Impact Statement for the Grand Targhee Master Development Plan Projects." Teton County, WY. March 2025.

² SE Group. "Social-Economic and Environmental Justice Technical Report for the Grand Targhee Master Development Plan Projects: Environmental Impact Statement". June 2023.

\$28.3 million in total sales to the Idaho counties.³ This ongoing annual economic impact to Idaho supports residents, the businesses they patronize, and by extension local government through sales, lodging, and use taxes.⁴

- In addition to impacts associated with the money directly spent by GTR visitors in TCI and surrounding counties, GTR itself spends heavily in TCI to support its ongoing operations. In 2024, GTR reported spending \$21 million directly in Teton County Idaho. This substantial injection of money into the local TCI economy occurs every year, with some variation. The 2024 GTR spending in TCI was divided roughly as 54% payroll, 38% purchases from local businesses, 7% for provision of employee housing, and 1% for transportation.⁵
- In addition to the annual direct spending in TCI by GTR associated with normal operations, GTR also has invested in the past, and plans future spending, for infrastructure in the county. These investments include \$8 million for employee housing in Driggs, \$86,000 for buses, and a planned \$6 million investment in the future 5th street apartment project. Additionally, GTR has pledged to contribute \$115,000 to Teton County roads, and \$130,000 to expand the Driggs transit center.⁶
- Currently, as of April 2025, GTR has \$38.8 million in existing contracts and commitments for work to be completed in the next few years. These funds will also be paid to businesses with operations in TCI.⁷

SUMMARY OF PROJECTED LOCAL ECONOMIC EFFECTS OF GTR MOUNTAIN IMPROVEMENTS PROJECT UNDER ALTERNATIVE 2

The GTR Mountain Improvements Project DEIS provides a careful analysis of the local (3-county) area including Teton County Idaho. The DEIS projects annual impacts associated with the proposed improvements project that would be in addition to current economic impacts noted above.

- For the preferred alternative (Alternative 2) the DEIS predicts economic activity from GTR operations by 2033 will account for an additional 274 FTE jobs in the Idaho counties, \$10.6 million in personal income, and \$31.1 million in total economic output (sales). Again, the large share of these impacts is most likely to be centered in TCI as it is the sole gateway to GTR.

³ SE Group. 2023. Tables 3.2.6 & 3.2.7. pp 21-22

⁴ As the county bordering and providing all access to GTR, Teton County Idaho likely captures a disproportionately large share of this 3-county estimated economic impact.

⁵ Personal Communication, Brad Grover, GTR. April 2, 2025.

⁶ Ibid.

⁷ Ibid.

- These predicted impacts to the Idaho counties would be in addition to the current impact of GTR on employment, income, and sales in the counties.
- Just as the DEIS predicts economic impacts of the proposed GTR mountain improvements project on TCI, it also provides information on impacts to neighboring Teton County Wyoming (TCW). For the proposed (Alternative 2) improvements, the DEIS projects TCW would experience an additional 340 FTE jobs, \$16.9 million in personal income annually, and \$43.5 million in additional total economic output (sales).

SUMMARY COMMENTS ON ECONORTHWEST REPORT

In July 2022, the consulting firm ECONorthwest completed an analysis and report for Teton County, Idaho (TCI) entitled “Effects of Proposed Grand Targhee Development on Public Services and Housing Markets in Teton County, ID.” The report had a narrow focus in economic terms, and while carefully developing the topics within its focus, it by no means addressed the full scope of the significance or impacts of historic and proposed future operations of Grand Teton Resort (GTR) on the economics of Teton County Idaho (TCI).

- The ECONorthwest report is a partial economic analysis that only focuses on one sector (essentially local taxes) and thus presents a biased and inaccurate view of the totality of economic effects of any action. Fiscal challenges to TCI are structural in nature and not largely due to GTR.
- Overall, the ECONorthwest report is severely limited in scope, generally tentative in its conclusions, and already somewhat outdated.
- The ECONorthwest report does a good job of describing the local taxing structures of ID and WY governments and how differences between them allow WY to capture more tax revenue from ski operations at GTR.
- Similarly, the report accurately describes the housing supply and affordability situation in TCI. However, different taxing structures are not within the control of GTR, nor is the current housing situation in TCI in any significant way due to GTR.
- Any fair analysis of the past, current, and potential future impacts of GTR and its proposed mountain improvements project must also include accurate estimates of direct spending in the TCI economy by GTR visitors as well as by GTR itself. These economic impacts on income, jobs, and sales are large and ongoing.

