

March 1, 2023

Dear Teton County Board of Commissioners,

DEV2022-0008 and ADJ2022-0013 do NOT COMPLY with The Grand Targhee Resort Master Plan for the following reasons.

- The Grand Targhee Resort Master Plan (GTRMP) requires preparation of a fire management plan prior to the first phase of development. This plan should be approved by Teton County, WY, Teton County, ID and the Caribou-Targhee Forest prior to consideration of any development application for the Grand Targhee Resort (GTR).
- Due to required wildfire mitigation, the proposed building envelopes will result in avoidable impacts on the adjacent forest service land. An approved fire management plan and wildfire mitigation plan should steer the location of the building envelopes to provide for human safety, protection of property and avoidance of natural resources, wildlife habitat and financial impacts on the Caribou-Targhee Forest land.
- The GTRMP (and the Land Development Regulations) prohibit development on slopes >30 percent. The west residential area of GTR is 84.3 acres. There is plenty of room to develop the allowable residential units without impacting slopes >30 percent.
- If development of slopes >30 percent is considered by the Board of County Commissioners (BCC), an amendment to the GTRMP is required; the Administrative Adjustment is the wrong tool.

The Jackson Hole Conservation Alliance objects to Grand Targhee Resort's applications for development of 22 cabins (DEV 2022-0008, ADJ2022-0013). Our issues with the proposed project are outlined below.

1. Threat to human safety and protection of property.

The proposed development lacks a fire management plan. GTR is in a remote, high fire-risk location, only accessible by Ski Hill Road. Having only one way in and one way out poses a huge risk to occupants and rescue workers in the event of a wildfire, or just about any other natural disaster.

Given the recent history of extreme wildfires and the devastation of numerous communities in the west, coupled with the fact that climate change will make this problem worse over time, it is imperative that GTR establish a fire management plan prior to approval of their Cabins application. The fire management plan should steer the design and location of the development, not be created as a remedial action after development permitting. GTR is in a remote location within Teton County's wildland/urban interface that is situated downwind and uphill of forests that support high-severity fire,

and its only access is Ski Hill Road. It is irresponsible to approve a remote residential development in a wildfire prone area, with only one access road without a fire management plan.

GTRMP, page 48, Section 3.9.C.4, agrees with this assessment in that "the resort shall prepare a wildland/urban interface study prior to the construction of the first phase of development". The Conservation Alliance contends, THIS IS THE FIRST PHASE OF DEVELOPMENT; the fire management plan is required. While the definition for "development" is not included in GTRMP, the LDRs define "development" in part as any development option or subdivision. The definition of development option includes any division of land.

It is unfathomable that this development has been brought forward without the common sense of a fire management plan in place prior to the approval of site planning of the development.

The Jackson Hole Conservation Alliance requests that the BCC require a fire management plan to be approved by Teton County, WY, Teton County, ID and the Caribou-Targhee Forest prior to consideration of the proposed applications.

2. Natural Resource Impacts.

To ensure human safety and protection of property, any development on GTR, will require a wildfire mitigation plan. The proximity of the proposed cabins to US Forest Service land will inevitably result in wildfire mitigation in the form of vegetation clearing and fuels reduction on forest service land. The 120-acre Resort was sized and configured by the forest service in part to avoid valuable wildlife habitat, wetlands and waterbodies within GTR. If structures are located so close to forest service property, impacts to natural resources for the purpose of fire mitigation (vegetation removal) will be located on the more ecologically valuable federal land. The proposed private development would result in natural resource, wildlife habitat and financial impacts on public lands.

Section 2.2.B.1 of the GTRMP states that minimum setbacks for residential uses will be established by building envelopes. Approval of setbacks and locations of the building envelopes have been left open for approval at the Final Development Plan stage. Now is the time to ensure safe and compliant placement of building envelopes. Placement of building envelopes should utilize information generated in the fire management plan to be located to minimize wildfire risk and eliminate offsite impacts as much as possible.

The Jackson Hole Conservation Alliance requests that the BCC, prior to approval of the proposed site plan, require GTR to prepare a fire management plan and a wildfire mitigation plan that will guide the safe location of building envelopes and alleviate natural resource, wildlife habitat and financial impacts on the Caribou-Targhee National Forest.

3. Impacts to slopes >30 percent.

The 17.5-acre development area for the Cabins is self-imposed by GTR; the west residential area of the GTRMP is 84.3 acres. Certainly, there are locations within the 84.3 acres that protect natural resources and are on slopes less than 30 percent. The project should be required to locate development to avoid slopes in excess of 30 percent as required by the GTRMP. The GTRMP itself calls out steep slopes (>30%) as “natural hazards to avoid”. Allowing adjustments to the established development standards whether in the GTRMP or the LDRs, when alternative development locations exist, reduces the protection to our community not only for this proposal but also for future development proposals. The validity of established development standards for future developments cannot be defended if they are easily adjusted in situations where alternatives are available. GTR could avoid steep slope development without changing regulations – the effect of which may have additional consequences outside of this development.

The Jackson Hole Conservation Alliance requests that the BCC uphold the prohibition of development of slopes >30 percent.

4. Administrative Adjustment vs Amendment to the GTRMP.

GTR is asking for an Administrative Adjustment from the LDRs to develop on steep slopes where development would otherwise be prohibited. We believe this to be the wrong approach.

Development of slopes >30 percent is prohibited in both the LDRs and the GTRMP. If the BCC, would like to entertain development on slopes in excess of 30%, then the appropriate process should be followed.

An Administrative Adjustment is permitted to adjust the LDRs under certain circumstances and within specific limits. The GTRMP dictates the development standards for GTR unless the GTRMP is silent then development standards default to the LDRs. The GTRMP specifically calls development of slopes more than 30 percent “natural hazards to avoid” and prohibits development of slopes >30 percent. The correct process to request development on slopes >30 percent is an amendment to the GTRMP, not an Administrative Adjustment to the LDRs.

The Jackson Hole Conservation Alliance requests that the BCC, require GTR to follow the correct process, amendment to the GTRMP, to construct on slopes >30 percent.

Thank you for considering our comments and for your service to our community.

Best,

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