



# Valley Advocates for Responsible Development

October 12, 2020

Mel Bolling, Forest Supervisor  
Caribou-Targhee National Forest  
499 North 2400 East  
St. Anthony, ID 83445

## **Re: Comment for Scoping Period for Grand Targhee Expansion**

Dear Supervisor Bolling:

Valley Advocates for Responsible Development (VARD) is a 501(C)(3) organization whose mission is to preserve natural resources, protect agricultural character, and promote vibrant communities in the Teton Valley of Idaho and Wyoming. We represent the 923 members of our organization, most of whom live in Teton County Idaho, or Teton County Wyoming.

Our letter focuses on potential social impacts resulting from the Proposed Action. To aid in this effort, VARD commissioned a report entitled "Social Impacts of Expanded Ski Resort Operations on Forest Service Lands" (the "IORT Report") prepared by Dr. Jordan W. Smith and Urian Guadarrama of the Institute of Outdoor Recreation and Tourism (IORT) at Utah State University. IORT identified social impacts that were studied in EIS's or EA's prepared for 24 other recent ski area expansions in the USFS system. Our requested areas of study mirror those analyzed in other ski resort expansions. We have attached the IORT Report for your reference.

We respectfully ask that Caribou-Targhee National Forest and its contractors ("CTNF") to study, provide data, and analyze the following potential impacts in the upcoming Environmental Impact Statement (EIS) for the Proposed Action:

### **IMPACTS TO RECREATION**

- 1. Evaluation SUP in the context of spectrum of recreation in CTNF.** We ask the CTNF to consider a recreational spectrum with respect to the amendment of the Forest Plan and the Proposed Action. What is the spectrum of activities provided by CTNF? How does the Proposed Expansion expansion fit within this spectrum? We request that CTNF analyze this information in the EIS alternatives.
- 2. Access to solitude.** The backside of Targhee, Teton Canyon, South Leigh Canyon, and other lands in the vicinity, particularly those adjacent to the Jedediah Smith wilderness, are refuges for those seeking solitude. How will access to solitude be affected by the Proposed Action? How will CTNF establish a baseline of solitude

and measure projected impacts? We recommend that CTNF analyze access to solitude in each alternative.

3. **Limited access to recreation resulting from construction.** The Proposed Action includes multiple buildings, roads, lifts, and other features that would require a significant amount of construction. We ask that CTNF study potential impacts to wildlife and those seeking to recreate in these areas, and evaluate the amount of potential impact in terms of access limitations before, during, and after construction for each alternative outlined in the Draft EIS. Summer and winter impact analyses should be separately studied with data reports on each.
4. **Induced demand.** Increasing the SUP area, adding on-mountain amenities, and other features in the Proposed Action could induce increased demand for skier visits as well as visits from other recreationists. Please provide an analysis of projected induced demand for each alternative outlined in the Draft EIS. Please provide skier visits data from the past 30 years to be used as baseline data from which CTNF and the public can study and consider impacts relative to projected skier increases.

#### **IMPACTS TO AESTHETICS**

5. **Disturbance to Vegetation.** We ask that CTNF identify all areas within the Proposed Action and identify potential impacts to existing vegetation. We recommend including a tree survey and a determination of the amount of existing trees to be removed with each alternative. We also recommend study of revegetation methods and the duration of various revegetation methods. How long will revegetation take, particularly at high elevations? What is the likelihood that a particular revegetation method will restore disturbed lands to their natural state? How visible will these disturbances be to vantage points along state highways and Ski Hill Road? How visible will these disturbances be from vantage points from Teton Canyon, Table Mountain, Devil's Staircase, and other hiking areas? We request that disturbance to vegetation and reclamation be analyzed in each alternative.
6. **Teton Canyon/Teton Peaks viewshed.** Teton Canyon is an iconic foreground for the world-famous Teton peaks. We ask that the CTNF incorporate a visual analysis to examine the aesthetic integrity of Teton Canyon for Teton peak views and include vantage points Hastings Lane, Stateline Road, Idaho State Highway 33, and other roadways that have a vantage of the Teton Peak view through Teton Canyon. Each alternative should include this analysis.
7. **Reflective surfaces.** We ask that CTNF identify all reflective surfaces in the Proposed Expansion. This includes buildings, lifts, utilities and all other

proposed features. Of special concern are features that are composed of, or clad in, metal. We ask that reflectivity be studied at various points of the day in various times of the year. In particular, please study, and provide data relevant to the impact reflective features will have during different times of the day. We also request the analysis of reflectivity during different times of the year, particularly the iconic alpenglow from Fred's Mountain and Peaked Mountain that occurs during sunsets in the winter season. Please study this impact in each alternative.