SUMMARY OBSERVATIONS ON HOUSING AVAILABILITY AND COST IN TETON COUNTY IDAHO

While the ECONorthwest report describes the relatively tight and high-cost housing environment in TCI, it fails to include in an organized way the necessary context that largely explains the sources of the current housing environment.

Rather, it alludes to GTR as the proximate cause of housing scarcity and prices and implies that future GTR mountain improvements would significantly worsen the situation. A review of housing trends as well as the conclusions from the DEIS found the following:

- Exogenous social, cultural, and economic factors outside the control of Grand Targhee Resort are the cause of the tight, expensive housing market in TCI.
- Structural causes of the tight, expensive housing market in TCI are the result of nationwide and statewide trends rather than resulting from actions by Grand Targhee Resort. The entire State of Idaho has seen a 162% increase in housing prices between 2015 and 2024.
- The higher cost of housing in TCI is substantially driven by residents working in WY who seek lower housing costs in Idaho, not because of actions by Grand Targhee Resort.
- Short-term rental conversions, i.e., the transition of rental properties into the AirBnB pool, have put substantial pressure on housing demand in TCI in recent years. That phenomenon is separate from, and not a result of, Grand Targhee Resort.
- Grand Targhee Resort has in the past, and plans in the future, to fund the construction and maintenance of housing for a large share of temporary workers at the resort, significantly limiting pressures by GTR employees on the TCI housing market. GTR invested \$8 million in the past for employee housing in Driggs, ID, and plans an additional \$6 million investment in the future 5th street apartment project.
- The impact of new workers associated with implementation of the Grand Targhee mountain improvements project would likely be trivial in the context of major drivers of housing demand in TCI.
- Grand Targhee Resort is a relatively minor player in cultural and economic pressures driving population and demand in TCI.

SPECIFIC RESPONSES TO THE ECONORTHWEST FINDINGS:

The ECONorthwest report is not a comprehensive analysis of the cost and benefits or regional economic impact of either historical GTR operations on Teton County Idaho (TCI) or predicted impacts of the GTR mountain improvements project on the TCI economy.

The report makes clear that its goal is limited to estimating likely impacts of the GTR mountain improvements project on the “Public Services and Housing Markets in Teton County, ID.” This narrow focus on costs associated with governmental fiscal impacts and the housing market ignores a broad category of benefits to businesses, workers, and associated tax revenues from economic activity generated by GTR.

While carefully done as far as it goes, the ECONorthwest report is speculative and tentative in many conclusions and simply evaluates the fiscal impacts of GTR mountain improvements project within the acknowledged constraints of Idaho Taxing structure.

The ECONorthwest report with its narrow focus addressed four particular aspects of GTR operations and the “potential” impact on county and city finances of the proposed mountain improvements project.

1. Impact on costs of garbage disposal
2. Impact on costs of emergency services
3. Impact on road maintenance
4. Impact on the housing market

All these impact areas were framed in the context of “would GTR mountain improvements project shift costs of providing services to the resort disproportionately onto residents of TCI? The report concluded the following:


1. Current garbage contract rates were fair and equitable, but the authors worried that disposal of future construction waste might shift some costs to the residents of TCI. The authors offered no significant evidence that this would happen. In any event, disposal rates for GTR are a matter of contract, and can be renegotiated if needed.
2. The report notes that current EMS contracts between TCI and TCW are based on share of emergency calls with a substantial \$20,000 annual escalation. The report parses whether the actual share of total calls to WY is 12% or 13% and notes that under some of its aggressive GTR growth projections the \$20K annual escalation would not cover all the potential costs of the calls. Basically, the report is saying that now and for the next few years TCW is likely fully covering the costs of the EMS services provided by TCI—BUT under aggressive growth scenarios, it might not.

