

October 2, 2019

Mr. Mel Bolling Forest Supervisor Caribou - Targhee National Forest 1405 Hollipark Drive Idaho Falls, ID 83401

RE: Project Proposal to Initiate the NEPA Review for Projects at Grand Targhee Resort

Dear Mel:

Subsequent to the Caribou - Targhee National Forest's (CTNF) February 5, 2019 acceptance of our 2018 Master Development Plan (2018 MDP), Grand Targhee Resort (GTR) requests the U.S. Forest Service initiate an environmental review of several of the projects outlined in our 2018 MDP(including the recently submitted errata sheet). The presently proposed projects would occur both within and beyond our existing Special Use Permit (SUP) area and are fully consistent with the 2018 MDP. The following summarizes the projects presently proposed on National Forest System lands:

- 1) SUP Boundary Adjustment
 - a. South Bowl Pod
 - b. Mono Trees Pod
- 2) New Lifts, Lift Replacements and Alignments
 - a. Construct Crazy Horse Lift, North Boundary Lift, and Palmer Platter surface lift (with lighting)
 - b. Replace Shoshone Lift
 - c. New and Realigned Teaching Carpets
- 3) Terrain and On-Mountain Infrastructure
 - a. Terrain Development, Glading and Grading
 - b. On-Mountain Roads Reclaim, Upgrade, and Construct
 - c. Snowmaking
 - d. Restaurants, Yurt, On-Mountain Cabin, and South Bowl Facilities

- 4) Non-Winter and Alternative Activities
 - a. Summer Recreation Trails
 - b. Other Summer Activities
 - c. Alternative Winter Activities

A detailed description of the individual project components follows. Refer to the attached Project Proposal Letter Figures 1 through 5 for project locations.

SUP BOUNDARY ADJUSTMENT

According to the Targhee National Forest Plan, the proposed SUP boundary adjustment would be located in areas identified as management prescription 2.1.2: Visual Quality Maintenance and 2.8.3: Aquatic Influence Zone for both our proposed Mono Trees and South Bowl areas. No portion of the proposed SUP adjustment would occur in areas classified as designated wilderness (management prescriptions 1.1.6, 1.1.7, and 1.1.8).

South Bowl Pod

GTR proposes to expand its existing SUP boundary into the "South Bowl" area adjacent to Peaked Mountain, adding approximately 600 acres to the resort's permitted area. To serve the terrain in the South Bowl area, GTR also proposes the construction of three lifts - South Bowl West, South Bowl East, and South Bowl Connector. In the interim period between potential project approval and installation of the proposed lifts in South Bowl, GTR proposes to operate SnowCat skiing in the area. The following paragraphs further describe these project components.

Terrain

In addition to naturally occurring undeveloped terrain that exists and would become skiable under this proposal, GTR proposes to construct new developed ski runs in the South Bowl area. In total, developed ski runs (SB01-SB22) account for approximately 165 acres of the approximately 600-acre South Bowl area that GTR proposes to incorporate into its SUP boundary. The majority of the proposed developed ski runs would be constructed in naturally occurring glades and alpine areas, and would require considerably less tree clearing than would typically be associated with 165 acres of developed ski runs. The proposed developed trails in the South Bowl area would all be constructed to provide well-defined and smooth skiable surfaces. As such, heavy machinery would be required in certain circumstances to achieve the desired surface.

The South Bowl itself is an open, steep bowl on the southside of Peaked Mountain, and GTR intends to maintain its open bowl feel as much as possible. Skiers and riders would access the terrain by riding the Sacajawea lift and previously approved but not yet constructed Peaked lift.

Glades and naturally occurring open meadows would also comprise South Bowl's undeveloped terrain.

Interim Cat Skiing

In the interim period prior to the construction of the three South Bowl lifts, GTR proposes to serve the South Bowl terrain by SnowCat skiing operations. This would be accomplished by shifting GTR's existing guided SnowCat and backcountry offerings—which currently take place in the Peaked Mountain area—to the South Bowl area before construction of the proposed South Bowl lifts, as the (previously approved) development of the Peaked Mountain portion of the SUP area would displace existing guided SnowCat tours. The South Bowl interim cat skiing operation is depicted on Figure 3. Select vegetation removal may be needed to enhance the experience of the SnowCat operation in places where future ski trails would be located; however, developed trails would not be cleared for interim cat skiing itself. The proposed South Bowl projects, depicted on Figure 4, would displace these interim SnowCat tours after construction of the proposed South Bowl lifts.