- 8. Scale/visibility of buildings.** The scale of proposed buildings should be examined. Of particular interest is the possibility of on-mountain buildings and facilities being visible from the valley below. Visual impact should be analyzed, and data provided, from vantage points along state highways in Teton County, Idaho and along Ski Hill Road in Idaho and Wyoming. Vantage points should also be studied from hiking areas such as Teton Canyon, Table Mountain, Devil's Staircase, and the South Leigh Canyon-Teton Canyon trail. Please study this impact in each alternative.
- 9. Roads.** We ask that a visual analysis is conducted for all proposed roads in the Proposed Action with a particular focus on road cuts on the mountain side. Visual impact should be analyzed, and data provided, from vantage points along state highways in Teton County, Idaho and along Ski Hill Road in Idaho and Wyoming. Vantage points should also be studied from hiking areas such as Teton Canyon, Table Mountain, Devil's Staircase, and the South Leigh Canyon-Teton Canyon trail. Please study this impact in each alternative.

#### **IMPACTS TO CULTURAL AND HISTORIC RESOURCES**

- 10. Consultation with Indigenous Peoples.** We understand that the Proposed Action is located within the ancestral lands of the Shoshone-Bannock Tribes and possibly other indigenous peoples. We ask that the Shoshone-Bannock Tribes and other indigenous peoples are identified, consulted with, and allowed to determine impacts to cultural, sociological, and archaeological resources that may result from the Proposed Action. We further request that said impacts are analyzed in the draft EIS alternatives.
- 11. Historical Significance of Fred's Mountain, Peaked Mountain, and Teton Canyon views.** We ask that a historical analysis be included in the Draft EIS that studies the historical significance the Teton Canyon/Teton Peaks viewshed to the Teton Valley community. We further request that said impacts are analyzed in the draft EIS alternatives.

#### **IMPACTS TO TRAFFIC AND PARKING**

**12. Vehicle Miles Traveled (VMT) Analysis for all regional highways into Teton Valley leading to the Grand Targhee Base Area.** Traffic impacts resulting from each alternative should be studied. We recommend using a VMT metric because we believe it will best to forecast traffic growth resulting from each alternative. We further recommend that CTNF establish a baseline VMT metric for comparison purposes. The geographic scope should include all county roads in Teton County, Idaho, county roads in the portion of Teton County, Wyoming that lie on the West Slope of the Teton Range, as well as all State and Federal Highways in Teton County, Idaho, Teton County, Wyoming, Madison County, Idaho, and Bonneville County, Idaho, as the Proposed Action may generate an increase in VMT's from the surrounding region, particularly counties within the region with airports that provide commercial air service (i.e. JAC and IDA). We note that Teton County, Wyoming, through its [Integrated Transportation Plan](#), seeks to limit VMT's throughout the County, and also that the County's [Comprehensive Plan](#) specifically seeks to reduce VMT's in Alta. We request that a baseline VMT is established, and that projected VMT is analyzed for each alternative, particularly on Ski Hill Road and county roads in Alta.

**13. Parking Capacity and Potential for Illegal/Unsafe Parking.** We request that parking demand is analyzed for each alternative. We are particularly concerned about the potential for illegal and/or unsafe parking resulting from the Proposed Action. Please study this impact for each alternative.

**14. Impacts to pedestrians and cyclists on Ski Hill Road and the Grand Targhee Base Area.** Ski Hill Road is a popular cycling route and pedestrian route. We also note that the Grand Targhee Base Area experiences a significant amount of pedestrian traffic within its roadways and parking areas. We request that impacts to pedestrians and cyclists are analyzed in each alternative, particularly along Ski Hill Road and in the Grand Targhee Base Area.

**15. Impacts on local law enforcement and emergency services.** We request that each alternative is analyzed for impacts to local law enforcement and emergency services, particularly those provided by Teton County, Idaho. We further request that said impacts are analyzed in the draft EIS alternatives.

## **IMPACTS TO LOCAL ECONOMY**

**16. Current Ski Area Expansions proposed in the USFS system.** The Scoping Letter states that as follows:

*“To address the growth in the Idaho and Wyoming skier markets and, to meet increasing guest expectations, GTR must continue to*

*develop and improve its terrain and guest services offerings. These developments are in direct response to evolving consumer demands and the competitive regional and destination skier markets.”*

Though we acknowledge the uniqueness of Idaho and Wyoming skier markets, we find that destination ski resorts have a national - even international - reach. If a Proposed Action, or alternative, is responding to “competitive regional and destination skier markets,” then we ask CTNF to consider similar expansions occurring in the markets that lie within the entire USFS system. Of particular consideration should be current and projected demand for regional and destination skier markets, and the capacity of current and proposed/expanded ski areas within the USFS to meet such demands. This analysis should be broken down into national and regional components. The latter should consider the “region” as Utah, Idaho, Montana, and Colorado.

This supply-demand analysis is important to assess the possibility of market saturation. Though we understand that CTNF and the USFS have multiple mandates, the accommodation of recreational uses should not take a backseat to other uses. We believe that CTNF and USFS should ensure that SUP lands are not overallocated, which we believe to be a key consideration for the Proposed Action. We want to ensure that it does not contribute to the possibility of over-allocation and/or market saturation. Please study this impact for each alternative.

