

APPENDIX M.

Response to Comments Regarding the Draft Environmental Impact Statement

APPENDIX M. RESPONSE TO COMMENTS REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

1.1. Introduction

All comments received regarding the draft environmental impact statement (DEIS) were filed in the official project file, as required by 36 Code of Federal Regulations (CFR) 218.25(b)(2), and assigned an identification number. “Miscellaneous Communications” (responses that requested copies of the DEIS in other formats, requests for additional information/clarification, or requests that required other such immediate responses) were replied to as needed, filed in the project file, and are not replied to again in the response to comments. For all other communications that contained comments, content analysis was conducted to identify specific comments (as defined in 36 CFR 218.2). The content analysis process is further discussed below.

1.2. Consideration of Comments on Proposed Activities

1.2.1. 36 CFR 218.25(A)(1) and (2) - Time Period for Submission of Comments

Comments were accepted on the Lookout Pass Ski Area Expansion DEIS for 60 days, beginning on the first day after the date of publication in the *Federal Register* of the notice of availability of the DEIS. The DEIS notice of availability was posted in the *Federal Register* on March 11, 2016, starting a 45-day comment period. The comment period was extended 15 additional days (ending on May 10, 2016 at 11:59 p.m. [Pacific]) subsequent to an amended DEIS notice of availability posted in the *Federal Register* on April 22, 2016. Before the *Federal Register* posting, interested parties and other agencies were notified of the DEIS availability and comment period via official correspondence letters and legal advertisements, which provided the link to the DEIS on the U.S. Forest Service Idaho Panhandle National Forests webpage. A hard copy DEIS was provided to the U.S. Environmental Protection Agency (EPA) as required, and options for requesting compact disks or hard copies of the DEIS were also provided for all other agencies and interested parties. Interested parties submitted specific written comments by email, Forest Service web form, in person, and U.S. Postal Service mail.

1.2.2. 36 CFR 218.25(A)(3) - Requirements

In addition to showing evidence of timely filing, individuals submitting comments during the comment period must also meet the requirements specified in 36 CFR 218.25(a)(3) and provide the following in order to be eligible to object:

- (i) Name and postal address. Email address in addition is recommended but not required.
- (ii) Title of the proposed project or activity.
- (iii) Specific written comments as defined in 36 CFR 218.2 regarding the proposed project or activity, along with supporting reasons.

- (iv) Signature or other verification of identity upon request and identification of the individual or entity who authored the comment(s). For comments listing multiple entities or multiple individuals, a signature or other means of verification must be provided for the individual authorized to represent each entity and for each individual in the case of multiple names. A scanned signature or other means of verifying the identity of the individual or entity representative may be used for electronically submitted comments.
- (v) Individual members of an entity must submit their own comments to establish personal eligibility: comments received on behalf of an entity are considered as those of the entity alone.

1.2.3. 36 CFR 218.25(b)(1) – Consideration of Comments

In accordance with 36 CFR 218.25:

(b)(1): The responsible official shall consider all written comments submitted in compliance with paragraph (a) of this section.

1.2.4. 40 CFR 1503.3 – Specificity of Comments

In accordance with 40 CFR 1503.3:

- (a) Comments on an environmental impact statement or on a proposed action shall be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both.*
- (b) When a commenting agency criticizes a lead agency's predictive methodology, the commenting agency should describe the alternative methodology which it prefers and why.*
- (c) A cooperating agency shall specify in its comments whether it needs additional information to fulfill other applicable environmental reviews or consultation requirements and what information it needs. In particular, it shall specify any additional information it needs to comment adequately on the draft statement's analysis of significant site-specific effects associated with the granting or approving by that cooperating agency of necessary Federal permits, licenses, or entitlements.*
- (d) When a cooperating agency with jurisdiction by law objects to or expresses reservations about the proposal on grounds of environmental impacts, the agency expressing the objection or reservation shall specify the mitigation measures it considers necessary to allow the agency to grant or approve applicable permit, license, or related requirements or concurrences.*

1.2.5. 40 CFR 1503.4 – Response to Comments

In accordance with 40 CFR 1503.4:

- a) An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement. Possible responses are to:*
 - 1. Modify alternatives, including the proposed action.*
 - 2. Develop and evaluate alternatives not previously given serious consideration by the agency.*
 - 3. Supplement, improve or modify analyses.*

4. *Make factual corrections.*
5. *Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.*

1.3. Individuals/Organizations Responding During the Comment Period

Attachment A provides a list of all organizations/individuals who responded regarding the DEIS during the comment period.

1.4. Issues and Concerns Raised During the Comment Period

In accordance with 40 CFR 1503.4 (Response to Comments), comments were considered individually and collectively in order to determine the appropriate response. In an effort to eliminate repetitive discussion of the same issues/concerns raised by various interested parties, content from each comment letter was categorized by resource area, law/regulation/policy, or other such categorization as indicated in the following list. Combined responses were provided when possible for those issues/concerns that were similar (or identical in some instances) in nature and context.

Attachment B provides a list of all comments received and Forest Service responses, organized by category.

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ATTACHMENT A

Mailing List Report



Mailing List Report

Project: Lookout Pass Ski Area Expansion EIS (43757)

Comment Period: Notice of Availability - DEIS Comment Period

Period Dates: 3/11/2016 - 5/10/2016

Generated: 9/16/2016 4:18 PM

Name	Organization	Address	City	State	ZIP	Email	Contact Method
Austin, Doug		29 Standing Rock Court	Superior	MT	59872	austin@blackfoot.net	Mail
Bardelli, Fred		PO Box 124	Osburn	ID	83849-0124		Mail
Bissett, Kevin				MT		kevinpatrickbissett@gmail.com	Email
Brink, Dave	Mineral County Weed District	P.O. Box 730 301 2nd Ave. East	Superior	MT	59872	weeds.msu@blackfoot.net	Email
Carey, Neil		1474 East Bogie Drive	Post Falls		83854	neilgcarey@gmail.com	Email
Cook, Jeff	Idaho Department Of Parks And Recreation	P.O. Box 83720	Boise	ID	83720-0065	Jeff.Cook@idpr.idaho.gov	Email
Crececius, Landon		1415 W Elmwood Ct	Spokane	WA	99218	landoncrececius@gmail.com	Email
DeGrandpre, Dave		36708 Leon Road	Charlo	MT	59824	landsolutions@blackfoot.net	Email
Dutton, Barry	Friends of Lookout Pass	2815 Tivoli Way	Missoula	MT	59802		Mail
Edholm, Phil						phil@skilookout.com	Email
Elke, Curtis	Natural Resources Conservation Service	9173 W. Barnes Drive, Suite C	Boise	ID	83709		Mail
Garr, Donal		229 Silver Creek Rd	Saltese	MT	59867	flatopgarr@aol.com	Email
Gilda, Alan		P.O. Box 498	Mullan	ID	83846	gmrvt@yahoo.com	Email
Gordon, Greg		1217 S. Oak	Spokane	WA	99204	fightingbull63@gmail.com	Email
Harvey, Geoffrey		5925 E. Hayden Lake Road	Hayden Lake	ID	83835		Mail
Hildebrand, Dennis		P.O. Box 311 605 Fourth Avenue East	Superior	MT	59872	spr3335@blackfoot.net	Mail
Howe, Arnold	BackCountry ATV	1603 N Idaho St	Post Falls	ID	83854		Mail

Jennings, Charles Ker, B.						317charlesjennings@gmail.com bk1492@aol.com	Email Email
Latta, John	Inland Northwest Backcountry Alliance	808 W 26th Ave	Spokane	WA	99203	john@lattaphoto.com	Email
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Loge, Denley		1296 4 Mile Road	St. Regis	MT	59866	Denley@montana.com	Email
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McLane, Adam						mclane@meic.org	Email
Miller, Sheelia		77 4 River bend Road	Superior	MT	59872		Mail
Mitchell, Sandra	Idaho State Snowmobile Association	501 Baybrook Court	Boise	ID	83706	smitchel@alscott.com	Email
Moses, Orin	Coeur d'Alene Snowmobile Club	PO Box 713	Hayden	ID	83835		Mail
Murphy-Kellis, Mary		PO Box 837	Superior	MT	59872		Mail
Nelson, Alan	Montana Nightriders	1334 S Nugget Drive	Coeur d'Alene	ID	83814	alannelson@yahoo.com	Email
O'Brien III, John		2205 W. Medoc Court	Hayden	ID	83835	trails39@hotmail.com	Mail
Owens, Phil	Idaho Citizen	12179 Kelly Rae Dr.	Hayden	ID	Hayden, 83835	phil_owens@hotmail.com	Email
Peters, Greg	Montana Backcountry Alliance	PO Box 8691	Missoula	MT	59807	montanabackcountry@gmail.com	Email
Peterse, Brian		707 Pine	Mullan	ID	83846	bkpetersen63@gmail.com	Email
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Sheroke, Chuck		1621 E. Lost Avenue	Coeur d'Alene	ID	83814	shevoke202@hotmail.com	Email
Stiegemeier, Dana		8030 W. Nevada	Rathdrum	ID	83858	stiegy5@hotmail.com	Email

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Thomas, William R.		301 Garcia Loop	Alberton	MT	59820		Mail
Van Winkle, Matthew						mjv77@students.calvin.edu	Email
Wilson, Ed		629 Friday Avenue	Mullan	ID	83846	ed.wilson1945@gmail.com	Mail
Wilson, Linda		629 Friday Avenue	Mullan	ID	83846	cougar091@frontier.com	Email
Worthy, Willie	Montana Back Roads 4x4 Club. Inc.	1011 Grizzly Mountain Road	Missoula	MT	59808	williesjeep@blackfoot.net	Mail
Young, Carol		P.O. Box 94	Kellogg	ID	83837	carolyoung@frontier.com	Email

ATTACHMENT B

Response to Comments

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
1	General Project Support	1-1	I strongly support expansion of Lookout Pass ski area. Increased skier access would significantly benefit local communities, many of which have been struggling for decades economically and socially. Recreation and enjoying the outdoors is the primary reason many of us live here. I am confident proper mitigation measures will be implemented to limit or avoid environmental impacts. Please allow Lookout Pass ski area to expand as proposed.	Thank you for your comment. The DEIS discloses the social and environmental consequences of implementing the different considered alternatives (No-Action Alternative, Alternative 2, and Alternative 3). The IPNFs and LNF Forest Supervisor will select an alternative in the record of decision based on information in the EIS, public comments, and how well each alternative meets the purpose and need for the project and complies with applicable state and federal laws, agency policy, and Forest Plan direction.
		2-1	I have skied at LP for many years, predating the addition of Chairs 2, 3, and 4. The addition of those chairs, and the accompanying expansion of skiable terrain, greatly enhanced the recreational experience, not only by providing new and exciting trails, by alleviating long lines at the original lift and crowding on the original slopes and trails. Although I have no technical or professional knowledge or experience in Forestry or Land Management, it would seem that this expansion was done in a highly professional and quality manner, with no visible negative impact to the property's environment or ecosystem. Further, the prior expansion resulted in increased employment (lift operators, slope groomers, guest services and hospitality, and general operations and management, etc.) at a time, and in a locale, that greatly needed such an economic boost, as prior key industries (specifically forest and mineral) were, and continue to be, on a downward trend. I have no doubt that the new proposed expansion will duplicate and likely surpass the benefits enjoyed by the previous expansion that I have described above. The LLC that owns and operates Lookout Pass are highly professional in operating the ski area and have a passion for outdoor recreation whilst simultaneously preserving the natural environment that make skiing at Lookout such a wonderful and affordable experience enjoyed by many local families in the past and for years to come.	
		3-1	We want to make this one happen big x.	
		6-4	I can accept either alternative two or three, expecting that due diligence was performed in the evaluation process, in both cases. I hope, and would expect, that our unbiased professional evaluators are giving us a fair shake in representing our interests. I am not fond of Johnny-come-lately second guessers, unless there are definitely special unknown circumstances not addressed in a previous version/alternative.	
		8-1	I find that this is an acceptable use of Forest Service land, and encourage you to allow this expansion.	
		14-1	I support alternative 2 or 3 for Lookout Ski Area. I think alternative 3 may be the best since it is better for the environment.	
		15-2	I'm bias living in the area. Anything that will help bring more jobs into the areas is good.	
		19-1	I support the expansion of Lookout Pass. Alternative 3 appears to be a good choice. Thank you for presenting the plans. This will be a great addition to our area	
		33-1	I am writing today to communicate my full support for Lookout Pass' expansion plans. I first skied at Lookout Pass in 1982 and continue to do so. It is a great family resort that caters to the local skiing population. Lookout's expansion plan will make more available the public's resource to the public.	
		35-9	If this project is moved forward, I would hope you would at least use alternative 3. It seems to have slightly less impact and probably would offer better skiing.	
2	General Project Opposition	4-3	I also want to point out that the taxpayers of this country own this land, 325 million of us. These commercial profiteers that come in never pay a penny to the U.S. treasury. The treasury gets nothing from this use of our land. So keep it in nature, which is much better for the climate. I vote no on this commercial destruction. Too much commercial destruction is going on. The fs is greed personified.	Thank you for your comment. Potential ski area expansion environmental and social impacts are disclosed in Chapter 3 of the DEIS. No change has been made in the FEIS. The IPNFs and LNF Forest Supervisor will select an alternative in the record of decision based on information in the EIS, public comments, and how well each alternative meets the purpose and need for the project and complies with applicable state and federal laws, agency policy, and Forest Plan direction.
		9-3	PROFITEERS LOVE TO TAKE ADVANTAGE OF USING NATIONAL LANDS. THEY PAY NOTHING SOME OF THE TIME LIKE CLIVE BUNDY WHO HASNT PAID FOR TWENTY YEARS TO USE NATIONAL LAND. OTHERS PAY SUCH CHEAP RATES THAT NONE OF THE MONEY EVER GETS TO HELP NATIONAL TAXPAYRS. THE WORK OF THE FS IS LETTING THIS LAND BE USED COSTS NATIONAL TAXPAYERS HUGE HUGE SUMS OF MONEY. LET'S LET THEM OPERATE AS THEY ARE, BUT NO EXPANSIONS. IT'S TIME TO START PROTECTING OUR NATIONAL LANDS. WE NEED THAT SITE FOR TREES AND VEGETATION TO GROW TO ABSORB CARBON. WE DONT NEED A SKI AREA EXPANSION NATIONALLY AT ALL. THERE ARE PLENTY OF OTHER SKI AREAS TO GO TO. DENY THIS PERMIT. THIS COMMENT IS FOR THE PUBLIC RECORD. PLEASE PUT ME ON THE LIST TO BE UPDAGTED ON THIS ISSUE OF USING OUR NATIONAL LAND FOR LOCAL PROFITEERS.	
		16-1	I am against any expansion of the Lookout Ski Area. Improvements on present occupation area are okay. The impact to the back country is not reversible. Never to be reclaimed.... Crowded tourist & recreation areas are a problem of increased population. It would be sad if that meant losing a pristine area to satisfy an ever increasing appetite for more, more, more. Think of our overcrowded parks, Yellowstone, Glacier, Yosemite- fortunately you can't make them bigger- control crowds by lottery, and added monetary admissions.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
		22-1	The public lands comprising the St Regis basin, and the wild lands adjacent to it, are among the most important scenic wild lands left in the Coeur d'Alene Mining District - an area that has suffered extreme environmental damage to its forests, streams, and river-bottom lands over the past 125 years. To hikers, photographers, and campers like myself, and nature lovers of all ages, the St. Regis basin area offers a rare opportunity to experience a microcosm of wilderness and the priceless beauty of nature - as yet untrammelled by human-kind. The trail through the basin is exquisitely beautiful, winding through a paradise of wild flowers and meadows, as it ascends to the beautiful St. Regis lakes, high in the Bitter Root mountains. Everywhere in this great wilderness state, and throughout the nation, our wild lands, especially our National Forest lands, that belong to all the American people, are under attack, and being ravaged, piecemeal, by soulless and unconscionable corporations and industries, devoted to one purpose only: the insatiable expansion of their bank accounts - with absolutely no regard for the beauty of nature nor respect for the ethical and moral principles of our American creed. Ansel Adams, the great photographer of our precious wild lands, assures the U.S. Forest Service, corporate America, and all Americans that "the right to experience is a fundamental right, just as the right to possess, the right to believe, or the right to work, or the right to security. The concept that there are other and equally important values than those of obvious material and financial character, is one we must nourish to the utmost." The expansion of the Lookout ski area will also encroach upon the already critically diminishing habitat of precious wildlife, including wolves, lynx, bear, cougar, elk, and fisher, besides many other smaller animals - such as rabbits, squirrels, and grouse - and delicate plants and flowers. They too have the right to experience their lives in wild lands, free from domination and destruction by human kind. We can build or expand ski resorts forever, but another St. Regis basin, with all its biological diversity, we can never reconstruct. Once our wild lands are gone they are gone forever - and with them our beautiful wildlife, without which this world becomes more lonely and devoid of the beauty and inspiration unique to them. The fate of our public lands has reached the eleventh hour - are you going to allow our last best wild lands be developed for the sole aggrandizement of special interests, in this case a ski resort; or will you take a moral stand and defend a higher good that these public wild lands serve: the well-being of invaluable, irreplaceable wildlife and the right of all Americans, both living and unborn, to experience wildlife and wild untrammelled public lands, that are the soul of America - and give life to one of its richest, most beautiful dimensions? Our National Forests and other public lands are too valuable as wild lands to be plundered for their natural resources or exploited for the benefit of corporate interests. Too much has already been lost - destroyed or ruined forever. Henry David Thoreau's haunting prophetic words are more vital today than ever: "In wilderness is the preservation of the world." Our survival literally depends on preserving and protecting our forests, for they are a life-giving force to our planet, benefiting their air we breathe, the water, wildlife, and climate in ways that are far from being understood; and their destruction forebodes an increase in global warming - a reality we can no longer ignore. Thomas Jefferson reminds this age of the technological exploitation of nature, that no generation has the right to trample on the rights and freedom of succeeding generations. It is time, no, it is critical that the Forest Service begins protecting our "geography of hope," keeping it a vernal masterpiece and fountain of life for all generations to come.	
		35-8	I would recommend the no-action alternative at this time. I just don't see this project as the best use of our public lands. I don't think it will really have any lasting impact on the local communities. I think it would be worth all of our time to look at how we can make Lookout Pass successful without falling into the standard ski industry solution to every problem, expand. It is not a sustainable approach and we need to do better.	
		50-6	Based upon the above inadequacies, the USFS should select the "No Action Alternative." The further expansion of the ski area should not be allowed until the issues raised above are adequately analyzed and resolved.	
3	Section 1.2 Background	23-1	The DEIS makes reference to a 2013 date for the submittal of the new MDP. Attached is the March 22, 2010 letter that initiated the proposed new MDP.	Thank you for the information. The DEIS acknowledges that the master development plan (MDP) was initiated in 2010. However, Section 1.2 of the FEIS has been updated to state that the MDP was accepted in 2011 and a memorandum of understanding (MOU) between Lookout Pass Ski and Recreation Area and the U.S. Forest Service was signed in 2012.
		25-1	Attached is the MDP acceptance letter dated November 18, 2011. This triggered the MOU which no one in the IPNF knew how to write. There was a long delay receiving the MOU which was first provided to me as an unfinished document in June of 2012. The document was rescinded because it was found to be in error. The eventual MOU was signed in August 2012 which led to the bid process for the Third Party NEPA Consultant.	
4	Section 1.3 Purpose and Need	49-30	The second need for the proposed action identified in the Draft EIS is to maintain ski terrain alignment with local market demand. However, the Draft EIS does not evaluate whether the Proposed Action meets this need. The Draft EIS indicates that during the 2014-2015 ski season, beginners made up the largest population of visitors and currently have only one trail, but no new beginner trails would be included, nor can be based on available terrain in the expansion area. The next largest population was made up of low intermediate users, and only 3 more acres of trails in this terrain category would be included in the Proposed Action. Intermediate and advanced intermediate users were the smallest populations of visitors, and the majority of new proposed trails are in those terrain categories. There are currently only 16 acres of advanced intermediate terrain (the second smallest acreage after beginner terrain); however, the Proposed Action only increases this to 30 acres, while intermediate terrain would be enlarged from 54 acres to 108 acres. Therefore, we recommend clarifying how this expansion fulfills the need for the project. Establishing objectives, i.e. metrics, for success in meeting the need can be helpful.	Thank you for your comment. Section 1.3.1.2 of the FEIS has been revised to provide additional details regarding the current and projected future market demand for Lookout Pass Ski and Recreation Area, and how the proposed project will meet these demands.

