

# PROPOSED EXPANSION AT GRAND TARGHEE RESORT

A COMMUNITY ASSESSMENT















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### A COMMUNITY ASSESSMENT WHAT IS IT?

This community assessment outlines the potential impacts of the proposed Grand Targhee Resort expansion and other Master Development Plan projects. This assessment predates the release of Caribou Targhee National Forest's Draft Environmental Impact Statement and was created by the Jackson Hole Conservation Alliance (JHCA), Winter Wildlands Alliance (WWA), Valley Advocates for Responsible Development (VARD), Teton Backcountry Alliance (TBCA), and contributing topic experts to provide community members with a review of the proposed project and to ultimately aid individuals and organizations in writing effective comment letters throughout the National Environmental Policy Act (NEPA) review process.

Initial review of the project and proposed expansion reveals a number of significant issues and potential impacts, for example: development next to the Jedediah Smith Wilderness and the degradation of the wilderness experience; deterioration of the Teton Canyon and Mill Creek areas; degradation of regional scenic values; threats to public safety, including wildfires and avalanches; and damage to biological resources, including critical wildlife habitat.

JHCA, WWA, VARD, and TBCA engaged local and regional experts to research and produce the following impact assessment. This document is intended to help you, citizens of the Teton Region, understand the implications of the proposal and how they are likely to affect our communities, lifeways, and core values. Should you have comments on the contents of this report, please write <a href="mailto:info@grandtargheeca.org">info@grandtargheeca.org</a>. We welcome your feedback.



#### **BACKGROUND**

1966	Grand Targhee, Inc. formed by East Idahoans					
1969	Grand Targhee Resort opens with two lifts, Targhee Lodge, and Day Lodge					
1973	Grand Targhee Resort purchased by Bill Robinson, a plastics manufacturer from Cincinnati					
1987	Grand Targhee Resort purchased and operated by Mory and Carol Bergmeyer					
1990	Rendezvous Day Lodge destroyed by fire					
1995	Caribou-Targhee National Forest approves Grand Targhee Resort's 1994 Master Development Plan					
1997	Booth Creek Ski Holdings, Inc., a corporation run by CEO George Gillet, Jr., purchases Grand Targhee Resort and Caribou-Targhee National Forest Issues a revised 40-Year Special Use Permit to Grand Targhee Resort					
	Dreamcatcher, a high-speed detachable quad chair, replaces Bannock and a fixed-grip quad replaces the Shoshone double chair					
2000	Grand Targhee Resort purchased by George and Rose Gillet and sons					
2001	Sacagawea lift installed					
2004	Squirrel Meadows land swap completed and 120 acres of public land become private land at the base area					
2016	Blackfoot double chair is replaced by highspeed quad					
2019	Caribou-Targhee National Forest accepts Grand Targhee Resort's 2018 Master Development Plan (MDP), which includes plans for a significant terrain expansion  Teton County, WY approves <u>Grand Targhee Resort First Amended Master Plan</u> Planed Unit Development for					
	Planned Resort (PUD-PR)					



**2020** for

Caribou-Targhee National Forest publishes the Notice of Intent to prepare an Environmental Impact Statement for implementing the 2018 MDP projects and terrain expansion

45-day formal scoping period begins August 26, 2020

2022 Spring Grand Targhee begins construction on a new "6 pack" lift up Peaked Mountain - a development that was approved as a quad lift in the 1994 MDP

**2022**Summer

Anticipated released of draft Environmental Impact Statement for proposed 2018 MDP projects

#### Native American Ancestral Lands

Niki Richards Executive Director Valley Advocates for Responsible Development An important part of Federal agency decision making includes meaningful coordination with Tribal Nations. The National Environmental Policy Act (NEPA)

requires a project's proposed actions, and varying alternatives, to be analyzed with consideration of potential impacts on Tribal lands, Tribal resources and/or cultural heritage. Federal agencies are governed by policy documents that outline agency-specific provisions for coordination with Tribal Nations. Executive order #13175, "Consultation and Coordination With Indian Tribal Governments" holds at its core the goal of strengthening relations between the United States Government and Tribal Nations - and all of the requirements, when applied throughout the process, can do just that.