**17. Current Ski Area Expansions proposed on non-USFS lands.** In order to consider the supply-demand relationship mentioned in Item #16, ski areas on private lands should also be considered. We note that several large regional and destination ski areas are either partially or wholly located on private land. Regional examples include Deer Valley Resort, Park City Mountain Resort, and The Canyons Resort in Summit County, Utah, as well as Big Sky Resort, Moonlight Basin Resort, and the Yellowstone Club in the Montana counties of Gallatin and Madison. Each is within a 250-mile radius of the Proposed Action. We believe a supply-demand analysis should include ski areas on non-USFS lands as they cater to the same skier markets. As we noted in Item #16, we believe this is necessary to ensure that USFS lands are not overallocated to recreational uses, and that the Proposed Action does not contribute to the potential of over-allocation and/or market saturation. Please study this impact for each alternative.

**18. Employment Growth by Sector.** According to the US Bureau of Labor Statistics Quarterly Census of Employment and Wages (QCEW) for the First Quarter of 2020, the Teton County Idaho economy is comprised of the following top five employment sectors: Leisure and Hospitality; Trade, Transportation, and

Utilities; Federal, State, and Local Government; Construction; and Real Estate. Leisure and Hospitality offers the lowest wages of these five sectors. We request that CTNF analyze employment growth by sector resulting from the Proposed Action for each alternative in the EIS.

## **IMPACTS TO EMPLOYMENT, POPULATION, HOUSING, AND PUBLIC SERVICES**

**19. Seasonal Employees.** We request that CTNF analyze the number of seasonal employees that will be required for each alternative, and how those employees will be housed. We acknowledge that Grand Targhee is bound by the employee and affordable housing requirements in the [Grand Targhee Planned Unit Development for Planned Resort \(PUD-PR\)](#) approved by Teton County, WY, but note these housing impacts only address the development permitted on private lands where the majority of the base area is located. Development on public lands is not addressed. We also note that the [Western Greater Yellowstone Housing Needs Assessment](#) finds that Teton County, Idaho and Teton County, Wyoming struggle to provide housing for their respective workforces - seasonal employees in particular - and that jobs in the Accommodations/Food Service sector pay an average hourly wage of \$6.89, the lowest of any employment sector in Teton County, Idaho (as well as Teton County, Wyoming). Compare this with the median rent and median home price in Teton County, Idaho, which is \$675 and \$395,000 respectively. These figures are from 2014, and we suspect that the disparity between wages and housing costs have increased significantly, and will continue to do so. The Assessment was funded by the US Department of Housing and Urban Development (HUD) as part of the [Teton View Regional Plan for Sustainable Development](#) (TVRP) for the four-county region of Teton County, Wyoming and the Madison, Fremont, and Teton Counties of Idaho. The TVRP notes that jobs in Teton County “grew at the fastest rate – over 70% during each decade. This was fueled by increased jobs in the Grand Targhee Resort area.” Teton County, Idaho and Teton County, Wyoming are currently experiencing a rental vacancy rate that is effectively at 0%. As such, we believe that determining seasonal housing needs is of extreme importance. This should be analyzed using current and projected figures (2020 and beyond) for each alternative.

**20. Year-Round Employees.** As in Item #19, we request that CTNF analyze the number of year-round employees that will result from each alternative and determine how these employees will be housed.

**21. Population Growth.** We request that CTNF analyze the effects that the Proposed Action will have on population growth in Teton County, Idaho, and Teton County, Wyoming, and provide this analysis for each alternative. We further request analysis of the socioeconomic status of new residents attracted by the Proposed

Action and each alternative, and what effect these new residents will have on the cost of land and housing in the two counties. We also request the effect population growth - and the socioeconomic status of new residents - will have on local property taxes and the ability of existing residents to pay them.

**22. Public Services.** We request that CTNF analyze the impact to public services created by population growth resulting from the Proposed Action to be provided by Teton County, Idaho, and Teton County, Wyoming. Specific areas of consideration should include impacts to schools, health care facilities, law enforcement, emergency services, social services, planning & zoning, transportation, and all other aspects of public services. This should be analyzed for each alternative.

### **IMPACTS TO LAND USE**

**23. Real Estate Development in Teton Valley.** We request that CTNF analyze any potential impacts that the Proposed Action will have on land use in Teton County, Idaho, and Teton County, Wyoming. These two counties comprise Teton Valley, an area that is characterized by open lands and agricultural operations that are unique to the area. Seed potatoes grown in the high elevation of Teton Valley are known for their hardiness and exported around the world. Small and medium-scale agricultural operations represent a budding industry in the area, but are susceptible to changes in land economics and the resulting land use dynamics. We ask that possible effects the Proposed Action will have on land use and growth pressures be analyzed for each alternative.

**24. Amenitization of Development in the Base Area.** The [Grand Targhee PUD-PR](#) was approved by Teton County, WY in 2007 and amended in 2018. It entitles 450 lodging/residential units and 150,000 square feet of commercial and resort service space, and is envisioned to be developed in four phases. It is also subject to a rigorous set of environmental, social, and infrastructural benchmarks imposed by Teton County. We request that CTNF analyze the economic viability of the PUD-PR with respect to the Proposed Action, assessing the market demand for development in the PUD-PR with or without each alternative. Our hope is that CTNF can demonstrate whether or not the PUD-PR can stand on its own in any of the alternatives, or if its economic viability is dependent on the amenities provided in any of the proposed alternatives.

