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Coeur d'Alene River Ranger District
Lookout Pass Ski and Recreation Area
RECORD OF DECISION



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LOOKOUT PASS SKI AND RECREATION AREA

Record Of Decision

Shoshone County, Idaho and Mineral County, Montana

I. Project Background

This decision is the culmination of an effort by the Idaho Panhandle National Forests (IPNF) and Lolo National Forest (LNF) to address recreation area expansion needs at the Lookout Pass Ski and Recreation Area (Figure 1). This Record of Decision documents our decision related to proposed expansions activities at the Lookout Pass Ski and Recreation Area (LPSRA) on the Coeur d'Alene River Ranger District (IPNF) and Superior Ranger District (LNF). The project area consists of approximately 500 acres of National Forest System lands located on the Idaho – Montana Border. The Forest Service administers all land within and surrounding the project area.

LPSRA is located in the northern Rocky Mountains, 6 miles east of Mullan, Idaho and 33 miles west of St. Regis, Montana (Figure 1). LPSRA is almost halfway between Spokane, Washington (90 miles west of the ski area) and Missoula, Montana (100 miles east of the ski area). The existing ski area lies entirely on Federal land administered by the USDA Forest Service. The Idaho Panhandle National Forest (IPNF) administers the Idaho side of LPSRA in Shoshone County. The Lolo National Forest (LNF) administers the Montana side of the LPSRA in Mineral County. The Special Use Permit for LPSRA is administered by the IPNF. Existing ski runs and lifts are located on the east side of Runt Mountain (Figure 1).

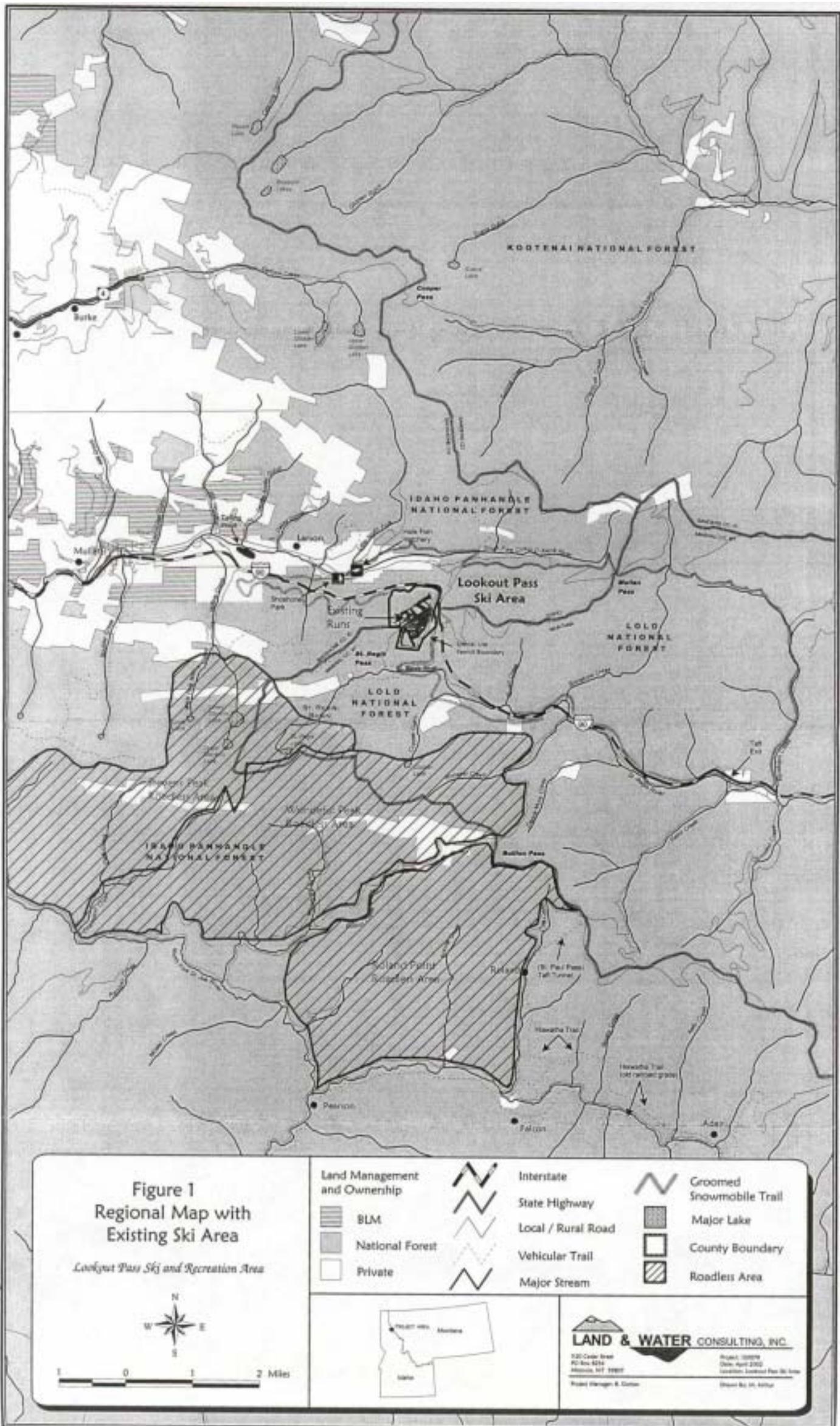
LPSRA currently operates a full winter and summer schedule. Facilities include one chairlift, one rope tow, a base lodge, rental shop, maintenance building, ski patrol first aid room, portable A-frame building for ticketing, electrical bunker, and flammable materials storage building. Existing facilities also include water and sewage disposal systems. Forest roads and trails can be accessed from both the upper and lower portions of the existing ski area.

The scope of this environmental impact statement was determined through public scoping and agency analysis, in accordance with the requirements of 40 CFR 1508.25. The scope of the actions includes only those site-specific, on-the-ground activities addressed by the FEIS and this decision document. The FEIS is not a general management plan for the Lookout Pass Ski and Recreation Area (LPSA).

II. Purpose and Need For Action

The LPSRA has proposed to expand its use of National Forest System lands. The proposed expansion is part of the LPSRA Master Development Plan (pgs 35-42, project files) which was accepted in 1997 by the Idaho Panhandle National Forest (IPNF), which administers the special use permit. The purpose and need for this project was based on both physical and economic factors that require expanding services at LPSRA (FEIS, pgs. 1-1 to 1-7). These factors included:

1. The need for additional ski terrain to respond to increased demand, to enhance the skiing experience, to provide more advanced and intermediate terrain and to compete effectively in the local ski market;



2. The need to decrease crowding, reduce skier congestion /conflicts and increase safe operating conditions; and
3. The need to maintain the economic viability of LPSRA to ensure its continued operation and its ongoing contribution to the local economy.

In addition to these factors, we used other guidance documents to help identify the purpose and need for this project. The first is the "Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin," (USDA and USDI 1996). The assessment covered the Columbia River Basin in Washington and Oregon east of the crest of the Cascade Mountains, most of Idaho, and small portions of Utah, Nevada, and Montana for a total of 145 million acres.

In the Integrated Scientific Assessment (p. 23), the Lookout Pass Project Area is listed within a geographic area identified as Ecological Reporting Unit (ERU) #8 (part of a larger area identified by the Bureau of Economic Analysis as the Spokane economic region).

"In the future, recreation demands for the public lands in the Basin will continue to increase. The Basin offers more recreational opportunities, especially in undeveloped and remote settings for land-, snow-, and water-based activities, than other regions in the country. The relative importance of recreation opportunities in the Basin will increase over time. As more people travel to the Basin for vacations, recreation will become an increasingly important export."

Another source of information was the Northern Region Overview and Summary (USDA April 1999), discussed in the FEIS on page 1-15. In the Overview, the Lookout Pass Recreation Area is listed within the Northwest Zone.

"Recreation investments will focus on water and sanitation rehabilitation along lakes and rivers. With proposed listing of lynx, winter recreation planning is a need," (Overview Summary, page 10).

"Some recreation sites in the Region are near or are exceeding their capacity for use," (Overview Detailed Report, page 143).

Achievement of the LPSRA project's purpose and need was identified as potentially requiring a site-specific Forest Plan Amendment(s) to the IPNF and/or Lolo Forest Plans (FEIS, pgs. 1-19 and 1-20).

III. Description of Our Decision

Decision

As Forest Supervisors of the IPNF and Lolo National Forest, we have been delegated authority as the Responsible Officials for the decisions outlined in this Record of Decision (ROD) by the Regional Forester.

We have chosen to implement Alternative D, described in the Final Environmental Impact Statement (FEIS), to achieve the project goals. Throughout this decision document, information provided for the Selected Alternative refers to Alternative D unless specifically

stated otherwise. Table 1 summarizes activities under the Selected Alternative. Please refer to Figure 2 for a map of the Selected Alternative.

In addition to the activities identified in Table 1, we analyzed the effects of implementing activities identified as “opportunities”, that could complement and improve resource conditions or recreation but that are not mandatory for overall project implementation. A description of these specific opportunities is provided in Attachment A of this decision.

Under the Selected Alternative, we are authorizing the following activities:

- 1. Recreation Area Expansion:** Improve recreation opportunities by constructing two new ski lifts, clearing 85 acres of timber for lift and ski run construction (with associated slash disposal of either burning, chipping, or lopping), expanding the parking lot by one acre, expanding existing buildings by 19,600 square feet (see Attachment A), upgrading 2,100 feet of existing road, constructing 1.2 miles of temporary roads for timber clearing and lift construction, regrading 4.7 acres of existing and new runs, installing 4,300 feet of underground electrical lines, installing one permanent and three temporary culverts and extending existing culverts by a total of 60 feet.
- 2. Permit Area Expansion:** Increase the size of the Lookout Pass Ski and Recreation Area permit area by 109 acres (from 335 to 444 acres). As a result, management area requirements will be amended in the respective Forest Plans to accommodate the ski area expansion. On the IPNF and Lolo National Forest, this will require a non-significant Forest Plan amendment to be implemented. The non-significant amendment to the IPNF Forest Plan will change the Visual Quality Objective within the IPNF portion of the LPSRA (Management Area 17) to modification from retention (see Attachment D). The non-significant amendment to the Lolo Forest Plan will change about 65 acres of Management Area 9 (concentrated public use) to Management Area 8 (developed ski area emphasis) (See Attachment E). The change in the permit area boundary will also mean that the 109 acres will be automatically withdrawn from mineral entry, subject to valid existing rights, per Sec 701(j), Title VII, Division I, of the Omnibus Parks and Public Lands Management Act of 1996. No claims are active in the area. (See section IX.J below for more information concerning the withdrawal.)
- 3. Water Quality Mitigation:** Mitigate the existing drainage and erosion problems on Primitive Roads A and B, Primitive Trail A, and Forest Road 18591.

Primitive Road A is an existing four-wheel drive road that crosses the bottom of a large wetland on the south side of Runt Mountain outside the current permit area. Water draining from the wetland area has been captured by the road and has caused gully erosion up to 12 inches deep. Seasonal use restrictions would be imposed on Primitive Road A to prevent damage during timber harvest operations. Water bars would be installed to keep all surface water contained within the wetland area and prevent additional roadway erosion. Following tree removal, Primitive Road A would be re-contoured and reduced in width to accommodate a trail for foot traffic, mountain biking and cross-country skiing. All exposed soil would be re-seeded and trees allowed to re-grow beyond the immediate trail surface (see FEIS, pg. 2-28).

Reconstruction of Primitive Road B would be accomplished in a manner that eliminates

past roadway erosion problems. This requires final grading to direct runoff into vegetated areas and revegetation of the formerly bare road surface. Those portions not reconstructed into ski runs would be rehabilitated and graded to eliminate erosion problems. The final number and location of water bars needed on Primitive Roads A and B will be determined by forest personnel during site visits coincident with construction and final contouring.

Forest Road 18591 would also be regraded to facilitate tree removal and transport from adjacent ski runs. Regrading would include installation of water bars to reduce current erosion.

- 4. Monitoring:** Monitor to measure how well we implement the above activities, how well the activities are achieving the effects we predicted, and long-term trends resulting from our actions.

Table 1: Activities included in Alternative D the Selected Alternative

Proposed Ski Area Modifications	Alternative D
Additional parking	1 acre
Temporary roads for timber harvest and lift installation (reclaimed after timber harvest)	1.2 miles
Road upgrade for timber harvest followed by reconstruction into trail for hiking, biking and cross-country skiing (Primitive Road A)	2,100 feet
Water Quality Mitigation - road elimination and re-hab into ski run with appropriate erosion controls and revegetation (Primitive Road B)	3,500 feet
Road upgrade for timber harvest including improved erosion control features (Forest Road 18591).	1,300 feet
Construct ski runs and lifts on south side	54 acres
Construct ski runs and lifts on north side	30 acres
Construct chairlifts	Two lifts totaling 5,766 feet
Regrading and revegetation on existing runs	2 acres
Regrading and revegetation on new runs	2.7 acres
Construct/remodel buildings (including Lodge, Guest Services Building, Rental/Retail Shop, Maintenance Building, and other structures. See FEIS pgs. 2-18 and 2-19)	19,600 square feet
Construct septic and drain field plus replacement area	0.1 acre
Snowmobile Re-route #2 length of trail cleared around south lift terminal (no excavation required)	955 feet
Installation and upgrade of permanent culverts to withstand 100-year flood event	1
Installation of culvert extension and upgrade to withstand 100-year flood event	1
Installation of temporary culverts	3
Tree Removal	
South Side Tree Removal	
For temporary roads	0.8 acres
For runs and lifts	54.1 acres
For snowmobile re-route #2	0.2 acres
Total for South Side	55.1 acres
North Side Tree Removal	
For temporary roads	1.6 acres
For runs and lifts	28.5 acres
Total for North Side	30.1 acres
Total for Parking	0
Total required tree removal	85.2 acres

Each of these activities is discussed in more detail in Section VI, Activities and Effects Under the Selected Alternative. Activities will be implemented through administration of the special use permit, commercial timber sales and service contracts, as discussed in Section XII, Implementation.

Figure 2
Alternative D.
Lookout Pass Ski and Recreation Area

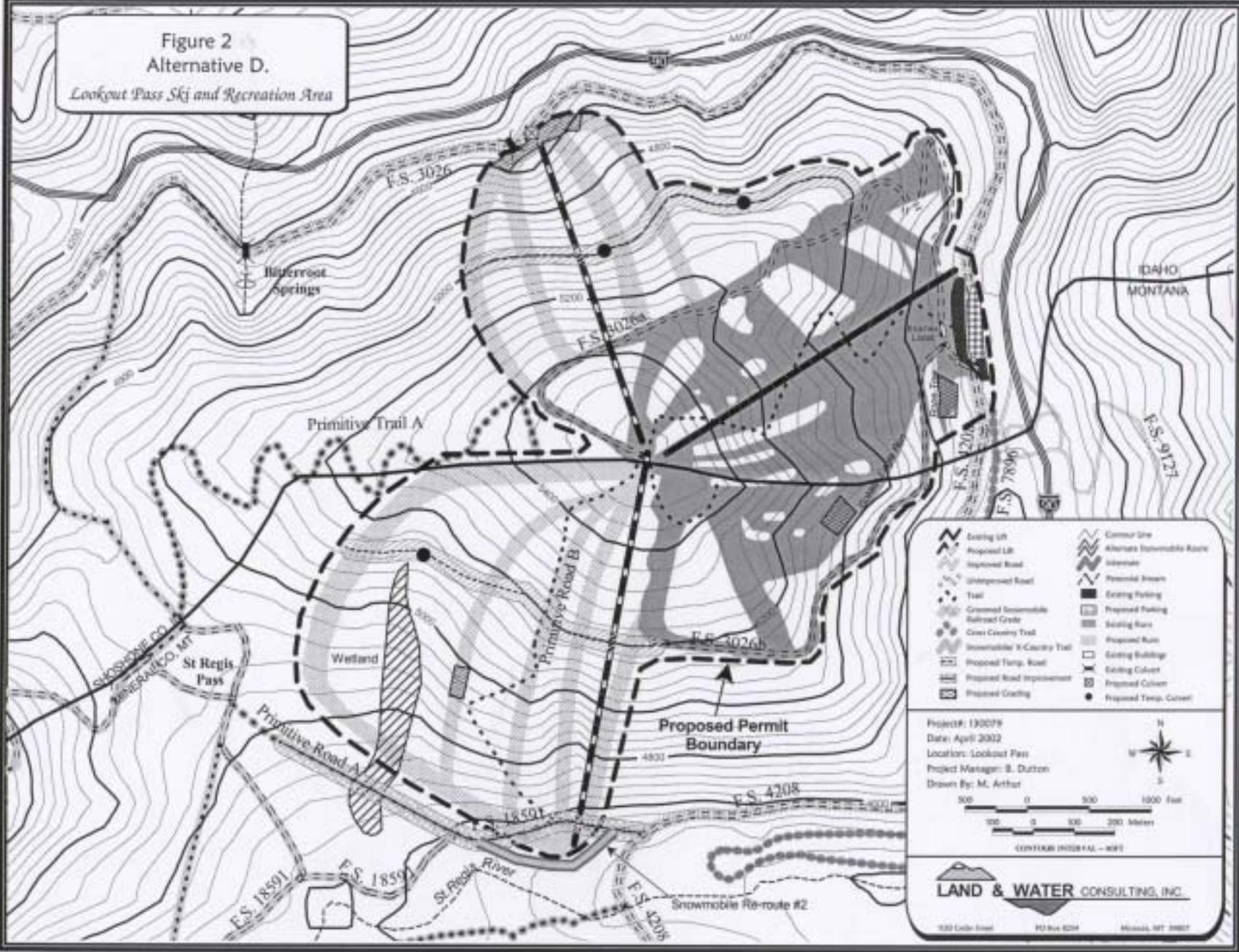
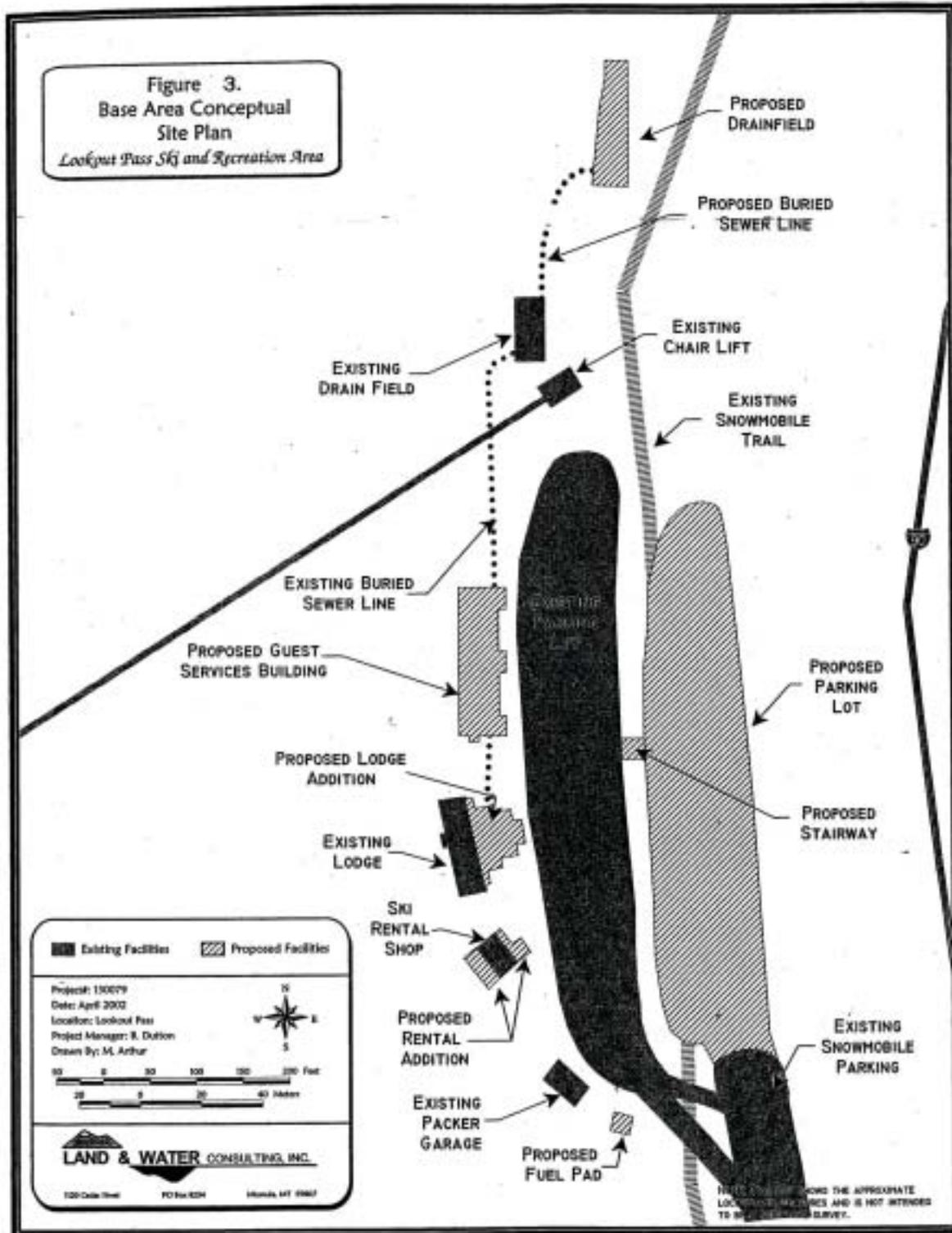


Figure 3. Base Area Conceptual Site Plan (Figure 2-4 from FEIS)



IV. Issue Identification and Alternative Development

This section describes the process used to identify issues and develop alternatives.

IV. A. Issue Identification

The project team initially met to discuss and identify issues related to the LPSRA proposal to implement portions of its master plan for expansion. These discussions included current conditions at the recreation area as well as recent increases in both summer and winter activities. Potential issues and alternatives were documented and presented to the public as we sought their input into the proposal. During scoping, the public and other agencies helped to identify additional issues, concerns, and ideas for alternative management in the area. The following table briefly identifies the activities that occurred during the scoping process for the Lookout Ski and Recreation Area project. Additional information is provided in Attachment C (Public Involvement and Comment).

Table 2. Overview of Activities During Scoping

Activity	Timing
<ul style="list-style-type: none"> ▪ Project initiation and planning meeting between LPSRA, IPNF, and Land & Water Consulting. Public Participation Plan initiated. 	March 29, 2000
<ul style="list-style-type: none"> ▪ Joint meeting between the Superior and Coeur d'Alene River Ranger Districts. ▪ IPNF completed and mailed a Scoping Notice that included a project summary and maps to over 300 individuals, organizations, and news groups. Public comments were accepted well beyond the 30-day scoping period. 	April 13, 2000 April 17, 2000
<ul style="list-style-type: none"> ▪ Notice of Intent (NOI) to prepare the LPSRA EIS was published in the Federal Register. 	April 21, 2000 April 21, 2000
<ul style="list-style-type: none"> ▪ LPSRA Expansion was first listed in the IPNF list of "Quarterly Schedule of Proposed Actions". The list is sent to over 500 groups/individuals and is also provided on the IPNF web site (http://www.fs.fed.us/ipnf). 	April 25, April 27, 2000
<ul style="list-style-type: none"> ▪ Feature articles appear in the Spokesman Review, Shoshone News Press, Missoulian, and Spokane.net. 	May 24, 2000
<ul style="list-style-type: none"> ▪ Last scoping comment received from the general public and government agencies. Scoping content analysis completed by May 30, 2000. 	

These activities identified issues pertinent to this proposal, helped drive the development of alternatives and highlighted environmental concerns as discussed further in Sections III.C, Development of Alternatives, and Section V, Comparison of Activities and Effects Under the Selected Alternative. The issues addressed in the FEIS included (see FEIS, pgs. 2-1 to 2-4):

- Recreation – Snowmobiling, Cross-Country Skiing, Ski Area Terrain, Free Ski School
- Snowmobile Trails
- Cross-Country and Backcountry Use
- Socio-economics Including Need, Feasibility, Profit, Taxes, Jobs, Economic Benefit, Increased Population and Ski Area Use, Recreation Costs and the Availability of a Free Ski School
- Wildlife
- Vegetation including Timber, Endangered/Threatened/Sensitive Plants, Noxious Weeds and Old Growth
- Watersheds, Water Quality and Aquatic Habitats
- Fisheries
- Springs, Wetlands and Riparian Areas
- Drainage Problems on the South Side of Runt Mountain
- Soil Resources Including Erosion and Productivity
- Air Quality
- Roadless Areas
- Parking, Transportation and Access/Visual Resources
- Avalanche Safety
- Snowmaking and Night Skiing
- Range

In addition to these issues, we received comments emphasizing the importance of the cumulative effects analysis, which is addressed through the documentation of effects in the FEIS (Chapter 3), rather than as a separate issue. Each of the issues is addressed in detail in the FEIS except for Snowmaking, Night Skiing and Range since none of these uses are part of the current conditions or the proposed action. For more information regarding concerns identified by other agencies and members of the public, please refer to Attachment C (Public Involvement and Comment).

IV.B. Development of Alternatives

Development of Alternatives Considered in Detail

Working with the public and other agencies, we used information from larger area studies (discussed in Section III.B), current condition data for the Lookout Pass Ski and Recreation Area (LPSRA), and public comments to develop three possible scenarios to address the Purpose and Need for Action in managing the LPSRA (we later developed an additional alternative based on public recommendations – please refer to the “Development of New Alternatives Considered in Detail” discussion in this section). The three initial alternatives are described briefly below. A summary comparison of management activities that would occur under each alternative is provided in the table that follows the alternative descriptions.

- **Alternative A** is the *No Action Alternative* that would maintain the existing ski and snowmobile opportunities at LPSRA. The No Action Alternative retains the availability of the area for other resource uses, such as timber management or dispersed recreation. The impacts from the proposed action alternatives to each resource (listed in Chapter 4 of the FEIS) would not occur.
- **Alternative B** was the original proposal by the applicant. Under this alternative, new ski runs and lifts would cover approximately 154 acres on both the north and south sides of Runt Mountain. Approximately 145 acres of trees would be removed for ski runs, lifts, temporary roads, and snowmobile re-routes. About 8.8 acres of new and existing ski runs would be re-graded on the north and south side of Runt Mountain to eliminate side-slopes and ease transitions to Forest Roads 3026 and 18591. The total area of National Forest Lands included in the ski area permit boundary would increase from 335 acres to 594 acres. Approximately 1.7 miles of temporary roads would be added between ski runs for tree removal and chairlift construction. The temporary roads would be reclaimed and revegetated after construction. One snowmobile trail would be re-routed around the chairlift on the south side of Runt Mountain (Snowmobile Re-route #2). Snowmobiles would be prohibited from accessing the north side of Runt Mountain within the proposed ski area permit boundary on the abandoned railroad grade (FS 3026). The existing snowmobile trail on FS 3026 would be closed between the proposed Bitterroot Lift and the ski area parking lot. Snowmobiles would access St. Regis Pass on an existing snowmobile route, but it would not be improved and groomed. Snowmobile users would continue to be allowed to park at Lookout Pass and travel south and west on FS 4208 and FS 18591.
- **Alternative C** was developed during preparation of the DEIS. Alternative C was designed to avoid Bitterroot Springs and its associated wetlands and wildlife habitat on the north side of Runt Mountain, to avoid most of a wetland impacted by a ski run proposed with Alternative B on the south side of Runt Mountain, to affect a smaller area

with ski runs and other features than Alternative B, to reduce impacts to visual resources and to provide two alternative groomed snowmobile trails to avoid conflicts with skiers.

Please refer to Table 8 for a summary comparison of the activities proposed under each alternative.

Development of Alternatives Considered But Eliminated From Further Study

Based on information gathered during scoping, three additional alternative concepts were identified by the project interdisciplinary team but dismissed from further study, as discussed briefly below. These alternatives were eliminated from detailed study because they did not meet the Purpose and Need of the project or for other reasons described below and in Chapter 2 of the FEIS pages 2-5 to 2-7.

- **Upgrading the Existing Ski Lift:** This would either add another double chairlift parallel to the existing chairlift or replace the existing chairlift with a triple or quad chairlift to increase the uphill capacity. An additional double chairlift parallel to the existing lift would be affordable, but would not alone meet the need to eliminate crowding at the base of the ski lift near the lodge area. Triple and quad chairlifts are expensive and the need for affordable skiing to continue and the economic need for LPSRA to maintain a viable operation would not be met.
- **Developing One Side of Runt Mountain Only:** Some comments were received that supported developing only the Lolo National Forest side, whereas other comments supported developing only the Idaho Panhandle side of Runt Mountain. Issues driving this suggestion centered on elimination of backcountry use within a user's favorite spot to recreate by snowmobile, cross-country, or backcountry skiing; or on concern that wildlife habitat would be more adversely affected on one side of Runt Mountain or the other. Analysis revealed that there are no clear recreation or wildlife issues driving development of one side of the mountain versus the other; and this alternative does not meet the purpose and need of the proposed action to reduce crowding and provide additional ski experiences and terrain.
- **Dual Use of the Railroad Grade on the North Side of Runt Mountain:** Dual (snowmobile and downhill ski) use of the abandoned railroad grade on the north side of Runt Mountain was suggested as an alternative to address recreation and wildlife issues raised in public comments. This alternative is similar to Alternative C but without a new groomed snowmobile trail to St. Regis Pass (Snowmobile Re-route #1). Analysis revealed that the existing railroad grade is not wide enough to accommodate both uses, especially in the vicinity of the lower lift tower and that widening the railroad grade is not feasible due to the slope steepness and interstate highway below.

Development of New Alternatives Considered in Detail

Existing conditions in the project area represent the effects of past activities. We analyzed the direct effects (those caused by the action and occurring at the same time and place), indirect effects (caused by the action but later in time or further removed in distance), and cumulative effects (effects of the activities when added to other past, present, and reasonably foreseeable future actions). We documented our analysis in a Draft Environmental Impact Statement (DEIS), and presented our findings to the public for their review. The following table summarizes the public involvement activities that occurred during review of the DEIS.

Table 3. Overview of Activities During DEIS Review

Activity	Timing
<ul style="list-style-type: none"> • DEIS sent to interested parties for 60 day review 	January 23, 2001
<ul style="list-style-type: none"> • Legal notice in the newspaper of record announcing availability of the DEIS 	January 23, 2001 January 23, 2001
<ul style="list-style-type: none"> • Notice of Availability of the DEIS published in the Federal Register 	February 23, 2001
<ul style="list-style-type: none"> • Joint field review of Snowmobile Re-route #1 (Alternative C) over St. Regis Pass by representatives of the IPNF, Lookout Associates, Montana Nightriders Snowmobile Club, Idaho Snowmobile Association, Blue Ribbon Coalition, Idaho State Snowmobile Club, and Lookout Mountain Skyriders Snowmobile Club 	March 8, 2001
<ul style="list-style-type: none"> • Presentation of the proposed action to the Shoshone Sportsman's Club by members of the IPNF. 	September 10, 2001
<ul style="list-style-type: none"> • Field review of Alternative C – Revised and Alternative C snowmobile re-route by members of the IPNF, Lookout Associates, and Land & Water Consulting, Inc. 	December 1, 2001 and December 5, 2001
<ul style="list-style-type: none"> • Presentations to U.S. Fish & Wildlife Service 	January 9 and December 4, 2001

During review of the DEIS, members of the public and other agencies provided comments that helped further define the analysis of effects and proposed activities, and which led to the development of Alternative D. Snowmobile enthusiasts did not agree with eliminating the existing groomed snowmobile trail along FS Road 3026 on the north side of Runt Mountain, even with construction of Alternative Snowmobile Trail #1. Other comments suggested limiting impacts to wetlands, especially Bitterroot Springs. These comments were used to develop a new alternative for consideration, Alternative D. Alternative D addresses issues concerning recreation and wildlife habitat related to Alternative C and would:

1. Retain the groomed snowmobile trail on FS Road 3026, the abandoned railroad grade on the north side of Runt Mountain;
2. Avoid the Bitterroot Springs and its associated wetlands and wildlife habitat on the north side of Runt Mountain;
3. Avoid most of a wetland followed by a ski run of Alternative B on the south side of Runt Mountain (see Chapters 3 and 4 – Vegetation and Wildlife); and
4. Affect a smaller area than Alternatives B and C.

