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Organization:

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Comments: Dear Supervisor Pierson & Caribou-Targhee land managers,

I appreciate the opportunity to comment on the DEIS for the 2018 Master Development Plan project regarding the Targhee Expansion. As a lifetime Teton local, a skier & trail runner, and a conservationist with a Masters degree in environmental law, I am strongly opposed to Targhee expanding beyond its current boundaries. While I support Targhee's growth and see the value the resort brings to both Teton County Idaho and Wyoming, I believe expansion of the resort's boundary would come at great expense to the surrounding wildland areas.

Alternative 3, as presented in the DEIS, would authorize new development within Targhee's existing footprint and would be a win-win for all interests. It allows the ski area to update its facilities and expand its lift-served terrain and offerings, while continuing to protect adjacent public lands that are not only imperative for wildlife, but valuable recreation resources as well.

I am opposed to Alternatives 2, 4, and 5 because they include:

- Direct and indirect habitat loss for wildlife, namely bighorn sheep.
- Loss of white-bark pine, an important endangered species we have gone great lengths to protect in other areas of the Teton Range.
- Significant impacts to the many uses and users of Teton Canyon and Grand Teton National Park (backcountry skiers, Nordic skiers, snowshoers, summer recreationists, etc.), particularly to the soundscapes and viewscapes of the area.

I am also concerned about how the increased snowmaking and other proposed new water uses across all Alternatives will impact water resources. The DEIS fails to provide adequate information about where the water to support these activities will come from, if it is even truly available, or how wastewater will be treated and disposed of. This issue must be addressed in the FEIS. Likewise, I am concerned about the impact of placing a restaurant on the very top of Fred's Mountain will impact the adjacent Wilderness and viewscapes from Grand Teton National Park. If approved, this restaurant should be located below the ridgeline where it would not be visible from the Wilderness or Park. Likewise, the North Boundary lift would be visible from many points within the Wilderness and should be eliminated or modified to reduce this visual impact.

While both expansion pods would bring negative impacts to wildlife, the expansion into South Bowl strikes at the heart of a conservation challenge the backcountry community is a key stakeholder in. Alternatives 2 and 4 would convert important bighorn sheep habitat in South Bowl into a ski resort and indirectly eliminate adjacent critical habitat through the disturbance caused by avalanche mitigation. Meanwhile, the Caribou-Targhee National Forest and other land managers in the Teton region have asked the backcountry ski community to voluntarily avoid important sheep habitat, including a portion of South Bowl! The mere proposal of expanding into this area is hypocritical.

According to available user data, Grand Targhee's existing boundaries encompass 2,600 acres and services about 200,000 skiers annually. The Jackson Hole Mountain Resort operates on 2,500 acres of Forest Service land and services over 500,000 skiers annually. Thus, Grand Targhee has many opportunities within its boundary to grow and develop. Expanding beyond its existing boundary is simply not needed, especially at such a great expense.

As a skier and a conservationist, I believe it is important that we find a balance between recreation and wildlife habitat needs in the Teton Region, and keeping Targhee within its current boundaries is the best way to

accomplish this on the West side of the Tetons.