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First name: Anon

Last name: Anon

Organization:

Title:

Comments: Caribou-Targhee Forest Supervisor:

Thank you for the opportunity to comment. My comments are summarized in the following points:

* The expansion into South Bowl does not fit the Purpose and Need. First, it is advanced terrain, which does not fit the skier market needs of beginner to advance-intermediate described in the Purpose and Need. Secondly, safety would not be improved by expansion into this area. Skiers would have access to other backcountry terrain from the expanded area, so that risk would not change, as stated in the DEIS. Additionally, if South Bowl were a part of Grand Targhee Resort, the avalanche risk would be controlled through bombs, avalaunchers, and closures. However, the DEIS does not assess the hazard of a steep south facing slope within the ski boundary. The risk of head and spine injuries from falls to a large number of resort users would be greater than avalanche risk to the small number of backcountry users. Regardless if it is in or out of bounds, this is hazardous terrain.

* Please consider the policy in Forest Service Manual 2343 in your decision. FSM 2343 states that the Forest Service should "work with holders to ensure that ski areas provide a high-quality recreation experience and that recreation activities at ski areas are conducted in a manner that protects the natural environment and cultural resources and enhances community values." Describe how your decision aligns with community values and protects the natural environment.

An additional element of FSM 2343 to consider in your decision is that operations are "not requiring significant modifications to topography to facilitate construction or operations." The proposed action includes 25 acres of grading for ski runs. I believe this goes against policy because it would significantly change the natural character of the mountain.

* Do not consider a septic system until the effects are properly analyzed. The DEIS recognizes the upper mountain where septic systems are proposed contains karst terrain where groundwater moves quickly and is susceptible to contamination. As such, the possibility of nutrient contamination from a septic system is an issue that needs to be addressed. The DEIS says that the Forest Service will solely rely on an engineering report to see if the septic system will be approved. This does not analyze the potential effects of the septic system through the NEPA process by an interdisciplinary team or disclose the effects in the engineering report to the public.

* The analysis of wetland impacts does not disclose effects and does not show compliance with EO 11990. The analysis of the proposed action and alternatives does not give the acres of wetlands that would be temporarily or permanently impacted, therefore the effects are not fully disclosed per NEPA. By not disclosing the impacts to wetlands, the project has not shown that it is following EO 11990 by showing how wetlands have been avoided where practicable. The DEIS suggests that it is not possible to avoid wetlands and there is no rationale to why it was impossible to avoid them.

* Correct inconsistencies and unexplained rationale about the speed of groundwater transport. The DEIS states "these areas are characterized by springs and underground caves in which the hydrogeology can be vulnerable to contamination due to runoff being transported through subsurface channels" (p. 341). Later in the DEIS, this statement is contradicted. "However, it has been determined that due to the large distance between the possible nutrient contamination area and the downstream PWS, the nutrients would likely be taken up by the plants, air, natural bacteria, and soils along the water runoff pathway" (p. 345). The rationale behind "it has been determined" is not explained. The best available science per Kiver (1977) shows that dye-traced water from near Devil's Stairs in Teton Canyon traveled only 4 and 6 miles to springs in Eddington Canyon, not a long

distance. Also, dye tracing in the karst terrain in Logan Canyon shows rapid groundwater transport, which has a similar geologic context to Grand Targhee Resort (Spangler 2001).

* The impacts of unstable slopes is inadequately analyzed. The BMPs state that no construction will occur on unstable slopes. Importantly, unstable slopes through sinkhole collapse is not analyzed in the DEIS. Sinkhole collapse is a known issue since the formation of the vertical cave in the Good, Bad, Ugly area. The top of Peaked Mountain, where a restaurant is proposed, shows signs of previous sinkhole collapse, as shown in elevations models accessible on websites like CalTopo.com (Doctor and Young 2013).

* Cumulative effects should consider effects from Jackson Hole Mountain Resort. The resort is located within the Teton Range as well, therefore effects from Jackson Hole Mountain Resort projects should be considered in this project. This should include effects to the Jeremiah Smith Wilderness and Grand Teton National Park by allowing overnight packs on the Tram and the visual impacts of the Tram and Grand Teton Skywalk. This should also include cumulative effects to sheep, lynx, and wolverine.

* Thank you to Grand Targhee Resort for being transparent with their fees and visitation numbers. This paints a clear picture important for understanding the effects of the project.

Thank you for your consideration.

Doctor, D. H., & Young, J. A. (2013). An evaluation of automated GIS tools for delineating karst sinkholes and closed depressions from 1-meter LiDAR-derived digital elevation data NCKRI Symposium 2: Proceedings of the Thirteenth Multidisciplinary Conference on Sinkholes and the Engineering and Environmental Impacts of Karst.

Kiver, E. P. (1977). Caves of Wyoming. Chris Hill, Wayne Sutherland, and Lee Tierney. Bulletin 59, Geological Survey of Wyoming, Laramie, 230 pp., 1976. Quaternary Research, 8(2), 243-244.

Spangler, L. E. (2001). Delineation of Recharge Areas for Karst Springs in Logan Canyon, Bear River Range, Northern Utah By Lawrence E. Spangler US Geological Survey, 2329 Orton Circle, Salt Lake City, Utah 84119. US Geological Survey Karst Interest Group Proceedings, St. Petersburg, Florida, February 13-16, 2001, 1(4011), 186.