Lifts

Construction of proposed South Bowl lifts discussed in the following paragraphs would require grading and construction of an access road.

South Bowl West

One of the three lifts proposed in South Bowl is the South Bowl West Lift. This lift would likely be a top-drive lift that provides lift service skiing and riding to the western portion of the South Bowl area. It would serve as the connection for guest in South Bowl to return to Peaked Mountain and the base area. Construction and maintenance access to this lift would be provided via an upgraded road to the top of the Peaked Lift. The proposed South Bowl West lift would have a capacity of approximately 1,800 persons per hour.

South Bowl East

The farthest east lift proposed at GTR is the South Bowl East Lift. This lift would likely be a bottom-drive lift that would provide skiing and riding in an open bowl setting with interspersed vegetation. Guests would get a backcountry feel without venturing outside of ski area boundaries. There would be a small guest support facility located at the base of this lift. Construction and maintenance access to this lift would be provided via the proposed South Bowl access road. The proposed South Bowl East lift would have a capacity of 1,800 persons per hour.

South Bowl Connector

The South Bowl Connector Lift is required to transport guests from South Bowl East to South Bowl West lifts. The lift would be 1,700 feet in length and transport guests 250 feet in elevation from the bottom terminal of the South Bowl East Lift to bottom terminal of the South Bowl West Lift. Construction and maintenance access to this lift would be provided via the proposed South Bowl access road. It would have a capacity of 1,200 persons per hour.

Mono Trees Pod

In addition to the proposed South Bowl area, GTR proposes to expand its existing SUP boundary to the west to include the Mono Trees pod, adding approximately 600 acres to the resort's permitted area. To serve the terrain in the Mono Trees area, GTR also proposes the construction of the Mono Trees lift. The following paragraphs further describe these project components.

Terrain

GTR proposes to construct approximately 97 acres of intermediate and advanced-intermediate trails (F1 and F2, M1 through M5 and M10 through M12) to provide developed skiing opportunities in the Mono Trees Area. Similar to South Bowl, inclusion of Mono Trees into the SUP adjustment area would also result in the incorporation of undeveloped, skiable terrain, into the overall GTR terrain network. The undeveloped terrain that would become accessible in the proposed Mono Trees pod is primarily characterized by glades and open meadows.

Development and operation of the Mono Trees pod would utilize the existing road from the base area to the bottom terminal of Sacajawea Lift and 0.9 miles of new road construction from the bottom terminal of Sacajawea Lift to access the Lightning Ridge area for construction and in case of emergency.

Lifts

The proposed Mono Trees terrain would be served by a proposed detachable quad chairlift, referred to as the Mono Trees Lift. It would have a capacity of 1,800 persons per hour. An important feature of this lift is to provide a quality skiing experience during periods when the upper mountain experiences poor visibility, high winds, or other weather factors.

The Mono Trees Lift is intended to offer round trip skiing and riding on the north- and eastfacing slopes of Lightning Peak. It should be noted that a similar lift in the Lightning Ridge area was approved for construction in the 1994 ROD with a north-south alignment.

LIFTS

For a discussion of lifts associated with the proposed South Bowl and Mono Tree pods, please refer to the previous discussions under the *SUP Boundary Adjustment* heading. The lifts described below are in addition to the lifts included in those pods.

Crazy Horse

GTR proposes a new detachable lift on Fred's Mountain called Crazy Horse. It would have a capacity of 1,800 persons per hour. The bottom lift terminal would be located near the *Powder Reserve Traverse* and the top lift terminal would be located to the southeast of Dreamcatcher top terminal. Electricity would be routed from the feed that currently supplies the Sacajawea Lift.

