

indirect, growth inducing impacts of ski areas, and the infrastructure, growth and development sprouting nearby to serve the ski area causes greater environmental impacts/concerns than the direct impacts of the ski area expansion itself.

We recommend that the FEIS identify and discuss indirect effects or induced growth or development changes or at least make a good faith effort to explain the effects that are "reasonably foreseeable." How much developable private land lies within easy commuting distance of MSB? Are there environmentally sensitive areas such as riparian areas and wetlands or other important wildlife habitat within reasonable proximity to MSB that may be developed as an indirect response to MSB expansion and increased skier use? Will induced growth and land use change have an effect on air, water, and other natural systems and/or environmentally sensitive areas near the ski area?

We recognize that future land uses near the ski area may not be precisely known, but it may be possible to consider likely land uses and development trends in the area and estimate and disclose the likelihood that undeveloped land near the ski area will be developed as an indirect result of the ski area expansion. Also, the consistency of the proposed MSB expansion with Missoula County Land Use Plans should be disclosed.

- 11. We are pleased that continuous shuttle service accommodating 120 more skiers at one time (SAOT) would be provided on busy days to reduce traffic and parking needs. We understand that that proposed action does not include construction of a new parking lot, since additional roadside parking was already created along the widened Snowbowl Road below the base area, although some additional parking would be created after the existing maintenance building is moved, creating 30 new parking spots. We are also pleased that no new roads are proposed.

#### Wildlife

- 12. The DEIS states that approximately 654 acres of Lynx Critical Habitat lie within the proposed expansion area, and 1,058 acres are present in the existing SUP area. (page 3-42). although there are no documented occurrences of lynx on MSB and there is no evidence of denning or reproduction in the vicinity of the proposed expansion area. The DEIS also states that given the proximity of the proposed expansion area to known lynx distribution within the Rattlesnake LAU, lynx have the potential to occur within the proposed expansion area.(page 3-43).

We are pleased that project guidelines to address requirements of the Northern Rockies Lynx Management Direction and Inland Native Fish Strategy (INFISH) are identified (page 2-14 to 2-15), and potential effects on the threatened Canada Lynx are evaluated and disclosed (4-15 to 4-20). We are concerned that the proposed project will result in the loss of 45 acres of suitable lynx habitat and 30 acres of mature multi-story habitat in the lynx analysis unit, although this is stated to be a small incremental loss. The biological assessment concludes that while the proposed project may affect the Canada lynx, it is unlikely to adversely affect