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
5	Section 1.6 Public Involvement	46-1	I thought the Format explaining the expansion process was very well presented by our District Ranger & the other Forest Service personal present.	Thank you for your comments. Because of the limited turnout at the two Idaho public meetings, the Forest Service opted to meet and discuss project concerns and issues with attendees on a person-by-person basis.
		46-3	I attended the Wallace Idaho meeting in hopes I would hear what the Idaho residents comments were on the expansion. There was no open forum to hear their comments. Very disappointing.	
6	Section 1.6 Public Involvement	29-1	On behalf of the Idaho State Snowmobile Association, I am requesting a 30 extension for comments on the Lookout Pass Ski Area Expansion DEIS. We understand the need to move forward with projects in a timely manner; however, in order for ISSA to submit substantive comments, we simply need some additional time. We were not aware of the project and its impact on snowmobiling until last week. Although we usually are notified of projects that involve winter recreation, this time, probably because of the change in how notifications are sent out, we were not. If it is possible to make this allowance, we would be most grateful.	Thank you for your request regarding a 30-day extension to the comment period for the Lookout Pass Ski Area expansion project. The comment period was extended an additional 15 days to respond to your concerns.
7	Section 1.7 Issues	49-31	On page 11, the Draft EIS lists analysis issues that were not essential in developing action alternatives but which were analyzed for potential effects. These included fish and wildlife, soils and special-status plants. It is not clear to us why these issues were not considered key in developing alternatives. We did not find the rationale for these decisions in the Draft EIS. Given that Alternative 3 was developed to respond to concerns over unacceptable impacts to watershed health and wildlife, it seems that wildlife and watershed health were considered and that soils may have been considered. It is not clear why the fish issues were not considered key in developing alternatives. We recommend that the Final EIS discuss the reasons why fish and special status plants were not considered essential to developing alternatives, or consider developing an Alternative that addresses these issues.	<p>Section 1.7.1 and 1.7.2 of the DEIS provide a list of resources that the Forest Service determined could be affected by the proposed project and that warrant analysis in the EIS. During alternatives development, the Forest Service considered opportunities to minimize or avoid impacts to all identified potentially affected resources. For most of these resources, the Forest Service determined that development of an additional alternative would not lead to reduced or total avoidance of impacts.</p> <p>Section 1.7 of the FEIS has been revised to state the following:</p> <p>Using the comments received from individuals, businesses, organizations, and local, state, and federal agencies during the scoping comment period, and considering known concerns among the Forest Service interdisciplinary team, a preliminary list of issues to address was developed. Identified issues consisted of the following:</p> <ul style="list-style-type: none"> • Air quality and climate change • Cultural resources • Fish and wildlife species, both terrestrial and aquatic • Land use • Plant communities and invasive species • Motorized and non-motorized winter recreation • Socioeconomics • Visual resources • NEPA process concerns • Watershed health <p>These preliminary issues were assessed for their potential to be impacted by proposed project activities. Those issues that the Forest Service determined would not be impacted by the proposed project and that were therefore eliminated from detailed analysis are described in Section 1.7.3, below.</p> <p>For remaining issues, the Forest Service assessed whether there were opportunities to minimize or avoid potential adverse impacts through refinement of the Proposed Action or development of an additional action alternative. This process occurred during alternatives development, as described in Section 2.2, and was used to further separate issues into two categories: key issues (Section 1.7.1) and analysis issues (Section 1.7.2). Rationale for these decisions is provided in the Lookout Pass Ski Area Expansion Environmental Impact Statement Scoping and Issues Report (SWCA 2015a) (Appendix A).</p> <p>Section 7.2 of Appendix A has been updated to include a table with rationale for issue categorization.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
8	Section 1.8 Potentially Required Permits and Consultation	37-4	The storm water runoff from the southeast parking lot will flow on the Montana side of the divide. The Montana Department of Environmental Quality has not been informed of reviewing a storm water permit for the parking lot expansion.	As noted in Section 1.8 of the DEIS, all required construction permits and plans will be developed and submitted to the Forest Service or approving agency prior to construction by the selected contractor. Completion of all permitting processes is not required to issue an FEIS or record of decision.
		37-5	If a new structure is built in proximity of the southeast parking lot then a septic system site evaluation, that includes non-degradation analysis, will be necessary. An on-site wastewater treatment permit would be required from Mineral County and possibly from the MT DEQ.	
9	Section 2.2.2 Ski Area Design	15-4	Would be nice to have a "warming hut" or hot chocolate stand/shed in the new area.	Lookout Pass Ski and Recreation Area's MDP identifies all project components (including guest service infrastructure) that would be developed if the Forest Service selects Alternative 2 (Proposed Action). Additional project components are outside the decision space of the Forest Service; that is, this EIS only analyzes what was disclosed in the MDP. Therefore, no change has been made in the FEIS.
10	Section 2.2.2.2 Ski Area Design	15-1	Preference for "runs" rather than "gladed" areas for safety reasons.	Thank you for your comment. The Forest Service developed two action alternatives that provide different trade-offs with regard to the number of runs versus acres of gladed terrain. These alternatives are described in Chapter 2 of the DEIS and are analyzed in Chapter 3 of the DEIS. The IPNFs and LNF Forest Supervisor will select an alternative based on information in this document, public comments, and how well each alternative meets the purpose and need for the project and complies with applicable state and federal laws, agency policy, and Forest Plan direction. No change has been made in the FEIS.
11	Section 2.2.2.5 Snow Removal Plan	20-3	Along with this overcrowded parking lot on top, near the lodge, a fence or barrier should be installed full length of the parking lot on the highway side, so the ski area does not push snow over the bank toward the highway. As a past employee of the highway department, I have seen this snow push over the side, filling the ditch along the highway and requiring blowing the snow back up to the ski area. This creates a dangerous situation for travelers on the highway if snow chunks come down onto the road, the ditches become full with no area for the plow trucks to put the snow as well as dangerous when the highway department has to blow the snow back up into the parking lot, not knowing if people are there or not.	Development of a snow removal plan or snow fencing is an operational issue that is outside the scope of this EIS. However, the Forest Service will work with Lookout Pass Ski and Recreation Area and area groomers during ski area operations to establish safe snow removal activities to protect the health and safety of users of Lookout Pass facilities as well as motorists along Highway 90. Additionally, the snow removal plan will include guidance and expectations to allow and maintain groomer access within the Lookout Pass parking lot and NORPAC Trail within the permit area. Section 2.2.2.5 of the DEIS also discloses that parking would be extended to permit parking on both sides of the railroad grade while maintaining a 20-foot-wide roadbed for ingress and egress for other users such as snowmobilers and groomers accessing the Northern Pacific Railroad Trail. Details on parking lot maintenance will be provided in the winter operations plan. Lookout Pass Ski and Recreation Area also staffs parking lot attendants who will be responsible for enforcing parking lot use in compliance with the winter operation plan.
		37-3	The snowmobile groomer access through all the parking logs should be facilitated. A better management plan for snow removal must be developed to minimize impacts on other interest such as the Highway Departments.	
12	Section 2.2.2.5 Signage	17-3	Educate the skiers that the snow mobile trail comes thru parking lot.	Section 2.2.2.5 of the DEIS states that Lookout Pass Ski and Recreation Area will post speed limit signs at the entrance from all roads and trails leading to the parking lot to notify recreational users of potentially congested areas and maximum speed limit requirements for both wheeled and tracked vehicles. In addition, the ski area has committed to providing signage in the parking lot that notifies visitors of the multi-purpose nature of the railroad grade that crosses in front of the ski area and overlaps parking spaces. Language noting this signage has been added to Section 2.2.2.5 of the FEIS.
13	Section 2.2.2.5 On-site Shuttle	15-3	Are they going to provide a shuttle bus to and from the expanded parking area?	A shuttle bus from proposed parking locations was not identified as part of Lookout Pass Ski and Recreation Area's MDP, which identifies all project components that would be developed if the Forest Service selects Alternative 2 (Proposed Action). Therefore, no change has been made in the FEIS. However, the Forest Service's decision regarding the Lookout Pass EIS does not preclude the establishment of a shuttle at a future date, if desired by Lookout Pass Ski and Recreation Area.

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
14	Section 2.2.2.7 Snowmaking	7-4	In the report it specifies what the potential changes in water flow that a change in the landscape would create. This is useful but what about the added snow from snow making?	No snowmaking would occur under Alternative 2 (Proposed Action) or Alternative 3. The DEIS discloses this information in Section 2.2.2.7. No change has been made in the FEIS.
		9-2	USE OF NATURAL WATER TO MAKE SNOW POLLUTES THE WATER FOR CLEAN WATER DRINKING. IT'S TIME TO PULL BACK AND NOT ALLOW SUCH USE OF OUR NATIONAL LANDS.	
15	Section 2.2.2.8 Road Design	6-2	About three years ago I was on an inspection for possible road locations under review by the Mineral County Conservation District. A landowner was interested in crossing streams and draws with water components, to further a potential logging operation. As one of the CD Supervisors at the time, I was concerned about the degree of abuse that had already occurred at some of the potential crossings. Alternate road locations and stream crossings were considered. Subsequently the landowner elected to sell to another party. I think it was the Ski Resort, or an affiliate. I bring this up to Share what was a problem at the time, and since I saw no reference in the DEIS, I don't know if it needed to be considered. What solutions to the road building, or construction in the riparian areas for roads or stream crossings that we arrived at, were the need to bring in plenty of road ballast to give a good foundation to drive on. This will require removing some of the surface "muck and gumbo" to lay down that subsurface ballast. Then when there is an actual need to cross the stream, that bridgework can accommodate the heavier traffic from logging, as well as the lighter loads of normal traffic. Though the DEIS addresses cute little schematics for ditches and culverts, there was not enough information on the roads or bridges themselves. That is why I bring this up.	No bridges will be required as part of the Lookout Pass ski area expansion. Section 2.2.2.8 of the DEIS describes road construction within the expansion area. In particular, Figure A8 displays how new roads would be constructed, based on slope. The project would use on-site cut and fill to form the road foundation. Reconstruction of 0.5 mile of NFS 18591 would require crossing one tributary. However, this tributary is located over an existing road with sufficient subsurface ballast to support timber and construction traffic.
16	Section 2.2.2.8 Road Decommissioning	49-15	We appreciate the Forest Service's plans to construct approximately 60% (0.8 mile) of proposed temporary roads on existing trails, tracks and unmanaged Forest Service roads to minimize vegetation and soil disturbance. The process for decommissioning of temporary (and permanent) roads is not completely clear, however, as different sections of the Draft EIS are not consistent regarding what actions are planned. We therefore recommend that these apparent inconsistencies be reconciled in the Final EIS. Additionally, if fertilization of reclaimed roads would occur, we recommend fertilization be done during dry seasonal conditions in order to reduce nutrient-laden stormwater runoff.	The Forest Service appreciates your comment. A detailed road decommissioning plan will not be developed until the contract package is prepared prior to construction. Section 2.2.2.8 provides a general description that is sufficient for disclosing the types of impacts that could result from road decommissioning. The FEIS has been reviewed and revised, as applicable, to ensure that discussion of decommissioning is consistent across the document.
17	Section 2.2.2.9 Forest Plan Amendment	39-2	Conflicts with the current Lolo National Forest Plan for the area of expansion are dealt with as an assumed set of amendments to this plan. A fair question might be asked: Is this the public process for those amendments or will there be another? This is yet another issue not fully addressed and possibly assumed from other text to be an issue beyond the scope of this DEIS.	Selection of any action alternative in the record of decision, which will be signed by IPNFs and LNF Forest Supervisor, will represent approval of the proposed Lolo Forest Plan Amendment, described in Section 2.2.2.9 and Section 2.2.3.8 of the DEIS. A separate public process will not occur.
18	Section 2.2.3 Alternative 3	6-5	Originally, I did not have an issue with what was being proposed. Options were considered and selected. I was ok with that process. Then along came the "need" for an alternative three. It seems to me that if any part of the alternative three components were addressed in the second alternative and not included in the second alternative that it should need not be considered. Unfortunately, I do not know what minutia was considered, or not, in the second alternative for comparison. I can only see what is being addressed in the third alternative.	Alternative 3 was developed to avoid or reduce some identified potential environmental impacts identified during scoping by eliminating all temporary road construction by using skid trails, eliminating three ski trails to expand the size of some inter-trail leave islands, and increasing the size of the gladed area to remove more insect-damaged trees. Other project components were not changed from Alternative 2 (Proposed Action) because they did not resolve identified environmental concerns.
19	Section 2.5 New Alternative	35-7	The plan to replace lift 1 with a detachable 4 person chair is a good idea. It is really all this project needs. That would alleviate the crowding that occurs on the high visitation days. The number of "high visitation" days is not what it used to be, just like our winters are not what they used to be.	The Forest Service considered an alternative that would expand Lift 1 capacity and improve parking without the development of additional trails, roads, and guest infrastructure. However, although this alternative would increase lift capacity and Lift 1 wait times, it would not address crowding and safety concerns associated with current high levels of Lift 1 and 2 ski trail use during peak days. Alternative 2 (Proposed Action) and Alternative 3 would more widely disperse skiers throughout the ski area by increasing ski-able acreage across differing skill abilities, thereby meeting the project purpose and need. No change has been made in the FEIS. The reader is referred to the Forest Service responses #39 and 40 regarding backcountry skier experience.
		43-3	There are elements of the proposed Action 1 and 2 that I would support - improving lift 1, adding additional parking.	
		44-1	The DEIS cites the purpose and need as "diminished skier experiences due to overcrowding" but the expansion will result in diminished backcountry skier experiences due to overcrowding. I have skied at Lookout pass for 20 years, and the crowding is at the base of Lift one, which can be alleviated by an upgrade to the lift. Rarely is there a wait on the other lifts.	
		44-5	The inclusion of only 3 alternatives, two of which there is virtually no difference, appears to be in violation of both the letter and spirit of NEPA. At least one additional alternative that addresses the purpose and need without adding more lifts is necessary. This alternative would allow for an upgrade to the area (increase parking, and a high speed lift #1, etc. without expansion of the footprint into St. Regis Basin.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
20	Section 2.5 New Alternative	35-10	In my volunteer work with the Spokane Mountaineers, Inland Northwest Backcountry Alliance, and Winter Wildlands Alliance, I have been able to observe some possible alternatives to this expansion project. Human-powered winter recreation is growing rapidly, but lift served snow sports is somewhat declining. To take advantage of this growth, some ski area offering areas where people can hike up hill instead of taking a lift. Some folks use this for fitness, others just to have a nice walk in the woods. These folks can walk back down if on snowshoes, or ski back if on skis. They then may also use the resort base facilities, rentals, etc. Some resorts have ski/hike in yurts for short overnight stays. The ski equipment industry has also been moving this way. They are offering more boots and skis with uphill travel capability than ever before. If you look at this expansion area, it could work very well for a human powered ski area. Some runs or trails may need to be cut, but it could be done with minimal impact. It would offer something very unique in our area and could be more of an asset to Lookout Pass than what is currently proposed in this plan.	The purpose of the proposed project is to provide high-quality, developed downhill skiing opportunities. Additionally, the DEIS only analyzes project components that are identified in Lookout Pass Ski and Recreation Area's MDP. However, the Forest Service's decision on whether or not to amend Lookout Pass Ski and Recreation Area's current special-use permit to implement (in whole or in part) the Proposed Action or another alternative does not preclude the future development of human-powered activities at the ski area, if desired by Lookout Pass Ski and Recreation Area. No change has been made in the FEIS.
21	Chapter 3 – General Analysis	49-44	Pursuant to EPA policy and guidance, the EPA rates the environmental impact of federal agency actions and adequacy of the NEPA analysis. While we support the fewer changes of Management Areas from riparian area to ski area, the smaller effect on downed woody debris and the construction of skid trails instead of temporary roads offered by Alternative 3, the EPA rates the Forest Service's Proposed Action (Alternative 2) and Alternative 3 as "EC-2" (Environmental Concerns-Insufficient Information). The "EC" rating means that the EPA's review has identified potential impacts that can be avoided in order to fully protect the environment. The "2" rating means that the Draft EIS does not contain sufficient information to fully assess environmental impacts. We recommend that the identified additional information, data, analyses, or discussion be included in the Final SEIS. A full description of the EPA's rating system can be found at: http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria .	Thank you for your comments. The Forest Service has reviewed and responded to all provided comments on a resource-by-resource basis. Responses can be found by reviewing the appropriate resource topics within this response to comments attachment.
22	Section 3.2 Cultural Resources: Mitigation Measures	18-1 34-3 37-1 38-3 38-4 38-7 38-8 51-1	<p>When the area is expanded, avoid and preserve the Mullan Road/Trail. Perhaps erect a few signs explaining the historical significance of the road.</p> <p>I would like to suggest that the Forest Service clear the deadfall that has fallen across the Mullan Road. This minimal maintenance would not be detrimental to the road or alter its character. It would allow the public to enjoy this unique piece of history. There could be some type of barrier to prevent motorized use. And there should be an historical interpretive sign. The ski area could benefit economically if it advertised and catered to visitors in the off season desiring to hike this unique section of the Mullan Road.</p> <p>The Mullan Road historical features that cross the proposed expansion must be protected and given a high priority in the permitting process. Minimization of the impacts should be specified and how the impacts will be monitored should be part of the permit. Interpretive signing for the route of the Mullan Road that expands and clarifies the Sohon's Pass importance should be included.</p> <p>Prior to any construction or clearing work within the project area a buffer area of at least 15 feet must be delineated to protect the Mullan Road from any construction impacts.</p> <p>There should be no disturbance of ground or complete removal of vegetation within the Mullan Road. If trees will be removed within or adjacent to the MR the stumps should remain and measures to prevent the logs from falling or skidding across the road must be taken.</p> <p>Construction of the ski runs will result in additional water drainage within the area from snow melt and stormwater. The project should include drainage diversion measures to protect the MR from erosion. Monitoring of erosion impacts to the MR should be included and possibly additional mitigation measures implemented.</p> <p>MCHS understands that interpretive signage will be required within the ski area and lodge. We would request to be included as contributors to the development of the content of these signs as this is an important part of passing on the history of Mineral County and the Mullan Road. If the visitors and employees of Lookout Pass understand the importance of this historic roadway, they will be more inclined to protect and appreciate it.</p> <p>Would it be possible to move the lifts to the south side of the Mullan Road to reduce the impact of building the addition of the ski runs. Also is there any possibility of helicopter logging the runs in order to keep the trees from damaging any of the area? This will minimize environmental impacts. There would need to be ongoing careful monitoring of the logging in order to facilitate this process. There should be no grading and no grubbing.</p>	<p>Section 3.2.4.2 of the FEIS has been revised to describe mitigation measures identified in the memorandum of agreement (MOA) that will be implemented for the Mullan Road through the administration of the IPNFs' special-use permit with Lookout Associates LLC, in their annual operating and maintenance plan. These mitigation measures will 1) protect the integrity of the remaining Mullan Road segments, 2) post exhibits/signs to illustrate the history and significance of the Mullan Road, and 3) provide monitoring stipulations. More specifically, the MOA identifies the following required actions (from the FEIS):</p> <ol style="list-style-type: none"> 1. Protect the integrity of the remaining Mullan Road segments that are not directly affected by the proposed ski runs within the Lookout Pass Ski and Recreation Area from all ground disturbance, including grubbing; grading; ground cover or tree removal; trail, road, and slope grooming; maintenance; and erosion where possible. <ol style="list-style-type: none"> a. Develop a treatment plan that includes ways to accomplish this goal and that includes the following: <ol style="list-style-type: none"> i. Install structures or water diversion barriers that funnel runoff away from the Mullan Road to prevent erosional damage, (see <i>Ski Area Best Management Practices</i>, Forest Service 2001). ii. Install fiber ski "fences" along the segment of the Mullan Road on the proposed ski run to clearly identify and protect it when slope maintenance or other ground-vegetation removal or other ground-disturbing activities are planned. iii. Establish a 5- to 10-m buffer along the road to protect it during ski trail grooming activity. iv. Avoid or minimize ground-disturbing activities, where possible, along existing roads and trails where they cross or are adjacent to the Mullan Road. 2. The permit holder shall provide training each season (winter and summer) to ski area staff about the history and significance of the road and what protection measures the employees and permit holder are responsible for.