This alignment would provide better access to trails on Fred's Mountain and allow skiers and riders to access Fred's Mountain terrain without having to return to the base area to ride Dreamcatcher Lift. In the event the Dreamcatcher Lift is inoperable, skiers would be able to access the terrain by riding Sacajawea and Crazy Horse lifts in succession to reach the top of Fred's Mountain.

North Boundary Lift

We are proposing to add the North Boundary Lift to provide access to the terrain from the North Boundary Traverse down to Rick's Basin. This lift would have a capacity of 1,200 people per hour and is intended to provide better utilization of the terrain at the far north edge of the resort, as well as providing access to intermediate and advanced terrain that is currently not lift-accessed. Additionally, this lift would be able to be operated during weather days when the upper mountain lifts need to be closed down. Similar to Mono Trees Lift, the North Boundary Lift would help provide a quality ski experience on those days when Dreamcatcher and Blackfoot lifts cannot be operated due to fog, wind, or other weather factors.

Palmer Platter Surface Lift and Lights

A surface lift is proposed to be installed on *Palmer's Raceway* trail in the Shoshone pod called the Palmer Platter. The lift would be aligned along the southside of the tree island between *Big Horn* and *Palmer's Raceway* trails. Lights are proposed on *Palmer's Raceway* as well. The lift would provide a quick turn around for athletes training on *Palmer's Raceway* and the lights would allow for longer training sessions during the winter months.

Shoshone

GTR plans to upgrade the existing Shoshone Lift to a detachable lift, as well as lengthen and realign the lift. The new alignment would improve access to surrounding ski trails and provide the necessary milling and preparation space for ski school and lower-ability guests using this terrain. This location provides further separation between intermediate and advanced skiers

and riders on the adjacent *Wild Turkey* trail, and beginner/novice skiers and riders on the Shoshone Lift.

The realigned Shoshone Lift would serve beginner/novice skiing and riding through the addition of a mid-loading station, which would be located at the current bottom terminal location of the Shoshone Lift. Skiers and riders using the terrain historically served by the existing Shoshone Lift would load at its mid-terminal.

Teaching Carpets

We additionally propose three teaching carpets; two new beginner teaching carpets and realignment of the Papoose carpet. The two additional beginner teaching carpets are proposed adjacent to the mid-station of the Shoshone Lift—one within our SUP area and one on private lands. These carpets would provide additional lift service for first time skiers/riders and would access additional, needed beginner terrain adjacent to Targhee Village.

We plan to realign the Papoose carpet to provide better integration with the Targhee Village plans. The lift would continue to provide both repeat skiing/teaching terrain as well as access from the mid-station of the Shoshone Lift up to the base area and the Dreamcatcher Lift.

TERRAIN AND ON-MOUNTAIN INFRASTRUCTURE

Expanding our terrain and on-mountain infrastructure is critical to GTR's growth over the next decade. The development of additional terrain and infrastructure would help GTR provide an enhanced guest experience.

Terrain Development, Glading and Grading

GTR proposes approximately 348 acres of terrain development and 325 acres of new glading. The current developed terrain network encompasses about 520 acres, with an additional 174 acres previously approved, to be implemented in the near future (most of which is on Peaked mountain and is currently used in the SnowCat skiing program). The 174 acres currently served by SnowCat is included in the additional proposed 348 acres to GTR's lift-serviced network. This includes:

- New teaching terrain around the two new teaching carpets and realigned Papoose carpet;
- New and realignment of key circulation trails (*Teton Vista Traverse*, *Powder Reserve Traverse*, and *Mill Creek Traverse*);
- Two new trails, widen or extend seven trails, and glading in the Dreamcatcher and Crazy Horse pods;

- One new trail, lengthen and realign *Wild Turkey*, and improve tree skiing by *The Good*, *The Bad*, *The Ugly*, and *The East Woods* through glading in the Blackfoot pod;
- Two new trails and glading in the Sacajawea pod;
- Various glading projects throughout the Peaked pod;
- Trail widening and grading along Papoose Creek upon the skiway which will connect
 the existing Sacajawea lift and the previously approved Peaked lift. Due to this project's
 proximity to Papoose Creek it is assumed that coordination with the United States Army
 Corps of Engineers would be necessary;
- Construction of the South Bowl Pod (refer to the previous discussion under SUP Boundary Adjustment heading);
- Construction of the Mono Trees Pod (refer to the previous discussion under SUP Boundary Adjustment heading);
- Construction of the trails within the North Boundary Pod, including six new runs, one new access route/collector trail for the North Boundary area, and two new short access routes to gain entry and exit the area.
- Approximately 149 acres of grading to accommodate the trail construction and improve the skiability of existing trails.