**25. Demand for Short-Term Rentals.** VARD and the Jackson Hole Conservation Alliance commissioned [this study of Short-Term Rentals \(STR's\)](#) in Jackson Hole and Teton Valley. The study found that there are 1,733 active STR's in Teton County, Wyoming, and 842 in Teton County, Idaho. This number is likely to increase, and, due to a recent Idaho law limiting local governments' ability to

regulate STR's, is likely to spike in Teton Valley. STR's have been shown to have a deleterious effect on housing affordability, neighborhood integrity, and provision of public services. We request that CTNF analyze the demand for STR's that will result from each alternative.

### **IMPACTS TO SOUNDSCAPES**

**26. Noise generated by construction.** The noise generated by construction of roads, buildings, lifts, and other features in the Proposed Action could affect the soundscape elsewhere in the forest. This is particularly true in the adjacent Jedediah Smith Wilderness area, where existing soundscapes are important to humans and wildlife alike. Hiking trails in Teton Canyon, Table Rock, the backside of Fred's and Peaked Mountain, Devil's Staircase, and other areas in the vicinity are known for their stillness. This is particularly true for those wishing to hear the unique chirping, calling, bugling, or other notable sounds coming from the area's world-renowned wildlife. We request that CTNF consider the noise from construction and its impact on users of the Forest. We also request that CTNF study the possible duration of construction, particularly during the short summers experienced in the Tetons. This should be analyzed for each alternative.

**27. Noise generated by permanent activity.** As with Item #26, the noise from facilities maintenance, facility operations, presence of humans, and other activities are likely to have a persistent impact on soundscapes. We ask CTNF to consider the noise from permanent activities and its impact on users of the Forest. We also ask that CTNF study the possible duration of construction, particularly during the short summers experienced in the Tetons. This should be analyzed for each alternative.

**28. Noise generated by increased traffic.** In light of traffic impacts discussed in Item #12, we believe that significant increases in traffic could result in increased noise for those living along roads servicing the Proposed Action, particularly Ski Hill Road. Thousands of residents live within earshot of the road, and could be impacted in several ways. The amount of construction equipment traveling to the site could be significant, and, given the size of the project/s, could occur over many construction seasons. Increased traffic resulting from the Proposed Action could also impact many residents who live near roads accessing the project. We request that CTNF analyze the noise generated by 1) construction traffic, both in terms of amount and duration, and 2) the noise generated by any traffic increases resulting from the Proposed Action. This should be analyzed in each alternative.

### **IMPACTS TO ENVIRONMENTAL JUSTICE**



**29. Impacts to Low-Income Households.** We are concerned that the Proposed Action could disproportionately impact low-income residents living in Teton County, Idaho, and Teton County, Wyoming. The Proposed Action may result in higher housing costs for low-income households and other protected classes. We request that CTNF analyze the impact that the SUP will have on housing costs in Teton County, Idaho, and Teton County, Wyoming, and any subsequent impact on the ability of protected classes to obtain housing. In particular, this analysis should examine the Proposed Action's potential impacts to increase the number of cost-burdened households and housing problems in Teton County, Idaho, and Teton County, Wyoming. We recommend using the [Western Greater Yellowstone Housing Needs Assessment](#) and the [Western Greater Yellowstone Analysis of Impediments to Fair Housing](#) to establish a baseline in this area of study. The analysis should then be applied to each EIS alternative. Please note that Idaho courts have struck down multiple municipal affordable housing regulations and that governments in Idaho have few regulatory tools available to protect or promote affordable housing.

**30. Ability to access the resource.** Access to lands subject to the Proposed Action may hinder low-income households and other protected classes from accessing the resource. It is our understanding that accessing the resources subject to the Proposed Action will require the purchase of tickets, passes, or fares. We request that CTNF analyze the impact that the SUP will have on low-income households and other protected classes seeking to access recreation opportunities on lands subject to the Proposed Action.

## **IMPACTS TO SAFETY**

**31. Collision risks.** The forest already supports a diverse array of summer outdoor recreation activities in and adjacent to the Grand Targhee's proposed area of expanded operations. As such, there's the possibility that new roadways and trails could create additional collision risks beyond those already present in the forest. We request that CTNF analyze potential collision risks and incorporate this analysis into each alternative.

**32. Skier Safety and Avalanche Hazards.** The larger amount of skiable terrain will lead to greater risks to skier safety and avalanche hazards. These risks can be mitigated through increases in on-mountain safety operations as well as avalanche hazard mitigation efforts. We request that CTNF analyze potential avalanche risks and skier safety risks in the proposed action and incorporate this analysis into each alternative.

**33. Response times and effectiveness of emergency response personnel.** The Proposed Action may lead to increased traffic and use of the area may negatively affect the response times of and effectiveness of emergency response personnel (e.g., search and rescue, fire fighters, emergency medical technicians, etc.). We request that CTNF analyze the capacity of emergency response agencies, and the risk posed by any lack of capacity from said agencies. This analysis should be incorporated into each alternative.