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>a. Training should include historic information about the significance of the Mullan Road and what Lookout Pass Associates LLC is going to do to protect the site.</p> <p>3. The permit holder in coordination with the LNF and the Mineral County Historical Society will develop exhibits/signs to be posted in the ski lodge or other areas where guests and staff have access. These exhibits/signs will illustrate the history and significance of the Mullan Road and the permit holders and Forest Service's commitment to its preservation. The information will be reviewed by the Forest Service to ensure accurate information.</p> <p>a. Examples of acceptable interpretive signs include the following:</p> <ul style="list-style-type: none"> i. A historic marker sign near the Mullan Road segment on the proposed ski runs that cross over the Mullan Road; the on-site signs will be small, intended only to identify where the Mullan Road is on the ground. ii. An interpretive sign at the Lookout Pass Ski Resort Lodge, fully compatible with all federal regulations talking about the Mullan Road and the significance it had on the development of the West. <p>b. Drafts of the interpretation signs will be sent to Montana SHPO for a review. The final draft of the interpretation signs will be reviewed by Montana SHPO before they are installed at the resort and posted on the website.</p> <p>c. The aforementioned exhibits/signs will be accessible on the ski area website.</p> <p>d. Interpretation and exhibits will be completed after the proposed ski runs are constructed but before the ski runs are used for recreation purposes.</p> <p>4. Monitor mitigation measures that are intended to protect the integrity of the remaining Mullan Road segments to determine if measures are successful in meeting the intentional preservations goal. The Forest Service shall monitor the effects on the Mullan Road as follows.</p> <ul style="list-style-type: none"> a. A baseline monitor inspection and inventory will occur before the implementation of the proposed ski run so that the status and condition of the Mullan Road can be captured before ground disturbing-activities take place. This inspection will be documented in a report for reference and will be submitted to the Montana SHPO. b. Monitoring will occur within 1 year of installation of the proposed ski run to ensure the protection measures (i.e., the barriers to funnel runoff away from the Mullan Road) are protecting the remaining integrity of the Mullan Road. c. Yearly monitoring for the life of the permit of the Mullan Road at each disturbed crossing on the proposed ski run and at a pedestrian walk through the Mullan Road corridor will continue to ensure that the protection measures are successful in meeting the intended preservation goals. <p>5. If protection measures are not sufficiently protecting the integrity of the Mullan Road, then the Forest Service with the Lookout Associates LLC will redesign, in consultation with Montana SHPO, the mitigation measures to protect the historic road as listed in</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				measure 1. Based on the Proposed Action layout described in Figure A1 within Section 2.2.2.1 of the DEIS, the Mullan Road would be crossed in two locations by proposed ski trails. Construction of ski trails would require the removal of all trees within the trail corridor, but trees would only be cut to ground level and stumps and roots would be left intact. No other ground disturbance or vegetation removal would occur on the two segments of the Mullan Road that would be impacted by ski expansion activities. Slash would be removed. Removal of deadfall from the Mullan Road is not currently identified as a mitigation measures. However, annual monitoring would occur to ensure that the integrity of the Mullan Road is preserved. Helicopter logging was considered but ultimately rejected as a viable alternative (see Section 2.5 of the FEIS).
23	Section 3.2 Cultural Resources: Avoidance of Mullan Road	34-1	I am concerned about the impact on the Mullan Road. I have hiked this section of the Mullan Road from St. Regis Pass (Sohon Pass) down to the road along St. Regis River. To my knowledge this segment of the Mullan Road is rare and unique in that it has not been altered at all by man's activities such as logging, ranching, mining, etc. It is as it was. This is a valuable archaeological, historical and cultural resource that ought not to be disturbed.	The Forest Service appreciates the history and value of the Mullan Road and has worked closely with Lookout Pass Ski and Recreation Area, the Montana SHPO, and Mineral County Historical Society to avoid the road where feasible, as well as to prepare a MOA that details specific roles, responsibilities, and mitigation measures that the Forest Service and/or Lookout Pass Ski and Recreation Area will implement to protect the resource and educate the public. The No-Action Alternative in the DEIS provides an alternative that would not impact the Mullan Road. The IPNFs and LNF Forest Supervisor will select an alternative based on information in the EIS, public comments, and how well each alternative meets the purpose and need for the project and complies with applicable state and federal laws, agency policy, and Forest Plan direction. No change has been made in the FEIS at this time.
		40-1	I am opposed to any impacts (either during construction or operation and maintenance) to the Mullan Road on the Montana side from its crossing of the State line at Sohon (St. Regis) Pass to near the St. Regis River at the bottom (south) edge of the APE. I hereby submit that that intact segment of the Mullan Road should be protected from any and all impacts due to its current degree of preservation and its historical significance, not only locally but regionally and nationally during the westward expansion of our Country. The Mullan Road at this location should be protected from all activities associated with the ski area expansion and subsequent uses and preserved for future generations.	
		40-2	As was explained to me at one of the public meetings and at a Mineral County Historical Society meeting, the amended project design now proposes to cross a segment of the original Mullan Road with two ski runs. Although you indicated that this will have little impact except for changing the "character" of two short sections of some 150 to 300 feet (?) in width where vegetation will be removed to accommodate the runs, I am opposed to even that change to the Mullan Road. My reasons being: 1. Very few intact segments of the "original" Mullan Road remain for posterity and historical significance, especially in Mineral County, Montana. The Road was constructed across the length of Mineral County in 1859-1860, some seventy five miles. In that distance, as of 2016, I am only aware of four sections remaining and three of those sections have already incurred modifications due to development and civilization. One of those sections, at "Point of the Rocks" west of Alberton (MT) has been nicely "preserved" as a self-guided trail, but has undergone modifications to accommodate subsequent traffic (following construction). One section that was relatively protected by its ownership status has recently passed into the hands of private ownership which brings with it the potential for (and expected) residential development. The only other section of the Mullan Road on public land (National Forest) in the County is still in fairly good condition but has been crossed and re-crossed for logging and public land uses. Parts of it are currently drivable and used as such. The section at Sohon Pass (St. Regis Pass), which is the portion that will be affected by the proposed ski area expansion, is an essentially intact portion of the Road, which was used very little after its construction since a better route over the mountains was sought and utilized in subsequent years. That fact alone and the condition of these other segments in the County are extremely important considerations to the preservation of one last intact, original section such as the one at Sohon Pass. It's the only one left in the County (and maybe beyond), and hopefully it will remain that way and not go the way of all others where development, land ownership transfers, and resource extraction have changed the character or wholly obliterated the Mullan Road.	
		40-5	I believe that through additional research, planning and analysis, the Mullan Road can be avoided completely by the ski area expansion. It is worth saving, protecting, and retaining it in its original, intact state because it is the only such section remaining!	
		52-1	As a past elected county official, long time home-owner, tax payer, and concerned citizen of Mineral County, Montana I want to go on record to protest and block the present and future actions of the Lookout Pass Ski and Recreation. I strongly feel that the historic value of preserving the Mullan Trail outweighs the economic draw of the expansion and interruption of the Mullan Trail by crossing said historic Mullan Trail with any of the Lookout ski runs. This trail needs to be preserved and protected for our current and future generations. It should be a hiking and biking trail. True the trail needs attention and upkeep. That takes money, man-power, and prioritization. If it needs volunteerism, I will be one of those and I would do what I could to round up others. There must be an alternative solution. Perhaps a raised ramp could work, similar to an over-pass, that spans over various free-ways, as an example. It reminds me of Tom McClay a rancher who borrowed \$23 million dollars, built Bitterroot Resort ski area, in Ravalli County, of southwestern Montana. He then decided to get permission and permits. He has lost all his court cases and his ranch. NO PERMISSION! NO PERMITS!!!	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
24	Section 3.2 Cultural Resources: Road Impacts	38-5	Existing access roads should be utilized during construction with no further crossing of the MR for this purpose.	<p>Based on the Proposed Action layout described in Figure A1 in Section 2.2.2.1 of the DEIS, the Mullan Road would be crossed in two locations by proposed ski trails. The proposed permanent road would be located west of the Mullan Road to avoid direct impacts. Although the Idaho side the Mullan Road would be crossed by a temporary road and powerline, this crossing would occur within the footprint of a previously disturbed, existing roadbed and would not result in impacts to the Mullan Road's integrity. Temporary road construction would not cross or coincide with the Mullan Road on the Montana side.</p> <p>Given the above findings, no road re-routes were analyzed in the EIS. Where possible, permanent and temporary roads would use existing road infrastructure. However, in some cases, the road condition or slope would prevent road use.</p> <p>To improve clarity regarding project impacts to the Mullan Road, a new map showing the location of the site in regard to proposed project components has been added to Section 3.2 of the FEIS (Figure CR1).</p>
		40-3	It appears to me (as best I can discern from the small scale maps in the DEIS) that a permanent road and one or two temporary roads will adversely impact the Mullan Road, by crossing it or stopping next to it, during construction activities, resource extraction, and retention (of the permanent road) for ski uses. Could any of these impacts to the Mullan Road be prevented by extending the "permanent access road" (No. 1859) farther up the bottom (on the MT side, along the St Regis River) along the existing "jeep" road before starting to climb or switchback up the slope to where the runs and development are proposed? May I suggest that the bottom jeep road be upgraded to Forest Service standards and be utilized as the access road for all construction and ski activities. It would have to be reconstructed to a point beyond and to the west of the bottom of the Mullan Road, so the Road is avoided at its lower extent. The bottom of the proposed runs and proposed lift 5 would have to tie-in closely to that point and if necessary an over snow shuttle could return users to Lift 2, or even back to the Lodge via Rds. 1859 and 4208. Not only would the upgrade of that "jeep" trail benefit the ski expansion, but could also be utilized for greatly improved access to the St. Regis basin trail system in the summer, and perhaps future considerations for summer recreational uses and a new mountain bike trail system, similar to the increased recreational opportunities afforded by the Hiawatha Trail.	
		40-4	Another option for avoiding and preserving the Mullan Road in its current condition would be to utilize the roads on the Idaho side, that are planned for decommissioning, to access the proposed runs/lifts of the ski area expansion. Those Idaho roads have already impacted the terrain and many sections of them go right to the new runs and lifts proposed. Or consider extending the existing Forest Service Rd. 3026B by a short section to tie-in to the upper section of Rd. 1859 thereby providing access for construction and use of the proposed runs and lifts and circumventing the intact section of the original Mullan Road.	
25	Section 3.2 Cultural Resources: Ski Design Impacts to Mullan Road	38-2	The ski run crossings should be kept to a minimum width and not be the full 150' width of the proposed ski runs to minimize impacts to the MR.	<p>Lookout Pass Ski and Recreation Area's MDP identifies all project components (including ski trail and lift tower design) that would be developed if the Forest Service selects Alternative 2 (Proposed Action). Although this EIS only analyzes the potential impacts of ski components as disclosed in the MDP, the Forest Service, in collaboration with the Montana and Idaho State Historic Preservation Offices, has established mitigation measures in an MOA that will be implemented for the Mullan Road through the administration of the IPNFs' special-use permit with Lookout Associates LLC, in their annual operating and maintenance plan. These mitigation measures will 1) protect the integrity of the remaining Mullan Road segments, 2) post exhibits/signs to illustrate the history and significance of the Mullan Road, and 3) provide monitoring stipulations. Section 3.2.4.2 of the FEIS has been revised to describe these mitigation measures in detail.</p>
		38-6	MCHS understands that the planned lift tower construction will not impact the MR. However, final engineering should ensure that there will be no impacts from lift construction to the MR.	
26	Section 3.2 Cultural Resources: Mullan Road Map	34-2	Your maps do not show the location of the Mullan Road as it lies in relation to the new ski runs and ski lifts. I have heard that you are not allowed to show the location of archaeological resources on maps open to the public, so the resource will be protected. This is ironic to say the least. The rule designed to protect the Mullan Road will damage it. If any ski runs or lifts cross the Mullan road, it will obviously alter the character of the road or surrounding landscape. By your not showing the location of the Mullan Road in relation to proposed lifts and runs, the public is denied the opportunity to give meaningful comment or suggest alternatives. This calls into question the validity of the scoping process and of the public's right to participate.... I have been told that some changes have been made to mitigate impacts on the Mullan Road. For that I am grateful, but I have also been told that two runs 75 feet in width will be cut across the Mullan Road. This will disturb this undisturbed section of the road and surrounding forest. I have no objection in general to expanding the ski area. But are you sure there are no other alternatives that would leave the Mullan Road undisturbed? Has serious effort been made to brainstorm other options? By not publishing maps showing the location of Mullan Road, you have deprived yourself of the benefit of ideas and ingenuity the public may be able to offer.	<p>The Forest Service has considered public comments and determined that publication of the Mullan Road's location will improve disclosure of impacts in the EIS and public education regarding the resource. Section 3.2 of the FEIS has been revised to provide a map showing the Mullan Road in relation to proposed project components.</p>
		38-1	The section of the historic Mullan Road that traverses the project area is one of the most pristine and undisturbed traces remaining and all opportunities for preservation should be implemented. The MCHS appreciates that the project has been altered to reduce the impacts to the MR, however, we understand that two ski trail crossings will impact the Mullan Road. To fully disclose the level of impacts to the Mullan Road and permit monitoring, a detailed map should be included in the final EIS to overlay the MR and project improvements and construction impact areas.	
		42-3	It is my understanding that an entire ski run on the east side was moved before the draft came out in order to preserve the Historic Mullan Road. I also understand that this information cannot be published because it would expose to the general public exactly where the Road is. How ridiculous is this!!?? You move an entire run to preserve an archeological site that nobody can know about but you find a current, and future, use to be insignificant? This is just laughable. It would seem you have deemed historical preservation to be more critically significant than HUMAN SAFETY.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
27	Section 3.2 Cultural Resources	38-10	MCHS appreciates the history within the document and acknowledgment of Sohon Pass, which is now known as St. Regis Pass.	Thank you for your comment.
28	Section 3.2 Cultural Resources: MOA	38-9	The DEIS includes a future MOA with the Montana State Historic Preservation Office (SHPO). This document should include at a minimum, the above mentioned mitigation measures. The MCHS requests to be a concurring party to this MOA and be allowed to comment before its final approval in accordance with the letter dated February 10, 2016 approved by the Mineral County Commissioners as requested by Erika Karuzas February 9, 2016.	Section 3.2.4.2 of the FEIS has been revised to describe mitigation measures identified in the MOA that will be implemented for the project. The Forest Service provided the draft MOA to the Mineral County Historical Society for comment, per their role as a concurring party.
29	Section 3.3 Fish: Passage	49-6	We recommend that, if possible, the Final EIS contain additional information on how the planned culverts will be designed to mimic natural channel structure and function and ensure efficient and safe fish passage. For example, it would be useful to know whether stream simulation techniques will be used, if open bottom or closed bottom culverts would be constructed and the rationale for the choice(s), and whether the design includes planning for failure of stream crossings in order to reduce the amount of sediment that would enter the stream channel should a crossing fail. These stream crossings could also be evaluated as potential wildlife corridors/movement locations, wherein the culverts could be expanded to provide enough width to accommodate upland wildlife passage and allow stream meander.	The Forest Service appreciates your comment but has not revised the FEIS to include additional information on how the planned culverts will be designed to mimic natural channel structure and function and ensure efficient and safe fish passage. Fish passage is not an issue for the proposed project. As Section 3.3.2.1 of the DEIS states, "Currently the road-stream crossing of Tributary SR2 by NFS Road 18591 is a drivable ford. Upstream of the existing ford, Tributary SR2 is not considered fish habitat because of its shallow depth and lack of quality pools. The end of fish habitat (shown in Figure F1) on Tributary SR3 was field-verified in 2014 with a backpack electroshocker (Forest Service 2014b)." To provide further clarification, we have added in Section 3.3.4.2.2 "which is located at the uppermost end of fish habitat (fish habitat does not extend upstream because of the lack of quality pools upstream of the existing ford). The average width of Tributary SR2 is 2.5 feet (see Table WR3); this is a small headwater stream." to the end of this sentence: "Under the action alternatives, the only instream work proposed in fish-bearing rivers or streams is at the Tributary SR2 culvert installation." Tributary CA2, which would also require culverts, is not a fish-bearing stream.
30	Section 3.4 Forest Vegetation: Beetle Infestation	44-4	There are actually very few beetle killed trees in the proposed expansion. This assertion of beetle killed trees in the expansion zone is in error.	Section 3.4.2.1.3 of the DEIS reports acres of stand mortality in the expansion area based on best available data at the time of DEIS production. If additional data sources are provided, the Forest Service will review and incorporate these mortality data, as appropriate. At this time, no change has been made in the FEIS.
31	Section 3.4 Forest Vegetation: Timber Harvest Methods	49-13	The Draft EIS includes some planning regarding mechanisms of timber harvest, and we recommend that these plans be refined in the Final EIS. For example, the Draft EIS states that during ski trail construction, harvest would be conducted via ground-based yarding using wheeled and tracked equipment (including forwarders). Some wheeled equipment is more damaging to soils; therefore, we recommend that the relative use of each be disclosed and at the same time encourage the Forest Service to use low impact equipment where possible and particularly in areas sensitive to soil disturbance. Similarly, Appendix E states that log-length skidding and yarding would be required unless otherwise approved, and skidding has a higher likelihood of causing soil disturbance and erosion. We therefore recommend that the Final EIS include more detail on where each method will be used.	The Forest Service appreciates your comments but at this time, specific harvest equipment and skidding/yarding use are not known. Therefore, no change has been made in the FEIS. The Forest Service will establish provisions in timber sale or construction contracts that ensure best management practices occur on-site.
32	Section 3.4 Forest Vegetation: Snags and Downed Woody Debris	49-14	Table FV11 on page 93 compares snags/acre and downed woody debris/acre by alternative. We recommend comparing these metrics to forest plan or regional guidelines.	Thank you for your comment. The Forest Service considered your recommendation but neither the IPNFs nor LNF Forest Plans contains snag or woody debris thresholds for the management areas that coincide with the location of Lookout Pass Ski and Recreation area. In developing the Proposed Action and alternatives, the Forest Service balanced the need of limiting the potential impacts to wildlife and vegetation habitat and providing a safe recreational opportunity for the public and customers of Lookout Pass. The IPNF Forest Plan includes desired conditions for designated primary recreation areas (MA7) that specifically address the need to consider safety and recreational values when developing actions that may alter existing vegetation conditions. MA7-DC-VEG-01. Vegetation alterations are made while considering the natural-appearing landscape and timber may be harvested to enhance recreational values, mitigate safety