Again, this is a contract agreement between TCW and TCI. If and when TCI feels and can document that they are being underpaid for the service they provide to WY, renegotiation is called for. However, this is outside the control of GTR.

3. The estimated cost of road maintenance to TCI from GTR mountain improvements project is particularly concerning. Missing is data on historic investments in the road sections addressed, context on maintenance backlogs due to a myriad of issues, or a direct and proportionate connection to GTR of any needed repairs.

Needed upgrades are not unique to the few miles of connectors and roadway discussed in the report. A 2024 report found that 14% of Idaho's major roads are in poor or mediocre condition, and 5% of Idaho's bridges are rated in poor/structurally deficient conditions.⁸ State, county, and city road and bridge departments work hard with often inadequate resources. Projects are prioritized given available resources. GTR is not a new ski area. It has been in operation for over 50 years with steadily increasing visitation over time. This is ample time for recognition of future challenges with the feeder road system, planning for improvements and prioritizing those improvements in the funding cycles.

Any analysis of the costs of road maintenance due to GTR would need to

A decorative graphic consisting of several overlapping blue triangles and polygons, creating a modern, abstract shape that tapers to the right.

A NOTE ON ECONORTHWEST GTR GROWTH PROJECTIONS: THE CAREFUL ANALYSIS CONTAINED IN THE USFS DEIS FOR PROPOSED GTR EXPANSION PREDICTS GTR VISITATION WITHOUT EXPANSION WOULD GROW AT 1% ANNUALLY THROUGH 2033. THE DEIS FURTHER ESTIMATES THAT WITH THE EXPANSION GTR VISITATION WILL GROW AT 3.9% ANNUALLY. THE DIFFERENCE BETWEEN EXPANSION AND NO EXPANSION GROWTH IS 2.9% ANNUALLY THROUGH 2033. HOWEVER, THE ECONORTHWEST REPORT PRESENTS THREE GROWTH SCENARIOS: A LOW OF 1% THAT MATCHES CURRENT GROWTH LEVELS WITHOUT EXPANSION, A MODERATE OF 3.5% AND A HIGH OF 6.4% ANNUAL GROWTH THROUGH 2032. THE MODERATE AND HIGH PROJECTIONS LEAD TO ANNUAL VISITATION LEVELS IN 2032 THAT ARE 20% HIGHER (FOR THE MODERATE GROWTH SCENARIO AND 58% HIGHER (FOR THE HIGH GROWTH SCENARIO) THAN THE DETAILED PROJECTIONS IN THE DEIS. THESE EXCESSIVELY HIGH GROWTH PROJECTIONS DRIVE MUCH OF THE ANALYSIS.

⁸ TRIP, A National Transportation Research Nonprofit. https://tripnet.org/wp-content/uploads/2020/04/TRIP_Fact_Sheet_ID.pdf

recognize this history and allocate use on the road segments among users (GTR visitors, Alta residents, local use) appropriately. The way the issue is presented in the report seems more like a “wish list” for the question, “what would you do to improve these roads and what would it cost?” The wishes may be appropriate, but the allocation of responsibility is wholly inadequate in my view.

4. The ECONorthwest report does a good analysis of the housing market and housing affordability in TCI. Their conclusions are not unknown: housing availability has not matched housing demand in recent years leading to increased housing prices. An increasing share of TCI residents are considered “cost burdened”. Meaning the household pays more than 30% of their income in housing costs.

What is either briefly mentioned or ignored in the report are the structural causes of the tight, expensive housing market in TCI. These include:

- a. National trends in housing prices. The entire state of Idaho has seen a 162% increase in housing prices between 2015 and 2024. This statewide and national trend is a huge share of the 192% increase in housing prices in TCI over the same period.⁹
- b. As noted in the DEIS, Idaho is heavily linked to proximity to Teton County, WY (TCW). Approximately 38 percent of all workers living in Teton County, ID (3,200 workers) travel to Teton County, WY for work. The higher cost of housing in TCI is substantially driven by residents working in WY, seeking lower housing costs in Idaho.¹⁰
- c. Short term rental conversions have put substantial pressure on housing demand in TCI in recent years. These rentals can provide an attractive alternative to homeowners when compared to long-term rental income. A 2021 survey of TCI renters found that 18% of those surveyed had been forced to move because their existing long-term rental was being converted to a short-term rental at significantly higher costs.¹¹ Short-term rental conversions reduce the available stock of long-term housing while also increasing rental rates on the existing housing stock (due to increased demand).