Targhee National Forest is named in honor of a Bannock Indian warrior. The proposed action is located within ancestral lands of the Shoshone-Bannock Tribes who hold treaty rights to uses of the forest. With respect to these ancestral lands and the rights of the Shoshone-Bannock Tribes, the Forest Service is required to consult and coordinate with the Tribes throughout the NEPA process.



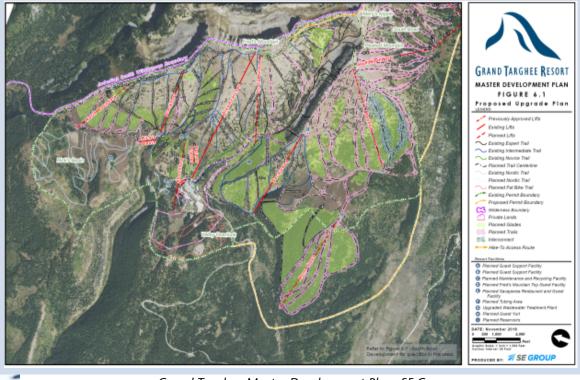
#### PROJECT SUMMARY

Chelsea Carson Conservation Program Director, Jackson Hole Conservation Alliance Grand Targhee Resort has proposed a major expansion onto National Forest lands and significant development within the existing resort footprint.

The Caribou-Targhee National Forest (CTNF) is evaluating the proposal through an Environmental Impact Statement (EIS).

Located on the west slope of the Teton Range, Grand Targhee Resort is approximately 45 miles northwest of Jackson, WY, and accessed via Driggs, ID and Alta, WY. Grand Targhee is in the jurisdiction of Teton County, WY and the Teton Basin Ranger District of the CTNF. Of the ski area's 2,414 acres, 2,294 acres are located within the CTNF and 120 acres at the base area are privately owned, as a result of a land exchange in 2004. Grand Targhee submitted master development plans (MDPs) beginning in 1991 through 2018 per its special-use permit with the Forest Service.

The Proposed Action would expand the ski area's current boundaries into two areas known as "Mono Trees" (Mill Creek) and "South Bowl"



Grand Targhee Master Development Plan. SE Group.



(Teton Canyon). The boundary expansion would nearly touch the Jedediah Smith Wilderness, and includes areas that are identified as critical habitat for Teton bighorn sheep, as well as for grizzly bears, which are federally listed as threatened under the Endangered Species Act. The area is also designated as suitable habitat for the federally listed Canada lynx and provides habitat for wolverines, a species under consideration for federal listing. The proposal includes building additional lifts; enhancing terrain and "improving" roads; developing on-mountain restaurants and amenities such as warming huts, yurts, and restrooms; and significantly increasing lodging and base services. According to Grand Targhee Resort, the current Comfortable Carrying Capacity (CCC) is approximately 3,000 guests per day. The proposed expansion would more than double its capacity to approximately 6,200 guests per day.

After the scoping period and before the DEIS, changes were made to the Proposed Action. The changes were made due to "internal and external feedback provided during the scoping period, fieldwork and analysis completed during the summer of 2021, and operational details that were uncovered during a holistic review of the entire proposal." Key changes to the proposal include reducing the South Bowl expansion from three lifts to one and reducing the proposed expansion area from 600 acres to 266. With these changes, Grand Targhee is requesting approximately 900 additional acres of National Forest Land within their Special Use Permit boundary. Changes also include a new gondola/chairlift on Dreamcatcher to accommodate non-skiers wanting to dine in the proposed restaurant on top of Fred's Mountain.