Alternative D does not include Snowmobile Re-route #1 over St. Regis Pass as proposed under Alternative C. Snowmobile use would be maintained on the abandoned railroad grade on the north side of Runt Mountain. The proposed ski runs and lifts for Alternative D would be moved higher on the hill to a bench adjacent to the railroad grade. To accommodate this location, ski runs would cover a smaller area than Alternative C. The proposed action under Alternative D would include approximately 87 acres of new ski runs and chairlifts, 1.2 miles of temporary road, and 5,766 feet of new chairlifts. About 4.7 acres of new and existing ski runs would be regraded on the north and south sides of Runt Mountain to eliminate side-slopes. Alternative D would require one permanent culvert extension and one new culvert above the abandoned railroad grade (FS 3026) on the north side of Runt Mountain. The total area of National Forest Lands included in the ski area permit boundary would be increased from approximately 335 acres to 444 acres.

Based on what we heard from the public and additional information we gathered, we prepared a Final Environmental Impact Statement (FEIS) that thoroughly described the resources and uses of the LPSRA, the options for management, and our predictions as to the consequences

of our actions. Table 4 identifies public involvement activities that occurred during review of the FEIS. For more information related to the public review period and public comments, please refer to Attachment C of this decision document.

Table 4. Overview of Public Involvement Activities During FEIS Review

Activity	Timing
U.S. Fish & Wildlife Service Letter of concurrence	March 28, 2002
Notice of Availability of the FEIS published in the Federal Register	August 9, 2002
Notice of availability of FEIS sent to interested public	August 14, 2002
Legal notice in the newspaper of record (Spokesman-Review) announcing availability of the FEIS	August 16, 2002
News article in the Spokesman-Review announcing availability of the FEIS	August 22, 2002
Last public comment letter received	September 17, 2002

Public comments received during the FEIS review period primarily reiterated previous concerns, in some cases providing additional detail or further discussion. No new issues or alternatives were identified based on public comments. Responses to comments received during the FEIS review are provided in Attachment C, with copies of each letter submitted.

V. Rationale for Our Decision

We have made this decision based on how well the Selected Alternative addresses the purpose and need for action; its consistency with the goals and findings of Forest Service policy and legal mandates; how well it responds to the environmental issues and concerns identified by the public, other agencies, and Forest Service resource specialists; and the effects of the Selected Alternative in comparison to other alternatives considered.

Alternative D, identified as the preferred alternative in the FEIS, was developed in response to comments from the public, other government agencies, and internal reviews. As explained in Sections V, VI VII, VIII, IX, and X of this ROD, the Selected Alternative addresses both recreation needs and resource protection better than any other alternative. The Selected Alternative provides an opportunity to implement the LPSRA Master Plan, confirming the conclusions and recommendations from studies such as the Interior Columbia River Basin Ecosystem Management project and the Northern Region Overview, while furthering IPNF and Lolo Forest Plan goals and objectives.

It is our determination that the Selected Alternative best addresses all three primary purposes of this project. It provides the best opportunity for additional ski terrain, for decreasing crowding and for ensuring the continued operation of LPSRA. We did not choose to implement one of the other alternatives for the reasons described below.

Alternative A (No Action): Under this alternative, there would be no short-term impacts to resources such as air, soils, and wildlife at LPSRA due to construction activities. However, the No Action Alternative would not meet any of the identified needs related to increasing demands for recreation at LPSRA. Alternative A also would not correct soil erosion problems on Primitive Roads A and B, Primitive Trail A, and Forest Road 18591 (see FEIS, pg. 4-5). For these reasons, we did not select Alternative A for implementation.

Alternative B: This alternative would address increasing recreation demands at LPSRA and

have the greatest effect on resources due to the larger area of disturbance activities. However, this alternative was not as responsive to public comment as was the Selected Alternative, because it would end snowmobile use on the old railroad grade (FS Road 3026) along the north side of the ski area (see FEIS, pg. 2-4). In addition, this alternative would have the greatest impact on wetlands and on the Bitterroot Springs watershed (see FEIS pgs. 4-13 and 4-42). For these reasons, we did not select Alternative B for implementation.

Alternative C: This alternative would address increasing recreation demands at LPSRA and would have less impact on resources than Alternative B due to the smaller area of disturbance activities. However, this alternative also was not as responsive to public comment as was the Selected Alternative because it would also end snowmobile use on the old railroad grade (FS Road 3026) along the north side of the ski area (see FEIS, pg. 2-4). This alternative would have much less impact on wetlands than Alternative B, although it would still have impacts on the Bitterroot Springs watershed (see FEIS, pg. 4-13). For these reasons, we did not select Alternative C for implementation.

The following sections further document our rationale for the selection of Alternative D.

VI. Activities and Effects Under the Selected Alternative

For each resource, the following information is provided:

Issues and public concerns: A brief description of the specific issues and public concerns related to the resource. Additional discussion is provided in Section III, Issue Identification and Alternative Development, and in Attachment C, Public Involvement and Comments.

Activities: A brief description of the specific activities (if any) that would occur under the Selected Alternative to address the resource-related issues.

Measures: A description of measures (if any) identified to protect or enhance each resource.

Mitigation: Identification of specific mitigation measures (if any) that will be required during implementation. These measures were identified after analyzing the potential effects of proposed activities, to reduce impacts to natural resources. These measures will be incorporated into the project design, timber sale contract, and other contracts and project plans. Note: All mitigation and monitoring requirements are the responsibility of the permittee unless otherwise stated.

Effects: A summary of effects on the resource under the Selected Alternative.

Consistency with Forest Plan Standards: A brief discussion of how the Selected Alternative is consistent with applicable IPNF and Lolo Forest Plan standards.

VI.A. Water Resources

Water Resources Issues and Public Concerns

During scoping, concerns related to water resources were identified by the Forest Service and other agencies (including the Idaho Department of Environmental Quality and the Idaho Department of Fish and Game) as well as one environmental organization (Alliance for the Wild Rockies) and three individuals (see project file – Scoping Comments). Additional concerns related to water resources were identified in comments on the DEIS by the EPA and two environmental organizations (Lands Council and Kootenai Environmental Alliance).

Water resource issues identified for evaluation include water quality, water quantity, water rights, floodplains, Best Management Practices (BMPs) and standards under the Inland Native Fish Strategy (INFS). Specific concerns were expressed for 303(d) Water Quality Limited Stream Segments.

Only one comment on the FEIS mentioned water resources (Letter #2, Attachment C, Public Involvement and Comments). Mr. Mihelich's comments related to wetland and stream crossing permitting for culvert installations. His questions are informational and are addressed in Attachment C. Many comments were received at the scoping and DEIS stages and are addressed in Section 4.2.3 of the FEIS.

Water Resource Related Activities Under the Selected Alternative

Under the Selected Alternative, 1.2 miles of temporary roads will be constructed on the north and south sides of Runt Mountain. Three temporary culverts, one permanent culvert and one culvert extension will be installed across intermittent streams. Grading will occur on 4.7 acres, most of which is not adjacent to streams. The stream that will have adjacent work occurring is located on the Idaho side and is not a fish-bearing stream. Water quality mitigation will occur at this site and on 6,900 feet of existing roads with erosion/sediment problems (see Table 1 - Primitive Roads A & B and Forest Road 18591). Timber removal on 85 acres will occur for construction of ski runs, lifts and other facilities with the potential to increase water yield. Increased water use and sewage disposal will occur due to lodge expansion and increased skier numbers.

Measures to Protect or Enhance Water Resources

In development of the Selected Alternative, standards and guidelines of the Inland Native Fish Strategy were used specifically to protect water and aquatic biota within the Resource Area. Riparian Management Objectives and road management standards and guidelines will be applied on those roads used for harvesting or hauling of timber.

- Riparian Management Objectives and road management standards and guidelines will be applied on those roads used for harvesting or hauling of timber.
- Culvert installations and extensions will be sized to accommodate a 100-year flow event.
- Streamside buffers will be maintained to meet the riparian management objectives for slope stability in potentially sensitive areas. These buffers will also help maintain stream temperatures and provide a long-term supply of large woody debris.
- Trees felled within the RHCA for snowmobile reroute trail #2 will have the limbs lopped, but otherwise shall remain on-site.
- In-stream work (culvert installations, extensions and removals) will be prohibited, except during the dry/low flow period of July 15th to September 1st of each year because it can cause increased sedimentation (fines) while the work is being conducted. Timing guidelines are used to reduce impacts to eggs and fry.

Review of research reports and published professional papers demonstrate that the Inland Native Fish Strategy reduces the risk of loss of inland resident native fish populations or negative impacts to their habitat on National Forest System lands in the assessment area (USDA Forest Service 1995).

To minimize erosion and ensure compliance with State water quality standards, all road construction, timber harvest, and grading of ski runs associated with the LPSRA project will be completed using Best Management Practices. Monitoring of Best Management Practices has determined that recent projects on the Coeur d'Alene River Ranger District have been implemented as designed (USDA Forest Service, Idaho Panhandle National Forest 1998, 1999, 2000, 2001). The Forest Service Handbook 2509.22 (Soil and Water Conservation Handbook) outlines Best Management Practices that meet the intent of the water quality protection elements of the Idaho Forest Practices Act. Many are standard provisions to timber sale contracts (USFS Timber Sale Contract - Division B, 2400-6). Monitoring has determined that BMPs are effective at preventing water quality impacts from activities included in our Selected Alternative (Idaho DEQ 2000, Rosquist 2001, USDA Forest Service 2000a and 2000c, LNF 2000). Activities will meet or exceed rules and regulations of the Idaho Forest Practices Act, Best Management Practices, and the Idaho Forestry Act and Fire Hazard Reduction Laws (1988). These practices also meet the requirements of Montana's voluntary BMPs for timber harvest (Montana DNRC 1998) and the Montana Streamside Management Zone Law and Rules (Montana DNRC 1991).

A National Pollutant Discharge Elimination System Permit (NPDES Storm water Permit) will be required for this project. These permits are required by Federal law and are administered by state authorities. The NPDES permit will require general mitigation measures as well as detailed erosion control mitigation plans for construction of any new ski area facilities.

Mitigation to Reduce Effects to Water Resources

We will implement those mitigation measures that were identified on pages 2-26 to 2-27 of the FEIS as being necessary to reduce effects to soil and aquatic resources.

Effects of the Selected Alternative on Water Resources

Effects to water resources under the Selected Alternative are less than those of the other alternatives due to less area of timber removal, less grading, fewer temporary roads and fewer stream crossings requiring culverts (see FEIS, pgs. 4-13 and 4-14).

Water Quality

On the IPNF, the South Fork of the Coeur d'Alene is a 303d listed stream segment for metals and sediment. No Total Maximum Daily Load Limit (TMDL) has been established. The current requirement for this reach according to the TMDL rule (1998 Idaho Administrative Code IDAPA 16.01.02.054.05) is that the Forest Service implements the "best management practices for non-point sources deemed necessary to prohibit further impairment of the designated or existing beneficial uses." The Forest Service has agreements with the State to implement Best Management Practices (BMPs) or Soil and Water Conservation Practices for all management activities to meet the objectives for Forest Practices.

On the Lolo National Forest, the St. Regis River is also listed as impaired under the Clean Water Act 303(d) regulations. The Clean Water Act and EPA Water Quality Planning and Management Regulations require the determination of allowable pollutant levels in 303(d) listed streams through the development of TMDLs. No TMDLs have been established for the St. Regis or South Fork Coeur d'Alene Rivers.

Sediment impacts to water quality from soil-disturbing activities listed above are predicted to be

short-term and minor (FEIS pages 4-6 to 4-8) due to the use of BMPs and site-specific mitigation practices discussed previously under Mitigation. On both Forests the use of BMPs have proven to be effective in reducing sediment delivery to streams (FEIS, pg. 4-9). The Forest Service will ensure the effectiveness of mitigation measures, during project implementation, through the monitoring of construction activities by certified timber sale administrators and engineering representatives (FEIS, pg. 4-9).

There is a risk of sediment being delivered to intermittent and perennial streams on the north side of Runt Mountain from ski run grading (FEIS, pg. 4-7). Such an event could occur if a large precipitation event were to occur prior to re-vegetation being complete. We believe this risk has been and will be minimized by Forest Service monitoring of implementation activities and specific mitigation measures that include use of silt fences, water bars, undisturbed buffer strips, seeding, and timing restrictions (see FEIS, pg. 28 to 2-28).

While the temporary roads, which are located on the upper slopes of Runt Mountain will cross three ephemeral headwater swales (no riparian vegetation or defined stream bed or bank) they are not located near or will they cross any live or intermittent streams (FEIS, pg. 4-6). In addition, existing sediment sources will be reduced or eliminated on 6,900 feet of road (Primitive Roads A & B and Forest Road 18591) with current erosion/sediment problems (FEIS, pg. 4-7). The risk of sediment reaching the St. Regis River from these improvements is minimal because there are excellent buffer areas separating the roads from all streams including the river (FEIS, pg. 4-7). Therefore, a measurable increase in sediment as a result of project activities is unlikely and negative cumulative effects to water quality are not expected (FEIS, pgs. 4-10 and 4-12).

Further, we expect nutrient impacts related to an expanded sewage system and increase sewage flows to be minor and likely undetectable due to the small flow increase predicted, the distance of the system to surface and groundwater and due to the permitting and review process required by local and state health authorities (FEIS, pg. 4-7).

Water Quantity and Water Rights

Tree removal (timber harvest) for ski runs, lifts, and roads may have a small effect on water yield in local streams, but the amount (85 acres) is too small to cause a detectable change in water yield (FEIS, pg. 4-8). No new water diversions are proposed and the existing spring used by LPSRA is expected to supply adequate water for the proposed expansion under the existing water right (FEIS, pg. 4-8). No snowmaking is proposed; therefore, increased water use will only result from increased visitor numbers. Water quantity and water right impacts are discussed in further detail on page 4-8 of the FEIS.

Floodplains

Effects to floodplains will be limited to the culvert installations/extensions (less than 0.1 acres affected). These effects are expected to be slight due to the temporary nature of three of the installations and the utilization of BMPs to minimize disturbance (see Measures to Protect or Enhance Water Resources and Mitigation sections).

Consistency with Forest Plan Standards

The IPNF Forest Plan requires that management activities on Forest lands not significantly impair long-term water productivity and ensure that state water quality standards are met (IPNF

FP, pg. II-33). The Lolo National Forest Plan requires that State water quality standards be met and that human-caused increases in water yields be limited so that channel damage does not occur as a result of land management activities. Because the St. Regis and South Fork of the Coeur d'Alene River are both 303(d) listed streams, management activities cannot result in a net increase in sediment to the streams. We find that implementation of the Selected Alternative is unlikely to result in an increase in sediment and therefore consistent with Forest Plan sediment standards for the following reasons (FEIS, pgs. 4-7, 4-13 and 4-14):

- The area of disturbance is relatively small;
- Almost all disturbances are located away from streams and are separated by effective vegetated buffer areas which would prevent sediment reaching streams;
- The number of culvert installations is low;
- Most culvert installations are temporary and are located in headwater swales and not streams;
- Upgrades and reconstruction of Primitive Road A (2100 feet), Forest Road 18591 (1300 feet), Primitive Trail A and Primitive Road B (11,400 feet) would reduce or eliminate existing erosion and sedimentation problems;
- The specific mitigation measures proposed for this project, combined with the BMPs and the INFISH standards; and
- Inspection of all activities by IPNF personnel to establish compliance with mitigation measures, BMPs and INFISH standards and to identify any additional erosion control activities needed.
- Surface and groundwater quality is not expected to be impacted from the septic system

Potential increases in water yield as a result of vegetation removal for ski runs has been determined to be less than one percent and therefore undetectable (FEIS, pg. 4-8). While road construction activities associated with drainage improvements to FR 18591 will occur within an RHCA, the result will be a reduction in the risk of sediment delivery to streams (BA/BE, pg. 29). Therefore, Forest Plan standards for maintaining stream channel integrity will be met.

VI.B. Vegetation Resources

Vegetation Issues and Public Concerns

During scoping, concerns related to vegetation resources were identified by the Forest Service and other agencies and two individuals (see project file – Scoping Comments). Additional concerns related to vegetation resources were identified in comments on the DEIS by two environmental organizations (Lands Council and Kootenai Environmental Alliance) and by two individuals. Vegetation resource issues identified for evaluation include old growth, white pine super trees, fire and fuels, TES species, wetland/riparian areas and noxious weeds.

Two comment letters on the FEIS mentioned concerns for wetlands (see letters 3 and 6 in Attachment C). One scoping comment letter and four DEIS comment letters mentioned wetlands including those from the Environmental Protection Agency, Army Corps of Engineers, Lands Council and Kootenai Environmental Network (see scoping content analysis in project file and Chapter 5 of the FEIS-Comments and Responses). One comment letter from individuals received during scoping expressed concern for wildflowers and another expressed general concern for plant resources.

Comments received during scoping from the Environmental Protection Agency and Kootenai Environmental Alliance (DEIS, Appendix A), and during review of the DEIS from Doris Gerhart

(Attachment E, Comment Letter 07) specifically identified concerns related to protection of old-growth stands within the project area.

Vegetation Activities Under the Selected Alternative

Under the Selected Alternative, a total of 85 acres will have timber removed to allow for construction of ski runs, lifts, buildings, temporary roads and snowmobile re-routing (see Figure 2). Timber will be allowed to re-grow on temporary roads while vegetation on the remaining areas will be maintained in a condition dominated by forbs, grasses, low shrubs and seedling trees to allow over-the-snow recreation. All vegetation will be permanently removed from approximately 1.5 acres for new parking and buildings. All vegetation will be temporarily removed at four temporary and one permanent culvert site and on 4.7 acres to be graded as ski runs. Vegetation will be re-established on these 4.7 acres. Shrubs will be maintained at a height that allows a ski run crossing on 0.7 acre of wetland. Less than 0.1 acres of riparian area will be temporarily lost at culvert crossings. Most of this existing riparian vegetation will be restored following temporary road restoration. Vegetation will also be temporarily disturbed during installation of 4,300 feet of underground electrical line. Most of this electric line will be installed with a cable plow and minimal vegetation disturbance. Portions of this electric line will require excavation.

Measures to Protect Vegetation Resources

Super trees will be prominently marked during timber harvests. Vegetation will be re-established on graded areas, culvert installation sites, temporary roads and other locations where vegetation is temporarily removed for construction activities. Noxious weeds will be controlled by the permittee according to guidelines adopted by the IPNF and LNF (USDA 1998 and LNF 1990).

Mitigation to Reduce Effects to Vegetation

The contractor/permittee will be required to clean off-road equipment prior to entry onto the National Forest. If operations occur in areas infested with new invaders (as defined by the IPNF Weed Specialist), all equipment will be cleaned prior to leaving the site. Additionally, all disturbed soil will be seeded with a weed-free native and desired non-native seed mix and fertilized as necessary. These requirements are standard Forest Service BMPs for noxious weed control (FSM 2080).

Effects to Vegetation Under the Selected Alternative

Old growth will not be affected since none is present within the old or new permit boundary area (FEIS, pg. 4-26 and Project File, Vegetation Section – Idaho and Montana side Old Growth Reports). A total of 24 white pine “super trees” with superior genetics are within the project area and one is adjacent to an area proposed for timber removal. This tree will be prominently marked during timber harvest and preserved (FEIS, pg. 4-27). Fire control will not be affected except that ski runs will increase access and provide potential fire barriers. Fuel loading will decrease due to timber removal on new ski runs, roads and the parking area.

All known populations of TES plants will be protected from disturbance (Land & Water 2002). Currently, there is no endangered plant species listed for Montana or Idaho (see USFWS Species List No. 1-9-03-SP-002). Also, no threatened plants listed in Idaho or Montana find suitable habitat within the permit area (FEIS, pg. 4-27). Suitable habitat is present for several

sensitive plants and plants of special concern; however, ground surveys did not document any occurrences (Dutton 2000a, 2000b and Elliott 2000). Even if these plants are present, the Selected Alternative will not result in a trend toward federal listing. A Biological Assessment and Biological Evaluation was prepared and concurrence obtained from the US Fish and Wildlife Service (Attachment B).

Under the Selected Alternative effects to wetlands would be minimized. On the upper slopes of Runt Mountain, less than 0.1 acre of wetland and riparian area will be affected at culvert crossings for the temporary roads. This will be a temporary loss only, as the culverts will be removed and the roads recontoured when project activities are completed. Additionally, shrub and tree height will be controlled on 0.7 acres of wetland to allow skiing over the snow. At this site, no wetland excavation, grading or filling will occur but skiers would travel over the wetland on top of the snow (FEIS, pg. 4-27).

We will continue noxious weed control at LPSRA under the guidance of weed management plans for both the IPNF and LNF (USDA Forest Service 2000b and LNF 1990). There is the potential for a slight increase in noxious weeds due to soil-disturbing activities; however, effective control methods are available and the permittee will be responsible for controlling and monitoring for noxious weeds within the permit boundary. Additional information regarding noxious weeds is available in the project files under Noxious Weeds.

Consistency with Forest Plan Standards

Both the IPNF and Lolo National Forests require the maintenance of sufficient old growth to meet the needs of old growth dependent wildlife species. The Lolo National Forest Plan recommends retaining at least 8 percent of the forestland in old growth to provide for old growth associated wildlife species. The IPNF Forest Plan requires that at least 10% of the forested portion of the IPNF be maintained as old growth (IPNF FP, pg. II-29). No old growth will be harvested with implementation of the Selected Alternative, either on the IPNF or Lolo National Forests, as none is present within the revised permit area boundary (see the Project File, Vegetation section for old growth reports). However, the harvest of timber and clearing of 85 acres for ski area development will preclude future old growth development on these acres. Currently, the IPNF has identified and allocated 267,840 acres to be retained as old growth (IPNF 2001, pg. 59), with the Coeur d'Alene River RD recording a total of 60,122 acres of this allocated old growth (IPNF, 1999, pgs. 57 to 59). Approximately 11.6% of the Forest's forested landbase is being managed for old growth (IPNF 2001, pg. 59). This exceeds the Forest Plan standard of 10%. Therefore, the timber to be harvested on the IPNF as part of this project is not needed for future old growth allocation.

On the Lolo National Forest, within the Big Lookout Ecosystem Management Area, which includes the Lookout Pass project area, there is currently 675 acres designated for old growth management. Past timber harvest in the eastern third of this area has reduced the availability of old growth and potential recruitment old growth. However, the small area of early to mid-seral forest affected by this project is not expected, in the future, to have an impact on the ability of the Forest to identify and allocate appropriate stands for old growth management at levels specified in the Forest Plan. Also, in the reallocation process eight percent of the Lolo National Forest Management Area 21 was to meet allocation by old growth type. The interdisciplinary team identified 3,600 acres (8.42%) for old growth allocation. The trees that are to be removed in the creation of ski runs are not part of the stands that were recommended for old growth allocation (see Project File, Vegetation - Old Growth Analysis for the Montana Side).

Lolo Forest Plan Standard 21 applies to protecting special features such as wallows and seeps. The 12-acre wetland located on the southwest side of Runt Mountain is one of these special features (see FEIS, pg. 3-27). As documented in the FEIS, the wetland will be protected and effects to it minimized under the Selected Alternative (see FEIS, Table 4-4, pg. 4-29). While a ski run will affect 0.7 acres of the wetland by cutting shrubs and a few trees to about one foot in height, no ground grading or filling is required and the wetland will remain functional (FEIS, pg. 4-30).

The Forest Plans also require that habitat of threatened and endangered plant species be protected and sensitive plant habitat be managed to prevent further declines in populations that could lead to listing under the Endangered Species Act. As documented, plant surveys within the permit area have not discovered the occurrence of any TES plant species (FEIS, pg. 4-27).

VI.C. Soils

Soils Issues and Public Concerns

We received one comment during scoping concerning soil resources and none during review of the DEIS and FEIS. The Forest Service is required to ensure that management of the National Forest is accomplished without impairing the land's productivity. To achieve this, soil quality standards and guidelines are used to measure effects and design activities to avoid compromising soil productivity. Specific features of the alternatives were designed to address this issue, including measures designed to protect soil resources, and specific mitigation measures.

Activities Under the Selected Alternative

One and two-tenths mile of temporary road will be constructed on the north and south sides of Runt Mountain. These roads will be used for harvesting trees from the ski runs and lift lines, as well as for installing the lifts. After timber harvest and lift installation are completed, these roads will be returned to their original contour and revegetated. Grading will occur on 4.7 acres, most of which is not adjacent to streams. The water quality mitigation that will occur on 6,900 feet of existing roads will resolve existing erosion/sediment problems (see Table 1 - Primitive Roads A & B and Forest Road 18591).

Soil will be exposed to short-term erosion during construction of the one-acre parking area. The parking area will then be graded and then surfaced with gravel or crushed rock.

Design Features and Mitigation Measures to Protect or Enhance Conditions Related to Soils

To minimize erosion and ensure compliance with State water quality standards, all road construction and timber harvest associated with the LPSRA project will be completed using BMPs, as described under Section VI.A. Water Resources. Mitigation measures related to soil resources are described in the FEIS beginning on page 2-27. In addition to BMPs, additional site-specific mitigation practices will be implemented including:

All Disturbed Sites

- Minimize the area of exposed soil to that necessary to complete construction.
- Re-seed all soil exposed during timber harvest, lift construction, re-grading, or other

activities using weed-free seed mixes approved by the Forest Service.

- Control noxious weeds as needed according to specifications of the respective Forest Plans.
- Install silt fences, filter fabric, water bars or similar controls to prevent sediment from reaching stream channels at all culvert locations, road and trail reconstruction sites and other locations where soil is disturbed.
- Schedule culvert installations, re-grading and other soil disturbances outside the spring runoff period and bull trout spawning period (Permitted time period is 7/15 to 9/1).
- Preserve sediment buffer areas between streams and all soil disturbances including road construction.
- Maintain vegetation buffer areas between all disturbances and all stream channels sufficient to prevent sediment from reaching streams.
- Do not remove stumps from sites within 500 feet of streams; instead cut stumps to ground level.

Re-grading Sites

- Salvage topsoil and existing understory vegetation from areas to be re-graded. Replace this topsoil and plant remains after re-grading to provide a native plant seed and rhizome source. Re-seed graded areas as discussed above. Salvaged soil will also provide a rough surface with significant organic matter content that will encourage infiltration and reduce runoff.
- Install temporary water bars at a minimum interval of 100 feet on all re-graded sites. Water bars will discharge to vegetated sites such that sediment will not enter streams. These water bars may be removed following successful revegetation.

Eroding Road and Trail Sections

- Install appropriate water bars during Primitive Road A upgrade for timber removal, then reconstruct the entire 2,100 foot length into a narrower trail for cross-country skiing, hiking and mountain biking. Solve current erosion problem at wetland with appropriate final grading and water bars.
- Upgrade 1,300 feet of Forest Road 18591 for timber removal including water bars to reduce existing erosion.
- Install water bars where needed to eliminate existing erosion problems. This will include approximately 4 water bars each on Primitive Trail A and Primitive Road B. Ensure water bars discharge to well-vegetated areas capable of filtering all sediment before it reaches any stream.

A National Pollutant Discharge Elimination System Permit (NPDES Storm water Permit) will be required for this project. These permits are required by Federal law and are administered by state authorities. The NPDES permit will require general mitigation measures as well as detailed erosion control mitigation plans for construction of any new ski area facilities.

Effects to Soils Under the Selected Alternative

Erosion, compaction and displacement can affect soil's physical, chemical and biological properties, which can affect soil productivity. The FEIS analysis concentrated on soil erosion, displacement and compaction (FEIS p. 4-5 and 4-6). Disturbance to the soils could be from compaction, displacement, or erosion, while soil nutrition could change due to these disturbances.

Under the Selected Alternative, the majority of effects to soils will be related to timber harvest for ski run construction. Road construction will also cause soil compaction and displacement, and additional short-term effects on soils will occur from ski run grading and culvert installations (FEIS pg. 4-3).

To minimize the potential for soil erosion, all road construction, timber harvest, and ski run grading associated with the LPSRA project will be completed using BMPs (see FEIS, pgs. 2-26 and 2-27). This includes limiting culvert installations, re-grading and other soil disturbances to the period of July 15th to September 1st. Forest Service monitoring of construction activities by certified timber sale administrator and engineering representative during project implementation will further minimize the risk of soil erosion (FEIS, pg. 4-4).

After use, the temporary roads constructed for this project will be recontoured and revegetated. Though recontoured and revegetated, soil productivity on these road locations will be negatively affected due to compaction, mixing, and displacement of topsoil. With the Selected Alternative we have attempted to minimize this effect to soil productivity, by limiting the amount of road construction occurring and incorporating restoration measures (recontouring and revegetating) to begin the soil restoration process.

Areas of topsoil affected by ski run grading (4.7 acres) will be salvaged along with the existing understory vegetation. The intent of this mitigation measure is to maintain soil productivity by replacing the topsoil and plant remains after re-grading so as to provide a native plant seed and rhizome source (see this section's Mitigation discussion and FEIS, pg. 2-28). Minor disturbances will occur in skyline and cable-yarded units, and where fire lines are mechanically constructed around units (FEIS, pg. 4-3).

We do not expect implementation of the Selected Alternative to negatively effect slope stability within the existing or expanded permit area. No landslides, slumps, mudflows or other slope stability problems were identified in previous soil and geologic mapping of the permit area. There were no slope stability problems observed during field work and most of the soils mapped in the permit area have a high rock content and a low clay content. Even on steep slopes these materials drain freely and are generally very stable (FEIS, pg. 3-5).

Cumulative impacts were analyzed by combining the effects of this project on soils with the effects of other recent projects in the same area. The only other recently completed project in the area (Snowstorm Canyon Project) has been monitored for soil impacts and none were determined to be serious (Williams, 1992). Other projects including the Touch America Fiber Optic Project and the Jeep Jamboree have been predicted to have minor impacts on soils (FEIS, pgs. 4-4 and 4-5). The specific impacts of these other activities and their overall effects based on this cumulative analysis are summarized in the FEIS (beginning on page 4-4).

Consistency with Regional/Forest Plan Standards

The Forest Plan soil standards are intended to supplement, not replace, the national and regional policies, standards and guidelines found in Forest Service manual and handbooks and the Northern Regional Guide. Regional soil quality standards were revised in November 1999 (FSM 2550). The revised standard specifies that 85 percent of an activity area must have soil that is in satisfactory condition. The soil quality standards apply to lands where vegetation and water resource management are the principal objectives, that is, timber sales, grazing pastures or allotments, wildlife habitat, and riparian areas. The standards do not apply to intensively developed sites such as mines, developed recreation sites, administrative sites, or rock

quarries. Because the Lookout Pass Ski Area is a developed recreation site, the Regional standards do not apply.

VI.D. Wildlife

Wildlife Issues and Public Concerns

Section 7 of the Endangered Species Act directs federal agencies to ensure that their activities are not likely to jeopardize the continued existence of Threatened or Endangered species or result in the destruction or adverse modification to their critical habitat. A number of species have been identified as Sensitive within the geographic area of the Idaho Panhandle National Forests and the Lolo National Forests. Other species of wildlife are used as indicators of how well their needs for certain types of habitat are being met. During scoping, comments were received from Skip Hancock; Len Broberg, Sierra Club; Greg Turlotte, Idaho Fish and Game Department; Mike Guthneck; Mike Petersen, Ecology Center; John Swanson; and Michael Wood identifying concerns related to protection of wildlife and associated habitat, effects of timber removal, hunting and trapping, snags, summer use, TES species, lynx, habitat fragmentation, biological corridors, and cumulative effects. Analysis of alternatives in the FEIS and the preferred alternative in the BA/BE addressed these concerns.

Public comments were received on the DEIS and FEIS expressing concern with protection of wildlife habitat (Attachment C, Comment Letters 09, 20, 21, and 22; and FEIS, Chapter 5). The Selected Alternative addresses the concerns by minimizing potential adverse effects on wildlife and habitat. We have discussed wildlife habitat needs with the U.S. Fish and Wildlife Service, who reviewed our analysis and concurred with our determination of effects to species listed under the Endangered Species Act.

Activities Under the Selected Alternative

Under the Selected Alternative, there are no specific activities with the sole intent of improving wildlife habitat. Wildlife habitat will be affected through the timber harvest and clearing of 85 acres related to ski run and lift construction. However, avoidance of habitat associated with Bitterroot Springs on the north side of Runt Mountain with the Selected Alternative will minimize impacts to potential lynx foraging and diurnal security habitat. Eliminating the snowmobile re-route over St. Regis Pass (which is a feature of Alternative C) will reduce the potential for snowmobiles to access wildlife habitat adjacent to the ski area. Closure and revegetation of Primitive Roads A and B will reduce motorized traffic within the project area and improve habitat quality.