In addition to the proposed new trails and glading, portion of the existing Peaked trail network would require select tree removal once the Peaked Lift is installed to accommodate additional skier capacity.

Roads

GTR proposes a Mountain Roads Rehabilitation Program to eliminate steep and no longer necessary access roads, as well as construct new roads to bypass steep grades and improve mountain circulation and maintenance. The overhaul of our mountain road network would allow us to improve erosion and sedimentation and allow us to better maintain our onmountain infrastructure. Key features of this program include realign and reconstruct the *Teton Vista Traverse*, *Powder Reserve Traverse*, Rick's Basin Access Road, spur road connecting the switchback on Peaked Mountain to the proposed South Bowl mountain road, and *Mill Creek Traverse*. In total, 3.9 miles of roads would be improved, 5.6 miles of roads would be constructed and 1.7 miles of roads would be reclaimed.

Snowmaking

GTR proposes 57 acres of snowmaking to improve lower-mountain circulation routes and high use trails (refer to Figure 5 for a depiction of existing and proposed snowmaking). By expanding our snowmaking infrastructure, GTR would be able to provide better snow surface and early season conditions. Snowmaking would be installed on the following trails:

- Lower portion of Chief Joseph Bowl (4.3 acres)
- o *The Funnel* (3.5 acres)
- o *Big Thunder* (7.5 acres)
- o Sitting Bull Ridge (11.6 acres)
- Headwall Traverse (2.1 acres)
- o Big Scout (4.6 acres)

- o Little Beaver Traverse (4.9 acres)
- o Mill Creek Traverse (3.4 acres)
- o Tubing Hill (0.9 acres)
- o Blackfoot Access Route (1.5 acres)
- o *Teaching Carpets* (1.9 acres)
- Teton Vista Traverse (10.8 acres)

Necessary water for this increased coverage would come from additional groundwater wells. Prior to snowmaking infrastructure development, additional groundwater wells would be developed.

Restaurants, Yurt, On-Mountain Cabin, and South Bowl Facilities

We plan to construct a full-service on-mountain guest service facility at the summit of Fred's Mountain, south of the existing Dreamcatcher Lift top terminal. The restaurant would serve many functions. It would serve as a central on-mountain location for skiers and riders within the Dreamcatcher and Blackfoot pods – this would eliminate the need to descend to Targhee Village for basic services – but also be a destination restaurant offering year-round views of the Grand Teton. This facility would include a restaurant, bar, restrooms and ski patrol facility. Electricity would be installed from the base area. Sewer would be a septic system or sanitary sewer line based on engineering recommendations. Water would be supplied from an onsite well. The building would have simple, linear forms to blend with the surrounding environment in sensitivity to viewsheds from the Teton National Park. It would be approximately 6,000 square feet of interior space and between 3,000 and 4,000 square feet of outdoor space. The realigned *Teton Vista Traverse* mountain road would provide construction access to the restaurant location.

In addition to the Fred's Mountain restaurant, we plan to construct a full-service on-mountain guest service facility at the top terminal of the Sacajawea Lift, to serve the southern side of the resort, including the Sacajawea, Peaked and proposed Mono Trees pods. This facility would include a restaurant, bar, and restrooms. Electricity would be supplied from the top of Sacajawea Lift. Restrooms would be vault toilets or an onsite septic system would be installed.

Water would be supplied from an onsite well. It is proposed to offer between 5,000 and 6,500 square feet of interior space. Additionally, 2,000 square feet of deck space is proposed for outdoor seating. The upgraded mountain road off the *Powder Reserve Traverse* would provide construction access to the restaurant location.