⁹ St. Louis Federal Reserve. <https://fred.stlouisfed.org/series/ATNHPIUS16081A>

¹⁰ SE Group 2021. P. 31.

¹¹ DEIS p. 123.

TCI housing is indeed expensive. However, the cause of high housing prices in the county is much more heavily influenced by statewide and national trends, dislocated workers from WY, and short-term rental conversions than from operations of GTR either past, current, or future. Finally, GTR has in the past, and plans for the future, to provide housing for a large share of temporary workers at the resort, significantly limiting pressures by GTR employees on the TCI housing market.

BOTTOM LINE ON HOUSING: the mountain improvements project of GTR over an extended period of time would bring some new workers to TCI. However, the impacts of these new workers would likely be trivial in the context of the major drivers of housing demand in the county described above.



GTR MOUNTAIN IMPROVEMENTS PROJECT IN THE CONTEXT OF COUNTY GROWTH PROJECTIONS: AS DETAILED IN THE DEIS, A VERY CONSERVATIVE ESTIMATE PROJECTS THE POPULATION OF TETON COUNTY, ID TO INCREASE BY 1,650 NEW RESIDENTS BY 2033 WITHOUT ANY GTR EXPANSION. EVEN IF ALL PROJECTED NEW EMPLOYMENT GENERATED IN THE COUNTY BY THE GTR EXPANSION WERE FILLED BY EMPLOYEES MOVING TO AND LIVING IN THE COUNTY, THIS LEVEL OF GROWTH WOULD STILL BE WELL WITHIN THE PROJECTED RANGE OF NATURAL GROWTH OF THE COUNTY POPULATION OVER THE PERIOD. IN FACT, HOWEVER, THE DEIS PREDICTS THAT ONLY 54% OF THIS NEW EMPLOYMENT WILL OCCUR IN IDAHO (274 OF 614 NEW FTE JOBS). THIS LEVEL OF GROWTH IS LESS THAN 9% OF THE CURRENT AND ONGOING IMPACT OF GROWTH FROM RESIDENTS OF TCI WORKING IN WY.

The ECONorthwest analysis frames GTR and the proposed mountain improvements project as “the straw that broke the camel’s back” in terms of economic challenges in Teton County, ID. In truth GTR is a relatively minor player in cultural and economic pressures driving population and demand in the county. Other more important drivers are the widespread shortage of affordable housing throughout the country and particularly in amenity rich areas of the West, and demand for more affordable housing from employees working in high-cost neighboring communities in Wyoming. That is not to say, however, that GTR does not play an important role in the Teton County, ID economy.

THE POSITIVE ECONOMIC IMPACTS OF GTR AND THE PROPOSED MOUNTAIN IMPROVEMENTS PROJECT ON IDAHO AND TETON COUNTY, ID LARGELY IGNORED BY ECONORTHWEST

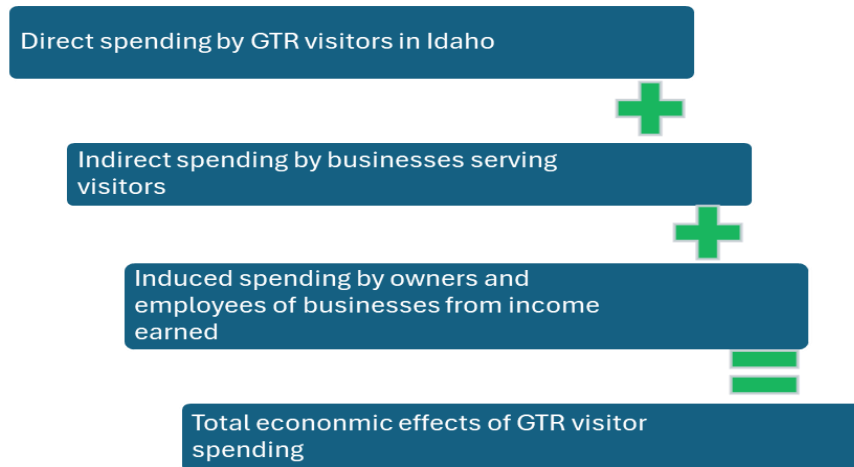
The narrow focus of the ECONorthwest report on fiscal impacts to TCI and possible impacts on housing in the county by necessity generally ignores large and ongoing positive impacts of GTR operations on businesses, jobs, and income in the county. Any fair economic analysis of current economic impacts to the county must include this type of analysis. The recently released DEIS does provide substantial clarity on these expected impacts.