A range of alternative actions will be analyzed in the forthcoming Draft Environmental Impact Statement (DEIS):

- **1.** A no action alternative
- 2. A modified proposed action, as described in the Scoping Notice, including projects within the existing Special Use Permit (SUP) area and proposed expansion in "Mono Trees" and "South Bowl"
- **3.** Proposed actions within the existing boundary only
- **4.** Proposed actions within the existing boundary and an expansion in "South Bowl"
- **5.** Proposed actions within the existing boundary and an expansion in "Mono Trees"



# COMMUNITY PERSPECTIVES ON POTENTIAL IMPACTS

#### **Natural Resources**

#### Wildlife

Mike Whitfield Conservation Biologist, Teton County ID When considering the wildlife impact of a project on the scale of Grand Targhee Resort's massive expansion in terrain and services, an understanding of the context is vital. Wildlife species generally need features such as suitable seasonal habitats, freedom to move about

between those habitats, and areas where they can find security from human disturbance. The historical and geographic context for wildlife disturbance in Teton Canyon and Mill Creek includes the original construction of the resort access road through critical mule deer winter range in lower Teton Canyon and the subsequent upslope expansion of the resort itself later in the 1960's. Additionally, there is increased wildlife disturbance due to the more recent dramatic expansion of recreational use at the bottom of Teton Canyon and the Mill Creek trail in all seasons, as well as growing backcountry activity throughout the area. Grand Targhee Resort is now proposing expanding into what is left: a band of highly used wildlife habitat at mid-elevation on the north slope of Teton Canyon (South Bowl) and deeper into Mill Creek. Our ongoing activities have pushed a remarkable array of wildlife into a narrow area of premium importance to their persistence—and Grand Targhee is threatening to develop what habitat remains.

South Bowl has long been recognized as vital winter range for many native ungulates, including bighorn sheep, moose, mule deer, mountain goat, and elk. Predatory species found on Teton Canyon's north slope include cougar, wolverine, black and grizzly bear, coyote, and potentially wolves and lynx. South Bowl also supports birthing and summer range for ungulates, as well as migratory pathways to lower elevation habitats and mineral licks. Of particular concern are impacts to the sensitive Teton Range bighorn sheep population,



a population at risk of local extinction. Resort expansion into 'South Bowl' will ultimately lead to high levels of human activity in all seasons, to the detriment of early and late winter, spring, and summer uses by bighorns. The sheep will also likely be cut off from access to an important mineral lick below the project area in the Apostle cliffs area. Ironically, in recognition of Teton Canyon's winter habitat value and potential, the Caribou-Targhee National Forest earlier entered into agreement with Wyoming Department of Game and Fish to complete vegetation treatments, specifically prescribed burning, in the lower South Bowl. We encourage the Forest Service to optimize the value of South Bowl for bighorn sheep in consideration of this population's severe habitat limitations.

The more heavily forested area in the Mono Trees portion of upper Mill Creek is security habitat for deer, elk, and moose, including winter range for moose and nesting habitat for sensitive bird species, such as goshawks, great gray owls, and boreal owls. Conservation of old growth forests such as those found in the Mono Trees area is a priority for the Forest Service, and compromising these habitats would conflict with the Caribou-Targhee Forest Plan because of their importance for many sensitive wildlife species. Overall, Grand Targhee's proposed expansion would increase year-round, industrial scale recreation into the Mill Creek area, which would severely impact one of the few remaining wildlife security habitats that remain in this area.



Big horn sheep, photograph courtesy of Josh Metten.



#### Wilderness

Carlie Ideker
Bridger-Teton Organizer,
Wyoming Wilderness
Association

Threats to Wilderness often bring to mind physical incursions behind designated boundaries, but in reality, indirect, cumulative actions can be equally harmful to wilderness character. The proposed expansion of the Grand Targhee Master

Development Plan into the South Bowl of Teton Canyon represents the latter: a ripple effect of changing land use, displacement, and increased access that endanger the character of the Jedediah Smith Wilderness.

The South Bowl has functioned as sidecountry between the current Grand Targhee footprint and the Jedediah Smith for decades. In those years, its value to and use by the local recreation community has grown significantly. While the 1984 Wyoming Wilderness Act prohibits the deliberate creation of buffer zones around Wilderness areas, the South Bowl serves as an intermediary between developed and primitive recreation opportunities. In that context, the proposed expansion will impact established community land use patterns. Displaced backcountry enthusiasts will likely seek to replace lost opportunities and experiences within the adjacent Wilderness. In doing so, they will redirect a human presence deeper into federally protected wildlands.