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>concerns (e.g., hazardous tree removal), or for fuel reduction.</p> <p>MA7-DC-VEG-02. Vegetative manipulation provides for safety and accommodates both existing and new facilities. Vegetative manipulation within ski areas maintains and creates ski runs.</p> <p>Similarly, the LNF Forest Plan identifies standards for vegetation alterations on lands designated for ski areas (MA 8) and concentrated public use (MA 9) as follows:</p> <p>Trees with a high potential for physical failure or susceptibility to insects and disease will be periodically evaluated. Hazardous conditions will be reduced by using acceptable methods such as single-tree removal or thinning.</p> <p>Tree removal will be limited to that required to eliminate safety hazards or permit road or trail construction or meet other management objectives.</p>
33	Section 3.4 Forest Vegetation: Stand Composition	49-12	Timber Harvest: On page 90, the Draft EIS states that acres and volume removed are the indicators for impacts to stand composition and volume. However, only data on volume are presented. Please add data on acres removed, as area and percent of area harvested are important metrics for understanding impacts. In general, we recommend including a percentage metric throughout the document, as percentages provide context for the amounts presented.	Section 3.4.4.2.1 of the FEIS has been revised to include estimated acres and percentage of acres of trees removed, per your recommendation.
34	Section 3.5 Recreation: Ski Area Buffer	10-3	We asked for a buffer between the new ski hill boundary & the existing trail on the northwest side. The current boundary has created conflict at the chair lift, we would like to eliminate this in the future.	<p>The proposed ski Lifts 5 and 6 are located 2,300 and 3,230 feet away, respectively, from the St. Regis Trail; no further buffer has been added. Although the proposed expanded special-use permit boundary on the northwest side parallels the Northern Pacific Railroad trail, no project components are proposed for construction in this area. The IPNFs and LNF Forest Supervisor will select an alternative based on information in the EIS, public comments, and how well each alternative meets the purpose and need for the project and complies with applicable state and federal laws, agency policy, and Forest Plan direction. At this time, no change has been made in the FEIS.</p> <p>Issues related to the existing Lift 2 are outside the scope of this EIS and will be addressed in Lookout Pass Ski and Recreation Area's winter operations plan.</p>
		11-2	The existing lift on the west side is located so close to the groomed snowmobile trail that it creates a traffic conflict and snow shoveled from the lift can create hazardous conditions on the trail. The new lift should have a buffer area away from St. Regis Trail.	
35	Section 3.5 Recreation: Current Snowmobile Parking	10-4	Parking in the multi recreational area at Lookout. That current parking is important at low snow conditions this is one of the only areas to park & access trails & snow traffic.	<p>The Forest Service has the authority under their federal regulations (36 CFR 261.58(g)) to prohibit parking of snowmobiles with posted notice. The Forest Service recognizes that there is a need for additional snowmobile parking in the region. However, this issue is not specific to the Lookout Pass EIS and needs to be addressed in a separate process through coordination with local entities. Section 2.5.4 of the FEIS has been revised to note that the Forest Service has successfully coordinated with Shoshone County and local landowners to secure grant funds to implement a 300-foot expansion of a four-season multiple-use parking lot designed for snowmobiles. This parking lot is located close to the resort and accesses the same trail system.</p> <p>Section 2.2.2.8 of the DEIS also discloses that all existing Forest Service roads and trails currently open to motorized or non-motorized public use would remain open under all alternatives. Section 2.2.2.5 of the DEIS provides further details regarding ingress and egress through the proposed parking area for other users such as snowmobilers accessing the Northern Pacific Railroad Trail. A 20-foot-wide roadbed would be maintained. Details on parking lot maintenance will be provided in the winter operations plan. Lookout Pass Ski and Recreation Area also staffs parking lot attendants who will be responsible for enforcing parking lot use in compliance with the winter operation plan. No change has been made in the FEIS.</p>
		11-3	Snowmobiles have also used parking for trailers at this area historically, particularly at end of season conditions. This parking access is important and should be maintained.	
		37-2	The parking issues created by the proposed expansion should address all recreational user needs. Mineral County is attempting to be proactive in recreational management and cooperation is the best approach. Considering parking expansion that would allow for other than skier parking is requested.	
		46-2	The one issue That needs to be considered is the proposed parking area, which leaves no path for Snowmobiles to get around Safely & no place to park Snowmobile trailers. This has always been a provision for years Since the 1980s.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
36	Section 3.5 Recreation: Alternative Snowmobile Route	11-1	I have concerns of snowmobile traffic conflict with the expanded parking area. A dedicated side route for snowmobiles would be preferred with snow left on the route for snowmobile cooling.	<p>The Forest Service appreciates your suggestion for an alternative snowmobile route via creation of a snow apron or berm. Creation of this snow apron is an operational issue that will require coordination between Lookout Pass Ski and Recreation Area, Shoshone County Groomer Board (who completes grooming activities in this area), and the Montana Knight Riders. The Forest Service is actively coordinating with these groups to identify snow management methods for incorporation into the ski area's winter operations plan. Section 2.5.4 of the FEIS has been revised to provide this information.</p> <p>Section 2.2.2.5 of the DEIS discloses that parking would be extended to permit parking on both sides of the railroad grade while maintaining a 20-foot-wide roadbed for ingress and egress for other users such as snowmobilers accessing the Northern Pacific Railroad Trail. Details on parking lot maintenance will be provided in the winter operations plan. Lookout Pass Ski and Recreation Area also staffs parking lot attendants who will be responsible for enforcing parking lot use in compliance with the winter operation plan.</p> <p>The topic of multi-use signage in the parking lot is addressed in response #12.</p>
		31-1	I am concerned with the lack of attention to the seasonal snowmobile route through the parking area and proposed expansion of the parking area. This route has been a part of the snowmobile trail system for decades and is a heavily used and important piece of the connectivity of the system. I believe to ensure the safety of all, there must be a signed and designated route through the already congested area warning all users of mixed usage. Snowmobile traffic is NOT insignificant, the trail is established and approved both historically and documented through appropriate agencies. It lies between two major snowmobile parking areas, Taft and Shoshone Park. Please consider the safety and concerns of all users.	
		42-2	I propose that a snowmobile trail be maintained on top of the snow berm on the north edge of the parking lot above the freeway. The ski area has equipment that is used to create terrain parks. This equipment is fully capable of flattening the top of the berm and creating a snowmobile trail on top of it. Signs could be posted to let skiers know there is a snowmobile trail there. A speed limit could be established and posted for snowmobiles, therefore making it enforceable.	
		47-2	The snowmobile trail has been there for years, it is NEPA, MEPA, and Idaho DEQ approved, this issue will not be going away. Shoshone County Snowmobile Club and The Montana Nightriders have been sharing three sections of trail for the last 40+ years. Both entities contribute to its functionality between grooming, cleaning, brushing, etc. One of the sections that we share goes straight through the Lookout parking lot. So it's not only the Montana Nightrider groomers that have to go through the parking lot, Shoshone County does also. It seems that if you can move a whole ski run to protect a trail, that no one knows where it exists, for historical and archeological value, coming to a solution to this SAFETY issue in the parking lot should take some precedence. There is a solution to this issue. When the parking lot is plowed for customer parking, the snow gets piled on the interstate side of the lot. It is possible to groom a trail on top of this pile. Lookout has the grooming equipment to make this trail and keep it maintained with very little effort. Montana Nightriders would help with maintenance when we are grooming through. If it is kept maintained consistently and signed this would be a full time snowmobile route outside the parking lot. This would solve all previously stated issues and lose no skier parking.	
		48-3	The discussion in section 2.5.4 further announces an apparent conclusion that "no technically feasible alternative snowmobile route was identified to re-route users around proposed and existing ski parking areas." DEIS at 31. The discussion further states "[a] potential alternative snowmobile parking lot site was identified, but the Forest Service has made a preliminary determination that the site is not likely to be technically or economically feasible to construct and is outside the scope of the project." Id. These statements violate both the letter and spirit of NEPA. The EIS requirement is primarily designed to serve two ends, and "ensures that federal agencies have sufficiently detailed information to decide whether to proceed with an action in light of potential environmental consequences, and it provides the public with information on the environmental impact of a proposed action and encourages public participation in the development of that information." Arizona Cattle Growers' Ass'n v. Cartwright, 29 F.Supp.2d 1100, 1116 (D. Ariz. 1'998) (citing Oregon Env't Council v. Kunzman, 817 F.2d 484 (9th Cir. 1987). 'NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." 40 CFR 1500.1(b). The "environment" in the NEPA context is the "human environment" for NEPA's operative EIS requirement is triggered by federal action which may "significantly affect [] the quality of the human environment" 42 USC § 4332(2)(C) (emphasis added). The "human environment" "shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." 40 C.F.R. § 1508.14. Whether expansion of a special use will displace and/or have potential safety recreational, aesthetic, or safety impacts on other legitimate uses is a fundamental issue that is squarely within the scope of any such expansion. An agency cannot properly make a "preliminary determination" on an issue so simple and central to the proposed action.	
37	Section 3.5 Recreation: Cross-county Ski Trails	32-17	In addition to the dispersed recreation opportunities in the area, the proposed expansion will destroy the existing cross-country ski trails in the St. Regis Basin and the St. Regis Pass areas. The DEIS fails to address the loss of these ski trails	<p>The Forest Service appreciates your comment but does not agree that the proposed ski area expansion will eliminate existing cross-country ski trail opportunities. Existing cross-country ski trails are available along NFS Roads 18591, 4208, and 7896. Although road re-construction would occur on approximately 0.5 mile from NFS 18591, Section 2.2.2.8 of the DEIS discloses that all NFS roads currently open to motorized or non-motorized public use would remain open under all alternatives.</p> <p>The Forest Service recognizes that an existing cross-country ski trail also starts at the top of Lifts 1 and 2 and heads west and south to connect back up to the route on NFS 18591 (a new map showing this route has been added to Section 3.5.2.3 of the FEIS). Ski area expansion will not affect use of this trail because most of the trail currently falls within the current special-use permit boundary. Additionally, no expansion components (trails, lifts, etc.) will intersect the route within the expanded special-use permit boundary. No change has been made in the FEIS.</p>
		44-9	In addition, the proposal eliminates the popular cross country ski loop, and there is no mention of this in the DEIS.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
38	Section 3.5 Recreation: Motorized Vehicle Access	10-2	The access into the Basin says no motorized vehicles. Again this is a dedicated snowmobile trail we would like access.	Section 2.2.2.8 of the DEIS discloses that all existing roads or trails that are currently open to motorized use will remain open under all alternatives. No change has been made in the FEIS.
39	Section 3.5 Recreation: Winter Activity Displacement Outside of the SUP	28-1	If the concerns of recreators are being written off as "outside the scope" of the DEIS then another outlet for these concerns should be created. From the outside perspective it appears that you are just saying you don't care what the people think and will do whatever you want to do regardless. Recreation is by far the biggest draw to public lands which are the main resource for our number 1 industry in the state; Tourism. Please at the very least take into consideration the concerns of all the people who call this land theirs.	<p>The Forest Service recognizes that dispersed winter recreation (e.g., backcountry skiing, cross-country skiing, and snowshoeing) is important to many local residents, and the popularity of these activities continues to grow. The Forest Service's decision to focus the recreational analysis to summer activities and downhill skiing within the current and expanded ski area is based on the need to respond to Lookout Pass Ski and Recreation Area's submission of a new MDP. The Forest Service is required to evaluate if the proposal is consistent with Forest Plan direction and related laws, policy, and direction related to activities on public lands. Additionally, the Forest Service is required to evaluate the potential impact of all proposed activities described in the MDP, as well as impacts to other activities that could occur within the proposed special-use permit area.</p> <p>As discussed in Section 2.5.2 of the FEIS, because most dispersed winter recreation occurs outside of the proposed special-use permit area, and would continue unimpeded by project activities, the Forest Service determined that no further analysis of backcountry recreation use outside of the special-use permit is warranted in the EIS. Proposed actions contained in both action alternatives would not restrict access to backcountry recreational activities located in the upper portion of St. Regis Basin and Stevens Lake Drainage, where dispersed winter recreation is concentrated. Trail #267 located adjacent to the St. Regis River will remain open for access to backcountry opportunities to both these areas. Loss of accessible winter backcountry areas in St. Regis Basin within the proposed expansion area the proposed project would not impact or overlap Backcountry Management Areas (MAs) as defined by the IPNFs and LNF Forest Plans.</p> <p>Section 2.2.2.8 of the DEIS discloses that all existing Forest Service roads and trails currently open to motorized or non-motorized public use would remain open under all alternatives. Therefore, there would be no loss of access for dispersed winter recreation users.</p> <p>Please see response #48 for Forest Service responses to snowmobiling comments.</p> <p>Please see the Forest Service's response #40 regarding displacement of backcountry users within the special-use permit area.</p>
		32-3	Backcountry skiing is one of the fastest growing segments of the recreational market. According to SnowSports Industries America nearly six million human-powered skiers and snowboarders explored the backcountry during the 2014/2015 season.1 According to the Outdoor Foundation's most recent report, telemark, or backcountry, skiing has increased by 8% over the past 3 years and is among the top outdoor activities for growth.2 Likewise, the Outdoor Foundation reports that cross-country skiing has increased by 5.7% over the past three years.3 Resort skiing (defined as alpine/downhill in this report), however, has decreased by 1.9% over the past 3 years.4 Given these trends, we feel it is extremely important that the Forest Service address impacts to human-powered backcountry winter recreation as part of this analysis.	
		32-12	Given the current range of alternatives presented in this DEIS, our organizations feel that the No Action Alternative is the only option for preserving the backcountry recreation experience. While we are not opposed to ski area expansion on principle, any expansion must be done in a way that accounts for other recreation opportunities. Dispersed recreation opportunities should not be sacrificed or ignored simply because the ski resort would like to expand.	
		32-13	We believe that the final EIS should address impacts to backcountry skiing, cross-country skiing, snowshoeing and snowmobiling and include an alternative that balances LPSA expansion with the preservation of high-quality backcountry recreation opportunities.	
		35-3	There seems to be quite an emphasis on how this expansion project helps the agencies involved to, "comply with its management directives to provide for all recreation types and abilities." This phrase or similar phrases are used repeatedly in the documents. When will the agency start complying with its directives and provide adequate opportunities for other recreation groups, especially those of us who enjoy low impact, human-powered recreation. Backcountry skiers, snow shoe hikers, XC skiers, and snow bikers all would like to see more opportunities. It seems to me winter travel planning should be a higher priority than this project.	
		41-3	My family learned to ski and snowboard at lookout pass ski area, And we have great memories from there. But there is a growing segment of skiers and boarders who enjoy more than just sliding down a hill. We enjoy getting into unspoiled areas too see the beauty of winter, and the side benefit of sliding back down a mountain. Please consider how this expansion will affect all winter users before approving this.	
		43-1	I am an avid backcountry skier from Missoula, MT. I travel to Lookout Pass several times a winter to ski in the St. Regis Basin. The St. Regis Basic provides some of the best, most accessible backcountry ski terrain in Western Montana and North Idaho. Much of the terrain is suitable for beginner and intermediate BACKCOUNTRY skiers, which is rare in these parts. I feel that this Draft EIS dismisses the legitimate concerns of backcountry skiers and fails to adequately analyze the impact of Lookout Pass's proposed expansion on this low-impact form of recreation.	
		43-5	I feel very strongly that the impact to snowmobilers and backcountry skiers resulting from Alternative Action 1 and 2 should be better analyzed and therefore support the no action alternative at this time.	
		44-12	Why is backcountry and winter travel not addressed in the DEIS? Clearly the expansion will have a significant impact on the winter recreation in the area. There are rapidly decreasing opportunities for non-motorized backcountry users. The DEIS needs a more comprehensive approach that addresses the cumulative effects of recreation-alpine skiing, backcountry skiing, side country access, cross county and snowshoeing and snowmobiling.	
		48-1	We are generally supportive of the effort to provide diverse winter recreation opportunities and related support to local economies in the project area and region. However, the DEIS and project configuration overlook several key issues and fail to adequately analyze and/or consider alternatives to other forms of winter recreation. We ask that these oversights be rectified in further planning efforts and any decision(s) on this project.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
		48-4	The project is framed too narrowly. The project focuses on addressing growing and increasingly diverse recreation demand, with a focus on winter recreation. The DEIS improperly avoids inclusion and meaningful discussion of these issues.	
		48-7	The conscious choice to avoid consideration of all forms of winter recreation will likely subject the Forest Service to claims of "user conflict" from some disgruntled users. We have reviewed the comments of such other users, including the Inland Northwest Backcountry Alliance. We agree that the proposed expansion of the ski area will adversely impact all other forms of motorized and non-motorized recreation, without proper mitigation or planning to address the full spectrum of these winter recreation uses. We also appreciate their reference to past collaborative efforts between the Backcountry Alliance and "snowmobile groups" to establish informal shared use boundaries/themes, which have worked reasonably well to this point in managing backcountry access within and near the project area. Our past experience dealing with the broader Winter Wildlands Alliance further reveal a likely strategy through which they will assert that expansion-associated displacement will create "user conflict"	
40	Section 3.5 Recreation: Winter Recreation Displacement within the SUP	12-1	I would expect a review of ski areas expansion and its impacts on skiing (touring & backcountry skiing) and its potential to increase skiers and snowmobile conflicts. (Saint Regis Basin).... What alternative areas are available to touring and backcountry skiers without contending with snowmobiles?	Section 2.2.2.8 of the DEIS discloses that all existing Forest Service roads and trails currently open to motorized or non-motorized public use would remain open under all alternatives. Therefore, there would be no change in access to the St. Regis Basin for winter recreation activities from implementation of the Lookout Pass EIS. The St. Regis Basin consists of approximately 2,113 acres of terrain. Of this total, the proposed ski area expansion overlaps an estimated 296.5 acres (14%) of the basin. Section 3.5 of the FEIS has been updated to include an analysis of project effects to non-downhill winter recreation within this affected area. The analysis consists of 1) acres of terrain loss for motorized and non-motorized winter recreation, and 2) qualitative assessment of user displacement into surrounding terrain.
		32-15	As proposed, the Phase 1 expansion will reduce the area available for backcountry recreationists. The St. Regis basin, including the area within the SUP, is currently much used by motorized winter recreationists. (Areas south of the St. Regis River within the proposed non-motorized winter recreation area where we have attempted to acculturate separation from OSV's is also heavily used by winter motorized users.) If the LPSA expansion goes forward as proposed, OSV use will be displaced from St. Regis basin and increase within the proposed Stevens Peak backcountry area. User conflicts between OSV users and human-powered winter recreationists already exist and are becoming increasingly common in the proposed Stevens Peak backcountry area. The expansion will further encourage OSV users into the Copper Lake, Stevens Lake, Lone Lake and Boulder Creek drainages and adjoining terrain of the Stevens Peak area. The compaction of snow, increased noise and loss of solitude degrades the experience which backcountry skiers, snowboarders, and snowshoers seek in this area.	
		32-18	The inclusion of nearly 650 acres along the Idaho- Montana state line ridge north of the St. Regis Basin in the proposed Phase 1 expansion Special Use Permit (SUP) boundary, and resulting out of bounds/off-piste use, will be a loss for human-powered winter recreationists. The area within the SUP has been used by backcountry skiers and snowboarders, cross-country skiers, and snowshoers for many years. This area provides a rare opportunity for easily-accessible backcountry terrain for backcountry skiers, cross-country skiers, and snowshoers....nor does it address the value that the area within the proposed SUP has for non-motorized winter recreationists.	
		35-1	Displacement of backcountry skiers, and other human powered winter recreationist, should be recognized and mitigated.	
		36-1	I frequently visit the areas around lookout pass for backcountry skiing, and I believe the Forest Service should either adopt the "no action" alternative or address the following concerns in their final EIS: Loss of accessible winter backcountry areas in St. Regis Basin within the proposed expansion area	
		41-1	As a backcountry split boarder who regularly rides in the area of the proposed expansion. I am concerned about the ability to access these areas. This does not seem to be addressed in the current plan and so at this point I have to oppose the planned expansion.	
		43-2	The Proposed lift 5 and the proposed expanded special use area cuts across terrain I have skied numerous times. Additionally, the top of Proposed Lift 5 drops skiers and snowboarders directly at the top of some of the best backcountry terrain in the Basin. Due to current use by snowmobilers, much of the terrain below the Proposed Lift 5 is under-utilized by backcountry skiers. If Lookout expands into this area, the snowmobile use will likely shift to the opposite side of the Basin, which has been traditionally used by backcountry skiers. This displacement will in turn further impact backcountry skiers. That this is not analyzed in this DEIS is disappointing and causes me to support the no action alternative.	
		44-3	The DEIS doesn't address how this project will affect backcountry skiers. Essentially the proposal favors one recreational activity (downhill skiing) to the exclusion of all others by promoting increased alpine skiing while sacrificing backcountry access. Many recreationalists, including myself, actively use the St. Regis basin for backcountry skiing. Displacement of this user group is not addressed in the DEIS! Nor is the impact on increased backcountry access from these lifts leading to more use of the Willow Creek and St. Regis basins. What will the impact be on this user group?	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
41	Section 3.5 Recreation: Backcountry Access and Safety	32-7	The DEIS does not mention how the proposed expansion may encourage out of bounds/off-piste access into avalanche terrain beyond the SUP boundary by inexperienced resort users without adequate avalanche safety training or appropriate avalanche safety gear (and experience), endangering not only themselves but other users of the area as well as members of search and rescue organizations. Backcountry access, avalanche safety, and avalanche control procedures should be addressed in the final EIS.	<p>The issue of backcountry skier safety, including backcountry access, avalanche safety, and avalanche control, is considered beyond the project decision scope because the project purpose and need is to improve developed, downhill skiing opportunities. Lookout Pass Ski and Recreation Area has identified an operational ski area boundary that establishes the limits of where skiers are allowed to ski. This boundary is disclosed in Chapter 2 of the DEIS. Under all alternatives, Lookout Pass would post signs at the boundary informing skiers that they have reached the boundary and that skiing beyond that point is not allowed. It is the skier's responsibility (per Idaho Statute 6-1106 and Montana Statute 23-2-736) to obey all posted signs; any skier's decision to ski beyond the boundary is conducted at their own risk and is not under the control or responsibility of the Lookout Pass Ski and Recreation Area.</p> <p>As part of the special-use permit, Lookout Pass Ski and Recreation Area will develop a winter operations plan that identifies procedures for off-area search and rescue and personnel training, as well as includes an emergency plan.</p> <p>No change has been made in the FEIS.</p>
		36-3	Avalanche safety concerns stemming from increased numbers of sidecountry skiers	
		43-3	I feel that Proposed Actions 1 and 2 would jeopardize the safety of backcountry skiers accessing neighboring terrain. With lift-deposited skiers descending to the bottom of the Basin (whether within the ski area boundary or outside), skiers hiking up from below would be subject to increased avalanche danger. The location of Proposed Lift 5 and the welcoming terrain below it, would attract skiers and riders to violate ski area boundaries and descend into the basin.	
		47-3	With the ski hill expansion back towards the St. Regis Basin it is going to increase the number of back country skiers in the Basin. This means that the risks for back country users increase. The snowmobilers have more experience and knowledge of the Basin area. After the incident with the skiers last year in the St. Regis Basin area, and the use of Search and Rescue, brings up some questions. Will the Nightriders be called on for use of our trail groomer? Who has jurisdiction, Montana or Idaho? Will Lookout provide training for Search and Rescue for avalanche related or missing person incidents? The bottom line concern for the Montana Nightriders is SAFETY.	
42	Section 3.5 Recreation: Stevens Peak Backcountry Plan	16-2	I have read the E.I. S. draft. The concern for skiers standing in long lines, the crowded "unsafe" parking lot, and lack of extreme ski runs equals expansion as an option. I submit that the "back" side of Lookout, in the St. Regis Basin is a unique, small, high alpine area that deserves to stay pristine as possible. I would recommend the Regis Basin be considered as protected land. It is small, but extremely unique for the entire area!	<p>The Forest Service recognizes that there is public interest in the development of a comprehensive winter travel/access plan that would address recreational opportunities within the St. Regis Basin and Stevens Peak backcountry areas. However, addressing broader winter recreation concerns through the Travel Management Planning Process, specifically Subpart C (Winter Travel Planning), is outside the scope of this EIS and not the responsibility of the project proponent (Lookout Pass Ski and Recreation Area) to fund necessary planning and environmental analysis. All proposed activities associated with this proposed project are located outside of designated Backcountry Management Areas as described in the Forest Plans for the IPNFs and LNF. Furthermore, as described in the DEIS (Section 2.5), access to off-piste or out-of-bounds ski terrain beyond the operational boundary area would not be authorized by Lookout Pass Ski and Recreation Area. Therefore, potential increase of recreational use of backcountry areas by patrons of Lookout Pass would be the result of individuals not complying with Idaho Statute 6-1106 and Montana Statute 23-2-736. Individuals not in compliance with these statutes are not under the control or responsibility of Lookout Pass Ski and Recreation Area.</p> <p>Available access for non-customers of Lookout Pass to recreational opportunities (motorized and non-motorized) within the St. Regis Basin outside of the special-use permit and the Stevens Peak backcountry area would not be reduced through the project as proposed. All roads and trails leading into these backcountry areas would remain open and located outside of the current and proposed special-use permit area.</p>
		30-1	I agree with your recommendation to the Forest Service to prioritize a comprehensive management plan for the Saint Regis basin and the Steven speak back country area.	
		32-2	We believe the Forest Service misunderstood our concerns as expressed in our June 13, 2014 meeting with the Coeur d'Alene River District Ranger Chad Hudson, Assistant District Ranger Ryan Foote, John Latta and Eric Ryan (representing our organizations). During that meeting the discussion was centered on clarifying whether or not the proposed expansion would directly overlap with the proposed Stephens Peak Backcountry Area. The District Ranger concluded that because footprint the proposed Phase 1 expansion does not directly overlap with the proposed winter non-motorized area, the proposed expansion would not affect the outcome of any future travel management decisions. We argued that while it is true that the proposed Phase 1 expansion does not directly overlap with the proposed Stevens Peak Non-Motorized Winter Recreation Area, the proposed Phase 1 expansion will force increasing numbers of OSV users, out-of-bounds/off-piste resort skiers and snowboarders, backcountry split boarders/skiers, snowshoers and winter campers to share the limited safe terrain in St. Regis basin. We also argued that the proposed Phase 1 expansion would create wide-ranging impacts that significantly impact non-motorized recreationists who use the proposed Stevens Peak winter non- motorized area. This is of great concern, as the St. Regis basin has outstanding easily accessible terrain for all types of backcountry winter recreation. However, the area is also serious avalanche terrain, as exemplified by this winter's avalanche accident involving experienced backcountry skiers who entered the basin from the ski area. The competition between motorized and non-motorized groups for limited terrain will increase the likelihood of users venturing onto or beneath dangerous slopes they would otherwise avoid. The proposed Phase 1 expansion would also create wider-ranging impacts within the St. Regis basin portion of the proposed non-motorized winter recreation area to users in nearby subalpine basins beyond St. Regis basin. To offset these impacts, the Forest Service must undertake a comprehensive winter plan for the Stevens Peak backcountry area before consideration of any and all of the LPSA proposed and future expansion plans.	
		32-16	The Forest Service should prioritize winter travel planning and a designation of the Stevens Peak winter non-motorized backcountry area. Doing so would allow the agency to proactively plan for all forms of winter recreation and ensure that human-powered users will continue to have safe and enjoyable areas to recreate.	
		39-3	The lack of full socio-economic analysis speaks to an underlying issue in the Lookout Pass-St Regis-Copper Lake-Stevens Lakes-Boulder Creek Complex of developed and backcountry. As the Forest Service is well aware and the DEIS failed to communicate this is a complex of mountains and basins that receives high use of downhill skiing, snowmobile and back country skiing use owing to its close proximity to Interstate 90 conveniently tying it to the Spokane-Coeur d'Alene population center. Although repeatedly counseled and requested to do so, the Forest Service has never undertaken a public planning process to decide areas of use in this complex. The Forest Service pleads poverty, which granted is difficult to deny, so any such process goes begging. Meanwhile the one entity with enough funds to hire consultants goes forward with its plans for the area while the rest of the recreational public sees a slow steady erosion of its interests in this area. Not only is this unfair as snow machine users are excluded from parking lots on	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			<p>the public domain with no mitigation or backcountry skiers and snowmobile users are further displaced by parking lot expansion, it is an unfair advantage given to one user. If the Forest Service fails to address this underlying issue with the current piecemeal approach, it is certain the issue will explode in the next phase of the ski area's planned expansion. The next phase is in the Lookout's 2010 Comprehensive Plan, an expansion across the St. Regis Basin and eventually into the Copper Lake Basin. It is unfair at this time to consider this expansion piecemeal without addressing the underlying issue of area use division with all user groups. If the Forest Service persists in this unfair approach, the next round of Lookout Pass Ski Area expansion promises to be explosive.</p>	
		44-13	<p>A piece meal approach is haphazard and will result in increased conflict, this project needs to be part of larger comprehensive recreational and travel management plan.</p>	
43	Section 3.5 Recreation: Comprehensive Winter Travel Planning	48-5	<p>While the DEIS on one hand purportedly brushes aside winter recreation impacts as "outside the scope of the project" it fails to reasonably discuss likely closures associated with the proposed expansion. One specific consequence of the project's singular focus on permitted ski area operations is the illegal failure to disclose restrictions on existing winter recreation within the project area. For one thing, during the long timeframe of possible ski area expansion, the winter travel management guidance has changed. While the original 2005 Travel Management Rule made winter route/area designations discretionary, the agency now faces a mandatory duty to designate routes and areas for over-snow vehicle use. 36 CFR 212.81 (2015); 80 Fed.Reg. 4511 (Jan. 28, 2015). No such disclosure is contained in the DEIS, nor has it been attempted by the Forest in a different planning process. The Travel Analysis Process Report at Appendix L does not satisfy regulatory planning requirements and does not adequately disclose impacts to recreational access. The TAP Report contains, at best, a cryptic discussion focused on wheeled vehicle use of "roads" within the project area. The best comparison between the status quo and the proposed action seemingly occurs through comparison of Table 2 and Table 7, which suggests that most routes considered "open" will remain so, with the exception of Roads 37315 and 37315-1, which are proposed for closure and decommissioning. However, this discussion is apparently focused entirely on wheeled vehicle use, for presumably the agency will not authorizing snowmobile travel within the proposed expansion during the winter use season. The DEIS disclosure and analysis is utterly lacking on this topic.... There is a disconnect between the current winter travel management status, the 20 15 Travel Management Rule changes affecting over-snow vehicle designations, the TAP, and any other winter recreation discussion in the DEIS. The agency needs to meaningfully revise the DEIS and project focus in order to sync these related duties in a compliant planning effort.</p>	<p>The Forest Service recognizes that it has a mandatory duty to designate routes and areas for over-snow vehicle use following guidance and expectations put forth under 36 CFR 212.81 (2015); 80 <i>Federal Register</i> 4511 (January 28, 2015). Winter travel planning has not been completed to date for the areas within or surrounding Lookout Pass Ski Area because of a lack of allocated funding and a lack of workforce capacity. Additionally, addressing broader winter recreation concerns through the Travel Management Planning Process, specifically Subpart C (Winter Travel Planning), is outside the scope of this EIS, and it is not the responsibility of the project proponent (Lookout Pass Ski and Recreation Area) to fund necessary planning and environmental analysis. However, the St. Regis Basin and Stevens Peak Backcountry areas have been identified as priority areas for this effort in the near future when funding and staffing allow.</p> <p>In 2013, two years prior to the release of the above listed CFR, the Forest Service approved a modified version of that proposed Master Development Plan—the Lookout Pass Ski and Recreation Area Master Development Plan (Lookout Pass Ski and Recreation Area 2013a). Our public participation efforts on this proposal was initiated in the spring of 2014 with the release of a scoping document describing proposed actions contained within the approved Master Development Plan (Lookout Pass Ski and Recreation Area 2013a). The purpose and need of the Lookout Pass Ski Area Expansion has remained focused on the need to improve developed downhill skiing opportunities, which is consistent with Forest Plan direction for the Idaho Panhandle and Lolo NFs.</p> <p>Section 2.2.2.8 of the DEIS discloses that all existing roads or trails that are currently open to motorized or non-motorized use will remain open under all alternatives. Therefore, there would be no change in access along open roads and trails leading to the St. Regis Basin for winter recreation activities if either action alternative is implemented. Dispersed motorized recreational opportunities would decrease by 296.5 acres within the portion of the St. Regis Basin located within the proposed special-use permit boundary for 20 years through expansion of the permit area if either action alternative is implemented (see Table A4 in FEIS). However, access to backcountry areas (motorized and non-motorized) would still be available on open NFS roads and trails, as well as dispersed access through lands not included within the permit area.</p>
		48-8	<p>For the various reasons described in these comments, the Forest Service should seize this opportunity to address not only the permitted ski area expansion, but the relation of that project to other forms of winter recreation in the affected area. With the modification of the Travel Management Rule the agency is now obligated to designate routes and areas for over-snow vehicle use, but has curiously declined to do so. We wish to note the collective winter recreation management experience at Kapka Butte on the Deschutes National Forest in Central Oregon, which is insightful here. That project focused on construction of an eighth "sno-park" along the access road to the Mount Bachelor Ski Area. In a broader context, that area has long been popular for all forms of winter recreation, and as early as the mid-1990's the Forest Service invested meaningful time and resources evaluating recreation and "user conflict" issues, particularly at focal points such as Dutchman Flat. The Deschutes National Forest conducted an approximately six-year planning process, culminating in a September, 2012, decision approving construction of the new sno-park. Various organizations challenged that decision in U.S. District Court. The Forest Service, along with various intervenors supporting the project, including our counterpart the Oregon State Snowmobile Association, ultimately prevailed. See, Order (dated April 14, 2014) in Case No. 13-0523-TC (D. Or.) (Enclosed herewith). An appeal from that decision has been briefed and remains pending before the Ninth Circuit Court of Appeals. The point of this discussion is to emphasize the importance of a broader planning focus, as revealed through the Kapka Butte project. There is no "quick and easy" way to address winter recreation issues of this nature. Rather than a singular focus on ski area expansion, the Forest here should recognize the broader need to address all forms of winter recreation. The project will ultimately be more defensible and the agency/public will receive greater return on its planning investment.</p>	
		48-9	<p>The current project configuration does not comply with binding direction in the Travel Management Rule. As noted above, the DEIS attempts to ignore winter travel management issues as outside the scope of the ski area expansion project. DEIS at 95, 31. However, the agency either does not have a valid OSV vehicle use map in place, or through this project will be making modifications to the existing map. Under either scenario, the DEIS fails to even consider designations or otherwise comply with the prescribed process. As noted previously, the Travel Management Rule was modified in 2015, in response to a court order. See, 80 Fed.Reg. 4511 (Jan. 28, 2015). The Rule, as originally adopted in 2005, contained a "snowmobile exemption" which made it discretionary with line officers whether to designate routes/areas for over-snow vehicle through the Rule's formal procedures. Some units elected to include over-snow vehicle designations in travel management decisions, some relied on previously completed formal winter use planning efforts, and others left existing winter use designations largely in place. In this latter category, there exists a range of planning efforts of varying degrees of specificity and/or procedural formality. It appears that the Forest is caught in between these varying requirements with regard to winter use planning in and around the Lookout Pass project area. One interpretation might be that the agency is making initial designations of routes/areas for over-snow vehicle use. However, such</p>	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			designations must conform to specific procedures in the Travel Management Rule. 36 CFR 212.81(d). An alternative view is that a compliant "designation" has already occurred, and that the Lookout Pass planning process will therefore include "revisions" to those designations. However, any such revisions must still comply with the procedural requirements of the Travel Management Rule. 36 CFR 212.54. In either instance, the Lookout Pass DEIS ignores binding regulatory direction by failing to consider winter recreation impacts.	
		50-5	The issue of proposed road closures was also included in numerous scoping comments. The DEIS inadequately addresses this issue and does not comply with the Travel Management Rule as it ignores winter travel management. The closure of roads currently used by snowmobiles appears to violate the intent of the winter travel management rule.	
44	Section 3.5 Recreation: ATV use of Maintenance Road	17-1	On the proposed action how about letting ATV/UTV use the maintenance road. You might get support from clubs if you do this.	All existing Forest Service roads and trails surrounding Lookout Pass Ski and Recreation Area that are currently open to motorized or non-motorized public use would remain open under all alternatives (Section 2.2.2.8 of DEIS). Because there would be no change to ATV access or trails, the Forest Service has determined that permitting ATV use of Lookout Pass Ski and Recreation Area's proposed permanent access road is unnecessary. No change has been made in the FEIS.
45	Section 3.5 Recreation: Off-Site Shuttle	50-2	As the existing topography limits the expansion of onsite parking, an alternative with offsite parking and shuttle busses for use on heavy skier days should have been analyzed (The operator of the ski area already owns a fleet of busses used on the Route of the Hiawatha Trail during summer months).	Section 3.5.4.3.2 of the DEIS discloses that Lookout Pass Ski and Recreation Area currently provides a Saturday ski shuttle during peak snow months that offers visitors an alternative parking solution. Lookout Pass Ski and Recreation Area's MDP identifies all project components (including parking) that would be developed if the Forest Service selects Alternative 2 (Proposed Action). Additional project components are outside the decision space of the Forest Service; that is, this EIS only analyzes what was disclosed in the MDP. Therefore, no change has been made in the FEIS.
46	Section 3.5 Recreation: Parking	50-1	The issue of inadequate parking was raised in numerous comments submitted during the EIS scoping phase. The proposed parking area expansions shown in the DEIS do not address this issue adequately. Simply expanding the parking lot to the east and west as shown in the plan does not solve the LOP ski area parking problem. There is already insufficient parking for the existing ski area. Enlarging the ski area will only exacerbate the problem. For over 25 years, I was chairman of the Shoshone County Planning and Zoning Commission. For all commercial developments, the county required the applicant to meet county parking space regulation requirements and/or prepare a report estimating the peak parking requirements. The applicant was then required to provide parking spaces for the estimated peak load. There is no such exercise in the DEIS. The operator simply proposes to expand to the east and west to gain a few more spaces.	Section 3.5.4.3.2 of the DEIS discloses that the proposed parking addition is sufficient to address most parking needs based on current use (only 5% of operating days were at or above projected parking availability during the 2014–2015 ski season). The section also discloses that Lookout Pass Ski and Recreation Area offers a Saturday ski shuttle during peak snow months that provides visitors with an alternative parking solution. The Forest Service's decision on whether or not to amend Lookout Pass Ski and Recreation Area's current special-use permit to implement (in whole or in part) the Proposed Action or another alternative does not preclude the future development of alternative transportation options, if desired by Lookout Pass Ski and Recreation Area, to address increasing visitation and parking needs. No change has been made in the FEIS.
47	Section 3.5 Recreation: Skier Displacement and OSV Use Patterns	32-5	The DEIS does not address how the proposed expansion will alter OSV use patterns in the St. Regis Basin. This is a major concern of ours. The proposed Lift 5 will provide easy access for skiers and boarders to take the fall line off-piste and out of the SUP boundary into the St. Regis Basin. In our opinion, this off-piste skiing out of the SUP boundary will be a major attraction for many skiers. The easiest way for off-piste skiers and riders to return to the resort from this area will be to follow the OSV trail on the north side of the St. Regis River back to lifts 2 and 5. This major increase in pedestrian activity will force the OSV traffic that currently uses the route up the north side of the river to use the cross-country ski trail on the river's south side. Members of INWBA have worked with snowmobile groups since 2003 to promote the idea of keeping OSVs on the north side of St Regis River, saving the south side of the river for cross-country skiers, snowshoers, and backcountry snowboarders and skiers. We had asked that the EIS address displacement of motorized recreation by the proposed expansion and the potential for increased conflicts between motorized and non-motorized users, yet the Forest Service did not include this analysis in the DEIS. The Forest Service's claim that topography permits a safe and sustainable route for skiers and riders to return to the resort boundary fails to account existing uses on this route, the impact of increased resort-bound traffic on this route to other users, or what the cascading effects of increased resort-bound traffic on the route will be.	The issue of off-piste skier activity is considered beyond the project decision scope because the project purpose and need is to improve developed, downhill skiing opportunities. Lookout Pass Ski and Recreation Area has identified an operational ski area boundary that establishes the limits of where skiers are allowed to ski. This boundary is disclosed in Chapter 2 of the DEIS. Under all alternatives, Lookout Pass would post signs at the boundary informing skiers that they have reached the boundary and that skiing beyond that point is not allowed. It is the skier's responsibility (per Idaho Statute 6-1106 and Montana Statute 23-2-736) to obey all posted signs; any skier's decision to ski beyond the boundary is conducted at their own risk and is not under the control or responsibility of the Lookout Pass Ski and Recreation Area. Section 4.5, Incomplete or Unavailable Information, has been added to the FEIS to disclose the Forest Service's uncertainty over out-of-bounds skier activity, as well as to qualitatively disclose the potential range of consequences that could occur to winter recreation users using roads and trails within or adjacent to the ski area boundary. This section also discloses any management actions included in the ski area's winter
		36-2	Increased winter motorized use in the proposed Stevens Peak Backcountry Area and the south side of the St. Regis River due to displacement by off-piste skiers and riders.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				operation plan that would be implemented to reduce the probability of displacement, including regulations that clearly prohibit backcountry skiing out of bounds.
48	Section 3.5 Recreation: Impacts to Snowmobiles	10-1	It appears that none of our concerns over snowmobile trail conflicts have been addressed. Topics brought up conflict with parking public traffic (families skiing and walking, cars, snowmobiles).	<p>Thank you for your comments. The Forest Service recognizes that the Northern Pacific Railroad Trail provides access for a variety of winter and summer users. Please see Forest Service responses to alternative snowmobile trails, additional snowmobile parking, and signage to provide safer conditions and ensure ongoing use by all recreation users in response #36, 35, 49, and 12, respectively.</p> <p>Additionally, Section 2.2.2.5 of the DEIS discloses that parking would be extended to permit parking on both sides of the railroad grade while maintaining a 20-foot-wide roadbed for ingress and egress for other users such as snowmobilers accessing the Northern Pacific Railroad Trail.</p>
		35-2	The impacts of the new parking lot to the OSV route over Lookout Pass has not be adequately analyzed. This route is a critical connection between OSV routes in ID and MT that needs to be maintained.	
		39-4	I feel the draft DEIS contains glaring omissions in its obligation to fully assess the impact of the proposed expansion on the environment of the area as it pertains to human use. The DEIS purports to assess socio-economic impacts of the proposed expansion. However, even a cursory examination of the documents reveals an assessment of economic impacts while the impact on other users of the area are written off as issues for the Forest Service to decide and thus beyond the scope of this analysis. Already the Forest Service allows the managers of the ski area to bar the parking of snow machine trailers in a parking lot which is solely on the public domain. If there is a public safety or some other reason for this exclusion one might expect the ski area operators to mitigate this problem created for other users, but the lack of a solution is written off by the inability of the Forest Service to find a viable mitigation. The parking lot currently blocks the use of a snow machine and ski trail across Lookout Pass, to the detriment of other users, but no mitigation of this impact is required of the ski area operators. Now the operators want to expand parking further on to the Northern Pacific Rail Grade on the south end, yet no discussion or mitigation for backcountry or snowmobile users appears in the document.	
		42-1	The impact of the Lookout expansion on the existing snowmobile trail must be addressed. The draft EIS is terribly mistaken in its conclusion that there is no significant impact. The fact that we are already mixing skiers and motorized users in the same area is a SAFETY issue. As it stands, we have parents trying to corral excited kids who are not looking for a snowmobile. Many skiers wear headphones listening to music who are unable to hear a snowmobile coming. People, particularly children, ski between cars to get to their own, not even aware that there can be a snowmobile about to cross their path. Vehicles backing out of parking spaces are not aware that a snowmobile may be coming and that these vehicles are not very tall, therefore not in the usual line of sight. Further, snowmobile trail groomers move through the parking lot. NOBODY is looking for one of these giant machines to all of a sudden appear in front of them. By doubling the distance of this mixed use, and not addressing it, you are ultimately responsible when someone gets hurt, or worse, killed. Nobody, skier or snowmobiler, wants any part of this.... The snowmobile trail through the parking lot is NEPA, MEPA, and Idaho DEQ approved. It would seem this fact is being ignored. The snowmobilers are not going away and the sport is growing just as skiing is. This use cannot simply be poo-poo'ed away like it doesn't exist. There is nowhere to move the snowmobile trail to go around the ski area. A solution must be addressed in order for all users to co-exist SAFELY. What few parking spaces the snowmobilers have at Lookout would be taken away if the expansion is approved as proposed. This indicates that snowmobile use is not outside the scope of this project and that SAFE passage must be addressed and a solution be put into place with this decision.... In summary: It is within the scope of this project that the snowmobile trail be addressed. The snowmobile trail will sustain significant impact. This is a matter of SAFETY.	
		47-1	We are supportive of the Lookout Pass expansion, to the point giving up our snowmobile parking at the lodge, but there are multiple areas that must be addressed in the EIS. The biggest issue, which was completely skipped over AGAIN, is the trail through the parking lot. How can this SAFTEY issue not be addressed? We are mixing an area with snowmobiles, skiers, and groomers which is a major safety issue. It is only a matter of time before there is an incident, it is unavoidable with the way that all traffic is forced to go through the parking lot. You have skiers, especially children, which are constantly moving between and around vehicles. Most skiers these days are wearing headphones and cannot hear what is going on around them. You have vehicles pulling in and out and none of these people are looking or prepared for snowmobile traffic coming through the parking lot. As this hill expands there becomes more and more vehicle traffic. To see this SAFETY issue completely ignored is inexcusable.	
50-3	The last time the ski area was expanded, snowmobilers and the groomer board were insured that the NP Snowmobile trail would not be impacted. As brought up in numerous scoping comments, this was not the case. The current parking area creates conflicts with the NP Snowmobile trail. On numerous occasions, parked vehicles have blocked the passage of the snowmobile trail grooming equipment. In addition, plowing of the parking lot causes the snow to melt requiring snowmobiles and the grooming equipment to operate on bare ground when passing by the ski area. Expanding the parking lot to the east and west will increase the distance snowmobiles and the grooming equipment will have to travel on bare ground to get by the ski area and increase conflicts between grooming equipment, snowmobiles, vehicles, and pedestrians. The DEIS totally ignores this issue and states that there is no alternate snowmobile route. The DEIS then proposes allowing the ski area operator to remove more of the snowmobile trail by expanding the parking to the east and west with the caveat that the operator would leave room for snowmobiles and grooming equipment to get by. There is an alternative that restores and maintains the NP Snowmobile trail. As mentioned previously, an alternative with offsite parking and shuttle buses should have been analyzed. Failure to analyze implementable alternatives			