To accommodate guests using beginner terrain and the Summer Activity Zone, we plan to construct a simple yurt at the top of the Shoshone Lift. The facility would be 1,500 square feet of indoor space and approximately 2,000 square feet of deck or outdoor space. The yurt would provide a simple, rustic environment. It would offer services to guests during the day, and also the potential as a dinner destination with access by evening winter sleigh rides or summer horseback rides. This facility would include restaurant seating, a simple kitchen and restrooms. Electricity would be spired from an existing electricity line supplying Shoshone Lift. Vault toilets are currently located at the top of Shoshone. Water would be supplied from an onsite well or would be transported to the yurt. The upgraded mountain road to the top of the Shoshone Lift would provide construction access to the yurt.

Two on-mountain warming cabins are also proposed to be constructed—one in Rick's Basin, within the Nordic trail system to support the Nordic trail network, and the other at the top of Lightning Ridge. These facilities would be outfitted with basic cooking supplies, wood stoves, and vault toilets.

A basic warming hut, with limited food service (i.e., outdoor grill and cold sandwiches, snacks, beverages, etc.) and vault toilets, is proposed at the bottom terminal of the South Bowl East Lift. This structure would be 1,000 to 1,500 square feet.

ALTERNATIVE AND NON-WINTER ACTIVITIES

We recognize the need for alternative and non-winter activities to give guests a variety of options during their visit and to more effectively utilize our existing infrastructure during non-winter months. The goal is to respond to evolving consumer demands, grow our summer and winter business, and offer guests a broader range of summer and winter activities within our existing SUP area.

Summer Recreation Trails

Our summer trails have been the bedrock of our summer program. We plan to construct approximately 29 additional miles of trail to enhance the existing network. This includes 6 miles of downhill biking trails, 2 miles of hiking trails, and 21 miles of multi-use trails.

Downhill biking trails would include nine new trails totaling 6 miles, including:

- Three trails descending from the *Grand Traverse* trail, adjacent to the existing *Tall Cool One* trail,

- A trail descending adjacent to the *Blondie* trail.
- A trail starting at the mountain road just east of the Sidewinder trail and ending at the Bullwinkle trail,
- A connector trail between the existing Rock Garden trail to the proposed Summer Activity Zone,
- A connector trail between Crazy Horse and Sticks and Stones trails to provide an easier alternative to the existing Grand Traverse,
- A re-route around the Summer Activity Zone, and
- A connector between *Rick's* and *Otterslide* trails.

Hiking trails would include one new trail totaling 2 miles, including:

- A trail from Mary's Saddle to the base area.

Multi-use trails would include seventeen new trails totaling 21 miles, including:

- A Tall Cool One cutoff trail,
- An extension for the existing *North Woods* loop, starting at the base of the *North Woods* trail and connecting with the *Quakie Ridge* trail,
- A connector trail between the proposed *North Woods-Quakie Ridge* connector and the bottom of the *Quakie Ridge* trail,
- A Quakie Ridge extension trail,
- A loop with a variety of switchbacks starting and ending along Rick's Basin trail,
- A beginner loop in between the *Rick's Basin* and *Snowdrift* trails,
- An outer loop on the western edge of the SUP boundary, extending from the *Roundabout* trail and terminating at *Greenhorn Access*,
- A shorter, beginner loop inside the existing *Jolly Green Giants* trail,
- A trail from *Colter's* to *Peaked* trails,
- A new trail from *Ain't Life Grand* to *Peaked* trails, with a segment extending west past the *Peaked* trail,
- A trail extending from *Action Jackson*, intersecting with *Andy's* and *Trail 3*, and connecting with the proposed *Ain't Lift Grand-Peaked* trail,
- A trail descending from the top of the Peaked lift to the northern tip of the *Ain't Life Grand trail*,

- A loop extending from Ski Hill Road and the base area, intersecting with the base of the Sacajawea lift and the *Action Jackson* trail,
- An outer trail around the *Buffalo Soldier* trail, connecting *Buffalo Soldier* and *Rocky Mountain Way*,
- A loop extending from the 38 Special trail,
- A trail connecting the existing 38 Special and Peaked trails,
- A connector trail between the northernmost proposed downhill mountain biking trail to the existing *Bring it On Home* trail in the Summer Activity Zone.