The proposed expansion is projected to double the resort's daily carrying capacity to over 6,000 guests. The motorized infrastructure, roads, and trail networks needed to service that number of people will also ease access and direct guests towards the Wilderness. Because there are no natural barriers in South Bowl, like the cliff along the backside of the existing resort boundary, resort infrastructure could provide several thousand guests entrance into the Jedediah Smith Wilderness. If that happens, the most durable federal land designation will be reduced to commercial sidecountry, diminishing its purpose and degrading its character. This influx in recreation traffic will concentrate human presence where it was never intended and put new, undue pressure on the Jedediah Smith, as well as the Caribou-Targhee National Forest employees tasked with safeguarding it.

The character of the Jedediah Smith Wilderness area and integrity of the 1984 Wyoming Wilderness Act are preserved as long as Grand Targhee remains within its existing boundaries. Without a robust enforcement and monitoring strategy from the Caribou-Targhee National Forest to



mitigate impacts from the South Bowl expansion, our public wildlands will diminish. The economic growth of one private resort should not take priority over the right of the American people to experience and engage in these protected and resilient landscapes now and into the future.

#### Wildfire

Hilary Eisen
Policy Director
Winter Wildlands Alliance

Targhee within Grand is located the "wildland-urban interface" (WUI). the transition zone between undeveloped forest and lands developed by infrastructure. Human settlements in the WUI are at a greater risk of catastrophic wildfire,

and in this era of climate change there are more frequent wildfires across the West each year. The lands around Grand Targhee are characterized by forest types that have evolved with wildfire. It is not a question of whether the lands around Targhee will burn, but when and how. Ski Hill Road is the only access and egress point for people living and recreating in Alta, at Targhee, and in Teton Canyon in the event of a wildfire or other emergency. Increased use and new facilities in and around Grand Targhee will raise the likelihood of wildfire while making it more dangerous and difficult for emergency services to respond and people to evacuate.

#### Greater Environmental Impacts

Howie Garber Images

Grand Targhee's proposed expansion is part of a larger development package that will bring significant environmental impacts to our local area, including both the Teton County, Wyoming and Teton County, Idaho communities. Teton County, Wyoming has already approved **Planned** Unit

Development (PUD) on the 120 acres of private land at the base of the resort, allowing for more homes, resort lodging, and retail space to be built separate from the proposed expansion (MDP) being evaluated by the Forest Service through an Environmental Impact Statement. And, in 1994 the Forest Service approved a new ski lift on Peaked Mountain, which is currently being built. This new lift will increase capacity and skiable terrain within Targhee's existing boundaries.

Additional expansion at Targhee will only compound existing regional growth pressures and bring additional environmental impacts that will affect our communities, such as: the impacts of development on downstream water quality and stormwater runoff, groundwater supplies, wildlife-vehicle collisions, pollution and energy use, and industrial scale recreation on public lands. These are all compounded by climate change, even while the expansion itself contributes to this overarching problem. Already, Teton Valley is experiencing the environmental effects of rapid growth. For example, Driggs' city-operated sewage plant has been in violation of Environmental Protection Agency (EPA) standards for discharging ammonia well above allowed limits into a small creek which feeds the Teton River.



would permanently alter and impact scenic resources located in and around the resort, including Teton Valley's dark skies. Driggs has a Dark Skies ordinance, and many residents can see the Milky Way from their home. Lights from the proposed restaurant on Fred's Mountain, night

The proposed developments

West-side of the Tetons, photograph courtesy of Howie Garber

skiing, and snowmaking would be visible from Teton Valley. The proposed expansion would also impact daytime scenery. If the South Bowl Lift is approved, it would be visible from the four most popular trails on the west side of the Tetons. From the peaks of Grand Teton National Park and the Jedediah Smith Wilderness, one would see a ski lift, trails, and a restaurant. Most significantly for the Forest Service's environmental review process, the Proposed Action would require an amendment to the Caribou-Targhee Forest Plan. An amendment is required to change approximately 900 acres of forest land from a "Visual Quality Maintenance" management prescription intended to protect undeveloped scenery to a "Special Use Permit Recreation Site." In effect, the South Bowl and Mono Trees areas would no longer be restored, maintained, or enhanced to provide quality scenic settings. Instead, these places will be managed as part of Grand Targhee's Special Use Permit, without important protections for scenic quality.

