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Comments:

Response to Scoping Request for Grand Targhee Expansion

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The proposal requests that the Forest authorize an expansion to virtually all aspects of The Grand Targhee Resort operation. While there will be impacts associated with such an expansion, there will also be benefits to the users of the public lands. Below please find my scoping comments concerning the aspects of evaluation that are needed to adequately make a decision on the proposal.

The evaluation should include, but not limited to:

* The impacts to wildlife in the expansion areas. There will be impacts to vegetation as a result of liftline and trail construction. Many ski areas have mitigated this issue during the rehabilitation of disturbed areas by planting palatable species that have actually increased wildlife numbers. Seasonal migration in the area is a concern and this can be mitigated by prohibiting activities during movement periods. Please identify the species and the impacts and provide mitigation and monitoring methods/procedures that will minimize and adequately address the impacts.

* The impacts to water runoff and quality. Appropriate methods of minimal ground disturbance, on site placement of water retention structures, and proper revegetation methods are all proven mitigation actions that will minimize the erosion issues. Over the snow trail and liftline construction, installation of on hill water bar and water retention structures, and timely revegetation of disturbed areas will prevent off site movement of sediment and degradation of water quality. Adequate mitigation and monitoring will adequately address the impacts. Please analyze the impacts to water quality and provide mitigation and monitoring methods/procedures to adequately address the impacts.

* On site services provided by the permittee. Currently the bathroom, food service, and lodge seating amenities provided are taxed during certain times of the winter season. The resort needs to expand these services to meet current skier visits let alone any expansion. As the land exchange has been completed, the permit holder should be encouraged to provide much of the needed base facilities on private lands, but also meet the needs of users with the addition of on mountain facilities. These facilities should be located in unobtrusive locations and not become an eyesore from distant locations or vistas. Conduct a visual analysis and present different viewpoints from which the facility impacts will be observed and the mitigation to minimize the visual concerns.

* Please provide for the number of skiers/boarders at one time (SAOT) given the current skiable terrain and anticipated numbers with the expansion. The current winter situation seems to be that many skiers leave the mountain at or shortly after noon as a result of the hill being tracked out on days of new snow. This increased short-term use is a result of several factors: local residents and guests staying in the Teton Valley (Idaho) seeking powder after a storm and local workers then having to go to work, people commuting from Idaho Falls, Rexburg, and surrounding areas in Idaho, and an ever increasing number of people coming from the Teton Valley (Wyoming) area due to wanting to see another area and the overabundance of users at the local Jackson areas. Targhee can only handle so many users given the current facilities, usable terrain, and parking. If the increased visitation is not addressed in an expansion proposal such as what is being proposed, the user experience level is going to decline as longer lines occur at facilities and lifts. An evaluation of current experience levels needs to be included in the evaluation of this project proposal so that an understanding of the expansion proposal can be put into perspective. National user numbers are flat at best and yet what appears to be an increased number of users at Targhee over the past several years indicates that there is a market for the additional expansion. Please evaluate the impacts to the environmental setting as well as the experience level of the users. The overflow of users coming from the Jackson area also needs to be discussed as Targhee is being used as a relief valve for the inability of the Jackson areas to handle the downhill users that valley is seeing, and this needs to also be evaluated.

* The resort has a parking lot problem and needs to increase its reliance on mass transit. While increasing the lot sizes may be a solution, an increase in transit is a more sensitive approach. While the small cutoff buses

being used was a small step in addressing the issue, there needs to be a significant increase in the number and size of vehicles provided. Targhee should join the START transit system already in existence. There is no need to initiate another transit system and as that system seems to be successful in operating a practical and useful transit friendly program, an expansion would be rather simple. While the existing vehicles provide a form of regular service, the cutoffs are standing room only during weekends and holidays, especially during peak time periods, and have lost their appeal with many valley residents. Targhee should be required to purchase land along the ski area road and develop a transit station and associated parking lot. Larger mountain worthy buses should be incorporated, with a more frequent schedule, especially in peak time periods. There are numerous methods in use by other resorts that deal with the parking issue and one of those should be analyzed and incorporated (incentives for bus riders, reservation system for parking, least favorite is paid parking and one in/one out). Please evaluate the options of a transit system that will provide efficient movement of riders while not significantly increasing the size of parking lots.

* The road to the resort is no different than roadways that lead to most resort areas. The problem with the road is the volume of traffic and the time periods that the road is being used. Mass transit will help and resolving the parking issue will also help with the road use issue. An additional passing lane in a few spots may help, but generally that just increases vehicle speed and the associated impacts that can come with that. The 30 mile an hour speed limit is an appropriate speed and the additional impacts of widening the road should not be necessary. Please evaluate the appropriate management of the use of the road (the Highway Department will deal with the surface of the roadway) so as to avoid additional impacts from further highway construction.

* Winter sports activity needs in the Teton Valley are increasing. The increase in population in the valley comes with consequences and providing activities for the increased numbers needs to be addressed. While it is not entirely the Forest Service's responsibility, the NFS is a component in the solution. Looking at the number of buildable lots still available in Teton Valley indicates that there will be an increasing number of issues that will need to be addressed well into the future. While it is not the Forest Service's requirement to provide adequate uses for all of the residents, the agency does play an important part. The evaluation of additional downhill capacity is part of that role. It is a balancing act determining the allocation of developed recreation verses backcountry use. An argument can be made for maintaining a more natural setting on the country's forested lands, but just as much of an argument can be made for the management of multiple use on those lands (at least a portion thereof). With an adequate Master Plan and with the amendment of the Forest Plan, the Forest has the ability to address the management of public lands for the enjoyment of all users. There will always be user driven conflicts, but the balance of uses is the responsibility of the Forest decision makers. In the case of this proposal, the existing use has exceeded its comfortable capacity causing the experience level to be diminished numerous times during the winter season. Also, with the requirement of financial and buildout plans, the Forest can adequately assess the competency of the proponent and make an informed decision. Please analyze and evaluate the increased population numbers in the eastern Idaho and western Wyoming communities and calculate the need for additional downhill recreation opportunities.

Targhee has had an open policy for backcountry users to utilize the permitted lands prior to and after the operational season. As downhill operators, Targhee management provides for backcountry use within the boundary as much if not more than many other areas. The perceived conflict between the two user groups comes down to a loss of some traditional areas that have been used by backcountry skiers though the number of acres lost by this proposal is relatively small in comparison to the total acres available. Every downhill resort expansion in recent times has been confronted by this issue and the Forest has had to make the difficult decision as to how to allocate the numerous acres that it administers. Please evaluate the current use of the resort and what the additional acreage and facilities will provide in the way of recreational opportunities, community benefit, and economic stabilization. Our valley has been too heavily influenced by the hardships of an unstable economy and an expanded resort will aid in the economic stability of the region.

Thank you for your consideration in this matter.

Sincerely,

Thom Heller