**34. Encroachments into lands beyond the SUP boundary.** The Proposed Action may result in increased encroachments into the Jedediah Smith Wilderness and other non-permit lands by skiers and other recreationists. These areas are often remote and inaccessible. We request that CTNF analyze the possibility of increased encroachments for each alternative. We also request that CNTF analyze the capacity of emergency response agencies to respond to possible encroachments for each alternative.

### **IMPACTS TO TOURISM**

**35. Overtourism in Teton County, Idaho and Teton County, Wyoming.** Tourism in Teton County, Idaho, and Teton County, Wyoming continues to grow year after year. Public lands in the two counties have been heavily impacted by increased camping, RV-ing, hiking, mountain biking, skiing, and other recreational activities. Overtourism, where usage exceeds the ability of public land agencies to manage impacts and maintain quality user experience, is increasing in the Teton Region and elsewhere in the Greater Yellowstone Ecosystem (GYE). We request that CTNF analyze the possibility of over-tourism in Teton Canyon and other popular recreational areas near and resulting from the Proposed Action. Each alternative should be analyzed to determine the potential of overtourism in lands subject to the Proposed Action, Teton Canyon, and other forest lands nearby.

### **IMPACTS TO REGIONAL SUSTAINABILITY AND QUALITY OF LIFE**

**36. Impacts to Regional Sustainability and Quality of Life.** A primary focus of the [Teton View Regional Plan](#) is to assess and maintain the high quality of life in the Teton Region. Throughout the planning process, [the public identified the following as their reason for living in the region](#): Clean Air and Fresh Water, Small Town Feel/Safety; Natural Environment, Wildlife, & Scenery; Outdoor Recreation Opportunities; Connectedness to Neighbors and Community. The top five threats to Quality of Life were identified as follows: Availability of Jobs that Pay a Good Wage; Affordability of Housing for Workforce; Population Growth; Amount of Land Development; and Diversity (or lack thereof) of the Economy.

Furthermore, the TVRP identifies 20 “Sustainability Indicators” to measure Sustainability and Quality of Life in the Teton Region. We request that CTNF analyze the Proposed Action using applicable TVRP Sustainability Indicators. This analysis should be provided for each alternative.

## **FINAL THOUGHTS**

We note that many of these impacts have been studied in the course of ski area expansions that are either ongoing or have been recently completed. These include ski area expansions in the following National Forests:

- Tahoe National Forest
- Wasatch-Cache National Forest
- Coconino National Forest
- White River National Forest
- Grand Mesa, Uncompahgre, and Gunnison National Forests
- Mount Baker-Snoqualmie National Forest
- Arapaho and Roosevelt National Forests
- Eldorado National Forest
- Medicine Bow-Routt National Forest
- Humboldt-Toiyabe National Forest
- Idaho Panhandle National Forests
- Okanogan-Wenatchee National Forest
- Deschutes National Forest
- Rogue River-Siskiyou National Forests
- Boise National Forest
- San Juan National Forest
- Bridger-Teton National Forest

With the exception of the relatively small expansion of Snow King Resort in the Bridger-Teton, none of these forests are **located in the planet’s only intact ecosystem in a temperate zone**. This means that the **Caribou-Targhee National Forest has a special duty to protect its resources and preserve the Greater Yellowstone Ecosystem**. A run-of-the-mill EIS will not suffice; CTNF should err on the side of thoroughness and any and all possible impacts should be considered for analysis. Though the USFS has multiple mandates, preservation should be the top priority in the portion of the CTNF that lies within the area of the Proposed Action.

On a personal note, I would like to mention that I am a member of the American Institute of Certified Planners (AICP) and a Certified Education Provider for the American Planning Association (APA). I convene the annual Mountain and Resort Town Planners Summit, a professional training event for certified planners. I formulate much of the curricula for these educational events, which often include

Grand Targhee EIS Scoping Letter

October 12, 2020

12 of 12

public lands issues and the communities that have an intimate and inextricable relationship with them. As a fourth-generation Teton Valley resident, I am particularly interested in these issues for a Proposed Action happening in my backyard. I wish you the best of luck in your analysis and look forward to reviewing the Draft EIS.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Shawn W. Hill". The signature is stylized and cursive.

Shawn W. Hill

Executive Director

## SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

Prepared by:

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### Introduction

The Grand Targhee Resort has submitted an application to the USDA Forest Service to expand the operations of the resort in an effort to “improve the recreational experience and address shortcomings in their terrain offerings and operations in order to remain viable in the competitive destination skier/rider market.” Expanded resort operations would involve:

- (1) expanding the operational boundary of the special use permit under which the Resort operates;
- (2) adding, replacing, and realigning ski lifts;
- (3) building new infrastructure (roads, restaurants, cabins, etc.); and
- (4) constructing new trails to support summer recreational activities.

Local stakeholders are concerned the expanded ski resort operations will lead to significant and possibly irreversible impacts to their social and economic characteristics of the nearby communities. The Forest Service is now soliciting comments on the proposed actions in an effort to identify possible and likely impacts that need to be considered in subsequent environmental analyses.