<sup>3.</sup> City of Driggs, Idaho, Ordinance 333-12.

<sup>4.</sup> Public comment by the National Park Service on 2018 Master Development Plan during scoping period.



The proposed development would also bring noise impacts. First, there will be heavy equipment and helicopter noise for road and lift construction. Once development is complete, noise from avalanche control, lift services, and increased recreationalists in "South Bowl" would displace wildlife and ruin the tranquility for the many winter visitors to Teton Canyon. Right now it is possible to hike or ski or snowshoe in Teton Canyon without even knowing that a ski resort is close by.

South Bowl's south facing slopes and the low elevation Mono Trees may not be skiable in the near future because of climate change. Rather than acknowledge this reality, Grand Targhee is proposing a significant increase in snowmaking - a strain on our limited water supply that may affect agricultural, residential, government, and commercial water users in Teton Valley. Snowmaking is not an efficient use of water. Depending on temperature and wind, 7 to 35% of water used for snowmaking is lost to evaporation. Water use for new homes, hotels, and retail on the private land at Targhee's base area could have an even more profound effect on local water supplies. And, while manmade snow does eventually melt and enter the water supply, after a season of ski resort activities this water is far less clean than it was when it was pulled from the ground and made into snow. Furthermore, Targhee is seeking to vastly expand its septic system and install several new vault toilets as part of the proposed infrastructure developments and to serve visitors within the expansion area. Not only will new lodges, restaurants, and other development lead to substantially more water use, the disposal of waste and wastewater poses a potential threat to ground and surface water quality in the Teton basin.

It is also possible that sediment from road building and lift construction could affect water quality for the Driggs, ID and Alta, WY municipal water supply, which comes from springs in the Teton Creek drainage. As sedimentation affects the microbiology and oxygen content of streams, it could possibly diminish vital aquatic habitat for Yellowstone cutthroat trout, negatively affecting survival and reproduction downstream in Teton Creek and Teton River. These waterways are also essential drinking water sources for terrestrial wildlife. Runoff and sedimentation from construction and development activities can be mitigated with stringent design standards and careful supervision, but would require that the Forest Service and local governments be diligent in enforcing standards, which will require additional staff and money.



#### Socioeconomics & Infrastructure

Extensive research has been completed on socioeconomics, public services, and housing related to the proposed expansion at Grand Targhee Resort and to regional growth in general. We've included links to these local and regional studies to better help community members evaluate and understand the impacts.

#### Public Services

1. Effects of Proposed Grand Targhee Development on Public Services and Housing Markets in Teton County, ID - ECONorthwest, 2022

This study was co-funded by Teton County, Idaho, Teton County, Wyoming and the Alta, WY Solid Waste District to analyze likely local socio-economic impacts stemming from proposed development at Grand Targhee Resort. The report concludes that revenue from future development at Grand Targhee would not outweigh the cost of impacts on Teton County, ID's roads, traffic congestion, solid waste and recycling, emergency services, and affordable housing. The table below, created by ECONorthwest and included in the study results, identifies public service costs for each jurisdiction and revenue options available to support public service provision. Read the entire report at the link above for an in-depth analysis of socio-economic, public service, and housing impacts.