Design Features and Mitigation Measures to Protect or Enhance and Reduce Effects to Wildlife

Conservation measures for preventing impacts to lynx at developed recreation sites were used to develop and evaluate impacts of the alternatives on Lynx as outlined in the Lynx Conservation Assessment Strategy (Ruediger et al 2000). We will review these measures during project implementation to ensure that all applicable measures are implemented correctly.

With the Selected Alternative, the snowmobile trail across St. Regis Pass will not be groomed and will be closed to motorized traffic during snow-free months. These measures will reduce effects to wildlife and wildlife habitat from motorized use in summer and winter (FEIS, pg. 4-

38). Enforcement of the Coeur d'Alene Ranger District's Access Management Plan will eliminate use of Primitive Roads and A and B and allow these roads to become revegetated. Avoidance of activities in the Bitterroot Springs drainage will maintain the integrity of this habitat for wildlife associated with the aquatic and riparian habitat associated with the springs (FEIS, pg. 4-32).

Effects to Wildlife Under the Selected Alternative

Tables 5 and 6 below disclose what species warranted detailed analysis, the anticipated effect to these species, and the rationale for the effects determination. Detailed discussion of these effects is provided in the FEIS (pgs 4-30 to 4-42). The Selected Alternative has been determined to have no effect on bald eagle, and grizzly bear and a not likely to adversely affect on wolves and lynx (FEIS, pgs 4-31 to 4-35; BA/BE in project files).

Table 5. Effects to Threatened, Endangered and Candidate Wildlife Species

Species	Effects Determination	Rationale
Grizzly bears	No effect	Due to a lack of quality habitat, grizzly bears are not likely to occur within the project area and the project area is not within a recovery area for the bear.
Bald eagles	No effect	Bald eagle habitat is tied directly to large bodies of water. There are no records of bald eagle sightings in the project area. The area does provide potential bald eagle habitat that could be used for feeding, nesting, or roosting.
Gray wolves	May affect but not likely to adversely affect	The area lacks important winter range for big game, which provides a prey base for wolves. There will be a short-term disturbance to big game, but the prey base will be maintained over the long term.
Lynx	May affect but not likely to adversely affect	The project area provides low-quality lynx foraging habitat and no denning habitat. The loss in foraging habitat will have a negligible effect on lynx foraging habitat in the Lynx Analysis Units affected by the proposed project.

Table 6. Effects to Sensitive Wildlife Species

Species	Analysis and Determination	Rationale
Peregrine falcon	Not analyzed in detail; no impact anticipated.	No known active or historic eyrie within the area.
Boreal toad	Not analyzed in detail; no impact anticipated.	The boreal toad is not known to occur in the project area. Potential breeding habitat may be present at Bitterroot Springs, which will not be affected by the selected alternative
Northern leopard frog	Not analyzed in detail; no impact anticipated.	There is no suitable habitat for this frog on or near the project area
Townsend's big-eared bat	Not analyzed in detail; no impact anticipated.	There is no suitable habitat (e.g., caves and abandoned mines) on or near the project area.
Common loon	Not analyzed in detail; no impact anticipated.	There is no suitable habitat within the project area.
Harlequin duck	Not analyzed in detail; no impact anticipated.	There is no suitable habitat within the project area.
Goshawk	Not analyzed in detail; no impact anticipated.	Goshawks have not been documented on the project area. The area may be used for foraging but high elevation and predominance of small-diameter (6-10") lodgepole pine is not optimal nesting habitat.

(Table 6 Continued)

Species	Analysis and Determination	Rationale
Wolverine	Analyzed in detail; may impact individuals or habitat but will not likely contribute to a trend toward federal listing or cause a loss of viability to the population or species.	Wolverines are unlikely to occur in the area due to the absence of denning habitat and current high recreation use.
Fisher	Not analyzed in detail; no impact anticipated	Fishers have not been documented for the project area and are unlikely to frequent the area due to the limited prey base (squirrels, hares, and birds) associated with the lodgepole pine habitat with open understory. Heavy snow accumulation in winter renders the area marginal fisher habitat.
Black-backed woodpecker	Not analyzed in detail; no impact anticipated.	Black-backed woodpeckers have not been documented for the project area although they may forage for insects on lodgepole snags. The Selected Alternative will remove snags; however, the area surrounding the project site and recent burned areas provide adequate habitat for this species.
Northern bog lemming	Not analyzed in detail; no impact anticipated.	There is no suitable habitat in project area.
Flammulated owl	Not analyzed in detail; no impacts anticipated.	The area lacks habitat for flammulated owl.
Coeur d'Alene salamander	Not analyzed in detail; no impacts anticipated.	Potential habitat for Coeur d'Alene salamander is present at Bitterroot Springs, which will not be affected by the selected alternative

Management Indicator Species – Big Game

Conversion of forest habitat to ski runs will reduce summer/fall hiding cover for elk and render them more vulnerable to mortality during the hunting season. Cleared ski runs will provide relatively easy pedestrian access for hunters and provide long, unimpeded views for shooting. Also, grass and other herbaceous forage will likely attract elk to openings created by ski runs, increasing their vulnerability to hunting mortality. The Selected Alternative will increase the risk of hunter-caused mortality to elk. This will be a localized minor impact since hunters readily access the permit area under existing conditions because of the high density of roads and trails (FEIS, pg. 4-38).

With the Selected Alternative, we will be reducing road density with removal of Primitive Roads A and B and which will improve summer habitat for elk (FEIS, pg. 4-38). These roads will become vegetated with grasses and forbs, which will provide forage for elk. Additionally, decreased traffic on these roads may reduce displacement of elk from parts of the analysis area during summer (FEIS, pg. 4-38). On the IPNF, potential effects of roads on elk will be further reduced through enforcement of the Coeur d'Alene Ranger District's Access Management Plan, which prohibits motorized access off of FR 3026 (the old railroad grade); thus, the steep, primitive road through St. Regis Pass will no longer be open to motorized travel.

Like elk, mule deer will be slightly more vulnerable to hunting mortality with the Selected Alternative. Closure of Primitive Roads A and B and enforcement of the Access Management Plan will reduce potential impacts on deer to negligible levels (FEIS, pg. 4-38).

Management Indicator Species – Old Growth

Three species are used to monitor old growth and late successional conditions: pine marten, pileated woodpecker, and goshawk. The Selected Alternative will not affect old-growth habitat; therefore, the potential to affect species often associated with old growth will be minimal (FEIS, pgs. 4-36 and 4-38).

Neotropical (land) Birds

Potential impacts to neotropical migrants could occur as a result of removing trees and shrubs from ski runs if the affected trees harbor nests with eggs or young. If active nests are destroyed, eggs and young will also be destroyed. Loss of nests and young from the relatively small area (87 acres) will not likely have a measurable negative effect on local and regional populations of neotropical migratory birds (FEIS, pg. 4-39).

Increased parasitism of nests by cowbirds is a possibility with increased clearing for ski runs; however, currently there are few large stands of forest that have not been dissected by existing ski runs, roads, and trails. If habitat for cowbirds is present under current conditions, it is unlikely that the proposed action will substantially increase the potential for cowbird parasitism. Additionally, there are no nearby agricultural fields, so the threat of nest parasitism by cowbirds should be minimal. The relatively high elevation of the LPSRA may also be beyond the optimum elevation range favored by cowbirds (FEIS, pg. 4-39).

Consistency with Forest Plan Standards

We find that the Selected Alternative is consistent with applicable IPNF and Lolo Forest Plan standards for wildlife species.

Threatened and Endangered Species

Lolo National Forest Plan standards 24 and 27 require that the Lolo National Forest not only manage for endangered, threatened, and proposed species, but also recover them, while IPNF Forest Plan standard 2(a) requires that management of habitat and security needs for threatened and endangered (T&E) species be given priority in identified habitat. As documented in the BA and FEIS, the Selected Alternative will have no effect on the grizzly bear and bald eagle. For lynx and gray wolf the Selected Alternative may affect individuals, but is not likely to adversely affect lynx and gray wolf (see BA, pgs 30 to 37 and FEIS, pgs. 4-31 to 4-35).

The Selected Alternative is consistent with The Canada Lynx Conservation Assessment and Strategy (Ruediger et al., 2000, which identified conservation measures for recreation management that apply to ski area developments and expansions (see FEIS, pgs. 4-33 to 4-35).

Sensitive Species

Lolo Forest Plan standard 27 and IPNF standard 9 directs both Forests to manage sensitive species to maintain population viability. As documented in the BA and FEIS, sensitive species habitat will either not be affected (Coeur d'Alene salamander, harlequin duck, flammulated owl, northern bog lemming, and northern leopard frog) or the amount of disturbance is sufficiently small such that individuals may be impacted, but the project would not likely cause a loss of

viability to the population or species (fisher, wolverine, boreal toad, black-backed woodpecker, and northern goshawk). (BA, pgs. 37 to 38 and FEIS, pgs. 4-36 to 43-37)

Management Indicator Species

The Forest Plan goal for elk habitat potential on the Wallace portion of the Coeur d'Alene River RD is 52% or higher. Existing habitat potential is currently calculated to be 52% (IPNF 2001, pg. 63). The small scale of the Selected Alternative is not expected to measurably change elk habitat potential. Elk habitat potential measures elk security and is mainly driven by open road density (IPNF1998, pg. 34). As documented in the FEIS, road density within the permit area will be reduced with implementation of the Selected Alternative (FEIS, pg. 4-38). The Lolo National Forest works with the Montana Department of Fish, Wildlife and Parks through the Montana Elk Management Plan (MDFWP, 1992). Lolo habitat guidelines for this management unit are for observations of between 1,725 to 2,050 individuals during elk counts. Currently, this goal is being met and implementation of the Lookout Pass Ski Area expansion is not expected to affect achievement of this goal due to the project's small scale (personal communications with Elizabeth Kennedy, Superior RD Wildlife Biologist, and Bob Henderson, Wildlife Biologist Montana Department of Fish, Wildlife and Parks).

Pileated woodpecker (both Forests) and American marten (IPNF only) are old growth dependent MIS. The IPNF Forest Plan requires that minimum viable populations (greater than 40% of maximum potential) of MIS be distributed throughout the Forest (standard 7a). The Lolo National Forest Plan does not have a similar standard for MIS, however; at least 8 percent of the forest land is to be retained in old growth to provide for old growth associated wildlife species. The IPNF Forest Plan requires that at least 10% of the forested portion of the IPNF be maintained as old growth (IPNF FP, pg. II-29). As previously documented, no old growth will be harvested with implementation of the Selected Alternative, either on the IPNF or Lolo National Forest. The IPNF currently exceeds Forest Plan standards for old growth allocation with 11.6% of the Forest being retained for old growth management (IPNF 2001, pg. 59). On the Lolo National Forest, within the old growth analysis compartment that includes the Lookout Pass project area, there is currently 675 acres designated for old growth management. Also, during the ecosystem management area analysis process, eight percent of the Lolo National Forest Management Area 21 was identified to meet allocation by old growth type. The interdisciplinary team recommended 3,600 acres (8.42%). The trees that are to be removed in the creation of ski runs are not part of the stands that were recommended for old growth allocation (see Project File, Vegetation - Old Growth Analysis for the Montana Side).

VI.E. Fisheries Resources

Fisheries Issues and Public Concerns

During scoping, concerns were raised with the potential for new ski runs to increase sediment and contaminant loads in storm water runoff to the St. Regis and Coeur d'Alene Rivers. Increased sediment could detrimentally affect native fish species. Concerns were also raised that snowmaking will take water from nearby streams and adversely affect fisheries.

We received no comments specifically regarding fisheries resources in response to the FEIS. The Idaho Department of Fish and Game expressed concern during the DEIS comment period that water quality and quantity effects may harm fish. The Lands Council commented at the same time that recovery procedures for bull trout and west slope cutthroat trout must be followed. Water quality and quantity are not expected to change, and conservation measures

featured in this project should improve habitat. This project may effect, but is not likely to adversely affect, bull trout, and is not likely to cause cutthroat trout to trend toward federal listing or a loss of viability of the specie as documented in FEIS Chapter 4-Fisheries Resources and Water Resources and in Chapter 5-Response to Comments p.5-12. The U.S. Fish and Wildlife Service has concurred with this conclusion concerning Threatened and Endangered Fish species (see Attachment B). The Shoshone Sportsman's Club expressed concern over water quantity increases in the Bitterroot Springs drainage, I-90 culvert capacity and the need for energy absorbers. The Selected Alternative does not include timber removal (for the construction of ski runs), culvert installations, culvert extensions or other activities in the Bitterroot Springs watershed (FEIS, pg. 4-23).

Greg Tourtlotte of the Idaho Fish and Game Department commented during scoping that water diversions from streams could affect fish. No such diversions are included in this project.

Activities Under the Selected Alternative

Under the Selected Alternative, 1.2 miles of temporary roads will be constructed on the north and south sides of Runt Mountain. Three temporary culverts, one permanent culvert and one culvert extension will be installed across intermittent streams. Grading will occur on 4.7 acres, most of which is not adjacent to streams. Water quality mitigation will occur on 6,900 feet of existing roads with erosion/sediment problems (see Table 1 - Primitive Roads A & B and Forest Road 18591). Timber removal on 85 acres will occur for construction of ski runs, lifts and other facilities with the potential to increase water yield. Increased water use and sewage disposal requirements will occur due to lodge expansion and increased skier numbers.

Design Features and Mitigation Measures to Protect or Enhance and Reduce Effects to the Fisheries Resources

The Selected Alternative incorporates standards and guidelines of the Inland Native Fish Strategy to protect water and aquatic biota within the Resource Area.

- Riparian Management Objectives and road management standards and guidelines will be applied on those roads used for harvesting or hauling of timber.
- Culvert installations and extensions will be sized to accommodate a 100-year flow event.
- Streamside buffers will be maintained to meet the riparian management objectives for slope stability in potentially sensitive areas. These buffers will also help maintain stream temperatures and provide a long-term supply of large woody debris.
- Trees felled within the RHCA for snowmobile reroute trail #2 will have the limbs lopped, but otherwise shall remain on-site.
- Instream work (culvert installations, extensions and removals) will be prohibited, except during the dry/low flow period of July 15th to September 1st of each year because it can cause increased sedimentation (fines) while the work is being conducted. Timing guidelines are used to reduce impacts to eggs and fry.

Review of research reports and published professional papers demonstrate that the Inland Native Fish Strategy reduces the risk of loss of inland resident native fish populations or negative impacts to their habitat on National Forest System lands in the assessment area (Inland Native Fish Strategy Decision Notice and Environmental Assessment, Appendix C).

To minimize erosion and ensure compliance with State water quality standards, all road construction and timber harvest associated with the LPSRA project will be completed using Best Management Practices. These practices are described under Soil Resources section of this document. Monitoring of Best Management Practices has determined that recent projects on the Coeur d'Alene River Ranger District have been implemented as designed (USDA Forest Service, 2000, Idaho Panhandle National Forests Monitoring - 1999).

The Forest Service Handbook 2509.22 (Soil and Water Conservation Handbook) outlines Best Management Practices that meet the intent of the water quality protection elements of the Idaho Forest Practices Act. Many are standard provisions to timber sale contracts (USFS Timber Sale Contract - Division B, 2400-6). Activities will meet or exceed rules and regulations of the Idaho Forest Practices Act, Best Management Practices, and the Idaho Forestry Act and Fire Hazard Reduction Laws (1988). These practices also meet the requirements of Montana's voluntary BMPs for timber harvest (Montana DNRC 1998) and the Montana Streamside Management Zone Law and Rules (Montana DNRC 1991).

Effects to Fisheries Under the Selected Alternatives

The Selected Alternative will not directly affect fish-bearing streams. The nearest fish-bearing stream is the St. Regis River. The runs and lift station will be located outside the 300 foot RHCA for this river (FEIS, pg. 4-19). The next closest fish-bearing stream is the South Fork of the Coeur D'Alene River located just over 0.5 mile from the new runs and lift station on the north side of Runt Mountain.

Indirect and cumulative impacts to fisheries resources could occur if the Selected Alternative were to increase sediment in fish-bearing streams, water temperatures, or channel instability. To address these concerns:

- 1) We have incorporated standard BMPs and site-specific mitigation measures into the design of the Selected Alternative to limit sediment delivery potential to streams. On both Forests the use of BMPs have proven to be effective in reducing sediment delivery to streams (FEIS, pg. 4-9). The Forest Service will ensure the effectiveness of BMPs and site-specific mitigation measures, during project implementation, through the monitoring of construction activities (FEIS, pg. 4-9). Where grading of ski runs is to occur, the distance to fish bearing streams, in all cases, is over 2,000 feet (FEIS, pg. 4-23).
- 2) The FEIS documented that tree removal (timber harvest) for ski runs, lifts, and roads will have a small localized effect on water yield in local streams, but the amount (85 acres) is too small to cause a detectable change in water yield (FEIS, pg. 4-8). Therefore, channel stability will not be measurably affected.
- 3) The FEIS identified snowmobile reroute trail #2 as being located in close proximity to, the St. Regis River RHCA (FEIS, pg. 4-19). An alternate route to the one mapped in the project description has been selected for implementation. This new bypass route is a fairly open corridor and would require cutting 40 trees or less, far less than will need to be cut to create the original bypass. The new bypass will also be approximately 60 feet shorter than the originally proposed site. However, the new route is closer to the St. Regis River and is 45 feet away from the stream's edge at the nearest point. The IPNF Forest Fish Biologist reviewed this location and determined that the route we have selected will have less of an effect than the proposed route because:

- Far fewer trees would need to be cut within the Riparian Habitat Conservation Area (RHCA).
- The corridor would be only used over the snow in the winter so no increase in sediment would occur and no disturbance to fish would be expected.

Use in the summer will be prevented by leaving the tree boles and lopped limbs within the trail corridor. The U.S. Fish and Wildlife Service has concurred with the findings that this change in trail location will not change the “may affect, not likely to adversely affect” determination for bull trout on the Montana side of the project in the Biological Assessment as long as the mitigation is implemented (see Project File, Fisheries Section and BA/BE).

Consistency with the Forest Plan

We find the Selected Alternative to be consistent with the following applicable INFISH standards and guidelines.

TM-1. Prohibit timber harvest, including fuelwood cutting, in Riparian Habitat Conservation Areas, except as described below.

Using “Standard Widths Defining Interim RHCAs,” no timber harvest activities are proposed with the Selected Alternative within RHCAs in the project area, therefore this standard does not apply.

Effectiveness: High. No timber harvest is to occur within the RHCAs. (Some trees in the St Regis River RHCA will be cut for the winter reroute trail, but they will be left in place as will the existing ground cover. This reroute/bypass follows a fairly open existing corridor through the trees.)

RF-1. Cooperate with Federal, Tribal, State, and county agencies, and cost-share partners to achieve consistency in road design, operation, and maintenance necessary to attain Riparian Management Objectives.

The proposed activities are all on National Forest lands, but have been coordinated with all those listed where applicable.

Effectiveness: High. This coordination is standard policy.

RF-2. For each existing or planned road, meet the Riparian Management objectives and avoid adverse effects to inland native fish by:

a. Completing watershed analyses prior to construction of new roads or landings in Riparian Habitat Conservation Areas (RHCAs) within priority watersheds.

This project area is within an INFS priority watershed for bull trout. No new roads or landings will be constructed within RHCAs.

b. Minimizing road and landing locations in Riparian Habitat Conservation Areas.

No new roads or landings will occur within RHCAs under the Selected Alternative. Three culverts will be installed on temporary roads in ephemeral draws. These crossings will be

removed when ski run construction activities are completed. One existing culvert will be upgraded and an existing culvert will be upgraded and extended on FR 3026. Therefore, the Selected Alternative meet this standard.

Effectiveness: Moderate to High. Timing of the crossing installation and removal depends on the timing of timber sale activities and ski run construction activities, but will be limited to the period of July 15th to September 1st annually.

d. Avoiding sediment delivery to streams from the road surface.

1. Outsloping of the roadway surface is preferred, except in cases where outsloping would increase sediment delivery to streams or where outsloping is unfeasible or unsafe.

This standard is applied directly for the temporary roads. In addition, cross drains will be installed in the existing problem road segments and at ditchlines before entering stream channels.

Effectiveness: High. Roads would be constructed and reconditioned with this design.

2. Route road drainage away from potentially unstable stream channels and hillslopes.

This standard was applied by improving the cross drainage of haul routes. This will reduce the potential to concentrate water and deliver it to unstable slopes. Few exist in the project area. Field exams detected no unstable slopes where the ski runs and temporary roads are proposed. The road improvements selected for implementation with our decision meet this standard.

Effectiveness: High. Improved road drainage is included in the project design. Water would be far less concentrated below Primitive Road A than at present.

e. Avoiding disruption of natural hydrologic flow paths.

Restoring slope hydrology will be accomplished through road reconstruction and maintenance, which will require frequent cross drain ditching to intercept road surface water and would, therefore, prevent the diversion of channel flow down the road prism.

Effectiveness: High. Road reconstruction projects would restore the hydrologic flow paths on the south side of Runt Mountain by reducing the amount of water diverted down the road surface (Primitive Roads A) from the 12-acre wetland.

f. Avoid sidcasting of soils or snow. Sidcasting of road material is prohibited on road segments within or abutting RHCAs in priority watersheds.

The St. Regis River is a priority watershed for bull trout. Mitigation measures have been included in the project design to prevent or limit sediment delivery potential to streams. Implementation of these measures will be monitored by the permittee and qualified Forest Service inspectors.

Effectiveness: High. Monitoring has determined that BMPs are effective at preventing water quality impacts from activities included in our Selected Alternative (Idaho DEQ 2000, Rosquist 2001, USDA Forest Service 2000a and 2000c, LNF 2000).

RF-3. Determine the influence of each road on the Riparian Management Objectives. Meet Riparian Management Objectives and avoid adverse effects on inland native fish by:

- a. Reconstructing road and drainage features that do not meet design criteria or operation and maintenance standards, or that have been shown to be less effective than designed for controlling sediment delivery, or that retard attainment of Riparian Management Objectives, or do not protect priority watersheds from increased sedimentation.
- b. Prioritizing reconstruction based on the current and potential damage to inland native fish and their priority watersheds, the ecological value of the riparian resources affected, and the feasibility of options such as helicopter logging and road relocation out of Riparian Habitat Conservation Areas.
- c. Closing and stabilizing; or obliterating and stabilizing; roads not needed for future management activities. Prioritize these actions based on the current and potential damage to inland native fish in priority watersheds, and the ecological value of the riparian resources affected.

The road reconstruction and maintenance activities described in this ROD and Chapters II and IV of the FEIS originate from the above standards. The Selected Alternative will meet this standard.

Effectiveness: High. Existing roads are proposed for reconstruction with the timber sale, so the likelihood that the improvements would be completed is high.

RF-4. Construct new, and improve existing, culverts, bridges, and other stream crossings to accommodate a 100-year flood, including associated bed load and debris, where those improvements would/do pose a substantial risk to riparian conditions. Substantial risk improvements include those that do not meet design and operation maintenance criteria, or that have been shown to be less effective than designed for controlling erosion, or that retard attainment of Riparian Management Objectives, or that do not protect priority watersheds from increased sedimentation. Base priority for upgrading on risks in priority watersheds and the ecological value of the riparian resources affected. Construct and maintain crossings to prevent diversion of streamflow out of the channel and down the road in the event of crossing failure.

The proposed road reconstruction including the permanent culvert upgrade and the culvert extension originates from the above standard. The Selected Alternative will meet this standard.

Effectiveness: High. The capacity of the permanent stream crossing and the culvert extension will be improved by adding a larger culvert. Crossings on temporary roads will meet this same standard. This work will be done under the timber sale.

RM-4. Design, construct, and operate recreation facilities, including trails and dispersed sites, in a manner that does not retard or prevent attainment of the Riparian Management Objectives and avoids adverse effects on inland native fish. Complete watershed analysis prior to construction of new recreation facilities in Riparian Habitat Conservation Areas within priority watersheds. For existing recreation facilities inside Riparian Habitat Conservation Areas, assure that the facilities or use of the facilities would not prevent attainment of Riparian

Management Objectives or adversely affect inland native fish. Relocate or close recreation facilities where Riparian Management Objectives cannot be met or adverse effects on inland native fish can not be avoided.

Riparian management objectives will be met with implementation of the Selected Alternative. Snowmobile reroute trail #2 will be located within the St. Regis River RHCA. Creating the trail will require the cutting of 40 trees or less (suppressed to dominant crown class trees). Review of the selected trail location has shown that it will not change the “may affect, not likely to adversely affect” determination for bull trout on the Montana side of the project in the Biological Assessment because non-winter motorized use will be prevented by retaining the tree boles and associated slash within the trail corridor (see Project File – Fisheries). Other management activities occurring within the RHCA, including the culvert upgrades and extension on FR 3026, the reconditioning of Primitive Road A, and reconstruction of FR 18591 are expected to provide a benefit in the attainment of INFISH RMOs (Project files - BA/BE, pgs. 29 and 30).

Effectiveness: High. The snowmobile reroute trail will not contribute sediment to the St. Regis River because non-snow motorized use will be prevented by leaving brush and scattering slash over the corridor.

VI.F. Recreation

Recreation Issues and Public Concerns

Most of the comments received for this project included issues related to Recreation. At the scoping stage, 14 commenters expressed support for the expansion and three expressed opposition. The remaining commenters identified specific concerns without expressing support or opposition. At the DEIS review stage, three commenters expressed support, eight opposition, and the remainder only identifying specific concerns. At the FEIS stage, two commenters expressed support for Alternative D, two expressed opposition and two only identified specific concerns. We used the concerns expressed by commenters to design and modify alternatives. Concerns included:

- The need for ski area expansion, size of the expansion and the effects of multiple regional and national expansions.
- Alternatives for increasing capacity without expansion of terrain.
- Shared use by snowmobiles and skiers and resulting conflicts.
- Re-route of snowmobiles over St. Regis Pass.
- Affordable skiing.
- Summer recreation including hunting and berry picking.

A site-specific amendment to the Lolo Forest Plan was identified as necessary to change management emphasis from concentrated public use to a developed ski area emphasis.

Scoping

During scoping, concerns related to Recreation were identified by the Forest Service, one ski club, one business organization (Wallace Business Community Association), two environmental organizations (Sierra Club, Ecology Center) and by 12 individuals (see project file – Scoping Comments). Additional concerns related to Recreation were identified in comments on the DEIS by two environmental organizations (Lands Council and Kootenai

Environmental Alliance) and by two individuals. These comments addressed the same issues listed above at the DEIS and FEIS stages.

DEIS

We received comments on the DEIS related to recreation from two agencies, (EPA, Montana Department of Fish, Wildlife and Parks), one recreation group (Shoshone County Groomer Board), two environmental organizations (Lands Council, Kootenai Environmental Alliance) and eleven individuals (see FEIS Chapter 5 pages 5-2 to 5-4 and 5-17 to 5-21). One agency, two environmental groups and several individuals expressed concerns over the need to expand the ski area. Two environmental groups and four individuals expressed concerns over user conflicts and shared-use trails for skiers and snowmobilers. The Shoshone Groomer Club and five individuals expressed concerns related to the St. Regis pass snowmobile re-route. One individual expressed concerns for noise. One organization expressed concerns over summer use including hunting and berry picking.

FEIS

We received comments on the FEIS related to recreation from one recreation group (Shoshone County Groomer Board), three environmental organizations (Lands Council, Kootenai Environmental Alliance, Predator Conservation Alliance) and two individuals (see Attachment C – Public Comment). The Groomer Board did not like shared use of the railroad grade and the snowmobile re-route over St. Regis Pass.

The environmental groups were concerned with shared use, predator impacts, expanding the ski area, providing affordable skiing, and the cumulative economic and environmental effects of multiple ski area expansions, both regionally and nationally.

One individual complemented the FEIS and the choice of Alternative D. The other individual expressed concerns in the St. Regis Basin over snowmobile/skier conflicts and snowmobile impacts on tree regeneration.

Response to Concerns

We have addressed concerns about the snowmobile re-route over St. Regis Pass by not including this shared use or the St. Regis Pass re-route in the Selected Alternative. We determined that concerns over shared use and related conflicts in the St. Regis Basin were beyond the scope of this analysis. These issues are beyond the area of direct effects and ski area expansion and will have only a small effect on these issues, which will continue to occur even without ski area expansion. Predator impacts were evaluated in Chapter 4-Wildlife of the FEIS and judged to be minor (see FEIS pgs. 4-31 to 4-38). Extensive information on predators was developed and is included in the FEIS and project file. The U.S. Fish and Wildlife Service agreed with the conclusions related to threatened and endangered predators (see Attachment B). The need to expand the ski area and provide affordable skiing was documented in the FEIS-Purpose and Need Chapter 1. Skier numbers have increased and created crowded conditions especially in lift lines, parking areas and the lodge (see FEIS, pgs. 1-5 and 1-6). A majority of commenters expressing an opinion supported expansion of the ski area.

Recreation Activities Under the Selected Alternative

Under our Selected Alternative, the ski area will be allowed to expand on both sides of Runt Mountain. Recreation improvements and changes under the Selected Alternative are described in detail in Section I of this ROD, are illustrated on Figures 2 and 3 and are

summarized in Table 1.

Measures and Mitigation to Reduce Effects to Snowmobile and Cross-country Skiing Recreation

The purpose and need for this project is oriented to addressing recreation needs. We expect that alpine skiing and snowboarding opportunities will be enhanced by additional terrain, lifts and other facilities (FEIS, pg. 4-47). Snowmobiling and cross-country skiing will be enhanced by additional parking and visitor facilities. We have tried to minimize impacts to existing snowmobile and cross-country skiing trails by maintaining use of the old railroad grade on the north side of Runt Mountain and by providing a re-route around the new lift station on the south side of Runt Mountain. Signs and barriers will be used to identify routes and segregate alpine skiers from other users. Signs and barriers will also be used to identify areas of motorized and non-motorized use.

Effects to Recreation Under the Selected Alternative

The Selected Alternative will provide additional ski terrain, decreasing crowding and help ensure the continued operation of Lookout Pass Ski and Recreation Area (FEIS, pgs. 4-47 and 4-61). The Selected Alternative will have the following direct effects (FEIS pgs. 4-45):

- Increased parking area, ski runs, and restaurant space to enhance the skiing experience;
- Increased lift capacity, with two additional chairlifts serving the north and south sides of Runt Mountain;
- Decreased crowding in lifts lines and on ski runs, increasing safety and reducing the potential for collisions;
- Added incentive to visit the ski and recreation area to use the visitor center, overnight accommodations, and RV parking;
- Primitive Roads A and B, and Primitive Trail A will be closed to motorized use but open to cross-country skiers, hikers and mountain bikes, reducing user conflicts and increasing safety;
- Additional north-slope skiing with better snow conditions;
- Increased opportunities for advanced-intermediate and expert skiing;
- Slightly less opportunities for off-area backcountry skiing;
- Widening part of an expert cross-country trail on the east side of Runt Mountain to downhill ski runs (Primitive Trail A);
- A decrease in user conflicts and increase in safety for the annual snowmobile "Poker Run" (congestion and traffic at the LPSRA parking lot will be decreased);
- For some visitors, the new lodge facilities and upgraded status of the ski area may detract from the quaint feel of the existing historic lodge and small-town atmosphere at the ski area. Alternatively, other visitors welcome the proposed changes because they view the existing lodge as run-down and the existing lift and other facilities as crowded;
- During years when the ski area is open during Thanksgiving weekend, there will be fewer hunting opportunities on the north and south sides of Runt Mountain; and
- Prior to Thanksgiving weekend, hiking, hunting, and wildlife viewing will possibly be enhanced by increased openings in the forest.

Indirect and cumulative effects of the action alternatives include (FEIS pg. 4-45 and 4-46):

- An incremental increase in dispersed summer and winter recreation outside the ski area boundary because of the enhanced facilities at LPSRA (visitor center, overnight

accommodations, and RV parking area) and activities being promoted by the ski area. Summer and winter recreation includes cross-country and backcountry skiing, snowmobiling, hiking, hunting, berry picking, wheeled motorized use, wildlife watching, and mountain biking;

- Increased impacts to trails, campsites, and dispersed recreation experiences as a result of the increased use listed above;
- Potential increased conflicts between different types of recreation users, such as motorized versus non-motorized users;
- Potential increases in visitation to LPSRA area over other family-oriented day-use ski areas in the region.