Two categories of impacts largely ignored by ECONorthwest are the direct, indirect, and induced impacts on employment, income, and sales in the county associated with GTR visitor spending, and impacts associated with direct spending on wages, contracts, and infrastructure by GTR within the county.

IMPACTS OF GTR VISITOR SPENDING IN IDAHO

The DEIS does a careful job of fully accounting for and predicting the impacts both of current GTR operations and the proposed GTR mountain improvements project. Using a regional economic impact modeling framework, the DEIS predicts levels of visitor spending-driven economic activity (employment, personal income, and total output/sales) under both the Alternative 1 (no action) scenario and the Alternative 2 (preferred mountain improvements project) scenario.

When visitors spend money in a local economy the impact of that spending is not limited to the dollars originally spent. Rather, initial visitor spending supports spending by the businesses that are patronized (for supplies and labor) as well as re-spending within the local economy by the employees and owners of the businesses from their wages and income. Therefore, the initial visitor spending is “multiplied” in its impacts throughout the local economy.



These types of economic impacts felt within gateway communities are nearly universally considered to be positive. Businesses welcome and depend on visitor spending and lobby strongly against any policies that might reduce visitation and associated visitor spending.

Table 1 shows the annual economic impact on the Idaho counties from current operations as well as the predicted future annual economic impacts of both the existing level of GTR development and the proposed mountain improvements project through 2033. These impacts are for the share of total impacts likely attributable to three counties in Idaho (Teton, Madison, and Bonneville). While Teton County has the lowest population of these three, its proximity and access to GTR suggests that the large share of these predicted impacts would be expected to accrue to this gateway county (TCI).

Table 1. DEIS predicted annual economic impacts on Idaho counties under alternative GTR growth scenarios.

Season	Employment	Income (millions 2033 \$)	Total Output (millions 2033 \$)
<i>Current Operations (5-year average)</i>			
Winter	283	8.60	24.8
Summer	40	1.21	3.48
Total	323	9.81	28.28
<i>Projected baseline (no mountain improvements project) growth—in addition to current operations</i>			
Winter	99	3.75	10.9
Summer	9	0.37	1.09
Total	108	4.12	11.99
<i>Projected mountain improvements project growth—in addition to current operations</i>			
Winter	250	9.71	28.51
Summer	24	0.92	2.70
Total	274	10.63	31.21

As noted in the table, GTI currently supports 323 FTE jobs, 9.81 million in labor income and 28.28 million in sales annually in the Idaho counties. The DEIS provides predictions of future (through 2033) operations as well. Current operations and level of development (no mountain improvements project) are predicted to have an additional average impact on total economic activity (sales) in the counties of \$12 million dollars per year, and support 108 jobs from growth in visitor spending through 2033. Under the proposed Alternative 2 mountain improvements project plans, an additional approximately \$20 million in annual sales and 166 jobs are predicted (for a total of \$31.2 million in added sales and 274 jobs).

These predicted increases in employment, income and sales (which include direct spending, as well as indirect and induced spending) represent business activity and employment opportunities for local Teton County residents. Additionally, this economic activity will generate local sales tax income in Driggs and Victor as well as substantial lodging tax income streams.

