



**File Code:** 1950  
**Date:** November 4, 2019

Geordie Gillette  
General Manager  
Grand Targhee Resort  
3300 E Ski Hill Rd.  
Alta, WY 83414

Dear Mr. Gillette,

This letter is in response to your October 2, 2019 letter proposing to initiate the NEPA review for projects at Grand Targhee resort in compliance with your 2018 Master Development Plan (MDP). This recent request includes your October 2, 2019 errata sheets that add an additional 12 miles of summer trails to the proposed summer trail network. Acceptance of this errata would change the 2018 MDP proposed summer trail mileage from 89 total miles to 101 total miles.

The Caribou-Targhee National Forest (CTNF) has reviewed, and hereby accepts the conceptual projects contained within the 2018 MDP with the 2019 errata. The MDP acceptance details in our February 5, 2019 letter of acceptance of the 2018 MDP still apply.

In response to your request to initiate the NEPA review, we refer to our June 22, 2019 meeting. During that meeting we discussed that your proposal:

1. is consistent with your accepted 2018 Master Development Plan;
2. passes the screening criteria for further analysis for use of National Forest System (NFS) lands;
3. merits consideration of an amendment to your special use permit number TEB4213, consistent with regulations at 36 CFR 251 and will require amendment(s) to the current Forest Plan.

Before initiating an environmental review, we requested that the resort have additional discussion with interested parties to highlight potential issues and mitigations, conduct a thorough NFMA compliance review, and assist the agency in identifying anticipated Revised Forest Plan (RFP) amendments needs to occur due to your proposal. Some of the potential RFP amendments that we encouraged the resort to consider included:

- 1) Winter range management prescription corrections, complying with the wilderness opportunity class II prescription next to the newly proposed resort boundary.-
- 2) Changes in public use of the designated winter travel route in Teton Canyon due to expansion which could result in RPF travel plan amendment(s).
- 3) Connectivity between the resort on existing travel routes and the potential demand for more trails or roads outside the resort (parallel trail to Ski Hill Road, user created routes up from South Leigh, and anticipated increase in the heavy use of the Mill Creek trail for example).
- 4) Effects to the active grazing allotment(s) and solutions.



Without this up-front work, multiple scoping documents could be anticipated in order to meet our regulations regarding public notification of proposed amendments. In our experience multiple scoping documents provide confusion for the public and create additional work and delays during the NEPA analysis process. We recognize that much of this work is outside the expansion proposal, but it will become necessary to address due to your proposal.

We have worked together previously with cost recovery agreements and this project fits that criteria. The Forest will review project work to complete and will provide estimates as the project becomes clearer. Sean McGinness and Kaye Orme will remain your contacts for preparation of the cost recovery documents.

Due to the size and complexity of your proposal, we recommend utilizing a contractor to complete the environmental analysis and monitoring. Having reviewed credentials, SE Group is well qualified to assist the forest in monitoring needs, NFMA compliance review and to complete an Environmental Impact Statement deemed necessary for this project.

In advance of the analysis, we reviewed wildlife monitoring data and have determined some additional needs that we feel may clarify effects. We would like to discuss those needs with you and your contractors prior to the initiation of the analysis.

In addition to Jay Pence (Teton Basin District Ranger at 208-354-6610), Sean McGinness (Mountain Resorts Coordinator at 307-739-5415) will serve as the project manager and primary contact for you as this project progresses.

Sincerely,



MEL BOLLING  
Forest Supervisor