Consistency with the Forest Plan

The Lolo and IPNF Forest Plan recreation standards (6 and 7, respectively) require that the Forests provide for a broad spectrum of Forest-related recreation activities. Both Plans also state that the private sector will be encouraged to provide for increased public needs on National Forest System land (standards 7 and 4, respectively). On the Lolo National Forest, Management Area 8 (developed ski area) standards also require areas under existing special use permit not be expanded unless a clear public needs exists. Our Selected Alternative is consistent with these standards for recreational use of the National Forests. The need for additional ski-able terrain and visitor services at Lookout Pass, due to increased public demand, has been documented in the FEIS (pgs. 1-1 to 1-6). The expansion will not only provide for additional skiing opportunities in winter, but opportunities also exist to provide for increased overnight use (year-round), lift assisted mountain biking, and facilities for environmental education (FEIS pg. 1-8). We believe the selected expansion activities will provide for the Forest Plan mandated broad spectrum of recreational activities, while maintaining the affordable winter recreation for which Lookout Pass Ski and Recreation Area has become known.

Implementation of the Selected Alternative will require a site-specific amendment to the Lolo Forest Plan for the purpose of changing management emphasis (through management area designations). Implementation of the Selected Alternative will result in expanding the permit area on the Lolo National Forest by 109 acres (there is no change in the permit area on the IPNF). A portion of the new permit area will fall into Management Area 9, which has a management emphasis of concentrated public use (see Lolo Forest Plan, pg. III-26). Standards for Management Area 9 permit for the expansion of the Lookout Pass Ski Area into this management area (see Lolo Forest Plan, pg. III-27). Developed recreation sites, such as Lookout Pass Ski Area, are managed under the goals and standards of Management Area 8. Therefore, the Selected Alternative is consistent with the Lolo Forest Plan *as amended* by this ROD (see Attachment E).

VI.G. Roadless Areas

Roadless Issues and Public Concerns

Roadless areas have recently been at the forefront of concerns regarding the management of national forests (See section IX.G., Roadless Area Conservation Rule, in this document). The major issues centered around logging and road building in these areas. The closest roadless area is one mile to the south and west of the project area.

One comment received in response to the DEIS expressed concern that night grooming or

grading on south aspects would be visible from areas identified as roadless. Another concern was the possibility of increased snowmobile use in the St. Regis basin and along the St. Regis River-Steven Creek divide; which in turn could encourage snowmobile use in roadless areas, especially the Stevens Peak area.

Activities Under the Selected Alternative

Under the Selected Alternative, night grooming of new ski runs on south facing aspects would be allowed through the winter. Night grading will not be allowed. Grading of the slopes would occur during initial construction of the runs and outside of the winter months, when there is a higher chance of people using the roadless areas. [A snowmobile bypass through St. Regis Pass, affecting more of the St. Regis basin, is not a feature of this alternative.]

Mitigation to Reduce Effects to Roadless Areas

Effects to roadless areas will be minimal due to project design. No mitigation measures are required.

Effects to Roadless Areas Under the Selected Alternative

The lights of grooming machines may be observable from:

- Viewpoints with in the western tip of the Stevens Peak Roadless Area (over 1 mile from the runs), and along the ridge forming the south boundary St. Regis basin and from Stevens Peak (2 to 3 miles away).
- Viewpoints along the north boundary of Wonderful Peak Roadless Area and from Wonderful Peak (1.5 to 3.5 miles away).

If the lights of grooming machines can be observed from roadless areas it is also highly likely that the lights of traffic on Interstate 90 would also be observed because I-90 largely parallels the runs, another mile down the valley and elevated on a hill side. The lights of radio beacons, a mile beyond I-90, on the ridge top forming the Idaho-Montana border, would also be observable.

Consistency with Forest Plan Standards

The IPNF and LNF Forest Plans divided the Stevens Peak, Wonderful Peak, and Roland Point Roadless Areas into seven Management Areas (MA) that all have non-wilderness prescriptions. The prescriptions do not require development, but they do allow for it. The Forest Plans state that the Stevens Peak, Wonderful Peak, and Roland Point Roadless Areas should be managed for non-wilderness uses, such as recreation, wildlife, range and timber. However, the Plans did not make “irreversible and irretrievable” commitments to development.

The LPSRA action alternatives would not directly affect any of the roadless areas. Indirect and cumulative effects from the action alternatives are compatible with the directives in the Forest Plans.

VI.H. Scenery (Visual Resources)

Scenery Issues and Public Concerns

Timber removal for ski runs, lifts and other features that area included in this project have the potential to change the scenic character of the project area. Visual quality objectives are used to identify and manage effects to scenic values in the National Forest. To meet IPNF Forest Plan visual quality standards a non-significant amendment to the Forest Plan was identified as being necessary.

There were no specific comments related to protection or improvement of scenic resources.

Activities Under the Selected Alternative

Under the Selected Alternative, there are no specific activities identified related to scenery, although timber removal for ski runs and lifts will affect scenery and is discussed below

Mitigation to Reduce Effects to Scenery

Principles of the National Ski Area Association "Sustainable Slopes" environmental charter for ski areas will be implemented. Principles outlined in the charter address visual quality.

Effects to Scenery Under the Selected Alternative

The action alternatives will slightly change the appearance of the scenery by introducing new canopy openings and ground disturbance. Variables influencing the visual effects include viewer position, season, adjacent vegetation, other disturbance in the vicinity, slope, position on the landform, harvest method, site preparation, and ski run shape or size. Not all of the features of the Selected Alternative will be visible in any given view, because they will be all or partially screened by intervening landforms and trees from all but aerial views. New ski runs on the north side of Runt Mountain will be visible along short stretches of I-90 for approximately 1.5 miles west of Lookout Pass and from some private lands in the eastern Mullan Valley (FEIS p. 4-67 and 4-68 and Project File - Visuals). These potential views are of very short duration at normal highway speeds. Ski runs are not visible from I-90 east of Lookout Pass. Light pollution from night skiing is not anticipated because night skiing was not proposed. Lights from ski run groomers operating at night may be visible from high elevations north and south of the ski area, eastbound viewers along Interstate 90 on the north side of Runt Mountain, and some portions of the eastern Mullan Valley.

Consistency with Forest Plan Standards

The existing visual quality standard on the IPNF for Management Area 17 (developed recreation emphasis) is retention. The harvesting and clearing of trees for the creation of ski runs and erection of the chair lifts is not consistent with a visual quality standard of retention. Therefore, the visual quality standard has been amended to allow this change. This site-specific amendment will change the visual quality standard within the IPNF portion of the Lookout Pass Ski and Recreation permit area from retention to modification. The Selected Alternative is consistent with the IPNF Forest Plan as amended by this ROD (see Attachment D).

The Selected Alternative also is consistent with management direction contained in the Lolo Forest Plan for Management Area 8. The visual quality objective for Management Area 8 is modification. The Selected Alternative is consistent with this standard (FEIS, pg. 4-69).

VI.I. Socio-economics

Socioeconomic Issues and Public Concerns

During the scoping process, concerns were raised over the economic feasibility of the proposed expansion project. A commenter expressed the opinion that there is currently much competition among regional ski areas for a limited pool of skiers.

Another commenter stated the opinion that the increased number of skiers that will result from the proposed expansion will stress public services such as highway patrol and emergency vehicles. Others commented that development of public lands for a private ski area is an inappropriate use of our natural resources. Conversely, others felt that the expansion of the ski area would increase the tax base, create jobs, and provide economic benefits to areas of Montana and Idaho suffering from a depressed economy.

Several scoping comments for this EIS stated that the affordability of skiing is important to families who use LPSRA. Many of the families in Shoshone and Mineral Counties are economically unable to visit the larger destination resorts. Lift ticket prices at LPSRA have been the lowest in the region and the Free Ski School for school children attracts many families to the area.

During review of the DEIS and FEIS, we reviewed comments on socioeconomic concerning economic need to expand the ski area to accommodate more skiers, the public need/demand for the proposed expansion, negative impacts to other regional ski areas, and the costs and benefits of the proposed expansion.

Based on skier use and demand, we believe that there is an adequate pool of skiers seeking recreation at the LPSRA to support expanding the facilities (see FEIS, pgs. 1-1 and 1-4 to 1-5). Crowding under current conditions indicates that the existing demand exceeds the capacity of the area to adequately handle the projected future increase in skiers. LPSRA is able to compete successfully within the region because their lift tickets prices are lower than the larger ski areas (FEIS, pg. 1-7). Increases in use at LPRSA may bring a corresponding decrease in use at other resorts in the region. The economic impacts of the proposed expansion on other ski areas are difficult to measure. Increased skiing and snowboarding popularity, as well as increases in population, may offset impacts of the Selected Alternative on other ski areas.

Activities Under the Selected Alternative

There are no specific activities related to socio-economics, although the improvements will have an effect on socio-economics, as discussed below.

Effects on Socioeconomic Resources with the Selected Alternative

Increased visitation to the ski and recreation area is expected as a result of the Selected Alternative. The number of skiers at LPSRA is expected to increase by 78% over the next 8 years, from 22,500 skiers per year to 40,000 skiers per year (FEIS, pg. 4-59). The number of summer users for the ski and recreation area bicycle concession is expected to double in the

next eight years (FEIS, pg. 4-59). This increase in use is expected to bring a small, but measurable increase in spending to areas near the ski area (FEIS, pg. 4-60).

Economic impacts of the action alternatives are expected to include (FEIS, pgs. 4-57 to 4-61):

- A temporary increase in construction employment for nearby contractors,
- Increased employment by the ski area for construction and operation of the new facilities,
- Increased local-area expenditures by new employees and skiers new to LPSRA,
- Increased taxes paid by the ski area, and
- Increased special use fees paid by the area to the federal government.

We do not expect the Selected Alternative to have a detectable impact on governmental infrastructure such as schools, roads, or emergency services (FEIS, pg. 4-58). While the expected increased popularity of LPSRA may in the future lead to some increase in associated support businesses such as lodging facilities, or vacation/residential development in the area, the degree to which such development will or will not occur is unknown at this time. Very little private land is available for lodging and vacation home development near Lookout Pass.

Consistency with Forest Plan Standards

The Lolo Forest Plan (Standard 7) requires that development proposals received for expansion of existing ski areas be evaluated according to the normal procedures for determining ski area feasibility. In our analysis we considered the need for the expansion based on existing and predicted future demand for the facilities (see FEIS, pgs. 1-1 and 1-4 to 1-7, and Project File – Socioeconomic section). The IPNF does not have a comparable Forest Plan standard.

VI.J. Monitoring

Monitoring by the Forest Service and permittee will occur to ensure we've implemented activities as we said we will (implementation monitoring), that the activities are having the level of effects that we predicted (effectiveness monitoring), and that the long-term effects are as anticipated (trend monitoring). The permittee will be responsible for all monitoring related to expansion/operations of the ski area, unless specifically noted otherwise.

Forest Plan Monitoring

The IPNF and Lolo Forest Plans document a system for monitoring and evaluating Forest activities. Monitoring and evaluation each have distinctly different purposes and scope. In general, monitoring is designed to gather the data necessary for project evaluation. During evaluation of project effectiveness, data provided through the monitoring effort are analyzed and interpreted. This process will provide periodic data necessary to determine if implementation is within the bounds of the project design.

Activities in the LPSRA comply with specific monitoring requirements identified by the respective Forest Plans (Forest Plan, Chapter IV; and Project Files, "Monitoring"). The length of time that we will conduct monitoring will be determined by the results and evaluation of what is being monitored. When it is certain that regulations and standards are being met, monitoring of a particular element will cease. If monitoring evaluations show that regulations or standards are not being achieved at the desired level, management intervention will occur.

Forest Corporate Monitoring

In December 1999, the Ecosystem Team for the Idaho Panhandle National Forests facilitated development of a Corporate Monitoring System. The emphasis is on monitoring our progress in restoring the ecosystems of the Idaho Panhandle and in being more consistent in the way we analyze effects to the ecosystems. The monitoring is tied closely to findings of the Interior Columbia Basin and Geographic Assessment. The LPSRA project data that will be tracked for long-term monitoring on the IPNF is provided in the table below.

Table 7. Long-term Monitoring of Ecosystem Core Data for the LPSRA Project

Ecosystem Condition Core Data Monitoring Element	Core Data to be Monitored
Hydrologic integrity	Road density
Wildlife security and public access	Open road density
Water yield	Hydrologic openings (equivalent clearcut acres)
Changes in forest structure outside the historic range of variability	Forest structure by size and age-class groups
Changes in species composition outside the historic range of variability	Forest composition by forest cover type group
Habitat loss and species decline	TES dry and moist/cold site habitat restoration
Changes in landscape pattern	Landscape pattern indicators (mean patch size and variability, edge density, etc.)

Monitoring Specific to This Project

In addition to the above, we are directing that the following monitoring activities occur specific to this project:

Vegetation: All regeneration and revegetation activities will be monitored jointly by the permittee and Forest Service for success in achieving adequate coverage to prevent soil erosion and establish adequate tree cover where desired. Special focus will be placed on buffer areas adjacent to aquatic resources, graded areas, culverts and temporary roads. The invasion and control of noxious weeds will likewise be monitored.

Aquatic Resources: The objective of monitoring aquatic resources is to determine if land management activities are meeting the resource protection and improvement objectives. In addition to the core data monitoring identified above, monitoring will occur in relation to implementation and effectiveness of Best Management Practices and site-specific mitigation measures. Monitoring of Best Management Practices has determined that recent projects on the Idaho Panhandle National Forests have been implemented as designed and have achieved the desired objectives (USDA Forest Service, 2000, Idaho Panhandle National Forests Monitoring - 1999, p. 34-41). The Forest Service will be responsible for BMP implementation and effectiveness monitoring of the timber sale associated activities (timber harvest, road construction/reconditioning, culvert installation, upgrade, extension). The Forest Service and permittee will be jointly responsible for all other mitigation monitoring involved with the ski area improvements.

Wildlife Resources: Lynx sightings will continue to be recorded by the Forest Service. If it is determined that there is a pattern of lynx use (based on lynx sightings in the area), current lynx analysis unit boundaries may require modification in cooperation with the U.S. Fish and Wildlife Service and Idaho Fish and Game. Other wildlife

observations will continue and will be incorporated into future management plans and decisions if appropriate. The Forest Service and permittee will be jointly responsible for reporting and recording wildlife sightings.

Project implementation is dependent upon the permittee obtaining the requisite permits and clearances from the Forest Service and other Federal, State, and local agencies having jurisdiction over certain aspects of the action alternatives. Table 2-6 in the FEIS (pg. 2-33) provides a comprehensive listing of the agencies with jurisdiction over implementation of the Selected Alternative and identifies their respective permit/authorizing responsibilities. Stipulations that address the above monitoring activities will be part of the permits and contracts required for this project.

VII. Comparison of Activities and Effects Under Other Alternatives

Table 8 identifies activities that were proposed under each alternative. The No Action Alternative (Alternative A) is not displayed in the table, because none of the proposed activities would occur. Alternative A is discussed under several resources where there is the potential for effects from doing nothing. Following the table, a very brief comparison of effects is provided for each resource (additional comparison is provided in Section 2.6 of the FEIS). Refer to Section IV, Rationale for Our Decision, for a summary of the reasons we selected Alternative D for implementation instead of one of the other alternatives.

VII.A. Comparison of Effects to Water Resources by Alternative

Water Quality

Potential water quality impacts from sediment are slightly higher for Alternatives B and C due to larger areas of disturbance for timber removal, temporary roads, culvert extensions and slope regrading. Under Alternative A (No Action), water quality impacts would continue to occur along Primitive Roads A and B on the south side of Runt Mountain.

Water Quantity

Potential impacts on water yield are slightly higher for Alternatives B and C than for the Selected Alternative due to larger areas of disturbance for timber removal. However, increases in water yield are estimated to be very slight or undetectable for all action alternatives (less than one percent) (FEIS, pg. 4-8).

Floodplains

Alternative B would have the greatest effect on floodplains since it would affect the Bitterroot Springs area. Impacts to floodplains are minimal under Alternative C and the Selected Alternative because neither would affect the Bitterroot Springs area.

Table 8: Total Area Affected by the Action Alternatives

Proposed Ski Area Modifications	Alternative B	Alternative C	Selected Alternative
Additional parking	1 acre	1 acre	1 acre
Temporary roads for timber harvest and lift installation (reclaimed after timber harvest)	1.7 miles	1.2 miles	1.2 miles
Road upgrade for timber harvest followed by reconstruction into trail for hiking, biking and cross-country skiing (Primitive Road A)	2,100 feet	2,100 feet	2,100 feet
Water Quality Mitigation - road elimination and rehab into ski run with appropriate erosion controls and revegetation (Primitive Road B)	3,500 feet	3,500 feet	3,500 feet
Road upgrade for timber harvest including improved erosion control features (FR 18591).	1,300 feet	1,300 feet	1,300 feet
Ski runs and lifts on south side	90 acres	57 acres	54 acres
Ski runs and lifts on north side	64 acres	33 acres	30 acres
Total new ski runs and lifts	154 acres	90 acres	87 acres
Chairlifts	Two lifts: 7,105 feet	Two lifts totaling 5,777 feet	Two lifts: 5,766 feet
Regrading and revegetation on existing runs	2 acres	2 acres	2 acres
Regrading and revegetation on new runs	6.8 acres	4.4 acres	2.7 acres
Trail Construction - north end of Snowmobile Re-route #1	0	3,600 to 5,260 feet (depending on route chosen)	0
Buildings	19,600 square feet	19,600 square feet	19,600 square feet
Septic and drainfield plus replacement area	0.1 acre	0.1 acre	0.1 acre
Snowmobile Re-route #2 length of trail cleared around south lift terminal (no excavation required)	1,015 feet	1,015 feet	1,015 feet
Area of affected wetland (affect is brush cutting; no fill or excavation)	8 acres	0.7 acre	0.7 acre
Electrical distribution lines	4,300 feet	4,300 feet	4,300 feet
Number of proposed permanent culverts	0	2	1
Number of temporary culverts	5	3	3
Estimated Length of permanent culvert extensions	100 feet	60 feet	60 feet
Permit area	594 acres	455 acres	444 acres
Tree Removal			
Removal for parking	0	0	0
Removal for temporary roads on south side	1.1 acres	0.8 acres	0.8 acres
Removal for temporary roads on north side	2.9 acres	1.6 acres	1.6 acres
Removal for Snowmobile Re-route #1	0	4.2 to 5.5 acres (depending on route chosen)	0
Removal for Snowmobile Re-route #2	0.2 acre	0.2 acre	0.2 acre
Removal for runs and lifts on south side	81.1 acres	54.1 acres	54.1 acres
Removal for runs and lifts on north side	59.5 acres	30.5 acres	28.5 acres
Total required tree removal – south side	82.4 acres	55.1 acres	55.1 acres
Total required tree removal – north side	62.4 acres	36.3 to 37.6 acres	30.1 acres
Total required tree removal	144.8 acres	91.4 to 92.7 acres (depending on snowmobile re-route chosen)	85.2 acres

VII.B. Comparison of Effects to Vegetation by Alternative

Timber Removal

Alternatives B and C both would remove more timber than the Selected Alternative (145, 91 and 85 acres, respectively).

Old Growth and Super Trees

No old growth would be affected under any of the alternatives, since none is present. No super trees would be affected under any alternative since they would be prominently marked during timber harvest and preserved.

TES Plant Species

No known population of TES plants would be affected under any alternative, since there weren't any occurrences of TES plant species observed during field surveys (Dutton 2000a, 2000b and Elliott 2000). Unknown populations of sensitive plants may be affected by timber removal and ski run construction activities. Alternatives B and C both would remove more timber and involve more ground disturbance than the Selected Alternative (145, 91, and 85 acres, respectively).

Wetlands and Riparian Areas

Less than 0.1 acre of wetland and riparian area would be affected at culvert crossings under all the action alternatives. A much greater area of wetland would be impacted under Alternative B (8 acres) than under Alternative C and the Selected Alternative (<0.1 acre).

Noxious Weeds

Potential for noxious weed spread are slightly higher with Alternatives B and C than the Selected Alternative due to the greater area of ground disturbing activities, including timber harvest, grading, culvert installations, parking lot construction and other activities.

VII.C. Comparison of Effects to Soils by Alternative

Potential impacts on soil productivity, erosion, compaction and displacement are slightly higher for Alternatives B and C than the Selected Alternative due to larger areas of disturbance for timber removal, temporary roads, culvert extensions, and slope regrading (145, 91, and 85 acres, respectively).

VII.D. Comparison of Effects to Wildlife by Alternative

Table 9 illustrates differences in wildlife effects for the alternatives. Alternatives B and C would convert more acreage of forest habitat to ski runs and other facilities (145 and 93 acres respectively) than the Selected Alternative. Alternative B would have a slightly greater effect on potential lynx habitat than either Alternative C or the Selected Alternative. Alternative B, but neither Alternative C nor the Selected Alternative would affect the forested diurnal security habitat downstream of the Bitterroot Springs. Although lynx have not been detected in habitat associated with Bitterroot Springs, the dense shrub canopy has the potential to provide diurnal security habitat that would allow lynx to remain near the ski area when there are high levels of human activity in winter (FEIS, pg. 4-32).

The snowmobile re-route included with Alternative C would likely increase numbers of snowmobiles that travel into the St. Regis Basin and along the Montana-Idaho Divide. Increased snowmobile use of the St. Regis Basin could have negative effects on lynx through increasing access of coyotes and other carnivores that compete with lynx (FEIS, pg. 4-33). Coyotes, mountain lions, and red fox gain access to areas of deep snow favored by lynx, along packed roads, ski trails and snowmobile trails. Increased snowmobile presence and back country skiing in lynx foraging habitat may displace lynx from foraging habitat, but there is little data concerning effects to lynx use of habitat by snowmobiles, skiers, and other human traffic. Data collected in Canada concerning lynx use of large ski areas indicates that some lynx appear to become accustomed to human activities and utilize areas near ski runs for foraging

and rearing young (Roe, iii).

A comparison of unsuitable foraging habitat for lynx by alternative is shown in Table 9. Alternative B would create slightly more unsuitable foraging habitat than Alternative C and the Selected Alternative. Habitat that would be converted to ski runs currently is not optimal (low quality) for lynx foraging due to stand structure and low densities of snowshoe hare, the primary prey of lynx. The action alternatives would have negligible impacts on lynx foraging habitat (FEIS, pg. 4-32). The action alternatives would affect areas with limited potential for lynx denning due to the scarcity of large woody debris. Removal of timber for ski runs would not reduce potential denning habitat (FEIS, pg. 4-32).

Table 9: Comparison of Alternatives - Wildlife

Issue	Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Forested habitat converted to ski runs and other facilities	No change	145 acres	91 to 93 acres	85 acres
TES wildlife				
<ul style="list-style-type: none"> ▪ Diurnal security habitat for lynx ▪ Unsuitable foraging lynx habitat ▪ Feet of packed trail in area of direct effect ▪ Acres of ski runs in area of direct effect 	<ul style="list-style-type: none"> ▪ No change ▪ No change ▪ No change (74,386 feet) ▪ No change (127 acres) 	<ul style="list-style-type: none"> ▪ Loss of diurnal security habitat for lynx below Bitterroot Spring (<0.1 acre) ▪ Unsuitable lynx habitat increased by 0.5% (MT) and 1.9% (ID) ▪ 55,235 feet total (74% of Alternative A) ▪ 154 additional acres (278 total acres, or 218% of Alternative A) 	<ul style="list-style-type: none"> ▪ Little potential to affect diurnal habitat ▪ Unsuitable lynx habitat increased by 0.3% (MT) and 1.2%(ID) ▪ Either 61,635 or 63,922 feet total (83-85% of Alternative A) ▪ 90 additional acres (212 total acres, or 167% of Alternative A) 	<ul style="list-style-type: none"> ▪ Little potential to affect diurnal habitat ▪ Unsuitable lynx habitat increased by 0.3% (MT) and 1.1% (ID) ▪ 69,729 feet total (94% of Alternative A) ▪ 87 additional acres (214 total acres, or 169% of Alternative A)
Wetland and riparian habitat				
<ul style="list-style-type: none"> ▪ Acres of wetland loss ▪ Acres of wetland affected by ski runs ▪ Acres of riparian area loss 	<ul style="list-style-type: none"> ▪ No change ▪ No change ▪ No change 	<ul style="list-style-type: none"> ▪ Loss at culverts <0.1 acre ▪ 8 acres ▪ Loss at culverts <0.1 acre 	<ul style="list-style-type: none"> ▪ Loss at culverts <0.1 acre ▪ 0.7 acres ▪ Loss at culverts <0.1 acre 	<ul style="list-style-type: none"> ▪ Loss at culverts <0.1 acre ▪ 0.7 acres ▪ Loss at culverts <0.1 acre

The amount of packed trails near the ski area would decrease under both Alternatives B and C. However, the number of packed ski runs would increase on Runt Mountain. Carnivores competing with lynx would have greater access to ski runs under the action alternatives, but would have less snowmobile and cross-country trails to access other areas of Runt Mountain. Packed ski runs would cover a larger area under Alternative B (281 total acres) than Alternative A (127 total acres), Alternative C (217 total acres), and the Selected Alternative (215 acres). However, Alternative A would maintain 74,386 feet of packed snowmobile and cross-country ski trails, whereas Alternative B would reduce this amount to 55,235 feet, Alternative C would reduce this amount to either 61,635 or 63,922 feet, and the Selected Alternative would reduce this amount to 69,730 feet.

VII.E. Comparison of Effects to Fisheries Resources by Alternative

Potential fisheries impacts due to water quality effects from sediment are slightly higher for Alternatives B and C than the Selected Alternative, due to larger areas of disturbance for timber removal, temporary roads, and slope regrading (see Table 8). Alternatives B and C also have a larger number of culvert installations (5 each) than the Selected Alternative (3). Under

Alternative A (No Action), water quality impacts and potential effects on fish would continue to occur along Primitive Road A on the south side of Runt Mountain.

VII.F. Comparison of Effects to Recreation by Alternative

Ski Terrain

Alternatives B and C would provide more ski terrain than the Selected Alternative (154, 90, and 87 acres respectively). The total size of the recreation permit area would also be larger under Alternatives B and C (594 and 455 acres, respectively, versus 444 acres). However, we find that the amount of terrain and permit area under the Selected Alternative is sufficient to meet the purpose and need for this project (FEIS, pgs. 1-1 and 1-4 to 1-7). Under Alternative A, existing crowding and safety issues would continue to increase.

Snowmobile and Cross-country Ski Use on the Abandoned Railroad Grade

Snowmobile and cross-country ski use on the abandoned railroad grade on the north side of Runt Mountain would be discontinued under Alternatives B and C. Alternative B would simply eliminate these uses in favor of alpine skiing. Alternative C would reconstruct a trail over St. Regis Pass for snowmobile re-route #1. With the Selected Alternative, snowmobile and cross country ski use will be maintained on the railroad grade, as requested by the public (see FEIS, pg. 2-4).

VII.G. Comparison of Effects to Roadless Areas by Alternative

Alternative D would not create the potential effects to roadless areas predicted for Alternative C. Alternative C, with Snowmobile Bypass #1 over St. Regis Pass, which would encourage more snowmobile use and noise in the St. Regis Basin, Idaho/Montana backcountry, and nearby roadless areas than the other action alternatives. Additional snowmobile use in these areas may in turn cause: 1) increases in snowmobile/cross-country skier conflicts; 2) decreases in cross-country skiing opportunities because skiers would be discouraged from using the area by the increases in snowmobile traffic and noise; and 3) increases in avalanche incidents and rescue efforts.

Potential snowmobile use impacts for Alternatives B may be lower than for A, and C and the Selected Alternative (D) due to the existing groomed snowmobile trail (F.S. Road 3026) being interrupted for skier use.

Of the action alternatives considered, Alternative C would have the greatest potential impact

VII.H. Comparison of Effects to Scenery (Visual Resources) by Alternative

Potential scenery impacts are higher for Alternatives B and C than the Selected Alternative due to larger areas of timber removal (145, 91, and 85 acres, respectively) and the location of ski runs under these alternatives. Of the action alternatives considered, Alternative C would have the greatest impact on scenery since it includes snowmobile re-route #1. This re-route would require constructing a series of switchbacks that would be visible from I-90 (FEIS, pg. 4-68).

VII.I. Comparison of Effects to Socio-economics by Alternative

The impact of Alternative A (No Action) may be a decline in the LPSRA market share, as other ski areas provide new skiing experiences, expand, and upgrade equipment. Crowding at LPSRA and a lack of varied terrain may cause skiers to seek recreation at other family-oriented areas (FEIS, pgs. 1-5 to 1-7 and 4-63).

Impacts to socioeconomic resources would be about the same for each of the action alternatives. In comparison to the No Action Alternative, construction and operational jobs would increase, taxes paid to local and state governments would increase, forest user fees would increase, and revenues to surrounding merchants would increase. These increases are expected because the action alternatives would enhance the attractiveness of the area for alpine (downhill) skiers (FEIS, pgs. 4-57 to 4-61).

The action alternatives may decrease the attractiveness of the area for backcountry skiers and hikers, as the north and south sides of Runt Mountain would be changed from a primitive to a developed recreation experience. Alternative C may increase snowmobile use in the St. Regis Basin and state line area, possibly discouraging some backcountry skiers from using the area. We believe that the increase in downhill ski use, overnight visitation and resulting expenditures will be greater than the decrease in backcountry visitation and resulting expenditures in the local economy (FEIS, pgs. 4-59 and 4-60).

VIII. Identification of the Environmentally Preferable Alternative

Previously in this ROD, we have described the Selected Alternative and given our rationale for choosing Alternative D to implement. The Council on Environmental Quality regulations for implementing NEPA also specify that the alternative or alternatives which are considered to be environmentally preferable be identified (40 CFR Part 1505.2b). The environmentally preferable alternative is not necessarily the alternative that will be implemented, but is ordinarily the alternative that causes the least damage to the biological, physical and cultural environment. The Alternative that best meets this definition is Alternative A, No Action. As previously discussed in this ROD, we have decided not to select Alternative A to implement because it does not respond to the purpose and need for this project. As documented by this ROD, we have determined that Alternative D can be implemented with minimal impacts to the biological, physical, and cultural environment. Therefore, Alternative D is the environmentally preferable action alternative.

IX. Findings and Consistency with Laws, Regulations and Policy

Numerous laws, regulations and agency directives require that our decision be consistent with their provisions. We have determined that our decision is consistent with applicable laws, regulations and agency policy. The following summarizes findings required by major environmental laws.

IX.A. National Environmental Policy Act

As described in the FEIS (page 2-2), the National Environmental Policy Act (NEPA) requires analysis of projects to ensure the anticipated effects upon all resources within the project area

are considered prior to project implementation (40 CFR 1502.16). The analysis for the LPSRA project followed the guidelines of NEPA as provided by the Council on Environmental Quality (CEQ). Alternatives were developed based on existing conditions, Forest Plan goals and objectives, and public concerns and recommendations.

We considered a total of four alternatives in detail, including a No Action alternative as required by NEPA and NFMA (FEIS, page 2-4); an additional three alternatives were briefly considered but eliminated from further study because they either did not meet the project's purpose and need or were infeasible (FEIS, page 2-5). We find the range of alternatives is appropriate given the scope of the proposal and the purpose and need for action (FEIS, pages 1-1 through 1-7).

IX.B. Endangered Species Act (ESA)

The Coeur d'Alene River District Wildlife Biologist, Fisheries Biologist, and Botanist evaluated the effect of the Selected Alternative with regard to threatened and endangered wildlife, fish and plant species. Findings are disclosed in the FEIS (Chapter 4) and summarized in the Biological Assessments and Biological Evaluations (Project Files).

Project activities may affect but are not likely to adversely affect the lynx and gray wolf. Activities will result in fragmentation of habitat that could alter the movements of lynx traveling through the area; therefore, implementation of the Selected Alternative may affect but would not likely adversely affect lynx or its survival. The project may affect numbers (they may increase or decrease slightly) and distribution of big game animals, important wolf prey, during the summer months; consequently, the proposed expansion may affect the gray wolf. Because wolves are extremely mobile and their distribution, denning areas, and rendezvous sites are generally determined by food sources in winter, slight changes in the distribution and number of deer, elk, and moose during the snow-free months would not adversely affect wolves. There will be no effect to bald eagle or grizzly bear because there is no known use of the area by grizzly bears or bald eagles and there would be no long-term degradation of habitat (see Project File, BA/BE).

The project may affect but is not likely to adversely affect bull trout (Project File, BA/BE). The Selected Alternative would not directly affect fish-bearing streams. The nearest fish-bearing stream is the St. Regis River located over 300 feet from the proposed new runs and lift station on the south side of Runt Mountain. The next closest fish-bearing stream is the South Fork of the Coeur d'Alene River located just over 0.5 mile from the new runs and lift station on the north side of Runt Mountain. The Selected Alternative would not directly affect these waters. Indirect and cumulative impacts to fisheries resources could occur if the Selected Alternative were to increase: sediment in fish-bearing streams, water temperatures, or channel instability (FEIS, pg. 4-18).