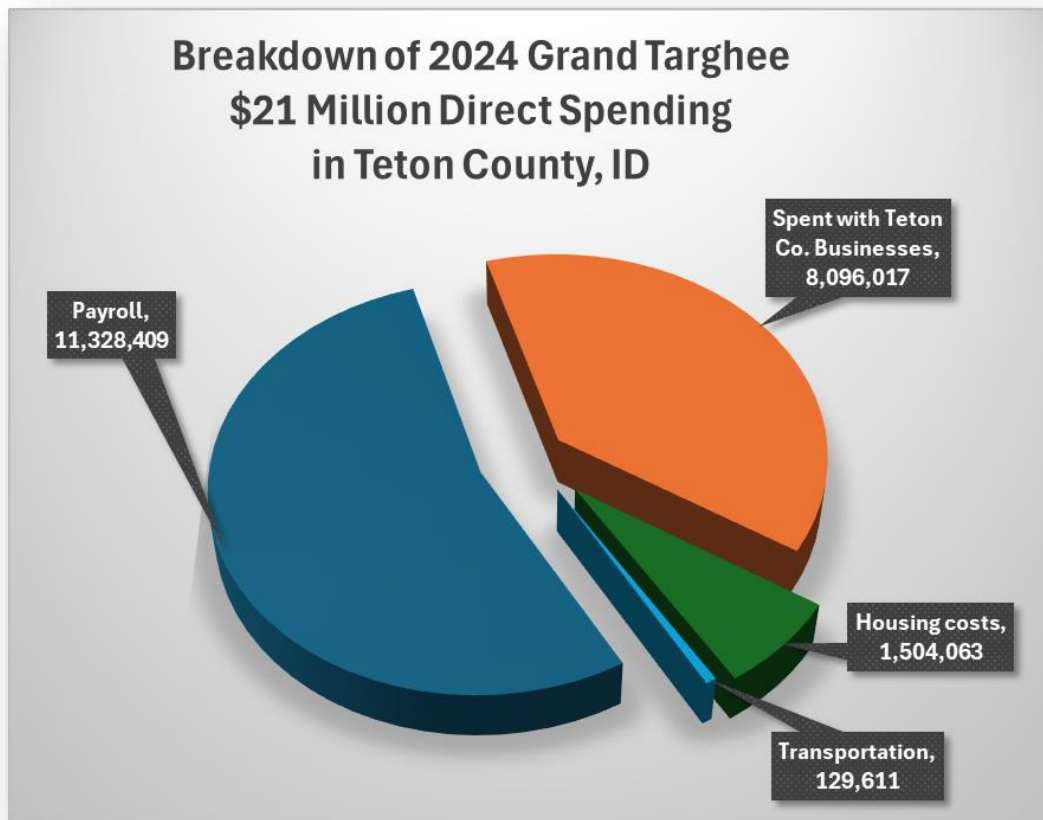
There are very real economic positives that come from visitor spending associated with GTR. Looking at the short-term impacts on local government finances without acknowledging the broad and widely acknowledged positives of increases in visitors and visitor spending is to present a very narrow and biased economic picture of the GTR mountain improvements project issue.

IMPACTS OF DIRECT GTR SPENDING IN TETON COUNTY, IDAHO

In 2024, GTR reported spending \$21 million directly in Teton County Idaho.¹² This substantial injection of money into the local TCI economy occurs every year, with some variation. The GTR spending in TCI is divided roughly as 54% payroll, 38% purchases from local businesses, 7% for provision of employee housing, and 1% for transportation.

Just as the direct spending by visitors on the local economy becomes multiplied to include indirect and induced spending effects, the spending by GTR in TCI also results in greater, multiplied local economic impacts.

¹² Personal Communication, Brad Grover, GTR.



IMPACTS OF GTR INVESTMENT IN TETON COUNTY, IDAHO

In addition to the annual direct spending in TCI by GTR associated with normal operations, GTR also has invested in the past, and plans future spending, for infrastructure in the county. These investments include \$8 million for employee housing in Driggs, \$86,000 for buses, and a planned \$6 million investment in the future 5th street apartment project. Additionally, GTR has pledged to contribute \$115,000 to Teton County roads, and \$130,000 to expand the Driggs transit center. Finally, GTR has \$38.8 million in existing contracts and commitments for work to be completed in the next few years. These funds will also be paid to businesses with operations in TCI.

