



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

April 20, 2011

Ms. Tami Paulsen
Missoula District Ranger
Fort Missoula, Building 24,
Missoula, Montana 59804

Re: CEQ 20110069; EPA comments on Montana
Snowbowl Expansion DEIS

Dear Ms. Paulsen:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Lolo National Forest's Montana Snowbowl Expansion Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The Lolo National Forest (LNF) proposes to approve a Special Use Permit (SUP) for the expansion of the Montana Snowbowl Ski and Summer Resort (MSB) to TV Mountain, increasing the SUP area by 1,105 acres to 2,243 acres. Proposed new facilities on LNF land would include 28 new ski trails on 166 additional acres, 4 additional lifts, an additional snowmaking reservoir, two wastewater drainfields, a day lodge, skier shelter and maintenance shop, buried utility lines (power, water, and wastewater), and hiking and mountain bike trails. Development activities would involve cutting trees on 182 acres. The Proposed Action includes an amendment to the Forest Plan that would change approximately 706 acres from MA 16 (timber production) and 399 acres from MA 25 (timber production) to MA 8 (ski areas)

The EPA's most significant environmental concern regarding the proposed MSB expansion DEIS involves increased adverse dewatering effects to Butler Creek fish and aquatic life and crucial over-wintering fisheries habitat that would result from diversion of an additional 20 acre-feet water from Butler Creek during the mid-October to end of March period. It is our understanding that MSB's proposed ski area expansion would increase the total water withdrawals from Butler Creek from 28 acre-feet to 48 acre-feet per year, with the additional water withdrawal needed for both snowmaking (15 acre-feet) and fire protection (5 acre-feet). This will be achieved by withdrawing water at the same rate that is currently used (115 gpm), but extending the period of withdrawal of water from Butler Creek from 55 maximum days per year to 94 days per year (increase of 39 days).