The Selected Alternative complies with IPNF and Lolo Forest Plan standards for fisheries. Specific requirements and how this project meets them have previously been discussed in Section VI. E. of this ROD. Water quality will be maintained through implementation of BMPs, site-specific mitigation measures, and monitoring (see ROD, section VI.A.).

There will be no effect to the threatened plant species water howellia (*Howellia aquatilis*) and Ute ladies-tresses (*Spiranthes diluvialis*) as a result of activities under the Selected Alternative because suitable habitat does not occur in the project area. There would also be no effect to Spalding's catchfly (*Silene spaldingii*) due to a lack of suitable habitat for the species in activity

areas (see Dutton 2000a, 2000b and Elliott 2000 and FEIS, pg. 4-27).

Based on these determinations, we find that the Selected Alternative is consistent with the Endangered Species Act. As required by Section 7 of the Endangered Species Act, we have consulted with the U.S. Fish and Wildlife Service regarding the activities and anticipated effects of this project. They have concurred with our findings (Attachment B).

IX.C. Clean Water Act

The Clean Water Act (as amended, 33 U.S.C. 1323) directs the Forest Service to meet state, interstate and local substantive as well as procedural requirements with respect to control and abatement of pollution in the same manner and to the same extent as any nongovernmental entity. The Forest Service has the statutory authority to regulate, permit and enforce land-use activities on the National Forest System lands that affect water quality.

Sediment impacts to water quality from soil-disturbing activities listed above are predicted to be short-term and minor (FEIS pages 4-6 to 4-8) due to the use of BMPs and site-specific mitigation practices. Existing sediment sources would be reduced or eliminated on 6,900 feet of road with current erosion/sediment problems (see Table 1).

Nutrient impacts related to an expanded sewage system and increase sewage flows would be minor and likely undetectable due to the small flow increase, the distance of the system to surface and groundwater and due to the permitting and review process required by local and state health authorities (FEIS, pg.4-7).

The South Fork of the Coeur d'Alene River is a 303d listed stream segment for metals and sediment (FEIS, pg. 3-11). No TMDL has been established. The current requirement for this reach according to the TMDL rule (1998 Idaho Administrative Code IDAPA 16.01.02.054.05) is that the Forest Service implements the "best management practices for nonpoint sources deemed necessary to prohibit further impairment of the designated or existing beneficial uses." The Forest Service has agreements with the State to implement Best Management Practices (BMPs) or Soil and Water Conservation Practices for all management activities to meet the objectives for Forest Practices.

The St. Regis River is also listed as impaired under the Clean Water Act 303(d) regulations for habitat alternation and siltation (FEIS, pg. 3-11). The Clean Water Act and EPA Water Quality Planning and Management Regulations require the determination of allowable pollutant levels in 303(d) listed streams through the development of TMDLs. No TMDL has been established for the St. Regis River (FEIS, pg. 3-11).

Based on the information listed above and the Water Resources and Fisheries analyses in Chapter 4 (FEIS, pages 4-6 to 4-14 and 4-18 to 4-25), mitigation measures outlined in the FEIS to protect water and soil resources (pages 2-24 to 2-28) and soils information presented in the Project Files, we find that the Selected Alternative meets Clean Water Act requirements. For further discussion, please refer to Section VI.A. Water Resources.

IX.D. Clean Air Act

The Forest-wide standard for air quality is to coordinate all Forest Service management activities to meet the requirements of the State Implementation Plans, Smoke Management Plan and Federal air quality standards. This will be done with the Selected Alternative. Slash

burning will be conducted by the Forest Service in a manner that will meet air quality requirements. We find that this project meets the Clean Air Act and state monitoring requirements through coordination with the State prior to burning, and the use of burning techniques that minimize smoke emissions (for further discussion please refer to the FEIS Section 4.2.4 - Air Quality).

IX.E. Environmental Justice Act

In February 1994, former President Clinton signed Executive Order 12898, requiring federal agencies to conduct activities related to human health and the environment in a manner that does not discriminate or have the effect of discriminating against minority and low-income populations (Project Files, Environmental Justice). Although low-income and minority populations live and recreate in the vicinity, activities under the LPSRA project will not discriminate against these groups. Based on the composition of the affected communities and the cultural and economic factors, we find that the Selected Alternative will have no adverse effects to human health and safety or environmental effects to minority, low-income, or any other segments of the population. (Please refer to the FEIS, "Effects on Social Groups" pages 4-74.)

IX.F. Natural Resources Agenda

On March 2, 1998, former Forest Service Chief Mike Dombeck announced the Forest Service Natural Resource Agenda. The Agenda provides the Chief's focus for the Forest Service, and identifies specific areas where there will be added emphasis. The following briefly describes consistency of the LPSRA project with those specific areas:

Watershed health and restoration: As stated in the FEIS (page 1-13), the activities to be implemented have been designed to be consistent with the goals and tentative direction provided under the Natural Resources Agenda to date. The Selected Alternative will have only minor short-term impacts on watershed health and includes measures to restore Primitive Roads and trails to reduce existing erosion/sediment problems.

Forest road policy: The Selected Alternative is consistent with the Forest Service Road Management and Transportation System Rule and the Roadless Area Conservation Rule, as discussed on pages 1-13 and 1-14 of the FEIS.

Sustainable forest management: This portion of the Natural Resource agenda is not applicable to the LPSRA project.

Recreation: Recreation has been identified as the fastest growing use of the national forests and grasslands. The Lookout Pass project addresses this part of the agenda by providing for additional recreation capacity where it is needed, thus contributing to the growing use of the national forests.

Based on these findings, we find the Lookout Pass Ski and Recreation Area project to be consistent with the Natural Resource Agenda.

IX.G. Roadless Area Conservation Rule

The Roadless Area Conservation Rule, restricting logging and road building activities in 58.5 million acres of National Forest System lands, was published in the Federal Register on January 12, 2001, with an effective date of March 13, 2001. This effective date was delayed until May 12, 2001, consistent with the Assistant to the President's memorandum of January 20, 2001. On May 4, 2001, Secretary Veneman announced that the USDA would implement the Roadless Area Conservation Rule. The U.S. District Court for the District of Idaho on May 10, 2001, preliminarily enjoined the Department from implementing the Roadless Conservation Rule. This decision was appealed on May 21, 2001, to the Ninth Circuit Court of Appeals, which held a hearing on the merits on October 15, 2001. On June 7, 2001, in order to bring some stability to roadless area management given the legal uncertainties, Chief Bosworth informed top agency officials that he reserved unto himself with some exceptions, authority to approve road construction, road reconstruction and timber harvest projects in inventoried roadless areas. Interim Directives were issued on July 27, 2001, and updated on December 14, 2001, formalizing this policy.

There are no lands in or adjacent to the Lookout Pass Ski and Recreation Area project identified as roadless under either Forest Plan. Therefore, there would be no change to road access in relation to inventoried roadless areas under any alternative (FEIS, pg. 4-66).

IX.H. Forest Service Road Management and Transportation System Rule

On January 28, 1998, in an Advance Notice of Proposed Rulemaking (63 CFR 4350), the Forest Service announced its intent to revise regulations concerning management of the national forest transportation system. In January 2001, the Forest Service issued a Final Rule regarding specific revisions to the road system rules (at 36 CFR part 212) and to Forest Service administrative directives governing transportation analysis and management. The roads policy provides basic procedural protection for inventoried roadless areas and contiguous unroaded areas from road building until the Roadless Area Conservation Rule (discussed above) becomes effective, and the Forest completes a forest-scale roads analysis and incorporates it into the Forest Plan.

It was determined that a Roads Analysis is not required for the Lookout Pass Ski and Recreation Area proposal for several reasons (see Project File, Transportation). A comprehensive evaluation of the entire Coeur d'Alene River Ranger District has evaluated road issues across the entire area including LPSRA. The LPSRA EIS has evaluated road conditions within the project area and determined that:

1. No changes are made to existing road management policies under the proposed project.
2. No new permanent forest system roads will be developed, constructed or re-constructed.
3. Work on existing forest system roads is limited to maintenance to accommodate timber haul from the project sites.

All ground disturbance generated by temporary road construction to harvest trees will be returned to the original natural condition.

IX.I. National Historic Preservation Rule

This project is expected to have only minor effects on cultural resources (FEIS, pages 4-43 and 4-44). Recognizing the potential for unidentified sites to be encountered and disturbed during project activity, any future discovery of heritage resource sites or caves will be inventoried and protected if found to be of cultural significance. A decision will be made to avoid, protect, or mitigate effects to these sites in accordance with the National Historic Preservation Act of 1966. Based on the successful protection of cultural resources on the IPNF through cooperation with the State Historic Preservation Office, these measures have been found to be effective (IPNF Forest Plan Monitoring Report for 1999, page 17).

IX.J. Omnibus Parks and Public Lands Management Act of 1996

Section 701 (j), Title VII, Division I, of the Omnibus Parks and Public Lands Management Act of 1996, authorized the withdrawal of all National Forest System lands within the boundaries of ski area permits, issued under the Acts of March 4, 1915 (38 Stat. 1101, Chapter 144; 16 U.S.C. 497), and the Acts of June 4, 1897, or the National Forest Ski Area Permit Act of 1986 (16 U.S.C. 497b).

Subject to existing rights, the lands are automatically withdrawn from all forms of appropriation under the mining laws, and from disposition under all laws pertaining to mineral and geothermal leasing. The withdrawal continues for the full-term of the permit, including any modification, re-issuance, or renewal of such permit. Unless otherwise requested by the secretary, the withdrawal is automatically cancelled upon expiration or other termination of the permit.

Thus the change in the permit area boundary will mean that 109 acres, all located on the Montana side of Runt Mountain, will be automatically withdrawn from mineral entry, subject to valid existing rights. A December 12, 2002 query of the Bureau of Land Management mining claim database revealed several closed claims in the sections that the permit area is located in and no active claims.

IX.K. National Forest Management Act (NFMA)

The National Forest Management Act and accompanying regulations require that several other specific findings be documented at the project level.

Forest Plan Consistency. Management activities are to be consistent with the Forest Plan [16 USC 1604 (i)]. The Forest Plan guides management activities [36 CFR 219.1(b)]. Standards and guidelines for the Forest Plans (Idaho Panhandle and Lolo Forest Plans, Chapter 1, p.1-15) apply within the project area. Forest Plan consistency has been discussed throughout this document.

We have evaluated features of the Selected Alternative against IPNF and LNF Forest Plan goals and objectives, as well as the resource standards for consistency with the Forest Plans. The Forest Plans are discussed briefly in Chapter 1 of the FEIS (pages 1-15 to 1-20), with disclosure of Forest Plan consistency for each resource in Chapter 4 of the FEIS. Upon review of the information disclosed in the LPSRA EIS, Chapter 4 effects analysis for each resource, we find that our decision is consistent with the respective Forest Plans *as amended* by this ROD (see Attachments D and E).

Our decision amends the IPNF and Lolo Forest Plans to: 1) Change visual quality standards from retention to modification within the IPNF portion of the Lookout Pass Ski Area permit boundary (MA 17) and 2) Change management emphasis for 109 acres (through management area designations) in the Lolo's Forest Plan. The affected 109 acres on the Lolo National Forest will change from Management Area 9 (concentrated public use emphasis) to Management Area 8 (developed ski area emphasis). These site-specific changes are being made in order to assure consistency of the Selected Alternative with the respective Forest Plans.

Forest Service policy permits forest plan amendments resulting from analysis conducted during implementation [36 CFR 219.10(f) and FSM 1922.5]. We have determined these changes are not significant; they are minor adjustments that will not significantly alter the Forest-wide environmental impacts disclosed in the IPNF and Lolo Forest Plan Environmental Impact Statements. This determination of non-significance is based on consideration of four factors (as per FSH 1909.12,5):

- 1) Timing -These amendments will be effective following issuance of this ROD and disposition of any appeal. Ski area development will affect national forest land within and outside of the current permit area boundary. This will be an issue without implementation of the amendments. Presently, the revision of the IPNF Forest Plan is expected to be completed in 2005, with the Lolo's Forest Plan revision expected at a later date. These modifications are necessary to ensure consistency with the current IPNF and Lolo Forest Plans.
- 2) Size and Location - The area addressed by this amendment on both the Lolo National Forest and IPNF is less than one percent each of the respective Forest's land base.
- 3) Goals, Objectives, and Associated Outputs – The change in visual quality objective does not alter the long-term relationship between the levels of goods and services projected in the IPNF Forest Plan because the current management emphasis will remain the same (MA 17 - developed recreation). On the Lolo, management emphasis on 109 acres will change from concentrated recreation (MA 9) to a developed ski area (MA 8). Other levels of goods and services (timber, grazing, etc...) projected by the Lolo Forest Plan should not be measurably affected by this change in management area designation due to the continuing recreation emphasis and the very small scale of the change.
- 4) Management Prescription – The changes to visual quality objectives (IPNF) and management area prescriptions (Lolo) are detailed in Attachments D and E of this ROD.

Resource Protection (36 CFR 219.27(a)). The following statements address resource protection requirements of the National Forest Management Act:

1. Activities will conserve soil and water resources and will not allow significant or permanent impairment of the productivity of the land. Please refer to the FEIS discussions of effects to Water Resources (pgs. 4-6 through 4-14), Soil Resources (pgs. 4-2 through 4-6); and the Project File, Soils.)
2. Activities will not affect the most potentially serious natural hazards. Within the permit area, construction of ski runs will provide for canopy breaks and potential fire breaks (FEIS, pg. 4-27). Slope stability within the permit area will not be affected by ski run construction or regrading. No problem areas have been identified in past soil and geologic mapping and no areas of slope instability were observed during fieldwork (FEIS, pg. 3-5).

3. The timber resources affected by the proposed ski runs will be managed in such a way to prevent or reduce serious, long lasting hazards and damage from pest organisms through provisions included in timber removal plans (project files—Pests). Measures include timing of the removal of trees from the ski runs and the reduction of resulting slash material.
4. Water bodies and their values are appropriately protected. For additional information, please refer to the ROD, Section IX.C, Clean Water Act and Section VI.A. Water Resources - Measures to Protect or Enhance Water Resources.
5. The activities will provide for and maintain a diversity of plant and animal communities. The Selected Alternative will increase vegetative diversity by converting 85 acres of forest vegetation to forb and shrub dominated communities. Please refer also to the FEIS, Vegetation, pgs 4-25 to 4-30 and Wildlife, pgs. 4-30 to 4-42.
6. Activities will either not affect or will maintain sufficient habitat for viable populations of existing native vertebrate species and management indicator species consistent with the multiple-use objectives established in the Forest Plan. The 1982 regulations implementing the National Forest Management Act (NFMA) require National Forests to provide habitat in order “to maintain viable populations of existing native and desired non-native vertebrate species in the planning area.” (36CFR219.19). The regulations direct that “habitat must be provided to support, at least, a minimum number of reproductive individuals, and that habitat must be well distributed so that those individuals can interact with others in the planning area.” The planning area is defined as the Forest Service lands included in the long-range management plan.

Documentation of viability analysis for Threatened and Endangered Species (wolves, lynx, and bull trout), Sensitive Species (sub-alpine habitat plant guild, fisher, wolverine, boreal toad, blackback woodpecker, and northern goshawk, Torrent Sculpin, westslope cutthroat trout), and Management Indicator Species (elk, piliated woodpecker, marten, and mule deer) that may be effected by the proposed project is attached to this ROD as Appendix F. The analysis revealed that expected impacts would not likely contribute towards federal listing or a loss of viability to a population for any of the above species.

(Please refer also to the ROD, Section IX.B, Endangered Species Act; FEIS, and Wildlife discussions, pgs. 4-30 to 4-42.)

7. The EIS assesses potential physical, biological, aesthetic, cultural, engineering, and economic impacts of the Selected Alternative and is consistent with multiple uses planned for the area. (Please refer to the FEIS, Environmental Consequences discussions, Chapter 4 and the Project Files.)
8. Implementation of the Selected Alternative will not affect critical habitat for Threatened and Endangered species (please refer to the ROD Section IX.B., Endangered Species Act; the FEIS, Wildlife, pages 4-30 to 4-32; TES Plants, page 4-27; and Project File, Wildlife - BA/BE).
9. There are no right-of-way grants being issued as part of the activities.

10. The road construction associated with this project is designed according to standards appropriate to the planned uses, considering safety, costs of transportation and effects upon lands and resources. (Please refer to the FEIS Section 4.4.3 – Land Use and Access and the environmental consequences discussions throughout Chapter 4 of the FEIS, which address effects of proposed roads in relation to each resource).
11. Applicable Federal, State, and local air quality standards will be met (please refer to the ROD Section IX.D., Clean Air Act; the FEIS, pg. 4-71; and the FEIS Section 4.2.4 – Air Quality).

Vegetation Manipulation (36 CFR 219.27(b). The following statements address vegetation manipulation requirements of the National Forest Management Act:

1. **Be best suited to the goals stated in the Forest Plan.** The Forest Plan allocated National Forest system lands in the analysis areas to Management Areas IPNF MAs 1 and 17 and LNF MAs 8, 9 and 24. Goals for each management area are described in detail in the IPNF and Lolo Forest Plans (IPNF FP pgs. III-74 to III-76; Lolo FP pgs. III-24 to III-27, and III-120 to III-127). We have evaluated features of the Selected Alternative against IPNF and Lolo Forest Plan goals and objectives, as well as the resource standards for consistency with the Forest Plans. The Forest Plans are discussed briefly in Chapter 1 of the FEIS (pages 1-15 to 1-20), with disclosure of Forest Plan consistency for each resource in Chapter 4 of the FEIS. Upon review of the information disclosed in the LPSRA EIS, Chapter 4 effects analysis for each resource, we find that our decision is consistent with the respective Forest Plans as amended by this ROD (see Attachments D and E).
2. **Assure that technology and knowledge exists to adequately restock lands within five years after final harvest.** This requirement does not apply to developed recreation sites.
3. **Not be chosen primarily because they will give the greatest dollar return or greatest output of timber (although these factors shall be considered).** Economic factors were considered in my decision; however, the Selected Alternative was chosen primarily based on the purpose and need, the benefits to the environment and responsiveness to Forest Plan goals and public desires. Please refer to the socioeconomic discussions in the FEIS (pages 4-57 through 4-63).
4. **Be chosen after considering potential effects on residual trees and adjacent stands.** Twenty-four white pine “super trees” have been identified in the expansion area. These trees will be protected during project implementation (FEIS, pg. 4-27). Old growth will not be affected by project implementation, since none is present within the project area (FEIS, 4-26; Project Files, Vegetation – Old growth reports).
5. **Be selected to avoid permanent impairment of site productivity and to ensure conservation of soil and water resources.** The use of Best Management Practices (BMPs), avoidance of problem soil areas, regulation of yarding and site preparation operations, and the application of specific measures under the Selected Alternative will assure that site productivity is maintained and soil and water resources are protected. Please refer to the FEIS, Chapter 2, pgs. 2-24 through 2-28, Water Resources, pgs. 4-6 through 4-13; and Soils pgs. 4-2 through 4-6.
6. **Be selected to provide the desired effects on water quality and quantity, wildlife and fish habitat, regeneration of desired tree species, forage production,**

recreation uses, aesthetic values, and other resource yields. After review of the EIS, I find that the Selected Alternative will provide the desired effects on vegetation resources within the project area, and will have acceptable effects on water, wildlife, and soil resources. Please refer to the discussions of effects to resources in Chapter 4 of the EIS.

- 7. Be practical in terms of transportation and harvesting requirements and total costs of preparation, logging and administration.** Data presented in the EIS and Project Files relative to transportation, economics and harvesting requirements indicate to me that the Selected Alternative is feasible and practical.

Silvicultural Practices (36 CFR 219.27(c). No timber harvest, other than salvage sales or sales to protect other multiple-use values, shall occur on lands not suitable for timber production [16 U.S.C. 1604 (k)].

This requirement does not apply to developed recreation sites since timber regeneration is not planned in the harvested areas. These areas will be maintained for developed recreation use.

Even-aged Management (36 CFR 219.27(d). When timber is to be harvested using an even-aged management system, a determination that the system is appropriate to meet the objectives and requirements of the Forest Plan must be made. Where clearcutting is to be used, it must be determined to be the optimum harvest method [16 U.S.C. 1604 (g)(3)(F)(i)].

This requirement does not apply to developed recreation sites since timber regeneration is not planned in the harvested areas.

X. Consistency With the Goals of Other Agencies and the Coeur d'Alene Tribe

US Environmental Protection Agency (EPA): No comments were received during the scoping or FEIS stages of the EIS process. EPA reviewed the DEIS and assigned a rating of EC-2, Environmental Concerns, Insufficient Information (project file – DEIS Comments). We responded to their comments in the FEIS (Chapter 5 – Comments and Responses pages 5-2, 5-3, 5-6, 5-8, 5-9, 5-13, 5-23 and 5-24). Their key concerns were related to purpose and need, alternatives, mitigation for aquatic habitat impacts, consistency with TMDL development for 303(d) listed waters, and indirect effects of off-site development (MDEQ 1998). The Selected Alternative, was developed based on concerns such as these and will have less impact to water resources than the other action alternatives (see FEIS, Table 4-2, pg. 4-13).

US Fish & Wildlife Service: Proposed activities in the project areas were discussed throughout the process with representatives from this agency. US Fish and Wildlife Service did not provide written comments during scoping or during review of the DEIS and in other discussions with project team representatives regarding wildlife habitat needs and concerns. As provided by Section 7 of the Endangered Species Act, US Fish & Wildlife Service representatives reviewed our analysis and determination of effects to ensure that we provided the best data available concerning the anticipated impact on listed species or critical habitat. In their March 28, 2002 letter (Attachment B), they concurred with our findings.

Idaho Department of Fish and Game (IDFG): IDFG provided comments during scoping and during the DEIS comment period. Their concerns were that removal of forest for ski runs would

adversely affect summer use of the area by elk and could contribute to increased stormwater runoff, which could adversely affect the aquatic biota. Additionally, IDFG expressed concerns that the proposed action would increase fragmentation of habitat, which would adversely affect forest carnivores such as lynx and wolverine. IDFG also commented on effects to snag-dependent species and snowmaking. IDFG commented that the DEIS did not adequately justify the need for the proposed expansion and suggested expansion on only the north side of Runt Mountain and the avoidance of Bitterroot Springs. We responded to their comments in the FEIS (Chapter 5 – Comments and Responses pages 5-3, 5-4, 5-6 and 5-12).

Montana Department of Fish, Wildlife and Parks (MFWP): MFWP provided comments on the DEIS that objected to changes to snowmobile use on the north side of Runt Mountain and the implementation of snowmobile re-route #1. Their concerns were analyzed in the FEIS and the Selected Alternative does not change snowmobile use on the north side of Runt Mountain and does not include snowmobile re-route #1.

Idaho Department of Environmental Quality (IDEQ): IDEQ provided comments during scoping and during the DEIS comment period. These comments focused on the Clean Air Act and air quality impacts. We responded to their comments in the FEIS (Chapter 5, page 5-11).

Coeur d'Alene Tribe: The Tribe receives the Forests' Quarterly Schedule of Proposed Actions (Quarterly Report), and indicates interest in proposals that could affect on their interests. The LPSRA proposal was first listed on the Quarterly Report in April 2000, and will continue to be listed through at least through the last quarter of 2002. The Tribe has expressed no concerns, support or objections to the project.

XI. Appeal Rights

This decision is subject to appeal pursuant to 36 CFR 215. A written Notice of Appeal must be submitted within 45 days after the date of notice of this decision is published in the Spokesman-Review newspaper. The Notice of Appeal must be sent to the Appeal Deciding Officer (Regional Forester):

**USDA Forest Service, Region 1
Attn: Appeals Deciding Officer (RFO)
P.O. Box 7669
Missoula, MT 59807**

It is the appellant's responsibility to provide sufficient written evidence and rationale to show why my decision should be remanded or reversed. An appeal submitted to the Appeal Deciding Officer becomes a part of the appeal record. An appeal must meet the content requirements of 36 CFR 215.14. As a minimum, the Notice of Appeal must include:

1. A statement that your document is an appeal filed according to 36 CFR part 215.
2. Your name, address and, if possible, telephone number.
3. The decision being appealed by title and subject, date of decision, and name and title of the Responsible Official.
4. The specific changes you want to see in the decision or the portion of the decision to which you object.
5. A statement of how my decision fails to consider comments previously provided either

before or during the comment period specified in 36 CFR 215.6 and, if applicable, how you believe the decision violates law, regulation, or policy.

An appeal will be dismissed if the preceding information is not included in the Notice of Appeal. If no appeal is received, implementation of this decision may occur five business days from the close of the 45-day appeal period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition.

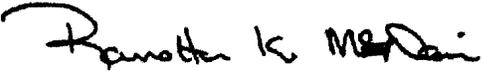
XII. Implementation

Construction of lifts, runs, and other facilities will be spread over a five-year period. Contracts will be let to local loggers for tree removal associated with new ski trails and lifts. These contracts will also include culvert installation, temporary road construction and water quality improvements existing roads. The ski area will employ an architect and building contractor for the lodge expansion. The owner, Lookout Associates LLC, will construct the lifts. Lift installation will require at least four additional LPSRA employees through the construction season, plus separate contractors for concrete and soils engineering associated with the footing sites.

XIII. Further Information

For more information regarding the project, please contact Glenn Truscott, Project Leader at the Fernan Office of the Coeur d'Alene River Ranger District, (208) 664-2318.

This Record of Decision summarizes some of the analyses that have led to this point in the process. More reports and analyses documentation have been referenced or developed during the course of this project and are part of the Project Files. All project files for the LPSRA EIS project are available for review by the public. Please contact Kerry Arneson, NEPA Coordinator at the Coeur d'Alene River Ranger District (Fernan Office), (208) 664-2318, to review the files.


RANOTTA K. McNAIR
Forest Supervisor
Idaho Panhandle National Forests

2/5/2003
Date


DEBORAH L. R. AUSTIN
Forest Supervisor
Lolo National Forest

2/4/03
Date

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LIST OF REFERENCES CITED IN THIS DECISION

The following references were cited in this Record of Decision. More specific citations were made in the Final Environmental Impact Statement, with the appropriate copies of reference material provided as part of the Project Files.

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Forests, Coeur d'Alene River Ranger District.

ATTACHMENT A OPPORTUNITIES

The following are project components that could complement and improve ski area facilities or resource conditions within the project area. These project components are not considered mandatory for project implementation nor are they guaranteed to be implemented. They may be accomplished if approved and if funding is available. The anticipated effects of implementing these activities are described below and are analyzed by resource in Chapter 4.

Opportunity to Provide Overnight Lodge Use

The proposed action includes the opportunity to create 8 rooms for overnight lodging in the skier services building. There is a need for overnight lodging at the LPSRA to fill several needs. Ski area personnel are required to work early and late hours and the availability of lodging would reduce the need for commuting especially when weather and snow conditions are extreme. Lodging would also eliminate commuting for organizers/participants of environmental education and other programs. Overnight facilities are expected to draw about 1200 people per summer, based on two people per room and 50% occupancy. The trail improvements on the Hiawatha and ongoing promotion of the trail by the LPSRA are generating visitor growth that is not related to the proposed action. However, the added overnight and guest services proposed at LPSRA may promote increased summer use of the trail. Increased use of the Hiawatha trail would bring additional user fees for trail maintenance and improvements.

Opportunity to Provide 20 RV Hookups in the Parking Area

The proposed action includes the opportunity to create 20 RV hookups in the parking area for summer use. These hookups would include water, electricity and sewer dump services and would allow LPSRA users another summer on-site lodging option. RV facilities would draw about 3000 people per summer, based upon two people per RV and 50% occupancy. Implementing this opportunity would also add to the economic viability of the LPSRA.

Opportunity to Provide Lift-Assisted Mountain Biking

The proposed action includes the opportunity for lift-assisted mountain biking in the foreseeable future. LPSRA has had bicycle tours and races in the past. Existing single-track and 4-wheel drive trails on Runt Mountain are currently used by mountain bikes and would continue to be used in the future. This summer use at the ski area would also tie in with the Hiawatha attraction. The effects of this opportunity would include the potential for increased soil erosion and weed spread although there are effective mitigation measures for each. Implementing this opportunity would also add to the economic viability of the LPSRA.

APR 02 2002

CD'A RIVER R.D.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Columbia Fish and Wildlife Office
11103 E. Montgomery Drive
Spokane, WA 99206

March 28, 2002

Joseph P. Stringer, District Ranger
Coeur d'Alene River Ranger District
Idaho Panhandle National Forests
2502 E. Sherman Avenue
Coeur d'Alene, Idaho 83814

Subject: Lookout Pass Ski and Recreation Area Expansion: FWS Ref. 1-9-02-I-252

Dear Mr. Stringer:

This responds to your February 27, 2002, letter referencing a Biological Assessment (BA) for the Lookout Pass Ski and Recreation Area Expansion (Ski Area). The Ski Area is located on Runt Mountain, which is situated on the border between Idaho and Montana and within both the Coeur d'Alene River Ranger District of the Idaho Panhandle National Forests (IPNF) and the Superior Ranger District of the Lolo National Forest (LNF). Your letter was received in our office on March 6, 2002, and requested our concurrence with your determination of effect for the grizzly bear (*Ursus arctos*), gray wolf (*Canis lupus*), Canada lynx (*Lynx canadensis*; lynx), bald eagle (*Haliaeetus leucocephalus*), and bull trout (*Salvelinus confluentus*).

The proposed action is to expand the Ski Area within the permitted boundary by developing approximately 87 acres of new ski runs and chairlifts, 1.2 miles of temporary road, and 5,766 feet of new chairlifts. The Ski Area is located within the St. Joe Divide East Lynx Analysis Unit (LAU) on the IPNF and the Lookout LAU on the LNF. Permanent loss of 87 acres of lynx habitat will occur through conversion of suitable lynx habitat to an unsuitable condition with construction of the ski runs and other features. Unsuitable lynx habitat will be increased from 102 acres (1.3%) to 132 acres (1.7%) in the St. Joe East LAU, and from 590 acres (2.3%) to 647 acres (2.5%) in the Lookout LAU. Thus, both LAUs are well within the 30% threshold for unsuitable lynx habitat required by the Lynx Conservation Assessment and Strategy (LCAS). Lynx denning habitat will not be impacted and, other than compaction of trails associated with ski runs, no new designated or groomed over-the-snow routes will be identified within either LAU. Expansion of the Ski Area within the permitted boundary should not affect lynx movement between habitats north and south of the Ski Area. Therefore, the proposal appears consistent with the LCAS.

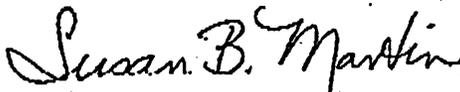
The St. Regis River (in Montana) drains the south side of Runt Mountain, and is a bull trout stream. However, the proposed expansion of the Ski Area would not directly impact the river. Other than improving (grading and water barring) approximately 250 feet of an existing road (FS 18591) within the St. Regis River Riparian Habitat Conservation Area (RHCA) to minimize erosion and sedimentation, no other activity will occur within an RHCA. Road improvements will implement Best Management Practice guidelines contained in the Inland Native Fish Strategy (INFISH). The proposal appears to comply with INFISH.

We have reviewed the information provided and concur with your finding that the proposed project will have "no effect" on grizzly bears and bald eagles, "may affect, but is not likely to adversely affect" bull trout and Canada lynx, and is not likely to jeopardize the continued existence of gray wolves. Concurrence by the U.S. Fish and Wildlife Service is contingent upon implementation of the project as described in the BA.

This concludes informal consultation pursuant to section 7(a)(2) of the Endangered Species Act of 1973, as amended (Act). This project should be re-analyzed if new information reveals that effects of the action may affect listed species or critical habitat in a manner, or to an extent, not considered in this consultation; if the action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this consultation; and/or if a new species is listed or critical habitat is designated that may be affected by this project.

If you have further questions about this letter, or your responsibilities under the Act, please contact Bryon Holt at the above address (telephone: 509-893-8014; fax: 509-891-6748).

Sincerely,


Supervisor

cc: IDFG, CdA, ID.
MFWP, Kalispel, MT.
FS, IPNF, CdA SO (Attn: Shanda Dekome, Bob Ralphs)
FS, LNF, Superior RD (Attn: Beth Kennedy, Don Hair)
FWS, Helena, MT.