Consideration	Idaho			Wyoming	
	Teton Co., ID	Driggs	Victor	Alta	Teton Co., WY
Public Service Costs	Direct: Road maintenance and replacement; TC Fire & Rescue "subsidy" of resort calls; Solid Waste Transfer Station usage and improvements; staffing difficulties.	Direct: road maintenance; staffing difficulties, parking and traffic congestion improvements.	Likely similar to Driggs; may have additional congestion due to proximity to other Wyoming ski areas.	Direct public service cost impacts not identified.	Direct public service cost impacts not identified.
Revenues	No direct revenues from economic activity. Limited ability to generate revenues from property taxes.	Limited increase in revenues from property tax revenues. Direct revenue growth from growth in economic activity but the distribution of spending is unknown.	Limited increase in revenues from property taxes. Direct revenue growth from growth in economic activity but spending impacts from resort expansion are unknown.	Only has solid waste rate- setting authority.	Direct revenue growth from property value growth; direct revenue capture from increased economic activity.



- 2. Teton County, ID & WY Short Term Rental Report Shelby lablon, 2000
- 3. Teton Region Housing Needs Assessment, 2022

#### Housing

Development

Emily Sadow Program Associate & Office Manager Valley Advocates for Responsible The Department of Housing and Urban Development (HUD) considers households to be burdened if more than 30% of their income is spent on housing. This implies that housing can be

considered "affordable" when monthly housing costs (including utilities) are equal to no more than 30% of a household's gross income. According to the newly released Teton Region Housing Needs Assessment, the Average Median Income (AMI) of a 3-person household in Teton Valley, ID is \$68,800. The current rental market in Teton Valley requires an income of \$99,000 to afford housing in the region, equating to 144% of a household's AMI on average. When asked what the biggest obstacle is in finding and keeping employees in the region, lack of housing is the number one response (81%).

4. Gateway Communities: Affordable Housing Issues & Planning Solutions - Sarah Knoebl, 2022

#### Sarah Knoebl

University of Colorado Denver, Master of Urban & Regional Planning Candidate 2022 | CAP Conversion of rentals from long to short-term (usually meaning less than 30 days) is also impacting renters in the region, causing an estimated 180 renter households to

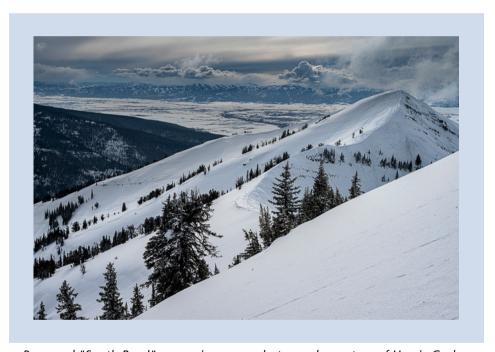
move in the past 3 years. Teton Valley residents are currently experiencing a critical shortage of available affordable housing. Tourism and the prominence of uncontrolled short-term rentals in the Valley is a key contributor to the housing shortage and resulting displacement of local residents. When considering Grand Targhee Resort's proposed expansion, it is critical to understand and evaluate the expansion's potential impacts on the local community - housing being a crucial priority. It is also imperative that Grand Targhee continue to partner with Teton County/s and surrounding cities to create affordable housing solutions and mitigate any additional stressors on community resources.



## Access to Public Lands

The proposed expansion at Grand Targhee Resort includes growth onto public lands - South Bowl and the Mono Trees. These lands are

currently open to everyone. However, if approved, the increase of Grand Targhee's SUP (Special Use Permit) would limit access to these public lands for private interests during the ski season. Only those who purchase a lift ticket (priced upwards of \$100 a day) would be able to access these areas. Loss of public lands and resulting impacts on individuals based on socioeconomic class becomes an environmental justice concern. Access to outdoor recreation, clean air, and clean water should not be infringed based upon a person's income.