*The purpose of this document is to catalog and describe how the USDA Forest Service has assessed the socioeconomic impacts associated with expanded ski resort operations on Forest Service lands in the past.*

### Methods

We systematically searched online databases and search engines to develop a comprehensive list of known cases where a private ski resort operator has expanded the operations of their resort. We only included cases in which the plans for expanded operations led to the development of either an Environmental Impact Statement or an Environmental Assessment. We also only included cases in which the ski resort was operating under a special use permit issued by the USDA Forest Service.

Each of these assessment documents was subsequently screened to identify how the possible socioeconomic impacts of expanded ski resort operations had been documented. We systematically identified impacts noted in each EA/EIS by reading the “Affected Environment and Environmental Consequences” section of each report<sup>1</sup>.

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<sup>1</sup> Required by the National Environmental Policy Act to be included in EAs/EISs as chapter or section 3.

# SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

## Results

### *Similar Cases of Expanded Ski Resort Operations around the Western US*

Our searches returned 24 unique cases from resorts scattered across the Western U.S. (Table 1). These cases were documented in 20 EISs and 4 EAs. The details of these assessments are [available online](#).

*The expansion of ski area operations is not unique to the Grand Targhee Resort. There have been many other cases around the Western U.S. where ski resort operators have expanded their operations on USDA Forest Service lands.*

**Table 1.** Cases where ski resorts have expanded their operations on Forest Service lands via an Environmental Impact Statement or and Environmental Assessment.

<b>Ski Resort</b>	<b>Proposed Action</b>
Alpine Meadows Ski Area - Olympic Valley, CA	Gondola construction
Alta Ski Resort* - Alta, UT	Building, parking and tram construction
Arizona Snowbowl - Flagstaff, AZ	Snowmaking infrastructure, building, parking and lift construction
Breckenridge Ski Resort - Breckenridge, CO	Lift and trail construction
Copper Mountain Resort - Frisco, CO	Snowmaking infrastructure, lift construction
Crested Butte Mtn. Resort - Crested Butte, CO	Lift and trail construction
Crystal Mountain - Crystal Mountain, WA	Lift construction
Eldora Mountain - Nederland, CO	Snowmaking infrastructure, building, parking and lift construction
Keystone Resort* - Keystone, CO	Snowmaking infrastructure, building, parking and lift construction
Kirkwood Mountain - Kirkwood, CA	Building construction and associated infrastructure
Lake Catamount - Steamboat Springs, CO	Building, parking, and lift construction
Lee Canyon - Las Vegas, NV	Snowmaking infrastructure, building, parking and lift construction
Lookout Pass Ski and Recreation Area - Mullan, ID	Building, parking and lift construction
Mission Ridge Ski & Board Resort - Wenatchee, WA	Building, parking and lift construction
Mt. Bachelor - Bend, OR	Building, parking and lift construction
Mt. Ashland - Ashland, OR	Building, parking and lift construction
Mt. Rose Ski Tahoe - Reno, NV	Building, parking and lift construction
Snow King Mountain Resort - Jackson, WY	Snowmaking infrastructure, building, parking and lift construction
Solitude Mountain Resort - Solitude, UT	Snowmaking infrastructure, building, parking and lift construction
Steamboat Ski Resort - Steamboat Springs, CO	Building, parking and lift construction
Vail - Vail, CO	Snowmaking infrastructure, building, parking and lift construction
Tamarack Resort - Tamarack, ID	Building, parking and lift construction
Purgatory Resort* - Durango, CO	Lift construction
Aspen Snowmass Ski Resort* - Snowmass Village, CO	Snowmaking infrastructure, and lift construction

\*EA, all other assessments are EISs.

### *Socioeconomic Impacts of Similar Cases*

Each assessment documented just under eight unique socioeconomic impacts (*mean* = 7.96; *std. dev.* = 3.41). Across all 24 environmental assessments evaluated, we identified 16 unique socioeconomic impacts associated with the expansion of ski resort operations on USDA Forest Service lands (Table 2).