ATTACHMENT C PUBLIC INVOLVEMENT AND COMMENT

Public Involvement Activities

The public has served as a source of information to us, helping to identify current uses, problem areas, and ideas for managing the area. They have also been a sounding board, reviewing our work and providing comments and suggested changes. The public involvement process followed the requirements of the National Environmental Policy Act as set forth in 36 CFR 215 (Notice, Comment and Appeal Procedures for National Forest System Projects and Activities), 40 CFR 1502.19 (Circulation of the Environmental Impact Statement) and 1503 (Commenting), and Forest Service Handbook 1909.15 (Environmental Policy and Procedures). The activities discussed below have been summarized in Tables 2, 3 and 4 of this decision.

Scoping

The first step in the process is “scoping” (refer to 40 CFR 1501.7). This process is designed to inform the public and other governmental agencies of a proposed action and determine the potential issues associated with a proposed action that are significant to the decision. The public was first notified of this project through the "Quarterly Schedule of Proposed Actions" for the Idaho Panhandle National Forests, beginning in the April 21, 2000 issue and continuing through the current issue.

In the spring of 2000, we began gathering information about the conditions in the Resource Area, and thinking about what needs to be done to identify concerns and evaluate the potential effects of this project. We visited the area with agency specialists, consultants and members of the public.

In addition to the proposed activities, our analysis considered the effects of past activities, ongoing activities, and those activities that could reasonably be expected to occur in the future.

In April 2000 we declared our intent to prepare an Environmental Impact Statement through publication of a Notice of Intent in the Federal Register and a legal ad in the newspaper of record (Spokesman-Review). Also in April 2000, we prepared a scoping notice that included a project description and map. This scoping notice was mailed to over 300 agencies, organizations and individuals who have expressed concern over issues related to this project.

Scoping comments were received from 29 agencies, organizations and individuals (See Project File - Scoping Content Analysis). Their concerns were identified and addressed in the LPSRA DEIS (refer also to the Project Files – Scoping). We used their comments to develop our initial proposal and alternative strategies for the LPSRA. Because some of these strategies could result in significant environmental impacts, we determined we needed to complete an environmental impact statement (EIS).

Draft Environmental Impact Statement

It took us eight months to complete the analysis and documentation. We documented what we learned and responded to public comments in a Draft Environmental Impact Statement (EIS), which was distributed to interested members of the public in January 2001. We notified the general public of its' availability through a Notice of Availability in the Federal Register and with a

legal ad in the Spokesman-Review newspaper. We asked the public and other agencies to take a look at it and let us know what course of action they'd like to see occur. We held several additional meetings, field trips and presentations with interested members of the public and consultants (documented in the Project Files, Public Involvement and in Appendix C of the FEIS). After 60 days of review, we had received 27 letters offering comments on the project from other agencies, from environmental groups and from individuals. Comments and responses are included in Chapter 5 of the FEIS and copies of letters are included in the Project File (DEIS Comments). Some of these comments led to the development of Alternative D. Other comments were used to improve our analysis and documentation.

Final Environmental Impact Statement

Based on what we heard from the public and additional information we gathered, we prepared a FEIS. In addition to responding to public comments, the FEIS thoroughly described the parts and pieces of the LPSRA project, the alternatives for management, and our predictions as to the consequences of our actions, whether we expand the LPSRA or walk away. We shared our final analysis findings with interested members of the public and other agencies through presentations, news articles, radio interviews and telephone conversations.

Although no public review of a FEIS is required, we chose to provide the public 30 days in which to review the LPSRA FEIS, prior to issuing the Record of Decision, because of the level of interest in the project, and the fact that a new alternative, based on public comments on the Draft, was formulated and analyzed in the Final. At the end of the 30 days, we had received six letters representing two individuals and four organizations. Of the six written comments, four had previously provided comments on the project as discussed below. Those who commented are identified in the table below, followed by our response to comments or concerns not previously raised, and copies of their letters.

Table E-1. List of those who provided comments on the FEIS

Cmt #	Name	Representing
1	Pfahl, J. Chris	Shoshone County Groomer Board
2	Sheroke, Charles	Individual
3	Mihelich, Mike	Kootenai Environmental Alliance
4	Gaillard, David	Predator Conservation Alliance
5	Marsh, Greg	Individual
6	Petersen, Mike	The Lands Council

Comment Letter 1

J. Chris Pfahl provided comments on the FEIS as Groomer Board Chairman of the Shoshone County Groomer Board. Mr. Pfahl and the Groomer Board had not provided prior comment. His letter expressed support for expansion of Lookout Pass Ski Area provided snowmobile access to the old Railroad Grade (FS Road 3026) and to the St. Regis Basin is maintained. He indicates that only Alternatives A (No Action) and Alternative D (the preferred alternative) appear to maintain this access and endorses Alternative D. Mr. Pfahl and the Groomer Board did not provide previous comments at the scoping or DEIS stages.

Comment Letter 2

Charles Sheroke provided comments on the FEIS as an individual and as a representative of the Kootenai Valley Alliance. Mr. Sheroke had also provided comments on the DEIS as an

individual. Comments were also received on the FEIS and DEIS from the Kootenai Valley Alliance represented by Mr. Mike Mihelich and are discussed under Comment Letter 3 below.

Mr. Sheroke's first concern is with conflicts between cross-country skiers, backcountry skiers and snowmobilers. Alternative D, the Selected Alternative, would allow expansion of the ski area with the least change on existing uses by cross-country skiers, backcountry skiers and snowmobilers. Skiers and snowmobilers would have access to the same areas by the same routes. Skiers and snowmobilers would be routed around the lower lift station on the south side of Runt Mountain on Snowmobile Re-route #2. Snowmobilers and skiers would be routed around the lower lift station on the north side of Runt Mountain on the old Railroad Grade (FS Road 3026). Analysis of the effects of the proposed action on cross-country skiing, backcountry skiing and snowmobiling is included in Chapter 4-Recreation of the FEIS. This analysis does not extend to conflicts between skiers and snowmobile users in the upper St. Regis Basin since it is outside the LPSRA special use permit boundary. Expansion of Lookout Pass Ski and Recreation Area may result in an incremental increase in skier and snowmobile use in the St. Regis Basin; however, increased use is likely to occur regardless of expansion of the LPSRA. Conflicts resulting from increased recreation use in the St. Regis basin should be addressed in a separate public process and analysis.

Mr. Sheroke's next concern is with snowmobile impacts on tree regeneration in the St. Regis basin. This subject is also beyond the scope of this FEIS. The Selected Alternative would have little or no impact on existing uses by skiers and snowmobilers other than an incremental increase in use that would occur over time even without expansion of LPSRA.

Mr. Sheroke's next concern is with the shared use of the St. Regis Basin by skiers and snowmobilers. This analysis did not extend to conflicts between skiers and snowmobile users in the St. Regis Basin since it is outside the scope of the proposed action except in the LPSRA special use permit area. Mr. Sheroke's comments on the DEIS also concentrated on shared use of trails and the St. Regis basin by skiers and snowmobiles.

Mr. Sheroke's next concern is with Lynx. Impacts to Lynx were evaluated through preparation of a Biological Assessment and are summarize on pages 4-31 to 4-35 of the FEIS. Consultation was initiated with the US Fish and Wildlife (FWS) and a letter of concurrence was received from the FWS on March 28, 2002 (see project file-BA/BE). Although the project will result in permanent loss of 87 acres of Lynx habitat for ski runs and other features, the amount of unsuitable lynx habitat will only increase to 1.7% and 2.5% of the two affected lynx analysis units. These values are far below the 30% threshold of concern identified in the Lynx Conservation Assessment and Strategy (Ruediger and others 2000). Other than the ski runs, no new groomed or compacted tails will be constructed to increase competition from other predators. No effects on lynx movement have been identified. The potential impacts on lynx cited in Mr. Sheroke's letter are existing impacts. Some of these impacts may experience an incremental increase due to the Selected Alternative, however, these incremental increases would likely occur without expansion of the LPSRA due to increase population and recreation use alone.

Mr. Sheroke alludes to grooming for snowmobile use in the St. Regis Basin. There is no grooming proposed for snowmobile use in the St. Regis as part of the ski area expansion.

Mr. Sheroke also mentions that wildlife harassment by snowmobiles in the St. Regis Basin is a constant problem. This may be a problem, but it is not associated with proposed ski area expansion and we cannot discern from his letter, which species of wildlife are being harassed.

Typically, deer and elk move out of the Basin when snow is deep. If lynx or wolverines are being harassed, we have received no reports of this taking place.

Comment Letter 3

Mike Mihelich provided comments on the FEIS as Forest Watch Coordinator for the Kootenai Environmental Alliance. He also provided comments on the DEIS. Mr. Mihelich's comments related to wetland and stream crossing permitting for culvert installations. He asks for clarification of whether a permit from the Army Corps of Engineers (COE) would only apply to stream crossing work associated with the wetland area, if the COE will be consulted regarding permit requirements for stream crossing outside the wetland area and what Federal agency would be responsible for stream crossings outside wetland areas if not the COE.

The COE is the Federal agency responsible for issuing permits on projects affecting wetlands and waters of the United States. The Selected Alternative includes culvert installations outside the wetland area, brush-cutting within the wetland area and rehabilitation work including minor re-grading and culvert installation within the wetland area to correct existing erosion problems on Primitive Road A. The Selected Alternative would require notification of the COE concerning the project details and potential impacts to wetlands and/or waters of the United States. The COE would then decide if the potential impacts are sufficient to warrant their involvement and if they will require a permit. The COE does not always get involved or require a permit if the impacts are small and if other agency oversight exists to ensure proper construction techniques and BMP implementation. The COE may or may not chose to require a permit for this project due to the small amount of area disturbed.

In addition to these federal requirements, the Montana Streambank Protection Act (310 Law) requires permits for all activities within the high water marks of perennial streams including culvert installations. The Mineral County Conservation District administers this law. Review and permitting under this law ensures proper culvert sizing and installation including use of BMPs to reduce impacts to aquatic resources and water quality.

Comment Letter 4

David Gaillard provided comments on the FEIS as program associate for the Predator Conservation Alliance. Mr. Gaillard and the Alliance did not provide previous comments. Mr. Gaillard states that the Alliance cannot support the proposed expansion of the Lookout Pass Ski and Recreation area without measures that address the dispersed recreation use outside the LPSRA permit area. This subject is beyond the scope of this FEIS. The Selected Alternative would have little or no impact on existing uses by skiers and snowmobilers outside the ski area other than an incremental increase in use, which would occur over time even without expansion of LPSRA. Mr. Gaillard is correct that there are issues related to recreation use and wildlife outside the LPSRA permit area, especially in the St. Regis Basin, however, these should be addressed in a separate public process and analysis.

Mr. Gaillard suggests that there is no indication that the recommendations of the Lynx Conservation Assessment Strategy cited in the biological assessment will be followed in this decision. He lists four of these recommendations as examples:

- “Minimize snow compaction in lynx habitat...”
- “Concentrate recreational activities within existing developed areas, rather than developing new areas in lynx habitat...”

- “Map and monitor the location and intensity of snow-compacting activities (for example snowmobiling, snowshoeing, cross-country skiing, and dog sledding) that coincide with lynx habitat, to facilitate future evaluation of effects on lynx as information becomes available.”
- “Provide a landscape with interconnected blocks of foraging habitat where snowmobile, cross-country skiing, snowshoeing and other snow-compacting activities are minimized and discouraged...”

The Selected Alternative minimizes snow compaction in lynx habitat as identified in the Biological Assessment (BA). Other than the ski runs, no new groomed or compacted tails will be constructed to increase competition from other predators. The Selected Alternative includes the smallest area of new ski runs (87 acres) of any action alternative. These 87 acres will increase the amount of unsuitable lynx habitat will to 1.7% and 2.5% of the affected lynx analysis units. These values are far below the 30% threshold of concern identified in the Lynx Conservation Strategy (Ruediger and others 2000). Other than the ski runs, no new groomed or compacted tails will be constructed to increase competition from other predators.

The DEIS and FEIS document the locations of snow-compacting activities in the vicinity of the proposed action under existing conditions and for each of the alternatives (DEIS and FEIS Figures 1-1, 1-2, 2-1, 2-2, and FEIS Figure 2-3). The intensity of these activities are discussed in the recreation and wildlife sections of Chapters 3 and 4.

The Selected Alternative would have negligible effects on lynx foraging habitat (FEIS page 4-32). Construction of ski runs and other features would convert from 85 acres of foraging habitat to unsuitable lynx habitat. This loss of foraging habitat would increase the amount of unsuitable habitat in the St. Joe East LAU (Idaho side) from 102 acres (1.3% of capable habitat in the LAU) to 187-247 acres (2.4-3.2% of capable habitat in the LAU). Unsuitable lynx habitat for the Lookout LAU (Montana side) would increase from 590 acres to 675 -735 acres (2.6 – 2.8% of capable habitat in the LAU). Habitat that would be converted to ski runs, currently, is not optimal for lynx foraging due to stand structure and low densities of snowshoe hare, the primary prey of lynx.

The Selected Alternative would have little effect on connectivity of lynx habitat (FEIS page 4-32). The interstate highway and its vertical retaining walls and steep rocky cut-slopes would remain a substantial barrier to the regional movement of lynx and other wildlife. Lynx are not expected to cross Interstate 90 within one mile of the top of Runt Mountain because of the vertical highway retaining walls, steep cut-slopes, and the existing ski area. The most likely place for lynx to cross Interstate 90 is between the ski area and Taft, Montana. The action alternatives are not expected to impede lynx movement across I-90. The action alternatives would be concentrated within one mile of the top of Runt Mountain. A slight increase in backcountry and cross-country skiing or snowmobiling may increase human interactions nearby, especially in the St. Regis Basin. However, the additional use of Runt Mountain is not expected to interfere with the main crossing area for lynx, which is further southeast of Runt Mountain along the interstate highway toward Taft, Montana.

The action alternatives would fragment existing lynx foraging habitat on Runt Mountain into smaller patches, reducing the capability of lynx to move throughout ski area. This would be a relatively minor effect since cover is still well distributed throughout the ski area and abundant in adjacent areas. The pattern and amount of cover with the action alternatives would have little or no influence on connectivity within the LAUs.

Comment Letter 5

Greg Marsh provided comment on the FEIS as an individual and had not commented earlier. He was impressed by the workmanship and is most happy with Alternative D, the Selected Alternative.

"I am most happy with your Alternate D, which represents insight into the local economy, respect for the multiple use of the forest by diverse recreational interests, and a true understanding of forest science. You have considered every scientific, aesthetic and economic aspect, and responded to all expressed concerns. I commend you."

Comment Letter 6

Mike Petersen provided comments on the FEIS as executive director of the Lands Council and also representing the Ecology Center and the Colorado Wild Ski Area Coalition. Mr. Petersen also provided comments for the Lands Council on the DEIS.

Mr. Petersen states that the project would substantially increase the size of the ski area however, the increase would only be 87 acres of new runs and 103 acres for the entire permit area. Mr. Petersen also states that there is no evidence that the expansion is needed. The need for this expansion is detailed in **Section 1.2 - Purpose and Need** of the FEIS and cites increasing skier numbers, increased crowding and economic considerations.

Mr. Petersen states concern over various users and resources and that the FEIS analysis unevenly presents the benefits of the project while downplaying or ignoring the costs. However, the FEIS and the BA/BE have evaluated both positive and negative impacts on users and resources. Mr. Petersen suggests the need for an alternative that would manage the ski area better to avoid last year's crowding, yet make it financially feasible. The crowding condition is a direct function of skier numbers versus acres of ski runs, number of lifts, square footage of lodge space and acres of parking. Improved management will not address this fact. Financial stability also depends on increasing skier numbers that cannot occur without improved facilities. Mr. Petersen suggests the analysis should consider undeveloped areas within the existing LPSRA boundary; however, there is not sufficient terrain within this boundary to support the purpose and need (see **Figure 1**).

Mr. Petersen expressed concern for wetlands, especially the 8 acres that would be affected by Alternative B. Alternative B was not selected as the preferred alternative so these effects would not occur. The preferred alternative affects 0.7 acres of wetland, mainly near culvert crossings. No logging would occur in the wetland on the south side of Runt Mountain. He also expressed concern with the sedimentation problem on Road 18591. This problem is the erosion of the road surface with sediment delivery to an adjacent forested area over 200 feet from the St. Regis River. No sediment is currently reaching the river. Grading, with the inclusion of water bars, will reduce erosion of the road surface and no sediment delivered to any stream will result. Mr. Petersen's suggestion to close this road is beyond the scope of this project and involves access issues related to recreation, mining, timber harvest and other resources.

Affordable skiing is not part of the purpose and need for this project, however, the current ski area operator has expressed the goal of keeping lift ticket prices low and has designed the proposed expansion accordingly. Methods to achieve this include purchase of used lifts from other areas. The factors that most affect lift prices are operating costs and the competitive market. These issues have been considered in the review of this project but are not

requirements. Mr. Petersen recommends a bond in case the ski area is bankrupt and abandoned. No bonds are required for the potential bankruptcy and abandonment of ski areas on public lands. Recent increases in skier numbers suggest that it is unlikely these events would occur. The current operator has overcome past problems with ski area profitability at LPSRA. If the area was abandoned, the Forest Service could seek another operator or, if determined desirable, the ski area infrastructure could be removed and the site made available for other uses.

Mr. Petersen suggests that other alternatives to expansion should be considered including replacing the current lift, changing pricing, glading and developing only the north side of Runt Mountain. Replacing the current lift with a high capacity lift does not meet the purpose and need of the project to maintain the economic viability of the LPSRA since the cost of a high capacity lift is too high. A detachable quad lift costs approximately \$3,000,000 to install and \$14,000 per month in electricity to operate (Clifford 2002). His suggestions to provide additional terrain by glading and only expanding on the north side of Runt Mountain do not meet the purpose and need of reducing crowding since there is not sufficient area to glade within the existing ski area and there is not sufficient area on the north side of Runt Mountain to provide enough additional ski runs (Figure 1).

Mr. Petersen expressed concern for cross-country skiing and the potential for user conflicts, partly due to re-routing of the trail over St. Regis Pass. The selected alternative does not include re-routing the trail over St. Regis Pass. No existing access by cross-country skiers or other users will be affected by the selected alternative.

Mr. Petersen expressed concern that ski area numbers are predicted to decline nationwide, however this trend has not been the case in the LPSRA market area. Skier numbers at LPSRA and other local ski areas in Montana and Idaho have increased (FEIS Figure 1-3). Since population growth has continued in the LPSRA market area and is projected to continue to increase, it is reasonable to assume that an increase will continue at LPSRA. Mr. Petersen suggests operating additional days per week, however this will not address weekend crowding conditions when most users have free time.

Mr. Petersen commented extensively on lynx, lynx habitat and provisions of the Lynx Conservation Assessment Strategy. He expressed concerns, including how habitat quality was determined, fragmentation of habitat, the latest science concerning lynx, lynx population numbers and trends, lynx refugia, snowshoe hare habitat, new groomed over-snow routes, and consultation with U.S. Fish and Wildlife Service.

Lynx and snowshoe hare habitat in the project was evaluated by on-site studies conducted during winter and summer by Land & Water biologists over a two-year period. Habitat quality was assessed based on published information concerning vegetation composition and canopy structure in the "Lynx Conservation Assessment and Strategy", "Ecology and Conservation of Lynx in the United States", and "Lynx Habitat Field Reference Notebook – Forage, Travel, and Denning", prepared by the Interagency Lynx Committee (1999). The open understory of grouse whortleberry and beargrass over most of the project area (except Bitterroot Springs) does not provide hiding cover for snowshoe hare or lynx (see pages 3-35 through 3-37 in the FEIS).

Fragmentation of habitat is discussed on page 3-37 and 4-33 in the FEIS. On a regional level, the action alternatives would have little effect on connectivity of habitat to the north and south of Lookout Pass. The interstate highway and its vertical retaining walls and steep rocky cut-slopes would remain a substantial barrier to the regional movement of lynx and other wildlife. Lynx are

not expected to cross Interstate 90 within one mile of the top of Runt Mountain because of the vertical highway retaining walls, steep cut-slopes, and the existing ski area. The most likely place for lynx to cross Interstate 90 is between the ski area and Taft, Montana. The Selected Alternative is not expected to impede lynx movement across I-90. The Selected Alternative would be concentrated within one mile of the top of Runt Mountain. A slight increase in backcountry and cross-country skiing or snowmobiling may increase human interactions nearby, especially in the St. Regis Basin. However, the additional use of Runt Mountain is not expected to interfere with the main crossing area for lynx, which is further south of Runt Mountain along the highway toward Taft, Montana.

The Selected Alternative would fragment existing lynx foraging habitat on Runt Mountain into smaller patches, reducing the capability of lynx to move throughout ski area. This would be a relatively minor effect since cover is still well distributed throughout the ski area and abundant in adjacent areas. The pattern and amount of cover that would be affected with the selected alternative would have little or no influence on connectivity within the LAUs.

In preparation of the FEIS, all relevant available information on lynx was considered in the analysis. Mr. Petersen implies by his comment that there is scientific information available that we did not consider. Without more specific information on studies that Mr. Petersen may be referring to, we cannot address his concern in greater detail.

Mr. Petersen raised questions concerning lynx population numbers and trends in the area of analysis. There are no data concerning lynx population numbers in the analysis area or in Montana or Idaho. There is no population trend information. There are historical reports of sightings of lynx or their sign and trapping records. Lynx are known to be present in western Montana and eastern Idaho, but have not been documented within the proposed expansion area. Although we do not know lynx population numbers, we assumed that lynx habitat exists and evaluated effects on lynx based mainly on how habitat would be affected.

The Selected Alternative would not result in new groomed over-snow travel route that would increase the potential for other predators that may compete with lynx to access lynx habitat in winter (see page 4-33 in the FEIS).

Mr. Petersen indicated that consultation with the U.S. Fish and Wildlife Service must be completed prior to release of the FEIS. Consultation with the U.S. Fish and Wildlife Service has been ongoing through the preparation of the FEIS and the BA/BE. They have concurred in a March 28, 2002 letter that the Selected Alternative may affect but is not likely to adversely affect the bull trout, lynx, and wolf and would have no effect on bald eagle and grizzly bear.

Mr. Petersen suggests that two LAUs is not a large enough analysis area for assessing effects on lynx from the Selected Alternative. Given the relatively small acreage of land directly affected (87 acres) and large amount of suitable lynx habitat within the two LAUs (45,833 acres), consideration of two LAUs is adequate. If more LAUs were considered, the net effect of the project (percent of habitat rendered unsuitable) would be a smaller percent than addressed in the FEIS.

Mr. Petersen stated that diurnal security habitat is very important and that it was not adequately considered in the FEIS. Pages 3-37 and 4-32 address diurnal security habitat. The only potential diurnal security habitat that exists near the project area is around Bitterroot Springs. The Selected Alternative would not affect this potential diurnal security habitat.

Mr. Petersen states that because we do not know population numbers for wolverines, we cannot conclude that the Selected Alternative would not lead to a trend toward federal listing under the Endangered Species Act. We concluded the Selected Alternative may affect individual wolverines but believe that the potential for adverse effects is slight because no potential denning habitat would be affected by the project. The St. Regis Basin may have suitable denning habitat but high levels of existing use by snowmobiles and cross-country skiers may displace wolverines from this area. The Selected Alternative would have a slight incremental effect on numbers of people using the St. Regis Basin for recreation. Given existing high levels of use, it is doubtful that this small incremental increase would further degrade potential wolverine habitat in the Basin to the point where the wolverine would have a greater potential to be listed under the Endangered Species Act.

Mr. Petersen suggests that there should be mitigation measures that reduce the barrier to movement of lynx and other wildlife posed by Interstate 90. He contends that increased traffic from more skiers would make the highway less likely to be crossed by lynx and other wildlife. Although there would be an increase in numbers of skiers with the Selected Alternative, traffic is already sufficiently heavy that the adverse effects on wildlife are probably not going to change with more skiers. The barrier posed to wildlife movement, especially on the Idaho side, relates not only to traffic but also to the physical barrier posed by retaining walls and other structures that block movement.

Mr. Petersen requests that the Forest Service perform a programmatic EIS and “*analyze the extent to which increasing the competitiveness of one resort will negatively impact the competitiveness of other, competing resorts.*” He further states, “This cumulative effects analysis must discuss and compare the cumulative environmental impacts of multiple ski area expansions both in the region and nationally. This request is beyond the scope of this project. LPSRA has demonstrated increased demand in recent time and population projections suggest increased demand into the future.

#1

RECEIVED

SEP 05 2002

CD'A RIVER R.D.

Shoshone County Groomer Board
700 Bank Street
Wallace, ID 83873
208-753-4321

9/4/02

Ranotta McNair
IPNF – CdA Ranger District
P.O. Box 14
Silverton, ID 83814-0014

Re: LPO Ski & Recreation Area – Final EIS

Dear Ms. McNair:

The Shoshone County Groomer Board is funded by snowmobile registrations and is in charge of the snowmobile grooming program within Shoshone County. The Board works cooperatively with the USFS, the Kootenai County Groomer Board, the Benawah County Board and the Montana Night Riders in grooming what we believe is one of the largest snowmobile trail systems in the Northwest. The Old Railroad Grade, which goes through the LOP Ski Area parking lot and the trail into the St. Regis Basin are both impacted by the expansion proposal.

The Board supports the expansion of the Lookout Pass Ski and Recreation Area provided continued snowmobile access to the old Railroad grade and the St. Regis Basin are maintained. It appears that Alternative D is the only alternative besides the No Action Alternative (Alternative A), that adequately maintains snowmobile access to these important trails. We urge the USFS to issue a Record of Decision allowing the Expansion of the ski area as outlined in Alternative D.

Thank you for the Opportunity to comment on this proposal.

Respectfully Submitted:



J. Chris Pfahl
Groomer Board Chairman

RECEIVED

SEP 12 2002

CD'A RIVER R.D.

#2

CHARLES SHEROKE
Attorney at Law
P. O. Box 580
Coeur d'Alene, ID 83816-0580
208-667-2483

Re: COMMENTS TO FEIS - LOOKOUT PASS SKI AREA
EXPANSION

Dear Sir/Ms:

Please accept these comments on behalf of myself and the Kootenai Environmental Alliance.

When addressing Alternatives, NEPA Case Law and implementing regulations require:

A rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid some or all of the adverse environmental effects, is essential."

Your refusal to address the impacts of the proposed action on cross-country and back-country skiing is a glaring defect in the FEIS. Specifically, the continuation and probable expansion of the shared use concept (cross-country, back-country and snowmobiles) for recreationists' utilizing St. Regis Basin has not been adequately addressed. (See 3-49 and 3-50.)

"The action alternatives would continue to allow snowmobilers and cross-country skiers to access the St. Regis Basin from Lookout Pass via Snowmobile Reroute #2." The increased use of the ski area by snowmobilers and cross-country skiers may create an increase in traffic along FS 1859 and Snowmobile Reroute #2 to St. Regis Basin. This increase in use may create an increased chance of avalanche encounters in avalanche-prone areas west of the proposed ski area in the St. Regis Basin. (See 4-47.) Moreover, none of the mitigation measures proposed would reduce or eliminate the inherent conflicts between cross-country skiers and snowmobiles utilizing the St. Regis Basin (Basin). The suggested road and trail closures are essentially

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inconsequential due to the fact that they "do not reach a particular destination unavailable by other routes." (See 4-49.)

Both cross-country skiers and increased numbers of snowmobilers would be funneled into the basin. What are the direct, indirect and cumulative impacts of this proposal on cross-country and back-country skiers.

- Safety -
 - a. increased avalanche vulnerability of skiers as a result of snowmobile use.
 - b. increased vulnerability of skiers to collisions with snowmobilers utilizing the same areas, particularly during periods of limited visibility.
- Noise - the noise from snowmobiles is constantly audible to skiers in the basin.
- Exhaust - the emissions from snowmobilers is on many occasions a constant irritant in the basin.

SNOW UNSKIABLE - the compaction and washboard snow surface caused by snowmobiles renders the snow unskiable.

Essentially your action alternatives will make the environment so inhospitable to cross-country skiers seeking solitude, quiet, clean and safe recreational sites that few skiers will continue to utilize the basin.

If you can not mitigate you must separate the conflicting uses. An alternative addressing separation, including eliminating the adverse environmental effects of snowmobiles in the basin is essential.

See NEPA's mandatory implementing regulations 1502.2, 1502.14, 1502.16, 1502.24, 1508.20, 1508.25, 1508.7, and 1508.8.

Your evaluation regarding Tree Regeneration and Snowmobiles is less than adequate. (See 5-14) Snowmobile tracks in the St. Regis Basin are causing many seedlings and saplings to have broken terminal leaders and/or unnecessary mechanical damage to their trunks - - - The advanced regeneration of high elevations is undergoing unnecessary tree mortality and damages that is unacceptable. Mr. Driden's personal assurances that damage to young trees from snowmobile traffic is not a problem is totally incorrect. (See 1502.24.) Snowmobiling occurs in the basin anywhere from November to May. As the snow melts and compacts (throughout the snowmobile season) more and more young trees are exposed and damaged by snowmobiles. I have personally observed scores of trees permanently damaged from snowmobiles. Driden's casual observations from a patrolling snowmobile do not offer the objective analysis or scientific methodology required of NEPA analyses.

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The total disregard for cross-county and back-country skiers in the DEIS is disturbing. Obviously, the authors' have not experienced the agony of attempting to ski in a shared use environment. What's shared is noise, emissions, increased avalanche hazards, loss of skiable snow, potential collisions between speeding snowmobiles and unprotected skiers and the total loss of a quality winter recreational activity. These impacts were not adequately addressed.

Most disturbing, however, is this agency's willingness to consider actions that would significantly increase the hazard to back-country skiers by authorizing and promoting "shared use" in avalanche prone areas in the Basin.

LYNX

Your assessment of the "action alternative's" impacts on the Lynx is grossly inadequate. A cursory, impartial review of the direct, indirect and cumulative impacts would indicate significant adverse impacts to the listed Lynx. Grooming for snowmobile use into the St. Regis Basin coupled with the proposed expansion (including grooming) of downhill ski runs on currently undeveloped forested areas will be detrimental to the continued presence of the Lynx in this vicinity

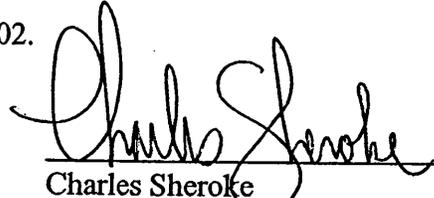
- a. Snowmobile use of the area will increase - both day and night. Nocturnal foraging opportunities for Lynx would be degraded.
- b. Snowmobile tracks and groomed trails will undeniably increase the ease with which Coyotes and Mountain Lions could expand their foraging into areas normally inaccessible because of deep snow. Coyotes and Mountain Lions will increasingly compete with Lynx for prey and may directly affect Lynx by harassment or predation.
- c. The entire St. Regis Basin as a result of past actions coupled with the foreseeable increase in snowmobile use resulting from the current proposal (including the recently promoted Snowmobile Hill Climb), has rendered the entire basin area a snowmobile play area.
- d. Harassment of wildlife by snowmobiles is a constant problem that will further jeopardize the existence and/or presence of the Lynx in the area.
- e. The shrill noise associated with snowmobile use, audible throughout the basin, will further discourage the Lynx's use of the area. There are no plans to limit snowmobile and other snow compacting activities outside of the LPSRA special use permit boundary. Grooming activities are necessary only for snowmobile and downhill ski activities. Cross-country and back-country skiing are not dependent on grooming and would probably prefer that grooming not occur. Unlike the

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Page 4

compaction that occurs from snowmobile tracts, cross-country and back-country ski tracks do not provide the same degree of compaction or the extent of compacted areas associated with snowmobile use.

Your decision to implement any of the action alternatives will further degrade Lynx habitat and violate both NEPA and the ESA.

DATED this 12th day of September 2002.



Charles Sheroke
Attorney at Law
KEA Board Member

Hand Delivered Fernan Ranger District
9/12/02 3:30

C.S.



#3

Kootenai Environmental Alliance

P.O. Box 1598 Coeur d'Alene, ID 83816-1598

Glenn Truscott
Joseph P. Stringer, District Ranger
Coeur d'Alene River Ranger District
Fernan Office
2502 East Sherman Avenue,
Coeur d'Alene, ID 83814

September 13, 2002

Dear Mr. Stringer:

The following comments concern the Lookout Pass FEIS prepared by Land and Water Consulting, Inc.

Culvert installations:

On page 3-28 of the FEIS the following two sentences include a mention of wetlands and stream crossings. "Work in the wetland area will require notification under 404 of the Clean Water Act and may require permits issued through the Army Corps of Engineers (COE). This permitting will be coordinated with **similar permit requirements** for stream crossings. (Emphasis added)

On page 4-13 of the FEIS, table 4-2 includes information regarding the number of temporary and permanent culverts that would be installed under the action alternatives.

