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Comments: Kim Pierson

Forest Supervisor

Caribou-Targhee National Forest

1405 Hollipark Drive

Idaho Falls, ID 83401

Re: Grand Targhee Resort draft Environmental Impact Statement

Dear Supervisor Pierson,

Thank you for the opportunity to comment on the proposed expansion of Targhee Ski Resort. I am in favor of the expansion of the resort into the Mono Trees area, but not the expansion into Teton Canyon proper (South Bowl). Also, I am in favor of permitting the continued development within the existing permit boundary as identified in the Master Plan with the exception of the Fred's Restaurant. While there will need to be some amendments to the Forest Plan to accommodate the expansion, these modifications are necessary to bring the Plan into sync with the changes that have occurred with the recreating public since the Plan was enacted in 1997.

While opponents of the expansion state that the existing permit boundary and the proposed additions within the Master Plan will meet their expectations of future users needs, the development within the Teton Valley will necessitate significant recreational development increases to keep up with the existing approved subdivisions, let alone any future proposed subdivisions. While there are numerous comments concerning the additional growth that will occur with any expansion of Targhee Resort, there is very little comment on how little the Towns of Driggs and Victor and Teton County, Idaho have done to accommodate the increased development that has been seen over the past several years. While the increased development of the ski area will be growth inducing, the horrible lack planning by all these government agencies has resulted in the lack of infrastructure, services, and public sentiment that prevails with many residents. There is lots of talk about how Teton County, Idaho does not want to resemble Teton County, Wyoming but that is exactly what is happening...minus the tax base. The ski area and other private recreational and business opportunities is what this county needs to dig itself out of the predicament that it finds itself in.

The main reason why an expansion of limited degree is warranted pertains to the dynamics that is occurring in Teton Valley, Idaho. There are approximately 16,000 undeveloped lots in already approved subdivisions throughout the county. In addition, there are additional projects that are requesting approval yearly. While there are citizens that harbor a dislike for the changes that are occurring, there is very little that is being done to curtail new development. One aspect of the economic engine of the county is that it thrives off the construction world. That increase in development is going to require that owners have a place to recreate in the future. Targhee Resort's request for the expansion of its facilities is in anticipation of this future need.

The cross-state boundary issues are not unique to Teton County, Wyoming and Teton County, Idaho. There are other locations that have faced similar cross boundary developments and through agreements between local, county, state governments and the Forest Service the development of Memorandums of Agreement/Understanding, Development Agreements, and Cooperative Agreements have provided a means to overcome the jurisdictional challenges. While not to be underestimated, the challenges of adequately dealing with the impacts of development of a recreational facility that accesses through a community in another county and in another state can be confronted and worked through.

While the expansion development of the ski area will have an impact on wildlife habitat, the significant use that the east Teton Valley, Idaho front area already receives has chipped away at the any pristine characteristics that once existed. The challenges that are faced by wildlife are well documented but so are the vegetation changes that occur when a ski run is constructed and the attraction that occurs when various wildlife species become attracted to the forage.

In addition to the future local population increases, there has been a significant increase in the number of out of area visitation. A walk through the ski area parking lot or a ride on a lift with other skiers reveals visitors from all over the country and even some from other countries. Many acknowledge that what has brought them to the area is a visit to Jackson Hole Ski Area, but when their experience was not up to their expectations, too costly, or they just wanted to try a different area, they were excited to have an alternative to try. The comments generally are that their experience was greatly enhanced with a day of skiing at Targhee verses Jackson.

The other aspect that has brought new skiers to the area has been the development of the multi-mountain ski passes and based upon the expansion of these programs; there appears to be an increase in visitation at quality resorts. There is a claim that the ski industry is flat as far as skier visits is concerned, but the numbers at resorts with good reliable yearly snow has not indicated such a downturn.

There has been a comparison made between Jackson Hole Ski Area and Grand Targhee as to permitted acreage and total yearly skier numbers. This is presented to show that though Targhee has fewer guests, it has about the same acreage allocated. The mistake in the way the permitted acreage is presented indicates what is allocated in the special use permit. Unfortunately, the comparison is inaccurate as Jackson's acreage is correct for downhill terrain, but Targhee's acreage includes several hundred acres that are part of the cross country ski terrain and are not, nor will ever be part of the downhill skier/snowboarder accessed terrain.

While the infrastructure will need to be increased and improved upon, the challenges are not unique to Teton Valley and are being seen in numerous locations around the country. This is especially the case in recreation communities where population increases occurred during the pandemic era and more recently as the number of retired individuals increases. All of Teton County is being challenged by the rapid increase that has occurred. At the same time, the town of Driggs has proclaimed itself a destination resort town which is in line with what the ski area is witnessing and proclaiming as well. With Teton County, Wyoming having controlled additional development and with the exorbitant prices for raw land and homes, the desire to live in many of the outskirts of Jackson will continue to occur...and Teton County, Idaho is just one of those impacted locations.