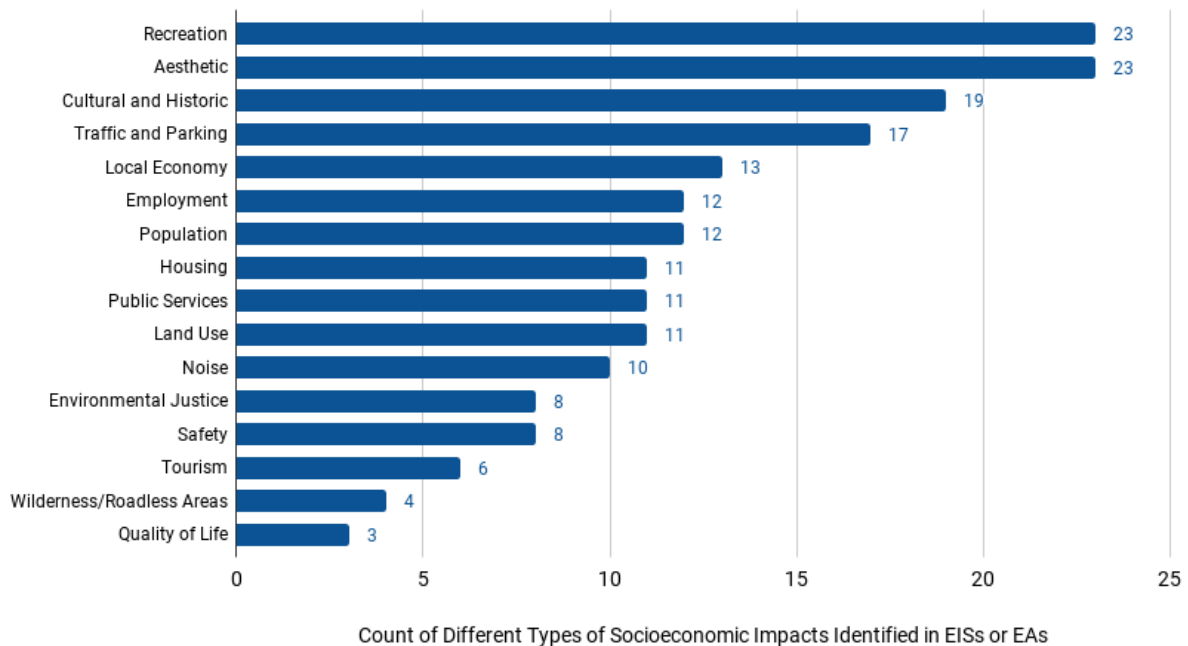
## SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

The most frequently identified socioeconomic impacts were impacts to existing recreational opportunities and aesthetic impacts. Each of these impacts were described in nearly all (95.8%) of the assessments we reviewed. The expansion of ski resort operations on USDA Forest Service lands has almost always resulted in impacts to existing recreational opportunities and the scenic quality of forest lands.

Other impacts noted in the majority of assessments evaluated included:

- (1) impacts to cultural and historic resources (noted in 79.2% of reviewed assessments);
- (2) impacts to traffic and parking (70.8%);
- (3) impacts to the local economy (54.2%);
- (4) impacts to local employment (50%); and
- (5) impacts to local population levels (50%).

The frequencies with which each socioeconomic impact of expanded ski resort operations on USDA Forest Service lands appeared in previous EAs and EISs are shown in Figure 1.



**Figure 1.** Socioeconomic Impacts of Expanded Ski Resort Operations on Forest Service Lands

*Our review of similar ski area expansion projects suggests that there are likely numerous socioeconomic impacts associated with expansion. Impacts to existing outdoor recreation opportunities and the aesthetic qualities of forestland seem almost a given. Impacts to local economies, employment opportunities, population levels, availability and affordability of housing, and public services and dominant land uses in nearby communities are all common concerns as well.*

## SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

### *Description of Impacts*

**Recreation.** Ski area expansion on Forest Service lands can have a variety of impacts to the outdoor recreation opportunities offered on forestlands. The agency is required to provide a diverse array of outdoor recreation opportunities within each forest; following the Recreation Opportunity Spectrum zones delineated in a forest plan. The expansion of ski area operations into terrain managed to provide 'primitive' outdoor recreation opportunities may limit the ability of the public to have those types of experiences.

The construction of new buildings, chairlifts, pipelines, and roads may also have significant and negative impacts on the outdoor recreation opportunities offered on forestlands. This is particularly true for summer opportunities that occur outside of existing special operating permit boundaries.

The expansion of ski area operations may also influence the ability of a ski resort to provide adequate facilities to meet what is assumed to be increased level of demand.

**Aesthetic.** The aesthetics of forestland has also been a major point of concern in previous ski area expansion projects. Construction and site development will likely significantly alter existing views provided from (and of) the mountainside. Concerns often cited in previous expansion projects focus on the potential impacts of grading, vegetation, and the construction of new vertical elements on the landscape (e.g., buildings, chairlifts, etc). These impacts are often considered significant. Ski area operators are frequently required to rehabilitate and revegetate areas of the landscape impacted by ski area expansion and/or development in order to minimize aesthetic (as well as environmental) impacts. The amount of impacts to a forest's visual resources is based on the size and extent of the expansion and/or development project as well as the extent of required mitigation actions.

**Cultural and historic resources.** The construction of new buildings and roads could damage cultural and historic resources on forestlands. Additionally, an increased volume of dispersed recreation may also lead to an increase in trampling and the collection of artifacts, which could impact the cultural and historic integrity of the area. Cultural and historic preservation groups should be consulted to identify development and management plans that minimize the possibility of these impacts.

**Traffic and parking.** The construction of roadways and buildings will likely result in temporary impacts to the type and volume of traffic in nearby communities. Long-term impacts would result from an increased volume of recreational use on forestlands. Impacts consistently noted in the environmental assessments that we reviewed include a higher volume of traffic and reduced parking availability. Less frequently mentioned impacts include more illegal and unsafe parking, a greater risk for collisions between pedestrians/cyclists and vehicles, and an increased burden on local law enforcement and emergency services.