The ROD should clarify the following issues relating to culvert installations and the permits that would be required to be obtained from the COE as part of Alternative D.

1. Will a permit from the COE only apply to stream crossing work associated with the wetland area?
2. Will the COE be consulted regarding the "similar permit requirements" for the stream crossings that do not involve wetland areas associated with Alternative D?
3. If permits for stream crossings outside of wetland areas do not require coordination with the COE, which Federal agency will review permit requests for these stream crossings?

Sincerely,

Mike Mihelich

Forest Watch Coordinator


Predator
Conservation
Alliance

Saving A Place for America's Predators

#4

September 16, 2002

Mr. Glenn Truscott
Coeur d'Alene Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814
208-769-3062 (fax)

VIA FAX AND U.S. MAIL

Re: Lookout Pass EIS

Dear Mr. Truscott:

Please accept these comments on the Lookout Pass Ski Area Environmental Impact Statement on behalf of Predator Conservation Alliance, a non-profit conservation group based in Bozeman, Montana, working to protect predatory wildlife and their habitat in the U.S. northern Rocky Mountains and High Plains.

We cannot support the proposed expansion of the Lookout Pass recreation area without measures that address the dispersed recreational use outside of the immediate area to mitigate the decline in habitat quality for rare carnivores and other wildlife in the area due to the proposed action.

As noted in the EIS and biological assessment, the area is one of the few remaining areas that still provides habitat for several imperiled carnivores: wolves, lynx, wolverines and fishers. It also has potential to serve as an important movement corridor between northwestern Montana, the Idaho Panhandle, and central Idaho wildlands for these species and perhaps grizzly bears as well. The dispersed recreational use associated with the Lookout Pass development — especially snowmobiles — compromises the ability of this area to sustain these sensitive carnivores. Until this problem is addressed, no additional impacts to carnivores in this area are justified.

We appreciate the detailed analysis in the biological assessment devoted to the lynx, and concerning the recommendations of the Lynx Conservation Assessment and Strategy (LCAS).

There are several recommendations in the LCAS to monitor and minimize dispersed recreational use in lynx habitat, which are excerpted in the biological assessment:

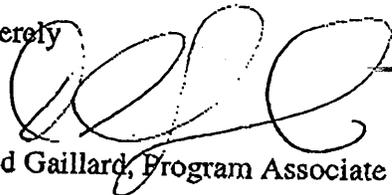
- "Minimize snow compaction in lynx habitat..."
- "Concentrate recreational activities within existing developed areas, rather than developing new areas in lynx habitat..."
- Map and monitor the location and intensity of snow-compacting activities (for example snowmobiling, snowshoeing, cross-country skiing, and dog sledding) that coincide with lynx habitat, to facilitate future evaluation of effects on lynx as information becomes available.
- "Provide a landscape with interconnected blocks of foraging habitat where snowmobile, cross-country skiing, snowshoeing, and other snow-compacting activities are minimized and discouraged..."

There is no indication in the EIS or biological assessment that these recommendations will be followed in this decision. On the contrary, the biological assessment states: "There are no plans to limit snowmobile, cross-country, and other snow-compacting activities outside of the LPSRA special-use permit boundary. Changes in overall management of the Forest outside the special use permit boundary is beyond the scope of the proposed action." The biological assessment states that Montana Fish, Wildlife and Parks is monitoring dispersed snow-compacting activities, but no data are provided.

The biological assessment also states: "Future use of national forest lands by winter recreationists is expected to increase in proportion to increases in population of western Montana and eastern Idaho." While this use will likely increase with or without the proposed expansion, various elements of the expansion such as the increased parking lots and summer use trails will no doubt exacerbate this problem. It is only appropriate that this decision address the problem of dispersed recreational use in this important areas for several imperiled carnivores and sensitive wildlife in general.

Thank you for the opportunity to comment, and please keep me informed of any developments in this process.

Sincerely



David Gaillard, Program Associate

cc: U.S. Fish and Wildlife Service, Spokane Office
Land and Water Consulting, Inc.
Kootenai Environmental Alliance

#5

Suzanne Burnside
Assistant to the Forest Supervisor
Idaho Panhandle National Forests
208-765-7369, smburnside@fs.fed.us

----- Forwarded by Suzanne M Burnside/R1/USDAFS on 09/16/2002 09:12 AM -----



"Greg Marsh"
<greg4mss@hotmail.com>

09/15/2002 12:46 PM

To: mleverick@fs.fed.us, rmcnair@fs.fed.us, dlaustin@fs.fed.us, jstringer@fs.fed.us

cc: chamber@imbris.com, greg4mss@yahoo.com, vince@silvervalleyedc.com

Subject: Response to Lookout Pass FEIS

Thank you for promptly providing me a hardcopy of the Lookout Pass FEIS upon my request. I have read it from cover to cover, and as someone who once wrote similar documents to MIL-STD specifications, I am VERY impressed with the workmanship involved. I am most happy with your Alternative D, which represents insight into the local economy, respect for the multiple use of the forest by diverse recreational interests, and a true understanding of forest science. You have considered every scientific, aesthetic and economic aspect, and responded to all expressed concerns. I commend you.

When I read in the August 22, 2002, Shoshone News-Press that the FEIS was published on the internet, I immediately added a banner and link on my Lookout Pass Ski Area website at <http://wallace-id.com/skilookout/index.html> .

Unfortunately, the paper merely cited your IPNF homepage, and your FS search engine did not provide a listing for the FEIS. Friday before last (9/6/02), I was finally able to locate someone in your organization who had the address for the 3.5 MByte PDF file. Unfortunately, the four reoriented figures of most interest in that document are not legible on a computer screen. Therefore, I contacted the Silverton office and they cheerfully arranged for me to pick up a hardcopy Tuesday morning. I scanned the figures at 2400 dpi and reduced the images to 1200 pixel widths. The linked figures now appear as JPG's on screen exactly as they do on paper. Feel free to copy and use them for your own purposes (although you may wish to standardize the borders first).

I was told that Monday, September 16, was the last day for public comment. Since the paper did not announce the FEIS until August 22, and apparently there were technical problems getting it on the internet until last week, I was hoping that you might extend the public comment period a week or so to compensate. Since getting it, I have been carrying the document with me and showing it to all I meet in Wallace. There is universal rejoicing for your enlightened Alternative D. I believe that many of my backcountry, cross-country and alpine skiing, snowboarding, snowmobiling and winter camping friends would put this in writing if given the chance.

Again, thank you for doing a superb job of looking at all issues and

opinions, and then crafting a plan that makes sense to all recreational enthusiasts, and is also kind to Mother Nature.

Greg Marsh, Ph.D.

Marsh Scientific Services

wallace-id.com and silver-valley.com

#6

RECEIVED

SEP 17 2002

SO: MAIL ROOM. IPNF



Phone 509.838.4912 Fax 509.838.5155 Email tlc@landscouncil.org Website www.landscouncil.org

921 W. Sprague Ave. Suite 205
Spokane, WA 99201

September 16, 2002

Ranotta McNair, Supervisor
Idaho Panhandle NF-FS-USDA
3815 Schreiber Way
Coeur d'Alene, ID 83815-8363

RE: Comments to Lookout Pass Final EIS

Dear IPNF,

The Lands Council, The Ecology Center and the Colorado Wild Ski Area Citizens Coalition would like to provide comments to the Lookout Pass expansion FEIS. The project would substantially increase the size and capacity of this small family ski area. Lookout Pass Ski Area (LPSRA) currently has a niche as a family friendly, affordable ski area with easy terrain. The expansion increase lift tickets prices, possibly forcing local residents, particularly children off the mountain. While skier days have increased in the past two years, likely due to good snow conditions, there is no evidence that this expansion is needed to serve the regional market. In fact, we are sure no other ski area owners want to be faced with more competition.

Ultimately, the proposal will hurt backcountry recreationists, including cross-country skiers, it will impact wildlife, impact water and wetlands, and it will benefit the ski area owner. As managers of the public domain, the Forest Service must weigh the costs and benefits of this potential project, and decide whether it maximizes public benefits. Unfortunately, the analysis unevenly presents the benefits, while downplaying or ignoring the costs. The range of alternatives fail to look at an alternative that would manage the ski area better to avoid last years crowding, yet make it financially stable.

The alternatives analysis must be comprehensive. Council on Environmental Quality (CEQ) Regulations implementing the NEPA (40 CFR 1502.14.) require that agencies shall "*rigorously explore and objectively evaluate all reasonable alternatives.*" Should an actual need be disclosed for additional advanced terrain at LPSRA, the alternatives analysis should fully consider undeveloped areas within the existing LPSRA ski area boundary, which could also provide such needed terrain.

Impacts on Wetlands

The Response to comments states that 8 acres of wetland would become a ski run but goes on to say it is doubtful that any adverse impacts would occur. Doubtful is a term that indicates no actual analysis or hard look at impacts has been done. Logging the wetland will certainly alter the function, wildlife use and hydrologic flows - none of this is analyzed in the FEIS. Further, the question of whether changing or degrading wetlands is legal was not answered by the IPNF.



The road that crosses the St. Regis River (18591) is currently causing problems with sedimentation, which the alternatives are supposed to fix. But merely grading the road will not solve long-term stability problems, and a likely increase in traffic was not discussed. We suggest that the IPNF may want to close this road to vehicular traffic.

Affordable Skiing

The ski area owner believes ticket prices will not increase. We appreciate that the ski area owner wishes to use "recycled" chairlift as a cost-cutting measure. However, we would like to see the numbers to substantiate this. Doubling the size of this ski area, creating new runs, water and septic infrastructure, grooming equipment, increased insurance costs, powerline upgrade, parking, etc. all cost money, we wonder if the analysis has been shown to the Forest Service that would substantiate a claim of no ticket price increases. It does not seem reasonable that increasing skiers by 52 over the next 8 years will provide the added income to pay for this.

Will there be a bond so that in the unfortunate event of poor snow or poor economic conditions, this area would be forced into bankruptcy, and the facilities were abandoned. Dozens of small ski areas have gone broke over the years, in large part because of excess debt.

Alternatives to Expansion

Crowding on weekends seems to be an issue. This can be alleviated in several ways – increasing capacity by replacing the current lift, increasing weekend prices, decreasing weekday prices, etc.

The other issue seems to be the lack of advance terrain. On one hand this can be seen as positive, since it keeps expert skiers at other ski areas. But another solution might be something similar to what the nearby 49 Degrees North ski area has done. They have created gladed skiing on intermediate terrain. Due to the ungroomed, treed nature it becomes advanced powder terrain that is appealing to better skiers. It also spreads out the crowds, since skiers take more time in gladed areas. This might be an option for Lookout Pass, a few gladed areas could adsorb skiers and offer much greater challenge and if some of the glades involved traverses it would offer less congestion at lifts.

Our point is that expansion is not the only alternative that could keep this area economically viable. For example a modified Alternative D, with just a north slope lift would be much less impactful, yet provide new advanced terrain that could disperse any crowds. The FEIS stated it looked at this possibility, but concluded that 1) there are no clear recreation or wildlife issues driving development of one side of the mountain versus the other; and 2) this alternative does not meet the purpose and need of the proposed action to reduce crowding and provide additional ski experiences. We disagree; if a north side lift such as Alternative D were chosen it would be within the existing permit area, it would not impact the cross country trails and roadless expanse to the south of Runt Mountain. It would provide advanced terrain and double ski area capacity, and it would not impact the rail trail. Impacts on wetlands would be eliminated, and seclusion habitat for wildlife would be retained on the south side. The snow on the north side is of much higher quality, and partial glading would create a unique experience. It would be a much smaller impact and capital investment and yet meets the stated Purpose and Need.

We believe the range of action alternatives are too narrow and fail to disclose reasonable alternatives that could maintain the character of the ski area, and not impact backcountry use or wildlife.

Cross Country Skiing Experience

The FEIS and response to comments indicates there may be more snowmobile/crosscountry user conflict under the action alternatives, partly due to the rerouting of the trail over St. Regis pass. We find this an unacceptable trade-off. Lookout Pass has traditionally been used as a back country skier access to high elevation, quality snow, in addition to the small family ski area. Losing this backcountry area by increasing user conflicts is very significant, these are federal lands owned by the public. It is clear that the benefits of the LPSRA expansion accrue mostly to the ski area owner. Since downhill skiing terrain is not limited in the market area, it cannot be said that this expansion is needed for the residents of Missoula, Coeur D'Alene or Spokane.

Economic and Social Impacts

Ski area expansions can force an upgrade in all other market ski areas. The FEIS states that the average number of skiers per season over the last 5 years was 24,090. Schweitzer, Blacktail Mountain, Discovery and Montana Snowbowl are discussed at competitors— like Lookout Pass the ski numbers go up and down as the snow levels rise and fall. The analysis fails to mention Mt. Spokane and 49 Degrees North ski areas, both are medium size areas much closer to Spokane who often struggle for business. They are the type of family area that is in competition with Lookout Pass. A study performed by R.R.C. Associates, a ski industry market research firm, recently concluded that ski areas nationwide should anticipate a decrease in skier visitation. According to the July 18-20, 2000 Ten Mile Times (Colorado):

“Ski areas around the country could see skier numbers drop by 27 percent - or more - from about 52 million annual down to 37 million, if present demographic trends continue, according to ongoing research by Boulder based R.R.C. Associates... Also factored into the equation were changes in demographics, weather patterns, family leisure time and competing activities.”

According to the FEIS population growth in the LPSRA service area is projected to continue beyond national averages, which increases the potential skier market. Mineral and Missoula counties in Montana have experienced population increases over the past ten years of 17% and 22% respectively. Shoshone county Idaho has experienced a population decline of 1% during this period while Kootenai County Idaho increased by 56%. Spokane County Washington had a 16% population increase during this ten year period. Together, these five counties had a total population increase of approximately 150,000 between 1990 and 2000 (US Census Bureau 2002). Here the economic analysis fails to look at all the expansions that have occurred in this time— Silver Mountain and Schweitzer most notably, areas that have an overnight infrastructure in place and are closer to population centers.

A survey of 13 ski areas in the Northern Region of the USDA Forest Service for the 1999-2000 season showed that skier visits (including snowboard visits) totaled 875,995 compared to 804,636 during the 1998-99 season. But the 98-99 season was a poor snow year in the Northern Region, so this snapshot portrays an inaccurate picture of demand, which is heavily driven by snow conditions.

The FEIS states that the small size and dependence on only one main chairlift at LPSRA significantly limit its attractiveness to skiers and its competitiveness in the local ski market. But in the next section it says the ski area is too crowded? So why is it so crowded - priced wrong, lack of weekday incentives? Creative solutions are not explored in the FEIS.

According to the FEIS lift lines are a problem when the area receives more than 300 skiers per day. Lift lines are about 10 minutes for 300 skiers per day, and about 15 minutes or more when skier numbers exceed 400 per day (Phil Edholm, pers. comm., 7/17/00). In the 2001-2002 season, skier numbers averaged 370 skiers per day and exceeded 450 on 27 of the 81 days of operation (33% of the time). One solution is to increase the number of days the area is open and provide incentives, such as bus service lower cost tickets ALL WEEK, to better utilize the area.

The Lands Council asked the following: There is no basis for the statement that people will stop coming unless LPSRA is permitted to expand...If crowding is an issue, then where does the concern about declines in users come from?

The FEIS response was: As crowding increases each year at LPSRA and other regional ski areas are allowed to expand, skiers are more likely to visit other ski areas than contend with crowded conditions at LPSRA.

Our comment is that the LPSRA is trying to become a bigger player in the regional ski market, rather than maintain its unique role as a quality provider for low cost, family fund. If people stop coming because it is too crowded, then the lower numbers become more attractive to those who do come.

Wildlife impacts

The impacts on wildlife have us very concerned. We are particularly concerned about forest carnivores, who require seclusion, in addition to foraging and denning habitat.

Lynx

According to the LCAS, "until conclusive information is developed concerning lynx management, we recommend the agencies retain future options. That is, choose to err on the side of maintaining and restoring habitat for lynx and their prey. In particular, managers should avoid making an irretrievable commitment of resources that could ultimately prove crucial in maintaining or restoring viable, self sustaining lynx populations within an ecosystem" (LCAS 76).

The IPNF has designated the Lookout Pass area as a primary conservation area for forest carnivores (lynx, fisher, and wolverine) (FEIS 3-31). Lynx and other forest carnivore protection should be of highest priority here. Yet, the FEIS does not adequately demonstrate consistency with the Lynx Conservation Assessment and Strategy (LCAS), the programmatic Biological Evaluation, the programmatic Biological Opinion, and the Conservation Agreement between the USFS and the USFWS. Impacts to carnivore habitat availability through the continued viability of regional travel corridors, fragmentation of forested terrain, and reduction in prey availability through increased predator competition (by snow compaction and coyote proliferation).

Since the lynx is an ESA listed-species, the FS should have determined whether the provisions of the LCAS adequately protects the lynx in this area or if additional steps are needed to locate lynx and protect lynx populations in this project area. The FS should have considered all the latest science on the lynx, including research cited in the earlier and final drafts of the LCAS and research that has been completed since the completion of the LCAS.

The Forest Service needs to amend its Forest Plans to fully adopt the LCAS before proceeding with this project. The FEIS fails to demonstrate consistency with the applicable forestwide and project-specific Standards and Guidelines contained in the LCAS with regards to recreational activities.

Adequate, informed consultation with USFWS and the preparation of a biological opinion for lynx must be completed before the FEIS is released.

The FS should have determined whether the scale of analysis is appropriate to determine the effects on lynx on a site-specific basis (LCAS 77). For example, what are lynx populations, population trends, or the conditions of lynx habitat in the LAUs in the vicinity of the project (FEIS 331)? Are the impacts of a large-scale project such as this appropriately analyzed on a two-LAU scale, or should more LAUs be considered?

The LCAS sets mandatory Standards that would modify or amend the Forest Plan regarding the lynx—steps the IPNF and LNF have thus far not accomplished. For example:

How has the FS identified key linkage areas that may be important in providing landscape connectivity within and between geographic areas, across all ownerships. (LCAS 89)?

How has the FS developed and implemented a plan to protect key linkage areas on federal lands from activities that would create barriers to movement? Barriers could result from an accumulation of incremental projects, as opposed to any one project. (Id.)

How has the FS mapped and monitored the location and intensity of snow compacting activities that coincide with lynx habitat (LCAS 82)?

How has the FS ensured that there has been no net increase in groomed or designated over-the-snow routes and snowmobile play areas on federal lands by LAU?

Has there been an assessment of the landscape patterns that affect the lynx (LCAS 78)?

Other large-scale considerations such as the potential needs of lynx for large, connected, protected areas to serve as refugia (LCAS 92, 96, 103-104), location of the best areas for refugia, and the potential for projects such as this to impact portions of potential refugia should have been a part of this analysis.

All activities with the potential for cumulative effects should have been disclosed and analyzed. Consistency of this project with LCAS 97&98 should have been demonstrated. Are all activities identified and analyzed in the FEIS and its maps? This is not clear from the document.

According to the LCAS, the FS must identify important lynx habitat components and elements such as denning, foraging, topographic features, non-forest vegetation, patch size, and connectivity (LCAS 79). The FEIS is replete with statements claiming that such habitat components are available or not available/appropriate, but the document provides few specifics. For example, the FS states "habitat that would be converted to ski runs, currently, is not optimal for lynx foraging due to stand structure and low densities of snowshoe hare" (FEIS 4-32). The FS does not disclose how it determined such habitat to be suboptimal. And this habitat may good or acceptable habitat for the lynx, for all the reader knows, but the FS does not disclose whether this is the case. And the FS states that areas proposed for disturbance have limited potential for denning (FEIS 4-32), but provides no specifics to document this claim.

Areas with good denning habitat or habitat with similar characteristics (such as areas with abundant large woody debris or jackstrawed logs) may provide important diurnal security habitat for the lynx (LCAS 83). The FS never fully explains how much of such habitat exists, is needed, or would be displaced by the project (FEIS 4-32). In addition, it is important that such diurnal security habitat areas be large enough and have adequate connectivity in order to protect the lynx (LCAS 83). Diurnal security habitat is especially important since portions of the ski area expansion may displace lynx. The LCAS alleges that "lynx may be able to adapt to...recreational use, so long as critical habitat needs are met" (LCAS 82). The FS does not explore whether this assumption is true in the Lockout Mtn. area and, moreover, does not ensure that all such critical habitat needs are even identified or protected.

The FS does not identify quality snowshoe hare habitat in the area (LCAS 82). The LCAS advises agencies to "minimize" or "preclude" snow compacting activities in and around this habitat, not merely ignore it or restrict them somewhat as is proposed here (LCAS 82).

Roads, other infrastructure, and higher motorized route densities associated with the ski project could have impacts to lynx and other forest carnivores during all seasons of the year. The impact of such motorized routes is an issue that was not fully explored in the FEIS (LCAS 95).

The FS should have disclosed what off-season programs and activities are likely and should have analyzed their impacts. Activities in non-winter months can affect lynx by affecting denning habitat (LCAS 83), as well as other habitat components. The FS should have also analyzed the degree to which nighttime (and early morning and late evening) activities could impact the lynx. Nocturnal foraging areas may be diminished in availability or quality (LCAS 84)

The FEIS ignores key components of the LCAS, such as objectives to concentrate use in already developed areas rather than developing new areas in lynx habitat (LCAS 83; FEIS 434). This project does just that.

The project also directly and indirectly creates new groomed and over-the-snow routes contrary to the LCAS.

And the FS acknowledges that the ski resort could push existing dispersed recreation users further out into outlying areas (and potential lynx habitat), but refuses to analyze the impacts of this change in distribution and concentration of use on the lynx and lynx habitat (FEIS 434).

Agencies are supposed to design trails, roads, and lift termini to direct use away from diurnal security habitat (LCAS 83). But alternative maps show many of the ski trails, lift termini, and roads associated with the project on ridges, wetland areas, and other topographic features that may be important habitat or travel corridors for lynx (See LCAS; FEIS Alternative Maps).

Connectivity should be thoroughly considered in the FEIS. The discussion in the FEIS concentrates almost solely on the impacts of I-90, but avoids any analysis of connectivity between the project area and portions of the NFs south of I-90 (FEIS 4-32).

We believe the FS should take a precautionary approach that retains possible lynx habitat, rather than developing new areas. The FS should "choose to err on the side of maintaining and restoring habitat for lynx and their prey. In particular, managers should avoid making an irretrievable commitment of resources that could ultimately prove crucial in maintaining or restoring viable, self-sustaining lynx populations within an ecosystem" (LCAS 76). This project does not do this. Instead, it carves up even more lynx habitat for a ski expansion project of questionable merit.

Wolverine

As stated in the FEIS (Chapter 4-Wildlife), wolverine may utilize habitat in the analysis area as part of a larger home range. The action alternatives may impact individuals and habitat, but would not likely contribute to a trend towards federal listing or cause loss of viability to the population or species. Since there is no survey of wolverine or lynx numbers we find the statement about not contributing to a trend towards federal listing speculative, and that it fails to meet the cumulative effects requirement of NEPA.

Chapter 4 of the FEIS also notes that the action alternatives would:

Affect areas with limited potential for lynx denning due to the scarcity of large woody debris; and decrease the number of packed trails near the ski area but increase the acreage of packed ski runs on Runt Mountain.

Carnivores competing with lynx would have greater access to areas affected by ski runs under Alternatives B, C, and D, but would have less snowmobile and cross-country trails to access other areas of Runt Mountain. Packed ski runs would cover a larger area under Alternative B (281 total acres) than Alternative C (217 total acres), Alternative D (215 acres), and Alternative A (127 total acres). However, Alternative A would maintain 74,386 feet of packed snowmobile and cross-country ski trails, whereas Alternative B would reduce this amount to 55,235 feet, Alternative C would reduce this amount to either 61,635 or 63,922 feet, and Alternative D would reduce this amount to 69,729 feet.

Comparing feet and acres is an apples and oranges comparison. Opening the south side of Runt Mountain to hundreds of skiers every day is a significant change from a mile less of trail usage.

The FEIS states: Interstate 90 and the existing ski area currently act as barriers to lynx movement within 1 mile of the top of Runt Mountain. Lynx are anticipated to cross I-90 southeast of the ski area near Taft, Montana. The action alternatives would take place within 1 mile of Runt Mountain and are not expected to interfere with lynx crossing I-90.

The proposal would be more acceptable if there were mitigation measures dealing with the I-90 issue. The impacts from an increase in traffic due to additional skiers, on wildlife crossing I-90 even is east a mile, is not discussed.

We believe the FS should take a precautionary approach that retains possible lynx habitat, rather than developing new areas. The FS should "choose to err on the side of maintaining and restoring habitat for lynx and their prey. In particular, managers should avoid making an irretrievable commitment of resources that could ultimately prove crucial in maintaining or restoring viable, self-sustaining lynx populations within an ecosystem" (LCAS 76). This project does not do this. Instead, it carves up even more lynx habitat for a ski expansion project of questionable merit.

The Forest Service Must Perform a Programmatic EIS

Given the static conditions in the national ski market, an expansion project with the effect of seeking to improve ski area "competitiveness" will necessarily impact other ski areas in the same market. Most, if not all, of these ski areas also operate on public lands administered by the Forest Service. The Forest Service should specifically address this underlying purpose for the LPSRA proposal and analyze the extent to which increasing the competitiveness of one resort will negatively impact the competitiveness of

other, competing resorts. This analysis must keep in mind that the Forest Service is under no requirement to maximize the profits of one of its permittees at the expense of the others. The Forest Service should prepare a Programmatic EIS which examines and compares the cumulative impacts of Forest Service plans and proposals to allow ski areas to be permitted or expand on National Forest System lands. As such, all cumulative impacts on the viability of other ski resorts in the Spokane and Missoula markets must be addressed in each ski area expansion or development proposal.

Specifically, IPNF must now examine the economic interdependence of ski areas and determine the cumulative environmental impacts of both historic and current Forest Service determinations as it applies to the current LPSRA proposal. In particular, the IPNF must recognize that approval of one ski area expansion will necessarily require other ski areas to expand in order to remain competitors in a market of skiers which is static. In the last two decades, skier numbers have increased a mere .3% / year nationally, yet skier acreage has increased tremendously in that time.

The Forest Service's failure to address this concern with a programmatic EIS leads to piece-meal approval of ski area proposals and / or expansions with related environmental and economic impacts, and may lead to multiple authorizations of ski area expansions without a statement as to the cumulative and synergistic environmental impacts occasioned by such approvals.

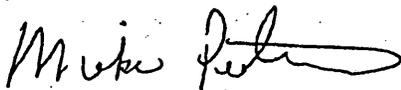
For instance, a study by the Utah Governor's Office of Planning and Budget in 1999 determined that development at any of the four Cottonwood Canyon resorts there would necessarily have an impact on the ability of the others to attract skiers. (Alta Ski Lifts resort Draft EIS, 1998 at 3-101, p. 11-18 & tables 12 & 13.) The Governor's report established that if development at the four Cottonwood Canyons is permitted, two of the ski areas - Solitude and Snowbird - stand to gain in market share, while two others - Alta Ski Lifts and Brighton - would lose less market share if the proposals are not authorized). Failure to analyze the impacts of the Lookout Pass ski area proposal and its marketing and attracting of a limited pool of skiers on the viability of other ski areas in the region, and indeed nationwide, would violate the requirements of NEPA and CEQ regulations implementing NEPA.

This cumulative impacts analysis must discuss and compare the cumulative environmental impacts of multiple ski area expansions both in the region and nationally. It should state with particularity the causal environmental effect of multiple ski area expansions with interdependent economic relations. Specifically, the LPSRA analysis must acknowledge and critically analyze the purpose and need for all historic ski area expansions for the necessity to remain "competitive", thereby impacting other ski areas in our national forests. These impacted ski areas then believe that they themselves must seek expansion approval from the Forest Service in order to remain a competitor in a flat skier market.

The Forest Service should review the stated purpose of this proposal to assess the cumulative environmental impacts of other resorts unable to remain "competitive" in a flat skier market without further expansion, and whether such circumstances will require other ski areas in the region to submit similar proposals should the LPSRA proposal be approved.

Thank you for the opportunity to provide comments.

Sincerely,



Mike Petersen, Executive Director

IDAHO PANHANDLE NATIONAL FOREST PLAN SITE-SPECIFIC AMENDMENT

January 24, 2003

This amendment changes Visual Quality Objectives (VQO) on the north side of Runt Mountain for the proposed expansion of the Lookout Pass Ski Area (N 1/3 Sec. 4 and NE ¼ Sec. 5, T48N, R6W, B.M., Shoshone County, Idaho) on the Coeur d’Alene River Ranger District. The changes are located within the permit boundary of the Lookout Pass Ski and Recreation Area.

The Master Plan for the Lookout Pass Ski and Recreation Area agreed in principal to an expansion of the ski area onto the north side of Runt Mountain, subject to analysis under the National Environmental Protection Act. The *Lookout Pass Ski and Recreation Area FEIS* has been completed; and the selection of Alternative D, per the Record of Decision, approved the expansion.

The permit boundary of the Lookout Pass Ski and Recreation Area preceded the Idaho Panhandle National Forests Plan, with the permit area being designated as Management Area (MA) 17 in the Forest Plan. The goals for MA 17 are to:

- “Manage for developed recreation opportunities in a roaded natural and rural recreation setting;
- Management to protect and enhance a natural appearing environment and the opportunities for social interchange between users.”

Though every effort will be taken to design for natural appearance in the creation of the required runs; this area lacks openings that can be repeated to produce a landscape in which manipulation is not visually evident. Because of this an amendment to the Forest Plan is required.

With this decision there will be a net change of approximately 400 acres from a VQO of Retention to Modification. This acreage also includes the existing developed ski area.

This has been determined to be a non-significant amendment to the Idaho Panhandle National Forest Land and Resource Management Plan.

LOLO NATIONAL FOREST
LAND AND RESOURCE MANAGEMENT PLAN
AMENDMENT #28

January 24, 2004

This amendment changes Management Area designations on the south side of Runt Mountain for the proposed expansion of the Lookout Pass Ski Area (SE ¼ Sec. 31 and SW ¼ Sec. 32, T19N, R32W, P.M.M., Mineral County, Montana) on the Superior Ranger District.

The expansion of the ski area extends into Management Area 9 of the Lolo National Forest. Management Area 9 includes parts of the Forest that receive concentrated public use. The numerous primitive trails on the south side of Runt Mountain and St. Regis Pass are included in this Management Area. The goals of MA 9 are to:

- *“Provide for a wide variety of dispersed recreation opportunities in a forest setting available to a wide segment of society;*
- *Provide for management of other resources in a manner consistent with the recreation objectives;*
- *Provide for acceptable levels of water quality and fisheries habitat; and improve opportunities for dispersed recreation.”*

The Lolo National Forest Plan allows for the conversion of MA 9 to MA 8 (provide developed recreation), requiring that a an environmental analysis be completed prior to allowing developed recreational; and specifies: *“Any recreational area plan developed will be incorporated into the Forest Plan as an amendment”*. The completion of the *Lookout Pass Ski and Recreation Area FEIS*, and the selection of Alternative D per the Record of Decision, fulfills this requirement.

With this decision there will be a net change of 65 acres from MA 9 to MA 8; and thus the Visual Quality Objective will also change for that area: from Retention to Modification.

This has been determined to be a non-significant amendment to the Lolo National Forest Land and Resource Management Plan.

Lookout Pass Ski and Recreation Area FEIS: NFMA Consistency – Species Viability

The 1982 regulations implementing the National Forest Management Act (NFMA) require National Forests to provide habitat in order “to maintain viable populations of existing native and desired non-native vertebrate species in the planning area.” (36CFR219.19). The regulations direct that “habitat must be provided to support, at least, a minimum number of reproductive individuals, and that habitat must be well distributed so that those individuals can interact with others in the planning area.” The planning area is defined as the Forest Service lands included in the long-range management plan.

I. Threatened and Endangered Species

A. Gray Wolf

Lolo National Forest Plan standards require that the Lolo National Forest not only manage for endangered, threatened, and proposed species, but also recover them, while IPNF Forest Plan standards requires that management of habitat and security needs for threatened and endangered (T&E) species be given priority in identified habitat.