CONCLUSIONS:

Grand Targhee Resort is situated in a unique geographical setting—located largely in one state (WY), with sole access through gateway communities located in another state (ID). While this setting somewhat confuses the distribution of taxing authorities, it does not change the fundamental underlying fact that the gateway

communities of Driggs and Victor Idaho have in the past, and will continue to derive significant economic benefits from the visitor and other spending driven by GTR.

The ECONorthwest report is carefully done as far as it goes. However, the report's extremely narrow focus on county fiscal impacts makes it wholly insufficient for evaluating the full scope of economic impacts associated with GTR—both costs, and more importantly, benefits as well. Where the ECONorthwest authors do hazard conclusions, they are generally couched in uncertainty or based on GTR growth scenarios that are at odds with the careful analysis presented in the recently released DEIS. I would not recommend relying solely on the ECONorthwest report as a tool for assessing whether the proposed GTR mountain improvements project would positively impact the TCI economy and government finances.

A full analysis of the impacts of GTR operations and the currently considered mountain improvements project should include all spending supported by GTR in the local economies (visitors spending as well as by GTR itself) along with the indirect and induced economic activity created by this initial spending. This GTR-driven spending supports jobs, income, and business sales in the gateway communities. These local economic impacts filter through the TCI economy supporting additional local-area taxes (resort, as well as lodging) that help fund local economic services. Without significantly expanding the GTR analysis beyond that presented in the ECONorthwest report—an expansion that would include a historical perspective as well as all direct and indirect economic drivers--the very real benefits of GTR to local economic activity remains unaccounted for.

AUTHOR

Chris Neher is a natural resource economist living in Stevensville, Montana. For the past 36 years he has worked for a private consulting firm in Missoula, MT and through the University of Montana on a broad range of natural resource economic issues. He also guided the Middle Fork of the Salmon from 1979-1989. Questions on this report can be sent to Neher@montana.com.

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EDUCATION

University of Montana	M.A. Economics	1989
University of Idaho	B.S. Business Management	1979

PROFESSIONAL EXPERIENCE

2015 to present	Independent economics consultant	
1989-present	Senior Economist, Bioeconomics, Inc., Missoula, MT.	
2007-2020	Research Specialist University of Montana, Department of Mathematical Sciences, Missoula, MT.	
1989-1990, 1996	Instructor, Department of Economics, University of Montana.	

PERSONAL

Born in Nampa, Idaho. Primary and secondary education in Nampa public schools. Married, with two adult children. Whitewater guide in Idaho, Oregon and Alaska (1977-1988).

Mr. Neher is an independent natural resource economics consultant. He also works as Senior Economist with Bioeconomics, Inc. in Missoula, MT, where he has worked for 35 years. His experience includes an appointment as Research Specialist in the Department of Mathematical Sciences at the University of Montana. His areas of specialization are environmental and natural resource economics and policy.

In addition to his economics background, Neher has wide experience with database management, complex statistical analysis and computer modeling and simulation. Neher is also very experienced at implementing complex and large-scale survey projects. Neher has been provided economic analysis support for a number of the large-scale EIS Projects, including EIS contracts on winter use management in Yellowstone NP, bison management plan for Yellowstone NP, reintroduction of wolves to Yellowstone and central Idaho, reintroduction of grizzlies to the Bitterroot Ecosystem, and the long-term environmental plan for management of Glen Canyon Dam.

Neher has an extensive resume of reports and peer-reviewed publications, including articles in Water Resources Research, Environmental Management, Lake and Reservoir Management, International Journal of Wildland Fire, Marine Resource Economics, Arctic Review of Law and Policy, and Western Economic Forum. Neher served on an advisory board for the State of Idaho and offered testimony on setting appropriate grazing fees within the state. Recently, Neher consulted with Irrigation and Power Districts in Nebraska on determining the fair

market value of residential lake lot leases within the district. Neher has also consulted for the Idaho Outfitters and Guides Association on river management.

Neher lives with his family on a farm in the Bitterroot Valley of Montana, where they raise hay and horses.

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