**Local economy (employment).** Of the environmental assessments which did mention ski area expansion would impact the local economy, the most frequently noted impact was an increase in employment within businesses related to travel and tourism. These businesses include retail trade (e.g., hardware and drug stores), food services (e.g.,



## SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

restaurants), food and beverage stores (e.g., grocery stores), gas stations, and real estate, rental and leasing businesses (e.g., realty and property management companies).

**Employment, Population, Housing, and Public Services.** Ski area expansion projects can affect the total population and housing of nearby communities. There are two concerns present in the EISs and EAs we reviewed. First, the majority of ski area employees are seasonal, supporting the high levels of demand seen in the winter months. These jobs are almost exclusively done by low-wage employees who are not residents of nearby communities. Consequently, ski area expansion projects that depend on large amounts of seasonal labor will lead to a greater proportion of the local population being comprised of individuals employed in these types of jobs. The second concern present in the EISs and EAs we reviewed was long-term population growth. Expanded ski area operations may lead to an increased demand for individuals to relocate to nearby communities. This demand often outstrips the supply of existing housing, leading to an increase in local property values. Rising property values may price some current residents out of living in nearby communities if they are unable to pay the taxes on their properties. The increased demand for housing to accommodate both an influx in seasonal employees and long-term residents can stress existing transportation infrastructure and utilities (e.g., wastewater treatment, etc.) in the near-term until communities are able to realize the financial returns generated by increased property and sales tax revenues.

**Land Use.** An increased demand for residential housing was a common concern across the environmental assessments we reviewed. These concerns focused on the impact that ski resort development and expansion had on the conversion of agricultural and grazing lands into residential development. The residential development value of property often outpaced appreciation in revenues realized by farmers and ranchers in their operations. The transition of local landscapes from farmland and open pastures to those that are characterized by small-to-medium size ranch lots was a common impact associated with ski area development and expansion.

**Noise.** Construction and development operations have the potential to influence existing soundscapes. Previous environmental impact statements frequently mentioned concerns about increases in noise levels local communities, on private land, and in other portions of the national forest. Noise generated by the construction of roads and buildings is a short-term impact limited to a few summers. However, the noise generated by facilities maintenance and an increased volume of visitors is a persistent impact. Increased traffic in nearby communities may lead to higher noise levels in those communities, degrading local residents' quality of life. Ultimately, noise levels will be determined by project size, equipment used, and the amount of increased recreational traffic, among other factors.

**Environmental Justice.** Environmental justice addresses concerns that federal decisions could disproportionately impact individuals based on socioeconomic factors such as race, gender, socioeconomic class, ethnicity or cultural heritage, among others. All federal agencies are required to consider environmental justice issues in their decision making under Executive Order 12898, which states that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

## SOCIAL IMPACTS OF EXPANDED SKI RESORT OPERATIONS ON FOREST SERVICE LANDS

The expansion of ski area operations may have indirect consequences for environmental justice in surrounding communities. The increase in home and property values as well as rents that often accompany ski resort development and expansion on Forest Service lands may disproportionately impact low-income residents living in Teton County (ID). Rising rental prices may make it difficult for low-income residents to continue to live within the county, potentially causing them to look for housing in adjacent communities. Similarly, rising housing prices and property values may price low-income individuals and families out of the local market. For Teton County (ID), these effects are likely to be compounded given a growing proportion of the labor market serving the Jackson area have already moved to Teton County (ID) in search of affordable housing.

**Safety.** Expanded ski area operations may lead to three potential impacts to safety: increased summer outdoor recreation use and associated safety risks; increased concerns over skier safety and avalanche hazards; and a reduced effectiveness of local emergency response personnel.

Regarding the first potential impact, the forest already supports a diverse array of summer outdoor recreation activities in and adjacent to the Grand Targhee's proposed area of expanded operations. As such, there's the possibility that new roadways and trails could create additional collision risks beyond those already present on the forest.

Regarding the second potential impact, a larger amount of skiable terrain will lead to greater risks to skier safety and avalanche hazards. These risks can be mitigated through increases in on-mountain safety operations as well as avalanche hazard mitigation efforts.

Finally, increased traffic and use of the area may negatively affect the response times of and effectiveness of emergency response personnel (e.g., search and rescue, fire fighters, emergency medical technicians, etc.).

**Tourism.** Ski area expansion will likely increase the appeal of and travel to the resort and nearby communities. All of the possible impacts associated with an increase in travel and tourism (e.g., impacts to the local economy, impacts to traffic and parking, etc.) are described as independent impacts in environmental assessments and described under their respective headers in this document.

**Wilderness/Roadless Areas.** Impacts to designated Wilderness or roadless areas on forest service lands were occasionally mentioned in the environmental assessments we reviewed. These impacts were often related to the ability to experience solitude or primitive and unconfined recreation in designated Wilderness areas. The expansion of the Grand Targhee Resort will likely not have any impacts to designated Wilderness or roadless areas given no portion of the proposed special use permit adjustment would occur in areas classified as designated Wilderness.

**Quality of Life.** Ski area expansion could influence changes in the quality of life for residents living in nearby communities. Across the environmental assessments we reviewed, noted impacts included: impacts to community structure that were perceived to be undesirable by current residents; an erosion of community identity; and a loss of sense of place.