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			(regardless of cost) violates NEPA.... I find it ironic that on one hand, the USFS recently awarded a RAG grant for expansion of the snowmobile trailhead parking lot adjacent to the fish hatchery and East Shoshone Park and on the other hand proposes allowing the ski area operator to further degrade one of the 2 trails that the parking lot serves	
		53-1	This letter is in support of the ISSA on opposing the Lookout Ski Resort Expansion. The expansion does not include the snowmobile use of the parking lot or the trails that pass through the resort. Snowmobilers use this area to access riding areas along with passing through on trail rides that takes you through the resort boundary. The Coeur d'Alene Snowmobile Club is in full support of the ISSA on opposing the expansion as it stands.	
49	Section 3.5 Recreation: New Snowmobile Parking	17-2	Try to make better parking for snow mobiles.	The Forest Service recognizes that there is a need for additional snowmobile parking in the region. However, this issue is not specific to the Lookout Pass EIS and needs to be addressed in a separate process through coordination with local entities. The Forest Service has the authority, under their federal regulations (36 CFR 261.58(g)), to prohibit parking of snowmobiles with posted notice. The IPNFs has taken steps toward resolving this issue through recent coordination with Shoshone County and local landowners to secure grant funds to implement a 300-foot expansion of a four-season multiple-use parking lot designed for snowmobiles. This parking lot is located close to the resort and accesses the same trail system. Therefore, no change has been made in the FEIS.
		20-2	On another matter, you need to allow expanded parking for snowmobile use.... On expanded snowmobile parking, additional room for snowmobiles should be allowed for in the new parking at the bottom of the St. Regis River valley, near the new lifts. Another thought of expansion could come down near the Taft interchange. At present, snowmobiles park there and very often over fill the lot and impede the Montana plow truck from getting to their sand pile. If you went through that parking area and across the St. Regis River, near the power company sub-station and developed that as a parking area, you could easily double your parking. In a longer range plan, you could level the piles between the Taft interchange and the rest area west to allow even more parking. This should all be considered with the ski area expansion since the expansion has an impact on the snowmobiles and displaces them. You may also consider this parking area at Taft as an important consideration as an eventual overflow for the ski area. If the intended and anticipated increased number of skiers as a result of the expansion comes true, busing skiers from Taft could become a necessity for the ski area. This need could be a way to pay for expanded parking to be built and plowed in the winter.	
50	Section 3.5 Recreation: Winter Recreation Survey	32-14	We also suggest that the Phase 1 EIS should include a study or survey of winter use in the St. Regis basin, on the groomed snowmobile trail system in the vicinity of Lookout Pass, and in adjacent areas including the Stevens Peak backcountry area. Analyzing these impacts will allow the Forest Service to find a balance between developed and undeveloped winter recreation in the Lookout Pass area.	<p>The Forest Service recognizes that dispersed and motorized winter recreation (e.g., backcountry skiing, cross-country skiing, snowshoeing, and snowmobiling) is important to many local residents. The Forest Service's decision to focus the recreational analysis to summer activities and downhill skiing within the current and expanded ski area is based on the need to respond to Lookout Pass Ski and Recreation Area's submission of a new MDP. The Forest Service is required to evaluate the impact of all proposed MDP activities, as well as impacts to other activities that could occur within the proposed special-use permit area.</p> <p>Because most dispersed and motorized winter recreation occurs outside of the proposed special-use permit area, and could continue unimpeded by project activities, the Forest Service determined that no further analysis is warranted in the EIS.</p> <p>Section 2.2.2.8 of the DEIS discloses that all existing Forest Service roads and trails currently open to motorized or non-motorized public use would remain open under all alternatives. Section 2.2.2.5 of the DEIS provides further details regarding ingress and egress through the proposed parking area for other users such as snowmobilers accessing the Northern Pacific Railroad Trail. A 20-foot-wide roadbed would be maintained. Details on parking lot maintenance will be provided in the winter operations plan. Lookout Pass Ski and Recreation Area also staffs parking lot attendants who will be responsible for enforcing parking lot use in compliance with the winter operation plan.</p>
51	Section 3.5 Recreation: Summer Trail Experience	13-1	I am concerned about the Stevens Lake Trail being compromised & the wilderness experience reduced. The same for the hike up to St. Regis Lake.... The finished project, especially on the St. Regis Lake Trail, must blend into the area a natural as passage so it doesn't ruin the hike.	Appendix E of the DEIS provides visual design features that would be implemented if either action alternative is selected by the Forest Service. Visual design features contain requirements such as low impact materials and colors and blending site grading disturbance into the existing topography to achieve a natural appearance. No change has been made in the FEIS.

