

Comments:

1. We appreciate the inclusion of clear narrative discussions describing alternatives in the DEIS, including discussion of project history, existing conditions and proposed features of the ski area expansion (i.e. lifts, ski trails, timber harvest, grading, buildings, roads, parking, water and wastewater systems, energy supply), mitigation measures and monitoring, as well as Table 2-2 comparing alternatives, Table 2-3 describing environmental effects of alternatives, and Table 2-4 summarizing permits and regulatory requirements. We also appreciate inclusion of the figures and maps showing locations of project features. The DEIS narrative, tables and maps facilitate improved project understanding, help define issues, and assist in evaluation of alternatives providing a clearer basis of choice among options for the decisionmaker and the public in accordance with the goals of NEPA.

Water Quality

2. The proposed action, in conjunction with connected actions, would remove trees from 182 acres, and soil erosion would occur during tree removal as well as during construction of ski trails, ski lifts, wastewater drainfields, a snowmaking reservoir, and buildings. We are pleased that the DEIS states that soil erosion would occur for only a short period of time and would be limited at sites scattered across TV Mountain (page 4-2). No areas of extended, continuous mineral soil exposure would result from timber harvest and slash disposal. It is stated that substantial soil disturbance would occur on approximately 39 total acres of ground due to grading necessary for ski trail smoothing, bike trails, and for infrastructure such as a new reservoir and new water and sewer lines, but this grading would occur in small scattered sites, most of which are less than 5 acres in size. The greatest potential for soil erosion would be at grading sites for construction of ski trail transitions and at snowmaking facilities and buildings.

→ The DEIS states that bull trout (a threatened species) and westslope cutthroat trout are present in Butler Creek (page 4-37) and may be present in La Valle Creek (page 3-71), but the DEIS also states that no streams or other waters of the U.S. are present in the proposed expansion area with La Valle Creek being the closest water of the U.S. to the proposed expansion area, located approximately 150 feet downhill of the west boundary at its closest point. The only construction activity within 500 feet of a surface water would occur with the lower terminal for lift A, which would be built 150 feet from La Valle Creek, and where erosion control practices and revegetation of disturbed ground would be used to minimize sediment transport.

We are pleased that the DEIS also states that none of the proposed areas to be graded are located on or immediately adjacent to a stream, wetland, or other waters of the U.S., and that a stormwater permit and erosion control plan would be obtained to minimize the area of disturbance. We also appreciate the many hydrology and fishery mitigation measures identified in the DEIS (e.g., sediment

ecological succession into habitat for hares that may remain optimal for 20 or 30 years (Ruggiero et al. 1999).

In winter, lynx tend to avoid hunting in openings, where lack of above-snow cover limits habitat for snowshoe hares (Ruediger et al. 2000). Generally, lynx prefer to forage in forest stands that are from 10 to 30 years old, with a high density of young conifers or branches that protrude above the snow. Older forests with a substantial understory of conifers or shrubs and young trees that provide dense cover that touches the snow in winter also provide good-quality lynx foraging habitat. Large open areas, whether human-caused or natural, are usually avoided by lynx (Ruggiero et al. 1999). Lynx seem to prefer to move through continuous forest.

Lynx Critical Habitat was identified in the Federal Register on February 25, 2009. Designated Lynx Critical Habitat consists of mesic mature forests dominated by subalpine fir, Engelmann spruce, and mountain hemlock at higher elevations; mature forests dominated by western larch, Douglas-fir, and ponderosa pine at lower elevations; and interspersed patches of lodgepole pine with little structural complexity. The mesic conifer stands with moderate to high levels of vertical and horizontal complexity appear to meet the characteristics identified by Squires et al. (2006) as quality lynx habitat on the LNF. Lynx Critical Habitat includes areas that provide one or more of the following beneficial habitat elements for lynx including snowshoe hares for prey; abundant, large, woody debris piles that can provide dens; and winter snow conditions that are deep and fluffy for extended periods. All areas of Critical Habitat have recent verified lynx occurrence and reproduction and are considered occupied (*Federal Register*, 73, 28, 2008).

→ Approximately 654 acres of Lynx Critical Habitat lie within the proposed expansion area, and 1,058 acres are present in the existing SUP area.

