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Teton County Commissioners

150 Courthouse Drive
Driggs Idaho 83422

June 9, 2025

Kim Pierson, Forest Supervisor
c/o Jay Pence, Teton Basic District Ranger
1405 Hollipark Drive
Idaho Falls, ID 83401

RE: GTR Master Development Plan Projects

Dear Ms. Pierson,

Teton County, Idaho, a formal cooperating agency, has taken the following position regarding the Draft Environmental Impact Statement (DEIS) of the proposed Grand Targhee Resort (GTR) Master Development Plan Projects (MDP).

GTR is part of the valued present-day unique character of Teton Valley and has served an important role in the community's economic development and healthy quality of life. Expanded capacity and facilities to sustain the resort's viability is desirable - to the degree that it supports the community's objectives and delivers a positive net impact in Teton County, Idaho.

In addition to reviewing and considering analyses contained in the DEIS, Teton County, Idaho made the following findings:

1. Teton County is currently facing extreme pressures from both a steadily growing population (+11.2% since 2020, US Census) and increasing visitors. The proposed Alternative 2 projects 80,000 more skier days per year over the no action alternative, an increase that Teton County does not have the resources to accommodate. Idaho tax structure severely limits our ability to increase our budgets, and thus, the type of growth proposed will add additional stress to our already over encumbered basic services like road maintenance, law enforcement and emergency services. We are also prohibited by state statute from significantly regulating or taxing short-term rentals or other lodging providers. Targhee is certainly not the only driver of our growth issues, but it is a major one.
2. Although GTR is located in Wyoming it is only accessible through Teton County, Idaho. This results in a situation where the direct benefits of property and sales tax go to Wyoming, and the burden of providing housing for GTR employees, their guests and the associated impacts are borne by Teton County, Idaho. Teton County, Idaho also provides the nearest hospital, Emergency Medical Services, emergency management planning and coordination, and solid waste services to GTR visitors. Lastly, the wear and tear on our roads is 100% non-reimbursed. **Absent some form of revenue sharing this is not a tenable**



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situation.

3. The BoCC recognizes the fundamental role of GTR to both our economy and our community. Many of our residents ski there regularly and recreate in the summer as well. Many work there, or in businesses that rely on Targhee visitors for a part of their revenue. Many would not be here if Targhee were not an available resource. We have a vested interest in the continued success of GTR; however, communities such as ours, that are heavily dependent on tourism, real estate and related construction are especially prone to the boom/bust cycles such as the 2008 bust. Currently we're in a boom phase, but that won't last forever. Speculative growth such as proposed in the MDP puts our economy in some peril, and this concern is not addressed at all in the DEIS. We find the DEIS deficient in this regard.
4. The DEIS fails to adequately address the cumulative impacts of this proposal coupled with the 450 housing units and 150,000 sf of commercial space proposed for the privately held lands at the base area. No attempt is made within the DEIS to quantify the additional employees needed to build and staff the additional lodging and resort operations, or how that may place additional burdens on Teton County, Idaho.
5. The DEIS is deficient in its treatment of erosion and groundwater quality and quantity issues. While mentioned, there is little in the way of quantitative analysis. The City of Driggs, in particular, relies on water from Teton Canyon as its primary municipal supply source, and this is immediately downhill from GTR.
6. Expansion into the South Bowl and Mono Trees areas will result in a severe impact to wildlife. The South Bowl is important Big Horn Sheep habitat. The National Park Service, Wyoming Game and Fish, and the Teton Sheep Working Group have spent years convincing backcountry skiers to avoid sensitive Bighorn habitat, yet the proposal considers developed recreation and avalanche mitigation activities within and adjacent to such habitat. The Mono Trees see frequent bear activity and other key indicator species.
7. Whitebark Pine is an endangered species. The proposed plan cites the need to cut 450 of these critical trees. Cutting of Whitebark should only be a last resort measure.
8. The Mono trees are a beautiful open forest of old growth fir and spruce. Cutting trails through this zone will result in the loss of many of these trees, and will degrade the scenic view of this area from Teton Valley.
9. Teton Canyon has long been a source of quiet recreation for our residents and visitors. Literally hundreds of people hike Table Mountain and the surrounding area daily in the summer. South Bowl expansion will both visually and sonically impact this area. Extensive avalanche control using explosives will be necessary to safely ski this area, and will be the most egregious of the impacts.
10. Most skiers recognize the need for in-bounds on-mountain improvements, especially on the Peaked Mountain side of the resort. The Sacagawea restaurant seems appropriate for this reason. The restaurant



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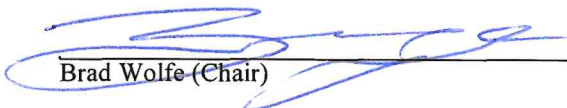
on top of Fred's Mountain is more problematic, as it sits on the edge of the Jedediah Smith Wilderness (JSW) and in view of Grand Teton National Park (GTNP). This restaurant should be much smaller than proposed and sited to be out of the GTNP and JSW viewsheds. This will also help reduce noise impacts in the JSW. Jackson Hole Mountain Resort is similarly situated on the border of GTNP, and has only a small waffle shack, below the ridgeline at the summit.

May 8, 2025, the Teton County Board of County Commissioners hosted a Town Hall to gather public sentiment regarding the DEIS. Over 100 members of the community attended, online and in-person, to make comments in line with the findings outlined in this letter, as well as other concerns. Although there were opinions and feelings expressed from many positions, it appears that based on the DEIS analyses, the overwhelming majority would support a Modified Alternate 3, no SUP expansion with the removal of the restaurant from the top of Fred's Mountain given that it would allow a moderate amount of capacity expansion, with correspondingly less severe impacts on Idaho public service levels than the proposed action, while also protecting valuable natural resources important to the community's wellbeing.

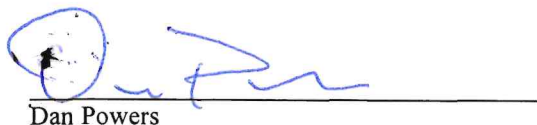
Given the strong opinions of many individuals, including the Commissioners themselves, Teton County Idaho recommends support of Alternate 3, no SUP expansion, and reserves the right for further discussion and comments concerning the restaurant on top of Fred's Mountain while pursuing forms of mitigation of the financial impact of the entire project to Teton County Idaho.

Sincerely,

Teton County Board of County Commissioners


Brad Wolfe (Chair)

Ron James


Dan Powers