The on-mountain facilities are lacking currently for the existing skier numbers. Limited restroom facilities are present, under development of parking, and there are no on-mountain restaurant facilities. The base lodge is grossly undersized for the current skier numbers and the proposed on-mountain facilities will go a long way in adequately addressing these issues and provide greater visitor satisfaction. The proposed on-mountain lodges that are being proposed are situated in optimum locations to serve the users, just should not be located in undesirable locations (ridgeline for example). There are mitigation methods that have been implemented in other situations that would reduce the visibility of the structures from the valley in the way of building materials and vegetative screening.

The argument that the on-mountain facilities may be visible from the wilderness is true. Many manmade structures are visible from wilderness areas all over the country. If wilderness areas were to be created where there would be no manmade structure, airplane route or development in sight, it would be difficult to establish many wilderness areas or the areas would be limited in size. And there is no validity to the concept that there are buffer areas to be established around wilderness areas to prevent a user from seeing something manmade. A perfect example of this is the wilderness boundary immediately adjacent to the eastern Targhee Ski Area boundary.

The Mono Trees area is a nice, forested area with characteristics that are forthcoming to attract and keep wildlife, but so is the surrounding several hundred thousand acres of forested lands. The development of several ski runs cut in the treed area will be viewed by many as additional ski runs when viewed with the numerous other cuts in the trees that currently exist on the hillside. Viewed in the winter the runs will look like treeless areas like avalanche paths, but in the summertime the trails will become obscure as the hillside will blend in with the surrounding green when viewed from a distance. Feathering the margins of the runs will also give the viewer a less harsh view when seen during the winter. Also, from a user prospective, the Mono Trees area, due to its lower elevation, provides skiable terrain when the peaks are shrouded in the clouds, thus enhancing the experience.

The Teton Canyon portion of the proposal causes numerous concerns. The south facing aspect is not favored due to sun exposure. There are also several cliffs in the area that will cause potential problems for unexpected/inexperienced users. The additional avalanche exposure adds a challenge and with the exposure, sun induced slide activity could be an issue. At present this area has become an escape from the in-boundary area for backcountry users to access the bottom of Teton Canyon. If in fact there is some sort of unwritten policy that the area is not supposed to be accessed at times during the winter months, that policy is grossly disregarded. The area is accessed throughout the winter when adequate snow exists and has become a private area for those that are aware that it exists. It is no surprise that there are some users that are against any expansion into the South Bowl as it has become their own private ski area. If there is really a concern about wildlife use of this area, the Forest Service needs to educate and enforce the exclusion. It is a little hypocritical to be so concerned about the ski area expansion into this area because of wildlife concerns and then knowingly allow people to ski the area. A series of closure gates with wildlife concerns would educate and will decrease the number of violators that are attracted to the area. Gate could be opened when there is no longer an issue.

As stated in the Forest Service Manual, one of the reasons for management decisions is to assist local communities and provide for economic stability. The multiple use doctrine of the agency lends itself to make decisions that are of the regional/national good and not bias by local public opinion. The decision is not public opinion decision, but rather a decision based upon a bigger need for the region. Targhee has demonstrated that the ski area is weathering any changes in climate, has a product that is attractive to winter and summer users, and provides a boost to the local economy.

The additional water use that is being proposed will pull groundwater out of the underground system, but the recharge that occurs will postpone the runoff. While a percentage of the water is lost to evaporation (I have seen figures from 35 to 45 percent lost to evaporation at the ski areas elevation), a larger amount is held on the ground and melts later. This postpones the runoff curve and results in a latter discharge period. While not significant, and while there is a loss in the groundwater table, there is also a slight delay in the runoff bell curve.

If the Forest Service wishes to develop a mitigation measure that could coincide with the approval of the ski area beyond its existing permitted boundary, there are numerous ski areas and other permitted recreational facilities that are developing Whitebark Pine nurseries. Contractors or employees are collecting seeds, having them germinated at nurseries, and then planting the seedlings within their permitted boundary. This has been successful at numerous high-elevation ski areas in the west and should be a measure that is implemented at Targhee.

Lastly, the bus system that has been implemented at Targhee is a good try, but very underutilized as it is inconvenient. The first suggestion would be to have the Jackson START system take over the program and run it like what is being done in that county. Two buses with thirty minute gaps does not entice a tremendous incentive to use the system. Compared to numerous other ski area roads, the highway is not the detractor that many claim it to be. The problem occurs when there is a backup with vehicles either waiting to be parked or with the parking lots filling up. At that point the road becomes a backlog of vehicles. With the inadequate parking, the bus system should be the most effective solution to move guests, but as currently arranged, it gets little use.

There are incentives that the ski area can provide if the Forest Service would get aggressive about finding alternatives to the present situation. And there are numerous examples that can be used to highlight the effectiveness of a good mass transit program.

Thank you again for the opportunity to comment on the Grand Targhee Resort draft Environmental Impact Statement. I look forward to your decision and while not an easy decision, an important one for the future of the valley and the region.

Regards,

Thom Heller