The Rocky Mountain Research Station of the USFWS has been studying winter and summer habitat use patterns of lynx on the LNF since 1998. Results indicate that in winter lynx preferentially forage in spruce-fir forests with high horizontal cover, abundant hares, deep snow conditions, and large-diameter trees (Squires et al. 2006). A review of Forestry Inventory and Analysis for the LNF indicates that areas of high structural diversity to support lynx denning and foraging habitat are well represented on the LNF (Tomson 2009). In summer, lynx expand habitat use to include young regenerating forests (Squires et al. 2006). Quality lynx foraging habitat is not confined to young stands; however, young stands with high structural complexity provide quality foraging habitat for lynx.

The MSB and proposed expansion area are part of the Rattlesnake LAU (38,453 acres). All of the Rattlesnake LAU is designated Lynx Critical Habitat (Figure 3-3). The MSB lies at the western periphery of the LAU. Most of the LAU is in the Rattlesnake Wilderness Area.

Because the Rattlesnake LAU is mostly located in the Rattlesnake Wilderness Area (99 percent is under Forest Service management), most of the lynx denning and foraging habitat in the LAU is in the wilderness area (Tomson 2006 personal communication).

Temporarily unsuitable habitat consists of open areas that at some time could support lynx habitat, but currently do not; in the Rattlesnake LAU these areas are either recovering from wildfire or are regenerating after harvest. These areas do not support above-snow vegetation or contain vegetation that is too widely spaced to provide connectivity habitat. In winter, lynx tend either to not use or avoid these areas, and in winter these areas hold few if any snowshoe

Gray Wolf (Reinstated as Endangered 2010)

→ The Northern Rocky Mountain Wolf Recovery Plan (USFWS 1987) identifies three areas for wolf recovery: Yellowstone, northwest Montana, and central Idaho. The proposed expansion area is in the Northwestern Recovery Zone for the gray wolf. Key components of wolf habitat are: sufficient year-round prey base of deer, elk, moose, and alternative prey; suitable and somewhat secluded denning and rendezvous sites; and sufficient space with minimum exposure to humans.

Wolves are social animals that form packs organized around a breeding pair. Depending on the prey base, packs maintain exclusive territories from 40 to 1,000 square miles (Reel et al. 1989). Wolves usually den in underground burrows dug in steep slopes. When young wolves (pups) are 6 to 10 weeks old, the pack moves from dens to rendezvous sites. Rendezvous sites are gathering areas where pups stay while the pack hunts.

Ungulate prey within the proposed expansion area includes elk, whitetail deer, mule deer, and moose. Wolf sightings are widely reported throughout the Ninemile, Mission, and Bitterroot valleys and surrounding area. Wolves have not been documented in the proposed expansion area or existing SUP area but may be present as transient individuals dispersing from packs in the surrounding area (MFWP 2009; Bradley 2010 personal communication); therefore, no denning or rendezvous sites are on the proposed expansion area. Because wolves continually expand and/or shift their ranges, they may form packs that utilize the proposed expansion area as part of their home range.

Bald Eagle (Sensitive Species)

On June 28, 2007, the Secretary of the Interior announced that the bald eagle was being removed from the federal TES list. The final rule delisting bald eagles was published July 9, 2007, and became effective August 8, 2007 (*72 Federal Register 37346*). After delisting, bald eagles continue to be protected under the Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act. Both of these acts prohibit killing or otherwise harming bald eagles, their nests, or their eggs.

Bald eagle habitat on the LNF is managed according to the Montana Bald Eagle Management Plan (United States Bureau of Reclamation [USBR] 1994) and the Pacific States Bald Eagle Recovery Plan (USFWS 1986). The most important habitats for bald eagles are foraging areas, usually along lakes and rivers, where fish and waterfowl provide a prey base. Good bald eagle nesting habitat includes an adequate prey base, large mature trees to support nests, and low levels of human disturbance. Nest trees are usually larger than surrounding trees and located near water. Perch sites are usually in large trees or snags located close to foraging areas and nests. Bald eagles sometimes use traditional communal roosts in winter, especially during periods of severe weather. These roosts can be located in large trees at the head of sheltered draws and may be many miles from bodies of water. Bald eagles are opportunistic foragers whose primary food is fish and waterfowl. They also prey on birds, mammals, and big game carrion (especially during winter).

Bald eagles are spring and fall migrants on the LNF and possibly the proposed expansion area. There are no known nests or communal roost sites, favored hunting areas, perches, nests, or areas of high prey density in or near the proposed expansion area. Bald eagles may visit the proposed expansion area primarily as transients. The best bald eagle habitat in the regional