Proposed "South Bowl" expansion area, photograph courtesy of Howie Garber

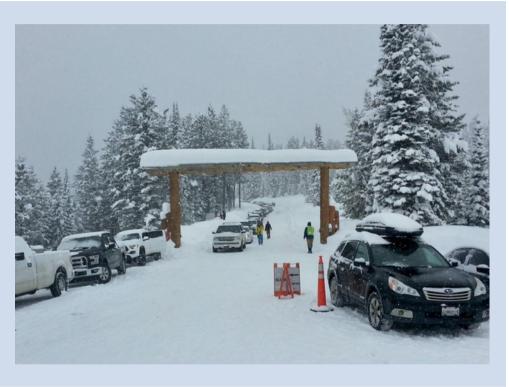
The newly proposed <u>Environmental Justice for All Act</u>, aims to provide policy solutions to what has been a growing trend of inequities in the outdoors.



#### Transportation

Dan Smith Transportation Engineer The mobility and transportation impacts of the proposed expansion of Grand Targhee Resort are of critical concern and need to be

objectively assessed in the Forest Service's analysis. These impacts will be felt most acutely on Ski Hill Road as more people travel to Targhee, but there will also be significant transportation impacts to the regional transportation network that must be considered.



Two lane highway leading into Grand Targhee Resort, photograph courtesy of Mac McCormick

Ski Hill Road is a two-lane road that already experiences significant congestion. If skier capacity is doubled, this problem will only get worse. Access for emergency vehicles will be extremely challenging during peak travel periods, and a typical ski day will involve time spent in gridlock. Additionally, the significant increase in base area services will create many (predominately low wage) jobs and dramatically increase the number of guests from outside of Teton County. These new residents and visitors will add a large volume of trips to an already near-capacity regional transportation network. This will further exacerbate the increase in traffic problems and extend far beyond Grand Targhee into communities downslope from the resort and over the pass into Jackson Hole.



#### Recreation

Gary Kofinas
Teton Backcountry Alliance

As we consider the proposal to expand Grand Targhee Resort beyond its current boundaries, let us consider a few facts. First, backcountry skiing is the fastest growing winter sport in

the country, if not the world. Second, Teton Canyon - with its glorious vistas, wildlife habitat, and tranquil soundscape - is a precious resource for newcomers and old timers alike. As many who grew up in Teton Valley remember, Teton Canyon is a place of fond memories of family hikes, picnics, and fun cross-country ski tours. Third, the landscape at the higher elevations of Teton Canyon provides opportunities for world class adventure, including high angle rock climbing and alpine camping, and, in winter, acres of deep powder skiing. Expanding lift serviced skiing into the South Bowl of Teton Canyon will change the character of Teton Canyon dramatically in all these areas. Lift skiing in South Bowl will require avalanche control, which will disturb wildlife and visitors' backcountry wilderness experiences. It will also add considerable risk to those backcountry travelers electing to approach ski slopes from below. The sight and drone of ski lifts will mar the view and soundscape not only in winter months, but also in the summer, assuming that Targhee's lift served mountain biking operations will eventually extend to that area. Moreover, the opportunities for backcountry travel will be significantly diminished, as an everexpanding human footprint encroaches further into the wildlands of the Tetons. To be sure, the new lift up Peaked will make the South Bowl more accessible and increase the number of backcountry users. This impact, however, pales in comparison to the addition of mechanized downhill skiing to Teton Canyon. Hence, the proposal to expand Grand Targhee Resort into Teton Canyon raises the guestion of priorities, and forces us to ask if, in this instance, can society elect to limit "growth" and preserve a sacred wild place that nourishes our human spirit? I suggest that we can.

#### Cumulative Impacts

When a project is proposed for Forest Service land that is likely to significantly affect the human environment, the Forest Service is required to write an Environmental Impact Statement (EIS) to evaluate the potential cumulative, direct, and indirect effects of the



project. However, "cumulative effects" as defined by the Forest Service do not necessarily include the full suite of social and economic effects, or how they are overlaid with a changing climate that is likely to decrease future snowfall, water supplies, ecosystem health, and overall quality of human health and well being. It is crucial that we push the Forest Service to examine not only the specific tangible impacts of this project, but also consider the full suite of changes, and their implications to intangibles such as the character of our communities and our unique rural culture.