Wolves are rapidly re-colonizing Montana and Idaho. Wolves, once packs become established, are one of only a very few species that are *easily detectable*. Consequently, unlike other species where we have to rely on habitat or prey availability to assess whether or not management activities are consistent with maintaining species viability, the question of meeting recovery goals or population viability for wolves can be answered simply by monitoring populations. The recovery goal for wolves in the Tri-State area (Montana, Idaho, and Wyoming) is 30 packs (USDI 1987). That goal has been exceeded in the Tri State area. At the end of 2001, an estimated 570 wolves, in 34 or more breeding wolf packs inhabited the Montana, Idaho, Wyoming recovery areas, with 18 wolf packs and about 120 wolves in Montana (see Project File): Montana Wolf Conservation and Management Plan Update, August 2002). On the IPNF, two wolf packs have been established in the upper St. Joe river basin in the last ten years (Kennedy 2000, project files). These are two of the 13 that are established in the Central Idaho Experimental Population area (see map Figure 5/page 10 Idaho Wolf Recovery Program (1998) in the project files). On the Lolo, the nearest known packs, the Snow Peak and Kelly Creek packs, are approximately 30 miles south east of the project area.

Wolves are also the one species where we can probably conclude that *recovery (to de-listing levels) equals viability*. Wolves have an extremely high fecundity rate, are highly mobile, and have sustained some habitat connectivity with large populations in Canada. Consequently, there is little concern among wildlife professionals that the 30-pack recovery goal should not be sufficient for long-term species viability¹. Wolf pack numbers at the Forest, Northern Idaho - Western Montana, and Tri-State area clearly indicate that cumulative, broad-scale activities are consistent with recovery at all scales.

¹ U.S. Fish and Wildlife Service, Nez Perce Tribe, National Park service, and USDA Wildlife Services. 2002 Rocky Mountain Wolf Recovery 2001 Annual Report. T. Meier, ed. USFWS.

B. Lynx

As required by the Canada Lynx Conservation Assessment and Strategy (LCAS) (Ruediger et al., 2000), lynx analysis units have been delineated for those portions of Idaho and Montana that will be affected by the expansion activities. The LPSRA lies within the St. Joe Divide East LAU in Idaho and the Lookout LAU in Montana. The area was designated an LAU because it contains habitat required by the lynx and lies above 4,000 feet elevation. The LPSRA includes unsuitable lynx habitat and low-quality lynx foraging habitat on the Idaho portion of the permit area and unsuitable habitat on the Montana side of the permit area (BA/BE, pg. 15).

According to the criteria of the LCAS (Ruediger et al., 2000), each LAU must have no more than 30 percent unsuitable habitat. If a LAU has more than 30 percent unsuitable habitat, no further reductions in lynx habitat shall occur. The construction of ski runs will convert 87 acres of foraging habitat to unsuitable lynx habitat. This loss of foraging habitat will increase the amount of unsuitable habitat in the St. Joe East LAU (Idaho side) from 102 acres (1.3% of capable habitat) to 132 acres (1.7% of capable habitat). Unsuitable lynx habitat for the Lookout LAU (Montana side) will increase from 590 acres (2.3% of capable habitat) to 647 acres (2.5% of capable habitat). This increase in unsuitable lynx habitat is well below the upper limit for unsuitable habitat of 30 percent in an LAU as specified by the Lynx Conservation Strategy.

The LCAS recommends that within an LAU, denning habitat be maintained on at least 10% of the area that is capable of producing stands with these characteristics. Within the analysis area, maternal denning habitat does not appear to be present due to a scarcity of woody debris (FEIS, pg. 4-32). Therefore, the removal of timber for ski runs will have a negligible effect on potential lynx denning habitat (FEIS, pg. 4-32).

To avoid periods of high human activity, lynx often seek nearby areas with dense vegetation and down woody material, with little human activity, in order to forage and rest. The LCAS recommends that trails, roads, and lift termini be designed to direct winter use away from diurnal security habitat. One such area within the LPSRA is on the north slopes of Runt Mountain, along drainages associated with Bitterroot Springs (FEIS, pg. 3-35). While this habitat currently does not appear to be used for lynx diurnal security (FEIS, pg. 3-35), the Selected Alternative will not directly affect this potential security habitat because the proposed ski runs of the selected alternative are located over 1,000 feet to the east of the springs. Likewise, no new groomed or designated over-the-snow routes, nor snowplay areas, would be created (BA/BE, pg. 36).

The LCAS recommends that vegetative structure be maintained that facilitates movement of lynx along important connectivity corridors. The Lookout Pass area and adjacent ridges are natural movement corridors for lynx, but the value of the corridor has been substantially compromised by Interstate 90 (FEIS, pg. 3-35). Therefore, on a regional level, the Selected Alternative will have little effect on connectivity of habitat to the north and south of Lookout Pass, as I-90 will remain a substantial barrier (FEIS, pg. 4-32).

Maintaining viability is a guiding principle to the Canada lynx conservation assessment strategy (page 3²). While implementation of the Selected Alternative has been determined to *may affect, but not likely to adversely affect lynx* (see BA/BE, pg. 36), as documented in the FEIS (pgs. 4-31 to 4-35) and BA/BE

² Ruediger, Bill, et.al. 2000. Canada lynx conservation assessment strategy. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Missoula, MT.

(pgs. 30 – 37), the actions taken in the LPSRA project are fully compatible with recovering lynx to non-listed status and consistent with maintaining habitat for viable populations of lynx at the Regional scale.

C. Bull Trout

Bull trout occurrence is well distributed across the Lolo National Forest. This species is confirmed in 100% of 4th code HUCs (large watersheds), and are known or assumed to occur in 100% of 6th code HUCs (smaller watersheds)³. The determination of effects to bull trout, as concurred to by the USFWS, was: *may affect, not likely to adversely affect*.⁴ This means that no individuals will be “taken” (as defined by the Endangered Species Act) as a result of this project. Based on the limited effects of the project and the distribution of the species across the Forest, no change to species viability at the Forest level is expected. Also, the road removal and reshaping of road 18591, which are features of the project, fit with the recovery measures listed in the proposed Bull Trout Recovery Plan and Critical Habitat (Nov., 2002).⁵

Bull trout are also present on the IPNF.⁶ However, as pointed out in the BE/BA: “The U.S. Forest Service does not consult with the U.S. Fish and Wildlife Service on bull trout for projects located in the South Fork of the Coeur d’Alene River because of the long of history mining and other human impacts in this watershed. The likelihood of management actions in the South Fork of the Coeur d’Alene River basin resulting in incidental take is low if not zero (Idaho Panhandle National Forest, 1998) (pg. 9).” Still, the selected alternative was designed as though the South Fork of the Coeur d’Alene River was not in its present condition and to protect the reaches above those with extensive mining.

II. Sensitive Species

The IPNF and Lolo Forest Plans require that habitat for sensitive species be managed to maintain viable populations.

A. Sensitive Plants

The IPNF Forest Plan standard for sensitive species is to “manage the habitat of species listed in the Regional Sensitive Species List to prevent further declines in populations which could lead to Federal listing under the Endangered Species Act” (IPNF Forest Plan, pg. II-28). The Lolo Forest Plan requires that sensitive species be managed to maintain population viability (Lolo Forest Plan, pg. II-14). The Selected Alternative meets this direction.

Surveys for threatened, endangered, and sensitive plant species were conducted within the project area (FEIS, pg IV-27). No threatened, endangered plant or sensitive plant species were discovered during field surveys (FEIS, pg. IV-27).

³ Lolo N.F. General Fish Information, 2000, and Montana Fish, Wildlife and Parks fisheries information map and list of fish presence by stream, 2002. Documents are in the project files.

⁴ Biological Assessment and Biological Evaluation For Proposed Expansion of the Lookout Pass Ski and Recreation Area, Wallace, Idaho. This document summarized the life history and distribution of the bull trout in the St. Regis River and stream/habitat conditions near the project area (pgs. 8-12 and 25-30). (See project files).

⁵ Chapter 3, which is about the Clark Fork River drainage, pg. 142. See project files.

⁶ Map produced by the University of Idaho in project files. See also document listed for footnote # 9 and Proposed Bull Trout Recovery Plan and Critical Habitat, U.S. Fish and Wildlife Service, Nov., 2002, pgs. 36-39 of Chapter 15.

While no individual or population of TES plant species was discovered during field surveys, selected activities will affect about 85 acres (55 acres on the Lolo NF and 30 acres on the IPNF) of subalpine habitat guild for the construction of ski runs and lifts. As a result, implementing the Selected Alternative could impact undetected individuals of the sub-alpine habitat guild. On the IPNF, suitable habitat for sensitive plant species appears to be well distributed. Approximately 625,000 acres has been identified as having the potential to support sensitive plant species in a wide array of plant communities (IPNF 2001). Of this amount, the sub-alpine habitat guild comprises approximately 126,000 acres (Project File, Vegetation section). To date 68,254 (about 10%) of all suitable sensitive plant habitats on the IPNF have been surveyed for sensitive plants (IPNF 2001).

Negligible amounts of moist guild habitat will be affected at sites where culverts are to be placed near wetland margins and existing road and trail crossings. At these locations vegetation has already been altered; therefore, would be negligible risk to plants associated with wet-forest habitat guilds (BA/BE, pg. 39).

In 1998, sensitive plant species trends across the IPNF were qualitatively assessed (IPNF 1998, pgs 112 to 116). Of the sensitive plant species assessed, 11 species were considered to have fairly secure populations with stable trends and few observed threats; 28 species had mostly stable populations with some concerns and threats; and for 16 species there was a serious concern. Estimates for this assessment were based upon the best information available including known population sizes, distribution, and threats. *Carex californica* was considered to be fairly secure with stable trends and few observed threats. *Cetraria alpina* had some concerns with potential declines to some population segments. There were no documented occurrences of *Buxbaumia aphylla* available for which to assess a trend.

Since implementation of the respective Forest Plans, impacts to many highly suitable habitats have diminished with the implementation of laws and policies protecting riparian areas, wetland, and peat-land habitats, and policies designed to maintain features like old growth. At the project level, to prevent further declines in populations of sensitive species, suitable habitat has been identified and surveyed. There are no documented occurrences of any TES plant species within the project area and field surveys have reduced the risk of populations going undetected. Therefore, the loss of undetected individuals is considered incidental, and such impacts would not lead to a trend toward federal listing or a loss of population or species viability (BA/BE, pg. 39).

B. Fisher

Fishers prefer mature and old growth, mesic forest habitats, close to water with abundant down woody material. Within the project area, fishers may be present occasionally and are infrequently present in adjacent suitable habitat at elevations lower than the ski expansion area (FEIS, pg. 4-36). The habitat to be altered by the ski area expansion activities is at relatively high elevations with open understories. This habitat is marginal for fisher denning and foraging (FEIS, pg. 4-36). Natal dens are most often in cavities of trees or in hollow logs. Low densities of large trees and logs in the expansion area limit its potential for fisher denning habitat. If present, the portion of the ski expansion area that they inhabit would be a small part of their home range (FEIS, pg 3-37). Management of an adequate amount of old growth plus managing for management indicator species⁷ will maintain viable (> 40% of maximum) populations. Therefore, due to the low suitability for fisher home range within the project area and the

⁷ Ten percent allocated old growth per the IPNF Forest Plan page II-5.

extent of old growth stands on the IPNF and Lolo National Forest⁸ fisher viability will not be affected by the proposed ski area expansion activities. While the Selected Alternative may potentially impact individuals or habitat, it would not be likely to contribute to a trend towards federal listing (BA/BE, pg. 37).

C. Wolverine

This species occupies a variety of open and forested habitats at all elevations. Wolverines are foraging generalists and often scavengers. They are omnivores and feed often on winterkilled animals, but also kill prey such as ground squirrels and marmots. Ungulate populations are at or near all time highs. Habitat for wolverine appears to be most useful when it reflects a historical range of faunal and floral diversity and structures (Copeland and Hudak 1995). Habitat, therefore, does not appear to be limiting for wolverines at this time on the IPNF. Wolverine dens at high elevations often in large rock or snow slide debris piles. Because of their large home ranges and low productivity wolverines are especially susceptible to human induced mortality and stress. During the spring when raising their young in dens, females and young are very susceptible to disturbance by motorized and non-motorized human activities, including backcountry skiing. Increasing snowmobile use and backcountry winter recreation (heliskiing, snowcat skiing, backcountry skiing) is likely the greatest threat (limiting factor) to wolverines. Since actual den locations are not known, it is difficult to protect these habitats from recreational disturbance (draft South Zone Geographic Assessment).

Wolverines may inhabit the ski expansion area, as there have been confirmed sightings within the Bitterroot Range of Montana and Idaho (FEIS, pg. 3-38). However, the home range of a wolverine is large (upwards of 130 to 168 square miles) so only a small portion of any potential home range would include the proposed expansion area. Within the ski expansion area, conversion of high-elevation forest habitat to herbaceous and shrub-dominated openings will not affect the prey base of wolverine and will not affect potential denning habitat (FEIS, pg. 4-37). The expansion would not occur within, nor immediately adjacent to, a high glacial cirque (see potential wolverine denning habitat map in the project attached to Kennedy's 2000 notes in the project files). Also, cumulatively, the project will not create new groomed or designated over-the-snow routes, nor snowplay areas or cross-country skiing opportunities. Instead, road densities will be reduced with the removal of primitive roads A and B. Thus the action alternative will not likely contribute to a trend towards federal listing or cause the loss of viability to the population or the specie (BE/BA 38).

D. Boreal Toad

Boreal toads require shallow ponds or shorelines for breeding. Road ditches, gravel pits and other man-made sites that hold water into late July or August are also breeding habitat. Young toads disperse from their natal ponds in late summer. Adults travel as far as 2 miles from their natal ponds to occupy a variety of upland habitats. Several threats affect this species: 1) fluctuating water levels which leave toad eggs to dry out; 2) predation from fish and other animals; 3) road kill, especially near breeding sites; and 4) water pollution. This species is declining throughout the western U.S. The causes of the population declines are not known. In general, habitat condition is not considered a major factor related to the decline of this species, since populations have declined in wildernesses and national parks where there hasn't been any habitat degradation (draft Central Zone Geographic Assessment).

⁸ The amount of allocated old growth on both national forests exceeds forest plan goals. See old growth analysis in the project files.

Within the project area, breeding habitat may be present at Bitterroot Springs and the associated drainages on the IPNF. Boreal toads may disperse from the potential breeding habitat and be present anywhere within the proposed expansion area. Potential upland foraging habitat may also be affected by expansion activities. Preliminary surveys for amphibians on the Coeur d'Alene District have not found any boreal toads, although some potential breeding sites occur (draft Central Zone Geographic Assessment). The majority of sites on the District, which have been surveyed for toads and appear to be suitable breeding sites for this species, did not have toads present. Field surveys for boreal toad within the project area also did not reveal species presence (FEIS, pg. 3-38).

The Selected Alternative may impact individuals and habitat, but would not likely contribute to a trend toward federal listing or cause a loss of viability to the population or species (BA/BE, pg. 38). Effects to the boreal toad, if present within the project area, from implementation of the selected activities are expected to be minimal. It is not known to breed on the Coeur d'Alene District and field surveys have reduced the risk of this species going undetected. By avoiding the Bitterroot Springs area and its associated drainages, the Selected Alternative will protect potential boreal toad breeding habitat. While potential foraging habitat will be affected by expansion activities, road density within the project area will be reduced by with removal of Primitive Roads A and B, resulting in decreased traffic on these roads, thereby reducing the risk of mortality from motor vehicles. Therefore, at the Forest-scale, viability should not be affected by the ski area expansion.

E. Black-backed Woodpecker

This species is widespread but occurs in very low numbers except in areas that have been burned in the last three years (IPNF FP Monitoring Report 1998, pg. 59). Past fire suppression activities and salvage harvest have had adverse effects on black-backed woodpeckers, by substantially reducing the amount of burned forests and snags. Within the LPSRA, the presence of black-backed woodpeckers has not been documented (FEIS, pg. 3-37). This species is associated with burned stands of mature forest, but it also occurs in forest communities containing decadent, diseased, or insect-infested trees. Because this species nests in a variety of forest types, in small and large trees, in open or closed canopy, in unburned and burned forests, nesting habitat is abundant, if food is available.

On the IPNF, because there have been few large fires in recent years, black-backed woodpecker populations are likely lower than they were historically (draft Central Zone Geographic Assessment). In the last ten years, only eight fires in the assessment area were 10 acres or larger; only one was over 80 acres. Over 500 other fires averaged less than 2 acres each. However, the Douglas-fir beetle outbreak has increased the snag component over what existed prior to the outbreak. Aerial detection flights in 1998 showed 2,730 acres on the Coeur d'Alene River District affected by beetle mortality. Aerial detection flights in 1999 showed 63,100 acres affected. Flights in 2000 showed 62,800 acres affected by beetle mortality.

Past surveys on the Coeur d'Alene District have located 16 black-backed woodpeckers or their sign. Over 50-incident sightings of this species have also been documented on the Forest since 1992 (IPNF FP Monitoring Report 1998, pg. 59). While current data are insufficient to determine recent population trends for this species, habitats (small snags) on both Forests are likely starting to increase from very low levels as the forests mature, fill in from below, insect and disease activity increase, more snags are being left in harvest areas, and growth exceeds timber harvest (draft North Zone Geographic Assessment). Therefore, on the IPNF, implementation of this project will not likely result in a trend toward federal listing or reduced viability on the Forest (BA/BE, pg. 38).

While the black-backed woodpecker may have been impacted by past fire suppression activities, in Region One, the current amount of habitat available is surplus to what occurred historically⁹. On the Lolo National Forest in the last few years, a number of large wildfires have occurred, which have created thousands of acres of black-backed woodpecker habitat. To maintain habitat for the black-backed woodpecker, the recent fire salvage activities planned on the Lolo National Forest will retain greater-than-historic levels of habitat when completed (see Lolo Post Burn FEIS). Further, research and monitoring indicates black-backed woodpeckers are present and nesting in high densities in burned forests¹⁰. The discussion about snag retention under pileated woodpecker below also pertains here. Consequently, actions taken on the Lolo National Forest appear fully consistent with the direction to maintain viable populations of black-backed woodpeckers and the small amount of potential woodpecker habitat harvested in conjunction with ski area expansion activities will not have a measurable effect.

F. Northern Goshawk

Goshawks are indicators of mature and old growth habitats characterized by a dense overstory of large trees and an open understory. They are present on both the IPNF and Lolo National Forest. Goshawks usually nest in stands dominated by large and old trees. Nest trees on the Idaho Panhandle National Forests include Douglas-fir, western white pine, western hemlock, and lodgepole pine. Old growth is important for northern goshawks because it provides prey species habitat and large trees for their substantial nests. Historically, old growth habitats were much more abundant. In dry forests, without fire suppression, forests were more likely to have had the open understory structure which is preferred by goshawks, compared to modern forests which often have a dense understory of conifers. Therefore, goshawk habitat was more abundant historically than it is today (draft Central Zone Geographic Assessment).

On the Lolo National Forest, potential goshawk habitat includes old growth, potential old growth and mature stands at mid elevations. This is where the nests and the majority of goshawk sightings have been made on the Lolo National Forest (Lolo National Forest Post Burn Final EIS). There are two limiting factors for goshawks: the amount of mature and old growth stands in large enough patches to provide nesting habitat; and open understory structure in otherwise suitable habitats (draft Central Zone Geographic Assessment).

⁹ Hillis, J. M., Amy Jacobs, and Vita Wright. 2002. In preparation. Status of Black-Backed Woodpeckers in U.S. Forest Service Region One. National Fire Plan Cohesive Strategy Team. (13 pp).

¹⁰ Hitchcox, Susan M. 1996. Abundance and Nesting Success of Cavity-nesting Birds in Unlogged and Salvage logged Burned Forest in Northwestern Montana. M.S. Thesis, University of Montana. Page 13.

Caton, E. 1996. Effects of fire and salvage logging on the cavity-nesting bird community in northwestern Montana. Ph.D. dissertation. University of Montana. Missoula, MT. (pp. 12-14; 23-24, 107-111.)

Hejl, Sallie J., and Mary McFadzen. 2000. Maintaining fire-associated bird species across forest landscapes in the Northern Rockies—Final Report. [INT-99543-RJVA]. USDA Forest Service, RMRS Forest Sciences Laboratory (21pp.)

Powell, H.D. 2000. The influence of prey density on post-fire habitat use of black-backed woodpeckers. M.S. thesis, Univ. of Montana. Missoula, MT 97 pp.

While the ski area expansion could potentially affect habitat used by this species, it is unlikely. The high-elevation habitat that will be affected by project implementation is neither considered good nesting or productive foraging habitat for goshawk (FEIS, pg. 4-36). Habitat within the LPSRA is mainly dominated by lodgepole pine, six to twelve inches in diameter. The analysis area does not contain large blocks of mature forest for nesting habitat nor does it contain especially good foraging areas. While the expansion area does have stands with relatively open understories, they do not produce abundant prey populations (e.g. passerine birds, corvids, and pine squirrels). Further, field surveys of the project area did not locate any goshawk or goshawk nests (FEIS, pg. 3-37).

The IPNF Forest Plan requires that at least 10% of the forested portion of the IPNF be maintained as old growth to provide for populations of old growth dependent species (IPNF FP, pgs. II-5 and II-29). On the Lolo, eight percent of Management Area 21 was to meet allocation by old growth type. No old growth will be harvested with implementation of the Selected Alternative, either on the IPNF or Lolo National Forests, as none is present within the revised permit area boundary (see the Project File, Vegetation section for old growth reports). As a result of project activities, no goshawk home range is expected to become unsuitable, on either Forest. Therefore species viability should not be affected by the expansion activities. Currently, 11.6% of the IPNF forested land base is being managed for old growth (IPNF 2001, pg. 59). On the Lolo National Forest, approximately 3,600 acres (8.42%) of the Big Lookout Ecosystem Management Area has been identified for old growth allocation (see ROD).

G. Torrent Sculpin

Little is known about Torrent Sculpin on the IPNF;¹¹ and they are not known to inhabit the Lolo N. F.¹² In a recent study (Maret¹³) Torrent Sculpins were collected at three sample sites: in Prichard Ck near Prichard and in the N. Fk. of the Coeur d'Alene River below Prichard and near Enaville. The latter two sites are in 5th order stream reaches, which support the findings of other research that indicates this specie prefers larger tributaries (Maret 877), fast water and cobbly reaches for spawning¹⁴. No Torrent Sculpins were collected at the three sites located in the St. Regis River (above Rainy Ck., near Haugman, and near St. Regis). The geographic scope of the study was limited and aimed at comparing stream reaches that drain areas containing extensive hard-rock mining (S. Fk. of the Coeur d'Alene River) with reaches that do not. The study suggests that sculpins (cottids) are more severely affected by elevated metals than are salmonoid (pg. 880). The study also went on to state, "Cottids composed about 70% to 90% of total individuals for reference sites...in the St. Regis River Basin, and site 11 upstream from the major mining impacts in the S. Fk. of the Coeur d'Alene River."

Thus, like the effects on bull trout (above), the likelihood of management actions in the South Fork of the Coeur d'Alene River basin resulting in incidental adverse effects on the viability of Torrent Sculpin is low if not zero. Still, the selected alternative was designed as though the South Fork of the Coeur

¹¹ A graduate student started a two-year study of the extent of the Torrent Sculpin on the IPNF in 2002. His thesis is scheduled to be published in 2004.

¹² Montana Fish, Wildlife and Parks fisheries information map and list of fish presence by stream, 2002, plus FEIS for Access Management within the Selkirk and Cabinet/Yaak Grizzly Bear Recovery Zones Kootenai, Lolo, (2002) and Idaho Panhandle National Forests, pg. 3-78, and Appendix E Special Status Species and Recovery Maps, UCRB Draft/Appendix Documents are in the project files.

¹³ Maret, T.R. and D. E. MacCoy. Fish Assemblages and Environmental Variables Associated with Hard-Rock Mining in the Coeur d'Alene River Basin, Idaho. U.S. Geological Survey. Transactions of the American Fisheries Society 131:865-884, 2002.

¹⁴ Kootenai National Forest, Forest Resources, 2002.

d'Alene River was not in its present condition and to protect the stream reach located above that which has the extensive mining.

H. Westslope Cutthroat Trout

Westslope cutthroat trout are found in 100% of the 4th code HUCs on both Forests. This species inhabits 100% of 6th code HUCs on the Lolo NF and in the Coeur d'Alene watershed. The project *may impact individuals or habitat, but is not likely to cause a trend toward federal listing or a loss of viability of the species*. Based on the limited scope of the effects and the widespread distribution of the species across both Forests, no change to species viability at the Forest level is expected on either the IPNF or Lolo National Forests.

III. Management Indicator Species

A. Elk

Elk are used as a management indicator species for big game on the Lolo National Forest and the St. Joe and Coeur d'Alene River Ranger Districts of the IPNF. The Lolo National Forest works with the Montana Department of Fish, Wildlife and Parks through the Montana Elk Management Plan (MDFWP, 1992). Lolo habitat guidelines for this management unit are for observations of between 1,725 to 2,050 individuals during elk counts. Currently, this goal is being met and implementation of the Lookout Pass Ski Area expansion is not expected to affect achievement of this goal due to the project's small scale (personal communications with Elizabeth Kennedy, Superior RD Wildlife Biologist, and Bob Henderson, Wildlife Biologist Montana Department of Fish, Wildlife and Parks) (project files¹⁵). Henderson further stated that elk do not winter in the Lookout area, rather, based on surveys and tracking radio collared elk, the elk that use the Lookout area come from a wintering area in the Avery/St. Joe River (Idaho) area. A conversation with Chuck Stock, IPNF South Zone Wildlife Biologist, confirmed Henderson's observations (project files) and agreed that the animals that summer in the Lookout area tend to leave the area in October due to the onset of adverse weather. Stock expects that the upward trend in the herd's numbers will continue due to the zone's recent road closures and burning of brush fields in their wintering area. These actions are expected to improve their habitat.

On the IPNF, the Forest Plan requires coordination with the Idaho Department of Fish and Game (IDFG) on allocating the distribution of habitat potential. IDFG recommends a minimum elk habitat potential value of 50% for general summer range.

The Forest Plan goal for elk habitat potential on the Wallace portion of the Coeur d'Alene River RD is 52% or higher. Existing habitat potential is currently calculated to be 52% (IPNF 2001, pg. 63). The small scale of the Selected Alternative is not expected to measurably change elk habitat potential. Elk habitat potential measures elk security and is mainly driven by open road density (IPNF 1998, pg. 34). As documented in the FEIS, road density within the permit area will be reduced with implementation of the Selected Alternative (FEIS, pg. 4-38). At the Forest-scale, monitoring shows Forest goals for elk habitat potential are also being met (IPNF 2001, pg. 63).

Recent surveys of elk in the Panhandle Zone by IDFG found 6,668 and 5,561 elk respectively (IPNF 1998, pg. 33). While elk populations are estimated to have declined since the late 1980s, mainly due to

¹⁵ See also Elk Plan Update and FWP Fact Sheet, Montana Fish, Wildlife and Parks, 2002.

a major winter kill during the winter of 1996-97; healthy huntable populations of elk are still distributed across the Forest. This is evidenced by the number of elk harvested (IPNF 1998, Table 15, pg. 34) and the liberal hunting seasons administered by the Idaho Department of Fish and Game.

B. Pileated Woopecker

The pileated woodpecker is an indicator of old growth or late successional ponderosa pine and Douglas-fir forests. Nesting habitat is found in late successional and old growth forest stands. Nest trees are at least 21 inches DBH. The primary management concern for pileated woodpecker is the loss of nesting habitat related to the harvest of old growth and late successional forest.

Within the LPSRA pileated woodpeckers may be year-round residents; however, habitat for nesting is not present and habitat for foraging is not optimal (FEIS, pg. 3-39; see also discussion for marten below). No old growth will be harvested with implementation of the Selected Alternative, either on the IPNF or Lolo National Forests, as none is present within the revised permit area boundary (see the discussion about availability of old growth and forest plan goals and standards plus the Project File, Vegetation section for old growth reports). Tree ages within the analysis area are mainly about 90 years old (immature) and date to the 1910 fire. Forest plan snag retention requirement across the landscape ensure 40% viability of snag dependent species.¹⁶ As a result, the Selected Alternative will not substantially alter habitat that may be used by this species for nesting. Consequently, the distribution and population numbers of this species in the ski expansion area will not appreciably change as a result of project implementation (FEIS, pg.4-38).

C. American Marten

Marten is an indicator of old growth forest communities with an abundance of down, woody materials. The marten is usually associated with late successional stands of spruce and Douglas-fir. Martens require large snags, stumps, and logs for resting sites and natal dens.

Old growth analyses have been conducted for the Lookout Pass Ski and Recreation Area FEIS (see also the discussion on old growth for fisher, above, and in the project files). The amount of old growth (includes potential recruitment old growth) that has been identified for management is well distributed and complies with the respective forest plan standards. The analyses concluded that, mainly due to the 1910 fire, no stands were old enough to meet old growth criteria and most lacked other criteria other than age (FEIS, pg. 3-26).

Within the LPSRA the relative scarcity of large, downed woody material, late successional forest, and sparse prey base (e.g. red squirrels) indicate sub-optimal habitat for marten (FEIS, pg. 3-39). Winter track surveys of the study area in March 2000 did not detect any marten. As a result, project activities are not expected to substantially alter habitat used by marten. Therefore, the distribution and population numbers of this species in the expansion area is not expected to appreciably change as a result of project implementation (FEIS, pg. 4-38).

¹⁶ Appendix X IPNF LMP.

D. Mule Deer

Like elk, mule deer do not winter in or close to the LPSRA due to snow depths. The Lolo N. F. is located in the Montana Fish, Wildlife, and Parks' Mountain Foothills mule deer habitat model where the deer use shrub-grass covered foothills in winter and higher elevation conifer and sub-alpine areas in summer. And, with more than two decades of research in Montana fawn survival depends on precipitation during late spring and early summer. "Older adult females tend to be vulnerable if they are in poorer condition going into winter."¹⁷ Analysis of mule deer surveys for 2001-2002 indicate that, for Region 2, the area surrounding Missoula, fawn recruitment was good and that, "for the areas surveyed, the total mule deer population was at or near the long term goal in many cases." Henderson confirmed this trend¹⁸ for the population in the LPSRA vicinity.

"Mule deer are Idaho's most abundant and widely distributed big game animal" and commonly travel 20 to 100 miles (Huffaker pgs. 21-1&2).¹⁹ And, as in Montana, the quality and quantity of nutritious forage in March, April and May has a major effect on the production and survival of fawns. However, "mule deer are best adapted to seral, transitional habitat types. Habitat succession is a continual and dynamic process and those habitats best suited for mule deer cannot be expected to remain indefinitely or be managed on a large enough scale to have significant population effects" (21-2). This statement is backed by Forest Service records and memories of long term residents of mule deer populations in the Idaho Panhandle: "mule deer were relatively scarce in the early 1900's. Large-scale fires between 1910 and 1931 created large bush fields favored by mule deer" (23-2). By the mid-1950's mule deer outnumbered white-tailed deer in many areas, and a concern about over browsed winter ranges developed, "which led to aggressive management to reduce the deer population. By the early 1970's this goal was accomplished. [...] The 1994-97 average mule deer harvest was 4% higher than that for 1974-77" (23-2). And, as mentioned above, the mule deer population was at or near the long term goal for the 2001-2002 season for the Lolo N. F.

As large block clear cuts and brush fields created by large fires are revegetated by large conifers mule deer habitat on public land is expected to decline; and "very little is known about the ecology of mule deer in the heavily forested environment typical of the [Idaho panhandle]" (23-2). However, radio-telemetry studies conducted in the Priest River area suggest that predation especially by mountain lions, is likely now an important factor in the population dynamics of mule deer in the panhandle (23-3).

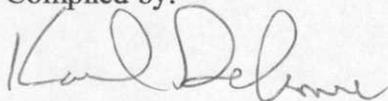
The removal of conifer canopy for the construction of ski runs will create a small amount of brush field that will be suitable summer forage for mule deer. That action, along with the closure of roads, will benefit mule deer using the area but have little effect on the viability of mule deer populations on the Lolo N.F. and the IPNF.

¹⁷ Questions and Answers and Spring Rain Eases Mule Deer Concerns, Montana Fish, Wildlife and Parks, 2002.

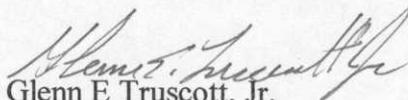
¹⁸ Bob Henderson, Wildlife Biologist Montana Department of Fish, Wildlife and Parks (project files) 2002.

¹⁹ Huffaker, Steve, White-Tailed Deer, Mule Deer, and Elk Management Plan: Status and Objectives of Idaho's White-Tailed Deer, Mule Deer, and Elk Resources. Idaho Dept. of Fish and Game, 1999.

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