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
52	Section 3.5 Recreation: Summer Recreation Opportunities	6-3	That bottomland has the potential for year around access and use. There was no mention of non-winter uses like hunting hiking cycling, etc., on these travelled ways. Will the Ski Resort Area encourage that kind of optional use?	Section 3.5.2.3 of the DEIS discloses current non-winter recreation activity that is permitted within Lookout Pass Ski and Recreation Area's special-use permit boundary. Sections 3.5.4.2.3 and 3.5.4.3.3 of the DEIS disclose potential impacts to these activities under all alternatives. Summer hiking, berry picking, and biking would be permitted within the expansion area, as would hunting, subject to all federal and state regulations. Existing and proposed permanent roads and trails in the analysis area would continue to be available for non-motorized summer recreation use. However, all motorized vehicles, including ATVs, would be prohibited within the analysis area unless specifically approved for use by Lookout Pass Ski and Recreation Area for maintenance activities. No change has been made in the FEIS.
53	Section 3.5 Recreation: Winter Recreation Data	44-8	The DEIS states that there is minimal winter skiing and snowmobiling within the expansion boundary? This is erroneous and in complete disregard of factual data. I personally use the route that transects the proposal many times every year and I always see other ski tracks in there.	Section 2.5.2 of the DEIS reports winter recreation in the expansion area based on best available data at the time of DEIS production. If additional quantitative data sources are provided, the Forest Service will review and incorporate these recreation data, as appropriate. At this time, no change has been made in the FEIS.
54	Section 3.5 Recreation: Snowmobile Enforcement	44-10	Furthermore, on any given weekend snowmobiles are all over the basin the St. Regis Basin, often off trail and in clear violation of forest travel plans. There is virtually no enforcement of travel regulations. This lack of enforcement needs to be addressed before any proposal that would increase backcountry use.	Enforcement of snowmobile activity in the St. Regis Basin is outside the scope of this EIS. Any decision based on the Proposed Action or other alternatives in this EIS would not affect the Forest Service's decision space for future management decisions related to winter travel management or developed recreation within and adjacent to the project area.
55	Section 3.5 Recreation: High-marking	39-5	The south edge of the area of proposed expansion is quite near a south facing slope some snow machine operators use to practice their sport of "high marking." Yet no discussion of this possible impact is mentioned.	Thank you for this information. Because the high-marking area is outside of the proposed ski expansion boundary and the project would not alter existing motorized access via NFS roads, this activity could continue unimpeded by proposed actions. Therefore, the issue is not carried forward for analysis in the EIS.
56	Section 3.5 Recreation: Ski Trail Design	35-4	The design of the ski runs and location of the lifts seems very poor. Any experienced skier can see that this project really does not add any better quality skiing to the area. It only makes the resort look better on paper. One example is that there are 15 runs in this small area. The area as it exists now is roughly 19 runs. It sounds like the resort has doubled, but looking at the map shows the truth. There is just a minimal increase in area with a number of short and off fall line runs. It looks to me more like ski industry marketing and I think our public lands are more valuable than that.	The DEIS only analyzes project components (including run design) identified in Lookout Pass Ski and Recreation Area's MDP. However, Chapter 3.5 of the DEIS discloses existing downhill skiing opportunities and potential changes to the acres of terrain by ability level, trail capacity, and lift wait times under all alternatives. No change has been made in the FEIS.
57	Section 3.5 Recreation: Multiple Topics	32-1	During the scoping period for this project in 2014, our organizations documented the concerns we have about the proposed expansion's impact on human-powered winter backcountry users who recreate in St. Regis basin and the Stevens Peak backcountry area. Specifically, we raised concerns about the loss of accessible winter backcountry terrain, displacement of over-snow vehicle (OSV) users to the south side of the St. Regis River (and subsequent increases in conflict between backcountry recreationists), the loss of established cross-country ski trails, elevated numbers of backcountry users exposed to avalanche hazard, and the cumulative effects of this and future ski resort expansion plans. We are extremely disappointed to see that the Forest Service has not addressed our concerns and dismissed them as being out of the scope of this analysis.	Thank you for your comments. The Forest Service has reviewed and responded to all listed concerns on a topic-by-topic basis. Responses can be found by reviewing the appropriate topics within this response to comments attachment, such as responses #37, 39, 41, 47, 101, and 48.
		48-2	The project has a single-minded emphasis on ski area expansion, which ignores both logic and the law. Specifically, the "recreation" discussion in the DEIS states that impacts to summer or winter recreation, involving motorized or non-motorized means of access, "are not analyzed in this DEIS. The reader is referred to Section 2.5 for rationale." DEIS at 95. Section 2.5 mentions but discounts concerns about backcountry access, alternative access routes for backcountry users, and long-term skier and snowmobile parking development. DEIS at 30-31. These concerns have been legitimately raised by both motorized and non-motorized winter recreationists, and should be considered in detail and actively managed within the range of DEIS alternatives. The agency (perhaps through its contractor) improperly deflects these concerns through assertions like "[t]he removal of a snowmobile parking option would not affect the Forest Service's decision space for future decisions related to parking development adjacent to Lookout Pass Ski and Recreation Area." DEIS at 31. Whether "future decision space" can mitigate the impacts of the present decision is not the relevant standard. The agency must analyze impacts of the proposal on the "human environment" and "inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 CFR 1502.1.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
58	Section 3.5 Recreation	26-1	The Idaho Department of Parks and Recreation (IDPR) staff reviewed the Lookout Pass Ski Area Expansion Draft Environmental Impact Statement (DEIS). The Lookout Pass Ski Area is seeking to expand its operating area by installing a new lift and increasing its parking area. Our staff focused its review on the Recreation Analysis started on Page 95 of the DEIS. The DEIS did a good job of describing the existing situation and how the expansion would impact recreation opportunities. The FEIS will not need much editing in this section.	Thank you for your review and feedback.
59	3.6 Special-Status Plants: Weeds	27-1	Appendix H, Rare Plant and Noxious Weeds Survey Technical Memorandum, lists only three (3) noxious weeds present in the project area. Since the majority of this project is in Montana, within the confines of the Mineral County Weed District (MCWD), and the Lolo National Forest (LNF), the survey MUST include both Montana listed noxious weeds AND Mineral County listed noxious weeds in order to comply with statute. Since no initial contact was made with this department, we are forwarding to you the current listed noxious weeds (both State and county) for all lands with the MCWD. 2. Having conducted previous surveys and inspections within and around the project area, we feel there were more noxious weeds present than indicated by Appendix H; specifically oxeye daisy (<i>Leucanthemum vulgare</i>), yellow toadflax (<i>Linaria vulgaris</i>), common mullein (<i>Verbascum thapsus</i>), Canada thistle (<i>Cirsium arvense</i>), and the meadow hawkweed complex (<i>Hieracium caespitosum</i> , <i>H. praealturm</i> , <i>H. floribundum</i> , and <i>Pilosella caespitosa</i>).	Thank you for your comments. Surveys for noxious weeds were conducted concurrently with rare plant surveys within disturbance areas and in a 150-foot buffer immediately surrounding the disturbance areas in June 2015. This survey spanned both the Idaho and Montana side of the project. Appendix H reports all weed species identified during the survey. However, the Forest Service recognizes that additional noxious weeds could be present on-site that were not identified during the survey. Appendix H has been updated and now includes an attachment providing state and county lists of noxious weeds. Section 3.6.1.1 of the FEIS has also been updated to state, "A list of invasive of noxious weeds species identified during survey efforts or provided by local agencies is provided in the <i>Rare Plant and Noxious Weeds Survey Technical Memorandum</i> ." Specific weed treatments and seed mixes will be established as part of Lookout Pass Ski and Recreation Area's summer operations plan. The plan contains approved seed mixes and herbicides for weed treatments within the permit area that are provided to Lookout Pass by Forest Service botanists. All seed mixes will be certified weed-free, and seeded areas will be monitored to confirm successful revegetation has occurred. A brief description of weed treatment and revegetation actions has been added to Section 2.2.2.2 of the FEIS.
		27-2	Portions of the DEIS dealing with ground disturbing activities such as new ski trail creation (Sec. 2.2.2.2), roads and access (Sec. 2.2.2.8), and facilities, state or allude to revegetating or seeding and fertilizing to establish native or desirable non-native plants. Two points of concern for the MCWD would be (a) noxious weed treatments are not adequately addressed in these sections and (b) approved revegetation materials and/or mixes are not identified. Approval of these seed mixes must be done by the LNF in consultation with the MCWD. Noxious weeds are currently present within the project area and will continue to be an issue unless adequately mitigated and managed by efforts of the lease permit holder, LNF, MCWD, and Idaho Panhandle National Forest (IPNF). Current plans for weed management on the LNF do not have the resources nor ability to address this issue in the proposed project area. We encourage you to consider these comments carefully and adequately address them before final EIS publication.	
		40-6	St. Johnswort, or Goatweed, is a Montana noxious weed that has widespread coverage in the high elevation "glades" of the upper St. Regis River. It has been displacing native vegetation in the area of the proposed Lookout Pass Ski Area expansion essentially unchecked. The proposed expansion will be removing many acres of forest canopy to accommodate the ski runs and associated development. Considering the epidemic of St. Johnswort in the area, without ongoing weed management/control measures, St. Johnswort can be expected to rapidly invade and become established on the newly disturbed, open areas of the Ski Area Expansion, continuing to spread unchecked. This has the potential to be a major problem in the area that the DEIS referred to as "an issue not carried forward for the Lookout Pass Ski Area Expansion DEIS" on page 12. That being the case, then what, if anything, will be done to address the spread of St. Johnswort from the adjacent slopes to the newly disturbed areas of ski runs, roads, etc.? Are ski runs periodically sprayed with herbicides to keep encroaching, unwelcome vegetation at bay? Is this issue covered in the operation and maintenance plan for the special use permit for Lookout Pass? I surmise that my weed concerns and these questions are answered on page 118 of the DEIS, section 3.6.1.1, but it would be beneficial to know what specific things we can expect to be done at Lookout Pass Ski Area expansion to address this looming problem.	
60	3.6 Special-Status Plants: Whitebark pine	32-9	The DEIS notes that the proposed ski area expansion would impact approximately one-tenth of an acre of subalpine forest stands composed of whitebark pine and other species (Page 126). Effects to whitebark pine are characterized as insignificant, and the DEIS concludes that the project will not result in a trend toward federal listing under the Endangered Species Act. However, because the... DEIS does not address future LPSA expansion plans, it fails to account for reasonably foreseeable developments that will impact whitebark pine. The FEIS must include a more thorough description of the anticipated cumulative effects of the proposed action to whitebark pine when taken with any additional future plans to expand the ski area.	Thank you for your comment. As addressed elsewhere in this response to comments attachment, consideration of future expansion plans for Lookout Pass Ski and Recreation Area in the St. Regis Basin is considered beyond the project decision scope because, per CEQ regulations, cumulative actions must be reasonably foreseeable and Lookout Pass Ski and Recreation Area does not currently have any documented plans filed with the Forest Service for a Phase 2 expansion. However, Section 3.6.4.4 of the DEIS does disclose potential cumulative effects to whitebark pine from other reasonably foreseeable projects. Additionally, the Forest Service has committed to buying eight blister rust-resistant whitebark pine seedlings from the Coeur d'Alene nursery to plant in undisturbed and untraveled whitebark pine habitat within the expansion area. This new mitigation measure is disclosed in Section 3.6.4.2.2 of the FEIS.
61	3.6 Special-Status Plants: Whitebark pine	24-1	Could you have your staff develop an alternative that would locate the proposed new lifts 5 and 6 and the ski patrol service building so they would not affect any whitebark pine trees. The trees are only growing in a very small area (0.1 acre) and yet the top of the proposed lifts and the ski patrol building would zero in on that small area like it was a bulls eye. Can the proposed facilities be moved to accommodate the trees? Whitebark pine is in a precarious position as a species throughout its range and I'm not comfortable sacrificing any of the trees, even if it'd only be eight small non-cone bearing trees.	Approximately 0.1 acre of whitebark pine habitat and eight individual trees were identified near the top of Lifts 5 and 6. Although planned roads, lift terminals, and the ski patrol building would be situated to avoid known habitat, construction of the Idatana Ridge trail would coincide with the habitat along its southwest edge. At its widest point, the trail would overlap with approximately 45 feet of known whitebark habitat. To address whitebark pine impacts from ski trail construction, the Forest Service has added the following mitigation measures within Section

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				3.6.4.2.2 of the EIS. "However, the Forest Service has committed to buying eight blister rust-resistant whitebark pine seedlings from the Coeur d'Alene nursery to plant in undisturbed and untraveled whitebark pine habitat within the expansion area as replacement for individual whitebark pine trees removed during ski area construction."
62	3.7 Socioeconomics: Lift Ticket Prices	35-6	The one concern I did have is that the increase in lift ticket price is not shown. Some estimate of the daily lift ticket price increase for the first year after the project is completed should be added. This will help people better understand how much this project is really costing them. It will also help them see if Lookout is going to be able to maintain the family oriented ski experience it is famous for.	Section 3.7.4.3.2 of the DEIS discloses that lift ticket prices will increase with inflation. No change in the FEIS has been made.
63	3.7 Socioeconomics: Induced Growth	44-2 49-29	There is no increased local demand with 5 ski areas within the major population center of Spokane/CDA. Regarding the need to maintain high-quality skier experiences on high-visitation days, past growth in visitation to the ski area is attributed to population growth in nearby counties. However, the growth in skiing far outweighs the growth in population (13% growth in population over 13 years vs. 40% growth in visits over 10 years). This may suggest that the expansion itself may have led to much of the growth in skiing. We recommend looking more closely at year-to-year changes in population vs. ski visits, especially in the years immediately after the past expansion. If increase in visitation was more correlated with the expansion than with population growth, we recommend considering the potential for induced growth from this project, as well as the indirect environmental impacts from that growth, as part of the cumulative effects analyses.	Section 1.3.1.1.1 of the DEIS discloses that visitation at Lookout Pass Ski and Recreation Area has increased by 40% over the last decade of operations, whereas average daily visits to the ski area have increased by roughly 56%. This trend clearly demonstrates increased visitor growth at Lookout Pass Ski and Recreation Area, even with the presence of surrounding ski resorts in the region. Skier visitation at Lookout Pass Ski and Recreation Area increased from 8% to 11%, annually, for the three ski seasons (2005–2008) following construction of the previous expansion, and then again from 2010 to 2014 at an average growth rate of 3%. Population data for the surrounding five counties are not available between 2001 and 2008 (U.S. Census 2016). However, between 2000 and 2009, population growth was minimal (2%) for Mineral County and total population decreased by 7% within Shoshone County. In contrast, Missoula County population increased by 10%, Kootenai County population increased by 22%, and Spokane County population increased by 9% (U.S. Census 2016). Therefore, it is possible that the growth in visitation could be spurred by regional growth in some surrounding communities. Because year-to-year population data are not available directly following ski area expansion, it is also possible that the increase in visitation could be more correlated with the expansion than with population growth. The Forest Service understands that the EPA recommends considering the potential for induced growth from this project, as well as the indirect environmental impacts from that growth, as part of the cumulative effects analyses. A project could be considered to have growth-inducing effects if it 1) either directly or indirectly fosters economic or population growth or the construction of additional housing in the surrounding area; 2) removes obstacles to population growth; 3) requires the construction of new facilities that could cause significant environmental effects; or 4) encourages and facilitates other activities that could significantly affect the environment, either individually or cumulatively. Growth-related impacts are those that occur later in time or are farther removed in distance, but that are still reasonably foreseeable. The Forest Service has considered the above criteria and has determined the following: 1. The project would not result in substantive economic growth or housing construction (see response #64 regarding assessment of economic changes from the previous ski area expansion). 2. The project would not alter current obstacles to population growth. 3. The project would not significantly affect the environment (see Chapter 3 of the DEIS), once mitigation and other design features are implemented. 4. The project would not encourage other activities that could significantly affect the environment (see item 1). Therefore, analysis of growth-inducing effects is not included in the FEIS.