#### THE BIG PICTURE

Hilary Eisen Policy Director Winter Wildlands Alliance One hundred and twenty-two ski resorts operate on National Forest lands, and Grand Targhee Resort is one of several currently seeking to expand. The potential impacts of

this expansion and the concerns voiced by the Teton Valley community are familiar to those living and working in ski towns across the country.

In 2011, Congress passed the Ski Area Recreational Opportunity Enhancement Act, updating the 1986 National Forest Ski Area Permit Act. The 1986 Act authorizes the Forest Service to issue special use permits for up to 40 years for the use and occupancy of National Forest System lands for commercial skiing operations. The 2011 Act clarifies and expands the types of activities permitted under these special use permits, most notably to include summer activities such as zip lines and mountain bike trails. As our climate warms, winters become shorter, and snowfall less reliable, summer activities are becoming an increasingly important part of the ski resort industry's business plans. The 2011 Act spurred a wave of ski resort expansion proposals, many of which, like Grand Targhee, feature increased footprints, expansion of summer activities, and development of adjacent private lands.

The outcomes of this process to determine Grand Targhee's future will reverberate far beyond Teton Valley. This project has the potential to set precedent for how the Forest Service considers other proposed or future ski resort expansions in other locations. By standing up for the quality of our community and public lands and ensuring that Grand Targhee Resort grows in a sustainable manner, we can provide a model for other communities to do the same.



# OPPORTUNITIES FOR ENGAGEMENT

**Caroline Daley** 

Public Lands Community Organizer Jackson Hole Conservation Alliance The goal of this Community Assessment is to encourage inclusive public engagement throughout the NEPA process on the Grand Targhee

expansion through proactive education and resource development. Learning more about this issue is the foundation for meaningful engagement. The website published by the consultants conducting the Environmental Impact Statement (EIS), SE Group, as well as the resources listed on <a href="https://jhalliance.org/wild-places/targhee/">https://jhalliance.org/wild-places/targhee/</a> are excellent ways to learn more about the details of the expansion and its potential impacts.

Jackson Hole Conservation Alliance, Teton Backcountry Alliance, Valley Advocates for Responsible Development, and Winter Wildlands Alliance will host a series of workshops during the 90-day public comment period following the publication of the draft Environmental Impact Statement (DEIS), likely to be released in summer 2022. Contributors to this Community Assessment will help lead these workshops and provide further insight into potential impacts, as well as review best methods for writing an effective public comment, and answer questions from community members.

The public will have the opportunity to provide feedback to the Forest Service for 90 days following the publication of the DEIS. This is the most important time for you to get involved and to influence the outcome of the Environmental Impact Statement and Final Record of Decision. After this comment period, your input will be considered and duly incorporated into the Forest Service's final Environmental Impact Statement (FEIS). The FEIS may take between 6 months and more than 2 years to be completed. The FEIS will include a draft Record of Decision (ROD). Those who have previously commented on the project will have the opportunity to object to the draft ROD once it is published. After the objection period the Forest Service may make some changes in response to objections, and then the agency will publish a final ROD. The final ROD will be the ultimate decision of what development is permitted. If the final decision is still unfavorable and



incompatible with public land designation and usage, next steps may include legal action against the Forest Service.

While the NEPA process applies to proposed expansion activities on public land, a separate process applies to base area expansion activities occurring on private land in Teton County, WY. All development activities on private land in the County are required to be approved by Planning and Zoning and the Board of County Commissioners. The base area expansion plan, called the Planned Unit Development (PUD), has already been approved by Teton County, Wyoming but review of base area expansion related to the proposed Grand Targhee development will occur in phases, and in some cases will require additional approval from the County Commissioners. Each time there is a trigger within the PUD, there will be an opportunity for community review and public comment. The best way to stay in the loop for upcoming opportunities for engagement is to sign up at www.grandtargheeca.org. Or contact one or more of the following organizations:

- Jackson Hole Conservation Alliance info@jhalliance.org
- Teton Backcountry Alliance info@tetonbackcountryalliance.org
- Valley Advocates for Responsible Development info@tetonvalleyadvocates.org
- Winter Wildlands Alliance info@winterwildlands.org