With the construction of these new trails, we can prevent rogue trail development and provide quality recreation in a managed fashion. These proposed trails offer an ideal opportunity for GTR to assist the CTNF in stewarding the land.

Other Summer Activities

We plan to focus our multi-season recreation opportunities in and around Shoshone Lift pod. This area was called the Summer Activity Zone in the 2018 MDP and was allocated for concentrated use of activities. This is an ideal location for our summer activity hub because it is an accessible location for a wide range of guests. The moderate terrain allows for a range of guests to experience the natural environment in a structured area. Activities in this pod could include activities such as a canopy tour/fly line, zip line and aerial adventure course. These activities would be located on Forest Service lands.

While the Summer Activity Zone was designated to allow for flexibility in locating activities, and to accommodate new activities as summer recreation evolves at ski areas, preliminary sites have been identified as being capable of accommodating certain experiences. The canopy tour or fly line would start west of the Shoshone Lift top terminal. It would be a multi-station tour where guests would travel on an elevated tour through the tree canopy. A canopy tour is a more traditional activity where guests wear harnesses and use short zip lines to travel from station to station, while a fly line is a new hybrid mountain coaster/zip line where guests wear harnesses but travel along a track from station to station.

The zip line would start south of the Shoshone Lift top terminal. It would consist of a multi-segment zip line; a shorter segment to get guests familiar to the zip line harness and equipment and a second zip line of more than 2,000 feet over the event area.

The aerial adventure course would start northeast of the Shoshone Lift bottom terminal or uphill of the event area. This elevated challenge course includes a series of elements of varying length and difficulty for both adults and children.

The disc golf course would also be re-located within the Summer Activity Zone to the north of the proposed canopy tour/fly line.

Alternative Winter Activities

We also recognize the need for additional winter activities. We propose a permanent, dedicated snow tubing facility located to the west of the Sioux Lodge on National Forest System lands. The facility includes lighting for night operation and snowmaking infrastructure sufficient to ensure quality construction and maintenance of tubing lanes. Proposed snowmaking coverage for the tubing facility totals approximately 2 acres.

Our Nordic, snowshoeing and fat biking trail development is another area we plan to expand. To improve access to Rick's Basin, we plan to realign and re-grade the existing, steep trail segment from the base terminal of Blackfoot Lift into Rick's Basin eliminating the existing steep grade. Additionally, the existing Nordic trail and alpine ski-out trail connecting the bottom terminal of the Blackfoot Lift with *Little Beaver Traverse* would be graded to make the slope more consistent and improve the width of trail for dual-use by alpine and Nordic skiers. New Nordic trails would be established on private lands and near the tubing center to tie Nordic skiing into the Targhee Village and introduce additional trail variety. As discussed above, a 2,000 square foot guest yurt with vault toilets and potable water would be located within the Rick's Basin trail network. The yurt would be a simple, rustic structure to accommodate guests in Rick's Basin. Approximately 1.4 miles of Nordic trails would be constructed to improve connectivity with the Rick's Basin trails.

Conclusion

GTR greatly appreciates the efforts the CTNF has provided in the review and acceptance of our 2018 MDP and looks forward to initiating this next step. We are excited to now have the consistency in our planning and business operations to be in a position to undergo a consolidated NEPA analysis for a comprehensive suite of future projects. We are confident that this process will make the future implementation of these projects far more streamlined.

To facilitate this NEPA process, GTR understands that the CTNF will require that we enter into a Cost Recovery Agreement to reimburse the CTNF for its time/expenditures throughout the process. We additionally propose to make the third-party NEPA contracting services of SE Group available to the CTNF to assist in conducting the NEPA process and the preparation of the environmental analysis/documentation – at your direction. We request that the CTNF please review the extensive qualifications of SE Group and confirm your direction on this matter.

We are available to provide additional information or provide additional details as may be helpful to your review.

Respectfully submitted,

Grand Targhee Resort, LLC.

Geordie Gillett

Vice President and General Manager

CC: Jay Pence, Teton Basin District Ranger