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
64	3.7 Socioeconomics: Induced Growth	49-33	The EPA recommends that the Final EIS assess whether the project would have indirect effects associated with induced growth around the Lookout Pass Ski and Recreation Area. Growth can affect land use, habitat and resources. If approved, this would be the second expansion to have occurred in 13 years, and the Draft EIS indicates an expectation for increased visitation and economic growth. Analyzing what growth likely occurred as a result of the first expansion would be informative for such an analysis.	<p>Section 3.7.4.3.2 of the DEIS discloses that although ski expansion under any action alternative would likely increase visitation by 20%, resulting in a long-term increase in visitor spending of up to an additional \$554,486, most of the new visitors would live within surrounding communities and would therefore require fewer community goods and services. Because Lookout Pass Ski and Recreation Area is, and would continue to be, a day-use operation that caters to a local market, it is not anticipated that the expansion would noticeably increase population growth or the subsequent increases in housing development, demand for public services, or economic development in the surrounding communities that can accompany such population growth.</p> <p>Subsequent to Lookout's previous ski area expansion that was constructed in 2004 and operational in 2005, Shoshone County, Idaho and Mineral County, Wyoming experienced a brief increase in the number of establishments and employees. However, the magnitude and duration of change were limited (i.e., an increase of 29 establishments in Shoshone County from 2005 to 2008 and only one new establishment in Mineral County during 2006) (U.S. Census 2016). On average, from 2005 to 2014, neither County experienced a substantive long-term increase in employment or new business creation that can be attributed to expansion activities.</p> <p>Total housing units were 7,057 and 1,961 for Shoshone County, Idaho and Mineral County, Wyoming in 2000, respectively. In 2010, total housing units were similar at 7,061 and 2,446 for Shoshone County, Idaho and Mineral County, Wyoming in 2000, respectively (U.S. Census 2016). Changes in population size as they relate to ski area expansion are addressed in response #63.</p> <p>Because of the above findings, indirect growth-related issues are not analyzed in the FEIS.</p>
65	3.7 Socioeconomics: Economic Viability	35-3	The effort to analyze the socioeconomic affects was good. It was also a bit depressing to see. As a life-long skier, it seems to show how the ski industry is struggling to survive. Small areas like Lookout Pass have it even tougher. I wish them the best of luck, but am concerned that some of the projections are overly optimistic.	<p>Sections 3.7.4.2 and 3.7.4.3 of the DEIS disclose best available knowledge regarding employment and revenue associated with the proposed ski area expansion. These data are based on historical economic growth associated with the previous expansion effort and reflect increasing visitation levels to Lookout Pass Ski and Recreation Area over the past 10 years, even with competition from surrounding area ski resorts. No change has been made in the FEIS at this time.</p>
		41-2	I also question the viability of this expansion based on the current number of ski resorts in our area.	
66	3.7 Socioeconomics: Traffic	13-2	The I-90 overpass is not adequate for present traffic and will be unsafe with increased traffic merging onto & off the freeway.	<p>Thank you for your comment. Section 3.7.4.3.4 of the DEIS discloses that visitation growth associated with the proposed ski expansion could result in up to a 5% increase in traffic during peak use days. However, vehicle incidents along I-90 have remained relatively consistent from 2005 to 2014, ranging from 281 to 435 total crashes based on an average daily traffic count of more than 17,000 vehicles, for a total crash rate of 57 crashes per 100 million vehicle-miles of travel (Idaho Transportation Department 2014). Given the low crash rate, the addition of up to 328 vehicles per day (or 65,600 vehicle-miles, assuming each car travels 100 miles, one-way) during peak winter use is unlikely to substantially alter vehicle incident rates. Over a 100-day ski season, up to four crashes are predicted along the entire I-90 corridor in Idaho. Similar data are not available for the Montana side of I-90. However, total reported crashes across all of Mineral County in 2014 was only 326. Therefore, similar crash estimates are anticipated.</p> <p>No change has been made in the FEIS.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
67	3.8 Soils: General	54-1	<p>NRCS has reviewed the Draft Environmental Impact Statement (DEIS) for the Lookout Pass Ski Area Expansion project to evaluate potential effects on the issues listed below.</p> <ul style="list-style-type: none"> I. Soil suitability and limitations II. Provisions for erosion, sediment, and dust control II. Considerations for soil and water conservation management systems IV. Water discharges V. Effects of disruption to the natural drainage patterns and severance of private land units VI. Impact on previously installed soil and water conservation management systems VII. Impacts on prime and unique farmland VIII. Impacts on ecosystems IX. Impact on other NRCS-related projects <p>Soil considerations for suitability, limitations, erosion, and sediment as well as water and ecosystem issues were analyzed through the DEIS. The proposed actions will not impact other NRCS related projects or private lands.</p> <p>No soils classified as prime or unique farmland are found within the proposed alternatives. Provisions for erosion, sediment, dust control and impacts to the ecosystem will be minimized or avoided through the installation of the design features listed in Appendix E.</p>	Thank you for your comment.
68	3.8 Soils: Productivity	49-17	<p>The basis for the Draft EIS' conclusion that there would be minimal long-term effects on soil productivity due to the Proposed Action depends on the resource protection measure in Appendix E that large woody debris would be retained on the ground, as practical. Page 93 of the Draft EIS also states that forest vegetation and soil resource design features would be implemented to maintain downed wood and snags as feasible. It appears, however, that the vast majority, if not all, of proposed activities would require that coarse woody debris and snags be removed from the forest floor; therefore, it is unclear how application of this resource protection measure would result in minimal long-term effects on soil resources. As stated in the Draft EIS, there is little downed woody debris currently present within the analysis area, which suggests that cumulative effects on soil resources may occur; however, such effects have not been considered.</p>	<p>The Forest Service does not agree with your interpretation of the EIS's findings. Section 3.8.4.2 of the DEIS discloses the following:</p> <p style="padding-left: 20px;">Proposed actions would not directly disturb any high productivity soils within the analysis area under either action alternative. Timber harvest and construction could alter or remove organic matter and woody debris present within the analysis area. But as discussed in Section 3.8.2.2.2, there is little downed woody debris currently present within the analysis area. Since any present fine organic matter and large woody debris would be retained on the ground, as practical, for sustained nutrient recycling (Appendix E), project actions would be expected to have minimal long-term effects.</p> <p>To improve clarity, the discussion in Section 3.8.4.2 of the FEIS has been slightly refined as follows:</p> <p style="padding-left: 20px;">Proposed actions would not directly disturb any high productivity soils within the analysis area under either action alternative. Timber harvest and construction could alter or remove organic matter and woody debris present within the analysis area. But as discussed in Section 3.8.2.2.2, there is little downed woody debris currently present within the analysis area. Since any present fine organic matter and large woody debris would be retained on the ground, as practical, for sustained nutrient recycling (Appendix E), project actions would be expected to have minimal additional long-term effects to downed woody debris beyond current conditions. Further, although the EIS chooses to report compliance with the regional and Forest Plans soil quality standards, this analysis is not required; soil quality standards do not apply to intensively developed sites such as developed recreation sites (FSM 2554.1, R1 Supplement 1999). This information has been added to portions of Section 3.8 in the FEIS, as applicable, to provide context for the significance of project effects to soil productivity from removal of downed woody debris and other actions.</p> <p style="padding-left: 20px;">Section 3.4.4.2.5 of the FEIS has also been revised as follows:</p> <p style="padding-left: 20px;">The Proposed Action would reduce snags and downed woody debris on roughly 25% of the analysis area. Snags and downed woody debris would not be affected on the remaining 75% of the analysis area. Based on CSE data, both action alternatives could reduce average snags per acre in the analysis area by as much as 27%.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>Downed woody debris could also be reduced by up to 30% (Alternative 2) or 20% (Alternative 3) as a result of vegetation removal. This snag and downed woody debris reduction would result in more fragmented distribution of these forest resources throughout the analysis area, because snags and downed woody debris would be completely removed from ski trails, lift corridors, access roads, and other infrastructure. The reduction in snags and downed woody debris would occur in the same discreet locations (i.e., gladed areas, cleared ski runs, and lift corridors) where stand density would be reduced. The proposed vegetation removal, including removal of snags and coarse wood, could reduce the potential for future fires to spread aggressively across the project area because canopy and surface fuels within the analysis area would have a more discontinuous arrangement than they currently do.</p> <p>The analysis area and immediate vicinity comprise an extensive landscape of lodgepole pine that regenerated following the 1910 fire. These pine stands generally comprise small-diameter trees that experienced an extensive pine beetle outbreak 10 to 15 years ago. Consequently, most of the overstory trees are dead (i.e., namely snags) (Kennedy 2016). The very high number of snags available across the surrounding landscape would make any loss of snags within the analysis area inconsequential in the surrounding landscape context. Forest vegetation and soil resource design features would also be implemented to maintain downed wood and snags as feasible.</p> <p>Additionally, although the IPNFs Forest Plan generally places an emphasis on retention of snags and downed woody debris, greater emphasis is placed on visitor safety and recreational values for actions that may alter vegetation on lands designated as Primary Recreation Areas (MA7) (see Section 3.4.3).</p>
69	3.8 Soils: Compaction	49-18	<p>It is also unclear how much compaction would be expected from activities on trails, including mechanized grooming; therefore, we recommend that the Final EIS include fuller analysis and disclosure of these effects. As stated in the Draft EIS, summer biking is currently allowed in Lookout Pass Ski and Recreation Area, and would continue to be allowed in the expansion area. Mountain biking can have a significant impact on soils; therefore, the Final EIS should include analysis of sedimentation caused by mountain biking, which could be based on modeling or available data on effects from biking in the current ski area.</p>	<p>Section 3.8.4.2.2 of the DEIS discloses potential project construction impacts to compaction from equipment or vehicle activity. Quantitative analysis of soil compaction from winter operational activities, including snow grooming, is not feasible. However, Section 3.8.4.3 of the FEIS has been updated to acknowledge the source of compaction as follows.</p> <p>Some isolated new soil disturbance could also occur from spot-grading and removal of vegetation or rock hazards, as well as maintenance of erosion control structures. Winter operations, such as trail grooming, could also result in soil compaction. The extent of these actions would be dependent on local site conditions, but would not be expected to be large enough to cause the analysis area to exceed regional and forest soil quality standards or increase the risk of soil erosion, mass failure, or sediment delivery. Additionally, the weight of winter operations equipment would be distributed over a large surface area, thereby reducing potential for soil compaction beneath the snow layer.</p> <p>Although Lookout Pass Ski and Recreation permits mountain biking on designated roads and trails within the special-use permit boundary, mountain biking use is limited (i.e., an estimated 200 trips per year) (Edholm 2016). Therefore, the FEIS has not been updated to provide estimates of sedimentation from this activity.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
70	3.10 Water Resources: INFISH Site Specific Analysis	49-5	In development of the Action Alternatives, streamside buffers were used to protect water quality and aquatic biota as prescribed by the Inland Native Fish Strategy (INFISH). The only proposed exception to this is the improvements to NFS Road 18591 within the St. Regis River 300-foot Riparian Habitat Conservation Area (RHCA) buffer designated by INFISH. The Draft EIS concludes that because the improvements are at least 100 feet away from the St. Regis River and therefore would not affect Interim Riparian Management Objectives (RMOs), this site-specific exception would be allowable. However, INFISH also requires that a watershed or site-specific analysis be done in order to establish a site-specific RMO, unless watershed or stream reach specific data support making the change by amendment. The EIS does not specify whether there is a site-specific analysis supporting the use of a 100 feet of buffer to protect against adverse effects. INFISH also states a finding that 200-300 foot riparian filter strips are generally effective at protecting streams from sediment from non-channelized flow. Therefore, we recommend that a watershed analysis be done or other site-specific data be included to demonstrate what width of buffer would be protective.	As stated in the DEIS, "NFS Road 18591 reconstruction would occur within 300-foot RHCA of the St. Regis River, but a 100-foot vegetation buffer would remain between the road prism and the St. Regis River during construction activities." To clarify, the 300-foot RHCA width is not being changed. The reference to the 100-foot vegetation buffer was used to provide information to the reader that a vegetated portion of the landscape remains between these proposed activities and the stream. INFISH and Forest Plan direction for the IPNFs and LNF is to avoid adverse effects to inland native fish through several measures, but it does not prohibit the proposed activities within an RHCA. There is not a site-specific exception being requested or employed, and there is no need to complete a watershed analysis for the reconstruction of an existing road in an RHCA. Site-specific analyses of this road's effects are included in the FEIS in sections 3.10.4.2 and 3.10.4.3.
71	3.10 Water Resources: Net Beneficial Impacts to Water Quality	45-1	On behalf of the Montana Department of Environmental Quality (DEQ) Nonpoint Source water quality program, I strongly encourage the Lolo National Forest to address the potential long-term water quality degradation in a more comprehensive manner in order to provide a net beneficial impact to water quality. These comments are specific to the St. Regis River and the applicable contributing watershed, St. Regis River Headwaters (HUC 170102040801), in Montana. Water quality in the St. Regis River is currently impaired by sedimentation/siltation, temperature, alteration in stream-side or littoral vegetative covers, and other flow regime alterations. These causes all affect the river's ability to support aquatic life and cold water fisheries. The main sources of the impairments are loss of riparian habitat, roads, bridges, and channelization. Total Maximum Daily Loads (TMDLs) have been written for temperature and sedimentation/siltation, the pollutant causes of impairment. The St. Regis Watershed TMDLs and Framework Water Quality Restoration Assessment details the sources and necessary load reductions for pollutants and describes a restoration approach for addressing the non-pollutant, riparian habitat and flow alteration, causes of impairment. In order to fully support the aquatic life beneficial use, significant water quality improvements within the watershed will need to be made.	The Forest Service appreciates your comments and supports ongoing efforts to address water quality issues in the St. Regis watershed. However, the Forest Service believes that requiring a net beneficial impact exceeds regulatory requirements given that the project would have a negligible impact on water resources. Section 3.10.4.2.1 of the DEIS clearly states that with the exception of one tributary (CA2), no sediment from construction surface disturbance would enter perennial streams. Because Tributary CA2 is greater than 1 mile away from the South Fork Coeur d'Alene River, dilution of this sedimentation over a distance would result in no sedimentation impacts to the fish-bearing river. Although culverting of Tributary SR2 at the present ford along NFS Road 18591 could temporarily produce sediment pulses downstream in Tributary SR2 and potentially in the St. Regis River during the several-day installation period, research indicates that increases in sediment and turbidity caused by culvert installation decrease with distance downstream, and became undetectable by approximately 0.5 mile (Foltz et al. 2008). Also, this effect would be short lived, with 95% of sediment released within 24 hours of completing the installation. Further, installation of the culvert would, over the long term, eliminate intermittent sedimentation associated with vehicle traffic crossing the current low water ford at that location. In regard to watershed hydrology concerns, Section 3.10.4.2.1 of the DEIS discloses that the St. Regis River Headwaters subwatershed would increase by 0.06%, whereas water yield in the Little North Fork-South Fork subwatershed would increase by 0.14%. On a watershed scale, these small yield increases would not be substantial enough to cause an elevated risk for channel degradation; specifically, combined with existing water yield (estimated at 5.4% for the St. Regis Headwaters subwatershed), water yield increases would not exceed the general significance standard of a 10% increase in yield above baseline conditions. Similarly, Section 3.10.4.2.1 of the DEIS notes that no vegetation would be removed along the banks of the St. Regis River, and therefore no decrease in shade or increase in temperature would occur. Similarly, removal of trees at 100 feet or more from the river would be unlikely to change recruitment of large woody debris into the St. Regis River system. These findings indicate that there would be no significant impact to water resources within the RHCA for the St. Regis River. Proposed construction activities are not close enough to other perennial streams to affect shade, temperature, or recruitment of large woody debris in those areas. Because the project would not contribute to the further degradation of the
		45-4	The DEIS modeled assessment of the proposed actions shows limited to no effects on the water quality from sediment in the St. Regis River with the application of all best management practices (BMP). We agree that application of BMPs will reduce potential negative impacts; however, given the scope these activities, there will be an effect on watershed hydrology and potential thermal (temperature) and sediment loading to the St. Regis River and its tributaries. Given the impaired status of the St. Regis River and federal and state water quality goals, it is important to have net beneficial impacts through land management activities.	
		45-5	The DEIS uses set conditions in Section 3.10.4.1.3 to evaluate the significance of actions based on their likelihood to impair beneficial uses of the stream. Beneficial uses in the St. Regis are already impaired. Section 3.10.1 of the DEIS recognizes the potential extent of impacts beyond the project's footprint, stating that "assessment and management of water resources at a watershed scale is important to ensure that desired water conditions are maintained." However, maintenance of an already impaired condition does not seem to be a sufficient standard to apply to this project. The Lolo National Forest Plan (Plan) articulates in several places the need to have beneficial impacts to water resources. One of the eight stated goals for forest wide management is to "meet or exceed State water quality standards." The water quality standards section (Section E(14-28)) of the Plan addresses this goal specifically stating that best management practices (BMP) will be applied to guarantee that "water quality is maintained at a level that is adequate for the protection and use of the National Forest and that meets or exceeds Federal and State standards." The St. Regis River is not meeting state standards. Table WR1 in the DEIS further points out that one reach assessed near the project area (close to the confluence with SR2) does not meet three of four identified Forest RMOs: number of pools, width to depth ratio, and percent undercut banks. Montana has narrative criteria for sediment, which does not allow for harmful or undesirable conditions related to increases above naturally occurring levels. For temperature, the maximum allowable increase over naturally occurring temperature (which in the case of the St. Regis River is less than 67° Fahrenheit) is 1°F and the rate of change cannot exceed 2°F per hour. Administrative Rule of Montana (ARM) number 17.30.602(19) defines naturally occurring as "conditions or material present from runoff or percolation over which man has no control or from developed land where all reasonable land, soil, and water conservation practices have been applied." Number 17.30.602(24) goes on to define reasonable land, soil, and water conservation practices as "methods, measures, or practices that protect present and reasonably anticipated beneficial uses. These practices include but are not limited to structural and nonstructural controls and operation and maintenance procedures. Appropriate practices may be applied before, during, or after pollution-producing activities." Adhering to BMPs during project implementation and ensuring their effectiveness as an ongoing practice will assist in reducing the impacts to water quality. As described in the TMDL for the St. Regis, culverts on roads within the project area or associated with the project should be installed or replaced to meet the 100-year stream flow recurrence interval in order to reduce the risk of sediment loading from culvert failures. All logging activities should apply an adequate buffer (at least 100 feet) and adhere to the Streamside Management Zone Law. However, beyond implementing BMPs to reduce the impacts of proposed activities, the Forest Service	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			should further ensure that water quality within the St. Regis River is improving. The Lola NF Plan supports these actions by indicating that project analyses should "identify existing opportunities to mitigate adverse effects on water-related beneficial uses, including capital investments for fish habitat or watershed improvement."	St. Regis River, no change has been made in the FEIS.
		45-7	The Lola National Forest has been a key partner in addressing water quality issues in the St. Regis watershed and would be able identify many additional projects to mitigate the impacts proposed ski area expansion. In addition, the Lola has demonstrated a willingness to support and implement similar projects, such as the Cedar Creek road relocation and instream habitat enhancement project. DEQ's Watershed Improvement Section is available to provide technical and financial support to projects that address nonpoint sources of pollution. Stakeholders within the watershed are beginning to develop a watershed restoration plan (WRP). A completed WRP will enable DEQ's Watershed Improvement Section to financially support projects, such as the one described above, through Clean Water Act section 319 project funding. More importantly, the WRP will provide a comprehensive approach for eliminating the causes of impairment to restore beneficial uses to the St. Regis River. As a major landowner in the watershed, the Lola National Forest can lead in this effort by showing net beneficial impacts to projects such as the Lookout Pass Ski Area expansion. The purpose for this project is to provide a high-quality downhill skiing recreation opportunity on the Idaho Pan Handle and Lola National Forests. The proposed action and alternative 3 will likely meet this objective and improve skiing opportunities. However, these actions, including increased road and parking construction, permanent clear cutting, and new building construction will have an impact on watershed hydrology, sediment delivery, and water temperature. The Montana DEQ strongly urges the Lola National Forest to pursue opportunities in conjunction with this project to improve watershed resources in addition to application of all BMPs.	
		45-8	The purpose for this project is to provide a high-quality downhill skiing recreation opportunity on the Idaho Pan Handle and Lola National Forests. The proposed action and alternative 3 will likely meet this objective and improve skiing opportunities. However, these actions, including increased road and parking construction, permanent clear cutting, and new building construction will have an impact on watershed hydrology, sediment delivery, and water temperature. The Montana DEQ strongly urges the Lola National Forest to pursue opportunities in conjunction with this project to improve watershed resources in addition to application of all BMPs.	
72	3.10 Water Resources: Net Beneficial Impacts to Water Quality	45-6	There are several opportunities in close proximity to the project area that could mitigate potential adverse effects and move toward net benefits to water quality and natural stream functioning. One opportunity is the removal and restoration of Forest Road #4307 (route #7896), which runs over a mile along the St. Regis River (see attached map) and impacts riparian areas along several sections. It also runs parallel to an upland road (Forest Road #4285/RTE# 4208 and Forest Road#4378/RTE# 4208) making it fairly redundant. Forest Wide standard 52 of the Lola National Forest Plan states that reducing stream sediment in streams is one of the primary benefits to be considered for road management. While this section of road is paved, reducing active erosion from the road bed, its location within the flood prone riparian area inhibits natural stream and floodplain functions that would buffer upland activities, reduce excessive instream sedimentation, increase effective stream shade conditions, and increase the source of large woody debris.	The Forest Service appreciates your comments and supports ongoing efforts to address water quality issues in the St. Regis watershed. However, the Forest Service believes that requiring mitigation to support a net beneficial impact exceeds regulatory requirements. Additionally, those roads identified in this comment letter (FS #4208 and #4307) where it is recommended that actions be implemented to improve water quality are located outside of the permit area. Please see our response to your net benefit comment above (in response #71) for further rationale.
73	3.10 Water Resources: Wording Edits	24-5	Concerning the wording of the second sentence in the third paragraph on page 165, could it be changed to read: "However, all impacts to wetlands and other waters of the U.S. are considered long term because once these resources have been filled or altered, their functions and services are considered lost or changed until restoration efforts have been implemented and recovery has subsequently been completed." I'd recommend changing the wording of the second sentence of the third paragraph on page 188 to read as follows: "Disturbance to the tributary itself (within the banks) will require permitting under both the CWA and Idaho Stream Channel Protection Act."	Thank you. The FEIS has been updated to reflect your proposed wording revisions.
74	3.10 Water Resources: Stream Disruption	7-5	And will there be any stream disruption from the trails or not? This was not clear in the report.	Section 3.10.4.2.1 discloses the potential effects to water yield and water quality for the St. Regis River, Coeur d'Alene River, and six tributaries from construction of the proposed ski trails, roads, and other project infrastructure. The DEIS states that yield increases would not be substantial enough to cause an elevated risk for channel degradation. Additionally, with the exception of one tributary (CA2), because of adequate vegetation buffers between disturbed areas and perennial streams (ranging from 300 to 1,200 feet), no sediment would enter perennial streams from construction surface disturbance. No change has been made in the FEIS.
75	3.10 Water Resources: Snowfall and Snowpack	23-2	There's a reference to annual snowfall of around 250". We average about 400". Our current snowfall to date for the 2015-2016 winter season is 308", which is during an El Nino season.	Section 3.10.2.1.1 of the FEIS has been revised to incorporate this snowfall data and to provide historical trends.
		49-19	The Draft EIS states that between 1938 and 2015, the ski area received an average of 264 inches of snow per year. Since averages over an extended period of time have limited usefulness, we recommend looking at trends in snowpack in the ski area over a similar period of time. Furthermore, when we accessed the Western Regional Climate Center's website, which is the	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			reference provided in the Draft EIS for the stated average of 264 inches of snow per year, data were only available for years 1940 - 1958, and additional constraints based on maximum allowable numbers of days for which data are missing would reduce that to years 1943-1946 and 1948-1957. Using data from the U.S. Department of Agriculture's Natural Resources Conservation Service Water, it can be determined that between 1955 and 2015, snowpack measured on or near April 1 decreased in the Lookout Pass Ski Area by 36% (data downloaded from https://www3.epa.gov/climatechange/science/indicators/snow-ice/snowpack.html on April 7, 2016).	
76	3.10 Water Resources: Peak Flow	7-2	Also with unprotected slopes I assume that melting would happen more rapidly. You should consider the impacts of a changing melting process in the spring and how it would affect the small streams in the area.	<p>Section 3.10.4.2.1 of the DEIS discloses potential impacts to peak flow. Within the "stream buffers and PIBO Parameters" header within the same section, the DEIS discloses potential project impacts to shade, temperature, and woody debris within affected streams and tributaries from vegetation removal.</p> <p>Section 3.10.4.2.2 of the DEIS discloses that up to 1 acre of trees and large shrubs would be removed within Wetland B for ski trail construction. However, this removal would occur over 800 feet or more from the St. Regis River. Therefore, there would not be temperature effects to the St. Regis River from the wetland alteration.</p> <p>As noted by one commenter, removal of vegetation can change the dynamics of snowmelt, potentially changing the timing of peak flows in downstream waters during snowmelt events. The potential magnitude of this change in the timing of peak flows is governed by the percentage of the watershed being disturbed by project activities. These percentages are shown in Table WR7 of the DEIS, and are 0.06% and 0.14% for the St. Regis River Headwaters and Little North Fork-South Fork subwatersheds, respectively. These small percentages are unlikely to result in perceptible changes in the timing of peak flows in downstream waters due to more rapid melting. No change has been made in the FEIS.</p>
		45-3	The proposed Forest Service action calls for the net addition of 0.5 miles of permanent road as well as 1.4 miles of temporary road, permanent clear cut of 100 acres for new ski trails (including areas surround a wetland), construction of a new restroom, maintenance shop, and ski patrol building; and the addition of 130 new parking spaces. Some portion but not all of these modifications will occur in the St. Regis watershed. Each has the potential to incrementally decrease watershed functions through loss of productive topsoil in construction of roads, parking areas, and facilities; through loss of mature trees; and through increased impacts to wetlands and headwater sources. The Draft Environmental Impact Statement (DEIS) does not address potential impacts to temperature associated with clear cutting in and around Wetland B as well as the timing of runoff and effects on base flow contributions as a result of upland clearing.	
77	3.10 Water Resources: WEPP	49-2	Page 180 of the Draft EIS states that the WEPP-modeled increase of 0.04 ton of sedimentation into tributary CA2 is the result of a ski trail crossing, a culverted road crossing and a buried power line, while Appendix J only states that the disturbance from a ski trail crossing of tributary CA2 was analyzed. Please clarify or reconcile these apparent inconsistencies, and if the road and power line crossings were not modeled, we recommend that they be. Also, Tables WR8 and WR10 display the data as 0.04 tons/acre and 0.004 tons/acre, while in the text of the document, the data is stated as 0.04 ton and 0.004 ton. It is therefore unclear how to interpret the data, and we recommend that the Final EIS disclose if the area to be disturbed is less than or equal to one acre or make corrections to the text, as well as clarify the time period to which these data are normalized.	Thank you for your comment. The FEIS text in Section 3.10.4.2 has been revised to clarify that sediment yield is in tons per acre per year.
78	3.10 Water Resources: Peak Flow	49-4	In section 3.10.4.2.1 (page 178), the Draft EIS qualitatively analyzed potential impacts from peak flows in tributaries in the analysis area, but not to the St. Regis or South Fork Coeur d'Alene River. This is of interest since transport of bedload sediment due to increases in peak flows would be more likely for rivers than high gradient streams. Therefore, we recommend that the Final EIS include qualitative analysis of impacts from increased peak flow for these two rivers in the analysis area.	<p>The water resources analysis area defined in the DEIS includes a much larger area than just the project disturbance and the immediate small tributary streams, and includes both the St. Regis River and the South Fork Coeur d'Alene River (p. 164–166). Neither of these waterbodies is excluded from analysis in the DEIS, and the significance criteria described in the DEIS are applicable to both of these waterbodies (p. 177–178). The peak flow analysis specifically applies to both of these waterbodies as the ultimate receiving waters for each subwatershed. The conclusion contained in the DEIS (p. 179) is as follows:</p> <p style="padding-left: 40px;">On a watershed scale, these small yield increases would not be substantial enough to cause an elevated risk for channel degradation; specifically, combined with existing water yield (estimated at 5.4% for the St. Regis-Headwaters subwatershed), water yield increases would not exceed the general significance standard of 10% increase in yield above baseline conditions.</p> <p>No change has been made in the FEIS.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
79	3.10 Water Resources: Stream Morphology	49-3	While the Draft EIS considers the effects of ski trail and culvert installation and crossing of the buried power line on sediment loading into tributary CA2, it is not clear if the construction and use of the ski trail could affect the morphology of tributary CA2. We recommend that any potential impacts be disclosed in the Final EIS. We also recommend that the permitting requirements related to the crossings of CA2 be included in the Final EIS.	<p>See DEIS page 179 citing Grant et al.'s (2008) findings regarding changes to channel morphology of small streams (streams with gradients greater than 10%). Also, changes to downstream morphology of a stream result, in part, from changes in sediment load to the stream. Change in sediment load is analyzed for Tributary CA2 in the DEIS (p. 180). With the implementation of specific BMPs designed to reduce sediment load, the DEIS concludes "These measures would reduce the potential impacts from sediment movement into CA2 to a level unlikely to impair beneficial uses of the stream or harm wildlife; therefore, sediment movement into tributary CA2 is not considered a significant impact." This conclusion would apply to changes in downstream morphology from sediment movement as well and is added as a new conclusion in section 3.10.4.2 following the previous statement.</p> <p>Prior to "Therefore, culvert installation at CA2 would not result in significant adverse effects" at the end of the "Culvert Installation" section on DEIS p. 181, this text has been added:</p> <p style="padding-left: 40px;">Because the Tributary CA2 crossing (2 culverts) would be designed according to Forest Service standards, no culvert impacts (headcutting, culvert failure, and inlet/outlet influences) to stream geomorphology would occur. Culvert installation will involve direct channel manipulation, but after several peak flow events, the stream geomorphology downstream of the stream crossing would return to its condition prior to the installation of the culverts.</p> <p>Regarding impacts to Tributary CA2 from vegetation removal, Section 3.10.4.2.1 of the FEIS has been revised as follows:</p> <p style="padding-left: 40px;">Construction surface disturbance under Alternatives 2 and 3 would involve vegetation removal within the 150-foot-wide RHCA for Tributary CA2 and would therefore reduce shade, increase temperature, and reduce large woody debris along a 120-foot-long segment of the stream. However, this segment represents less than 2% of the 10-foot-wide, 7,100-foot-long tributary segment that leads over 1 mile away to the fish-bearing South Fork Coeur d'Alene River. As a result, potential changes in shade, temperature, and woody debris from vegetation removal would likely not be substantial enough to degrade aquatic habitat beyond the localized Tributary CA2 crossing. Impacts would not extend to the point where Tributary CA2 joins the South Fork Coeur d'Alene River (due to the remainder of the stream corridor having intact RHCA over the 1-mile distance); therefore, effects are not considered significant.</p> <p>A discussion of permitting requirements is provided in Section 3.10.4.5.1.</p>
80	3.10 Water Resources: Stream Buffers	24-3	The third paragraph on page 181 mentions the removal of vegetation within the 100-foot-wide buffer area established for tributary CA2. Buffer areas normally preclude vegetation removal activities. If this tributary's buffer area is legitimate, vegetation removal and other possible disturbances should not be allowed in it.	Section 3.10.4 of the FEIS has been revised to incorporate an analysis of project actions within the 150-foot RHCA surrounding Tributary CA2.
81	3.10 Water Resources: Weed Treatment	49-28	Since herbicide use will be restricted within 100 feet of tributary CA2 to protect aquatic species, it would be useful to know if mechanical methods of weed removal would be used instead. If not, we recommend that effects of this restriction on noxious weeds be disclosed.	Noxious weed treatment in the project area will be guided by Lookout Pass Ski and Recreation Area's summer operations plan that will establish protocols and expectations for treatment activities. These may include a combination of herbicide application and mechanical control actions, in addition to spill control and storage protocols. Where noxious weed treatment may be implemented adjacent to waterbodies or sensitive habitats, mechanical treatment will be used.
82	3.10 Water Resources:	24-4	The second sentence of the second paragraph on page 188 reads: "However, guidance envisions that site-specific assessments	This sentence has been revised in the FEIS to state "However, INFISH envisions that site-specific assessments can be made when disturbance

