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Comments: Date: Jun 20, 2025

To: Kim Pierson

Forest Supervisor

Caribou-Targhee Forest

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Idaho Falls, ID 83401

From: Arthur Melville

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Subject: Grand Targhee Resort DEIS Comments

Dear Forest Supervisor Pierson,

Thank you for the opportunity to comment on the proposed Master Development Plan DEIS for Grand Targhee Resort (GTR).

Targhee is an asset to our community, and I enjoy skiing and mtn biking there. Like a lot of others, I moved here (in 1980) for the great skiing: backcountry, cross-country, and alpine skiing at Targhee. I worked at Targhee for 8 years as a concessionaire plus 8 more as an employee. It was good work and helped me make a living and to be able to stay here, and I want Targhee to continue to be successful. However, being successful does not mean Targhee needs to become another Big Ski Resort, which if it did, would have significant negative impacts on wildlife, our public land, our infrastructure, our services, and our communities.

As an Alta Wyoming resident, I strongly support Teton County Wyoming's well-researched Cooperating Agency letter, detailing the County's concerns, recognition of benefits, conclusions, and recommendations regarding the GTR DEIS. I'm impressed with the quality of work they've done. It's well-analyzed and documented, and it's my sense that it accurately represents the beliefs/concerns/interests of most Teton County Wyoming citizens.

In addition to my support for my County's letter, I want to highlight several parts of it and add some additional important details.

Ricks Basin and North Boundary Lift

I strongly oppose the proposed building of a road, guest facilities and a chairlift in Ricks Basin.

On page 19 of the DEIS, the 2011 Ski Area Recreational Opportunity Enhancement Act, (SAROE) states:

"Importantly, each activity and facility authorized by the Secretary shall:"

**"Harmonize with the natural environment of the NFS lands on which the activity or facility is located;" and

**"Be located within the developed portions of the ski area;"

The proposed road, guest facilities and chairlift for Ricks Basin would NOT be located within the developed portions of the ski area, nor would they "harmonize with the natural environment". The proposed lift and other developments that GTR is proposing in Ricks Basin are not allowed by the 2011 SAROE.

The proposed North Boundary Lift would ruin a pristine Nordic and multi-use area, Ricks Basin. It would require building a new road, the glading of a healthy aspen grove, and placing the base of a ski lift in a mostly undisturbed natural environment. One of the many pleasures of Nordic skiing in Rick's Basin is the solitude, the un-marred, quiet and peaceful place it is, just slightly away from the busy base area.

Please ensure that the direction in the 2011 SAROE is followed, and do not approve any changes to the current natural environment in Ricks Basin.

Squirrel Meadows Land Exchange

When the private property at the base of Targhee was created by the Forest Service during the Squirrel Meadows land exchange, part of the rationale for doing so was so that the existing lodging, restaurants, bar and shops on Forest Service land become deeded properties on private land, and that future lodging, restaurants and other development would be on private land, and managed by Teton County Wyoming.

Jay Pence, Teton Basin District Ranger said "Jerry Reese, the forest supervisor at the time, wanted to concentrate development in the base area, he thought it was better to have the county oversee those uses through their land-use rules".

I agree with former Caribou-Targhee Supervisor Jerry Reese that the County is better suited to oversee the development through its Land Development Regulations (LDRs) than the Forest Service is, and I agree with Teton County Wyoming that all proposed on-mountain restaurants be limited to the base area on private land, and not on public land.

It would be against the public's interest to reverse that historic policy of limiting development to private land, and make a 180-degree turn on the impactful decision the FS made to privatize the public land at the base of GTR.

On Mountain Restaurants

Teton County Wyoming believes 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." [page 14]

The TCWY CA letter also says "The private lands at the base area are more suitable than public lands at higher elevation for new visitor services requested by the Resort on the CTNF. These development proposals on private lands will have proper and timely review and permitting by Teton County." [page 14]

The Forest Service has well-established procedures for inspecting chair lifts and other lifts and is well-qualified to keep those facilities safe for public use. However, overseeing construction of public buildings to ensure public safety, is not in their normal purview. Restaurants on a mountain are very different from ski lifts - they have water, sewer, plumbing, electrical, public restrooms, kitchens, lighting and other impacts and concerns.

Teton County has well-established procedures for approval of new buildings and other development including an established system for all the inspections that need to take place during construction, which ensures that buildings are built to code - grading and erosion control, engineering, mechanical, plumbing, electrical, waste management, lighting, and others must all pass inspection before a Certificate of Occupancy is granted.

The County is in the business of ensuring that buildings are built correctly, follow County code, and are safe for the public to use, the Forest Service is not.

Allowing the proposed restaurants to be built on FS land would be a loophole which could allow the developer to avoid some of the conditions and inspections that would take place if the restaurants were built on Targhee's

private property at the base area.

Dark Skies

Teton County Wyoming became the first County in the World to achieve a 'Dark Sky' designation in April.

https://www.jhnewsandguide.com/valley/feature/teton-countys-dark-skies-are-astronomical-success/article_4b70d21c-e919-4c2f-a965-cbcfa5f22333.html

The County has worked hard and spent considerable time and money over a number of years to reach compliance with Dark Sky standards, in order to receive that designation.

Of course, Teton County's LDR's are not enforceable on FS land, so Targhee would be on the "honor system" for making their lighting on the public lands compliant with County Dark Sky standards. The County takes that Dark Skies honor seriously and they do not want Targhee, which is in Teton County, to potentially tarnish that designation.

Expansion of the Special Use Boundary (SUP)

There is no need to expand the SUP. The runs and lifts are rarely crowded, and other than waiting for the lifts to open on a powder day, even a 5-10 minute wait for a lift is rare. Grand Targhee claims 2,600 skiable acres, more than Jackson Hole Mountain Resort's 2,500 acres, but Targhee has far fewer skiers. Targhee does NOT need more skiable terrain. There is no good reason to approve any expansion of the SUP.

Thank you for your consideration,

Arthur Melville

Alta, Wyoming