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
	Wording Edit		..." What's the source for this guidance?"	occurs within an RHCA to assess whether the actions are compliant."
83	3.10 Water Resources: Groundwater Modeling	49-16	Where forest roads are cut into a slope, they can potentially intersect shallow groundwater, and a seepage face then forms along the road cut. This causes the groundwater flow to be redirected, occurring as surface water in ditches rather than as shallow subsurface flow. Such an alteration can influence the timing and magnitude of peak flows because the surface water moving through ditches typically reaches a stream more rapidly than subsurface water does. The interception of shallow groundwater may also reduce groundwater flow to downslope environments (e.g., vegetation, springs and seepage areas). If practical, we recommend mapping groundwater flow and estimating the groundwater portions of a hydrologic budget to assess the potential of road construction to impact groundwater. This information can be used to determine proper road placement to avoid adverse effects on groundwater flow and/or causing locally saturated conditions.	<p>The Forest Service appreciates your comments but believes that groundwater mapping and modeling exceed the level of effort required to evaluate and disclose surface and groundwater flows and timing for the Lookout Pass Ski Area Expansion EIS. Section 3.10.4.2.1 of the DEIS currently discloses that surface-disturbing construction activities (such as road construction) would increase total water yield (aka surface and subsurface outflow) by only 0.06% in the St. Regis River Headwaters subwatershed and by 0.14% in the Little North Fork-South Fork subwatershed.</p> <p>Depth to groundwater in the analysis area is highly variable, as is to be expected for this type of geology; some areas clearly exhibit shallow groundwater that supports wetland areas or surface water, whereas other available hydrologic data indicate groundwater levels over 100 feet below ground surface. The potential for road construction to potentially impact wetlands by exposure of groundwater is disclosed in the DEIS (p. 187), but further analysis of potential impacts by specific roads cannot be reasonably modeled or analyzed.</p>
84	3.10 Water Resources: Consultation	49-1	The EPA considers aquatic resources to be among the most important issues to be addressed in the NEPA analysis for these types of project activities. The Draft EIS discloses that there will be long-term impacts to wetlands, riparian areas and streams associated with the Action Alternatives. Since the St. Regis River and the South Fork Coeur d'Alene River have been impaired by sediment and temperature increases, it will be important to coordinate with the Montana and Idaho Departments of Environmental Quality in order to ensure that project activities are consistent with the Total Maximum Daily Loads for these rivers.	Thank you for your comment. Included in the EIS is a detailed analysis of potential impacts to water resources, including water temperature and sediment within waterbodies within the project area. The Forest Service will continue to work with all relevant federal and state agencies, including the Montana and Idaho Departments of Environmental Quality, to provide ongoing management of Forest Service natural resources.
85	3.10 Water Resources: Wetland Mitigation	49-9	For any unavoidable impacts to wetlands, we recommend that the Forest Service offset such impacts through in-kind compensatory mitigation. We recommend the Final EIS identify potential mitigation sites as close to the impacted area as possible, preferably within the effected sub-watershed.	<p>The Forest Service believes that no compensatory mitigation is warranted for the Lookout Pass Ski Area Expansion EIS. Compensatory mitigation is required to replace the loss of wetland, stream, and/or other aquatic resource functions. However, no fill of wetlands would occur, and wetland function would not be lost. Wetland B does not support any known rare plant or sensitive aquatic species populations. Similarly, the area proposed for large tree removal (associated with ski trail development) does not contain vegetation, soil, or hydrologic features unique within the wetland.</p> <p>The DEIS provides further rationale that the alteration of 1 acre (9%) of the 11-acre Wetland B is not significant because of the following:</p> <p>Low-impact yarding would be used to remove trees and shrubs, while avoiding soil compaction. No surface disturbance or wetland fill would occur in Wetland B for the creation of the two new ski trails. (pp. 83 and 216 of the DEIS).</p> <p>Under the action alternatives, this 1-acre alteration would not substantially affect the wetland's ability to provide rare plant and sensitive aquatic species habitat – regarding the functions and services provided by this wetland – and would not likely contribute to a trend toward federal listing or cause a loss of viability to rare or sensitive populations or species:</p> <p>Section 3.6.4.2.1 discloses that 1 acre of rich fen (rare plant habitat) would be affected. Rare plant field surveys were conducted, and no rare or sensitive plants were observed in this habitat.</p> <p>Section 3.11.4.2.4 discloses this alteration of 1 acre of sensitive aquatic species' habitat. During field surveys, no sensitive aquatic species were observed in this habitat, and individuals in the area during active tree removal (construction) could move to the unaffected 10 acres.</p>
		49-11	The Draft EIS concludes that alteration of Wetland B would not substantially affect the functions and services provided by the wetland because the hydrologic connection (surface and subsurface water flow) would remain unchanged. Also, impacts to 9% of Wetland B is considered in the Draft EIS to be insignificant, but information is not provided to indicate that the number of acres that will be left is sufficient to avoid significant effects, including effects on rare plant and sensitive aquatic species. Therefore, we recommend further explanation of this conclusion, and if the road decommissioning across Wetland B would serve as compensatory mitigation for impacts from ski trail construction, please clarify this.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				The road decommissioning across Wetland B (p. 186 of the DEIS) would improve hydrologic connection of this wetland and could also result in net increases in aquatic habitat over time, but is not being proposed as compensatory mitigation.
86	3.10 Water Resources: Wetland Re-route	24-6	To return to the lodge and the parking lot, skiers using the new proposed facilities and runs will have to use the existing Lift 2. Skiers using the southwestern portion of the existing facilities and runs currently have to use Lift 2 to return to the lodge and parking lot. The current Rainbow run already impacts Wetland B to some degree. The proposed Dizzy Lizzy, R2C2, and Tamarack runs would further impact Wetland B. The proposed Tamarack run would be an extension of the existing Rainbow run. The Rainbow run is a done deal, but could the designers come up with routing for the proposed Dizzy Lizzy, R2C2, and Tamarack runs to avoid further damage to Wetland B while still affording skiers access to the bottom of Lift 2?	As noted in the DEIS and by one commenter, the Forest Service evaluated options to reroute two ski trails to avoid impacts to Wetland B. Because of the north-south orientation of the wetland, rerouting R2C2 to completely avoid the wetland is not feasible without requiring skiers to ski uphill. The Dizzy Lizzy trail could be rerouted north to connect into the Rainbow Ridge trail. However, this reroute would eliminate critical new novice terrain for skiers and potentially cause increased congestion and bottlenecks at the base of proposed and existing trails in the area. No change has been made in the FEIS; however, this response serves as rationale for the Forest Service's decision. The Forest Service believes that no compensatory mitigation is warranted for the Lookout Pass Ski Area Expansion EIS. Compensatory mitigation is required to replace the loss of wetland, stream, and/or other aquatic resource functions. However, no fill of wetlands would occur, and wetland function would not be lost. Wetland B does not support any known rare plant or sensitive aquatic species populations. Construction of the ski runs that intersect Wetland B may require felling of trees on the outer fringe of Wetland B; however, numerous design features specific to wetland form and function and accepted BMPs have been developed to minimize potential impacts to these sensitive habitats. These design features are listed in Appendix E. Similarly, the area proposed for large tree removal (associated with ski trail development) does not contain vegetation, soil, or hydrologic features unique within the wetland. Please see our response to comments regarding wetland mitigation in response #85 for further details.
		49-8	Both Action Alternatives would adversely impact one acre of palustrine scrub-shrub/palustrine emergent wetland (Wetland B) and less than one acre each of palustrine scrub-shrub and palustrine emergent wetlands (Wetlands A, C and D) due to terrain disturbance actions that result in the discharge of material into streams and wetlands and removal of trees and large shrubs. On page 188 of the Draft EIS, it is stated that avoidance of effects to wetlands was considered; however, no detail about this consideration is included and no mitigation is offered for these impacts to wetlands. Consistent with EO 11990 and the objectives of NEPA, we recommend that the Final EIS provide rationale as to why the proposed ski run impacting Wetland B is necessary, or could not be moved away from the wetland and still provide for a functional ski run.	
		49-10	Due to the slow rate of accumulation of peat in fens, these ecosystems are considered to be "difficult-to- replace" under the EPA's and the Corps' Final Rule for Mitigation for Losses of Aquatic Resources [33 CFR Parts 325 and 332; 40 CFR Part 230 (73 FR 19594, April 10, 2008)]. Because of the irreplaceable nature and rarity of montane fen wetland ecosystems, compensation for these wetland impacts is extremely difficult. The EPA therefore strongly recommends avoidance of these highly valued resources, and that the Forest Service consider the Mitigation Rule to protect aquatic resources even when a CWA Section 404 permit is not required.	
87	3.10 Water Resources: Wetland Mapping	49-7	The document adequately describes the wetland communities and tributary waters that are affected by the ski area expansion/upgrades. Although maps were included in the Draft EIS, the scale does not provide sufficient detail to understand the impacts to various types of wetland plant communities from proposed ski area features. Larger scale maps would more fully disclose impacts from specific ski area features and to assist with future avoidance and minimization efforts with final design. We recommend the Final EIS include 1 inch equals 100 feet scale mapping for wetland plant communities impacted by ski area features, including direct, indirect, temporary, and vegetation removal types of impacts. The location(s) of the rich fen wetland(s) mentioned in the EIS should also be included.	The Forest Service appreciates your comments but does not believe that larger scale maps are necessary to disclose potential wetland impacts. Section 3.10.4.2.2 provides a clear discussion of project impacts. No direct impacts would occur to Wetlands A, C, or D, and no wetland fill would occur in any of the wetlands in the analysis area. However, two new ski trails (R2C2 and Dizzy Lizzy) would be created within Wetland B and could result in wetland alteration. These ski trails would require the removal of up to 1 acre of trees and large shrubs, which represents approximately 9% of the total wetland area (see Figure WR3). The Forest Service's response to comments regarding the need for wetland mitigation is provided in response #85. The Forest Service has revised revise Figure WR3 in Section 3.10.4.2.2 to identify the location of the rich fen wetland.
88	3.11 Wildlife: Wolverine	32-10	The DEIS fails to provide any meaningful analysis about the effects of the project to wolverine. There are essentially two short references about wolverine in the entire document. Page 204 of the DEIS notes that the U.S. Fish and Wildlife Service decided not to list wolverine as a threatened or endangered species in 2014. However, their decision was recently overturned by the District Court of Montana. The Court found the Fish and Wildlife Service's decision ignored the best available science regarding wolverines and remanded the decision back to the agency for further consideration. A second reference to wolverines is found in Table W9 on page 217 of the DEIS. This table estimates the total acreage of wolverine habitat that will be impacted by the expansion of the ski area. However, the DEIS fails to (1) summarize the best available scientific information about wolverines and (2) given what is known about the species, the document also fails to provide any meaningful discussion about the consequences of the action alternatives to the species. The underwhelming analysis of the effects of the project to wolverine provided in the DEIS cannot be attributed to a lack of available scientific studies. In fact, several recent studies have investigated wolverine habitat associations.	Ecological information and analysis has been added to the FEIS regarding the wolverine. Section 3.11.2.3 has been edited to read as follows: The wolverine was a candidate for federal listing until 2014, when the USFWS determined that listing was not warranted (USFWS 2013). However, this decision was recently overturned by the District Court of Montana, and the decision has been returned to the agency for further consideration. For these reasons, the species is currently managed as a proposed threatened species. The wolverine occurs in a unique combination of wildlife habitat

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			<p>For example, Copeland et al. (2007) used radio telemetry data collected in Central Idaho to determine whether or not wolverines associated with specific vegetative or cover types. They determined that topographic variables (e.g. elevation) better explained the habitat used by the wolverines in their study. They also hypothesized that wolverines may have an affinity for habitats associated with persistent spring snow pack.... Aubry et al. (2007) compiled 820 verifiable records of wolverine occurrence in the contiguous U.S. dating from 1801 to 2005. A total of 729 records could be spatially referenced to the nearest township and range. They investigated whether or not vegetation, cold temperatures, or spring snow cover (April 15 to May 14) could explain the distribution of wolverine. Spring snow cover was the only variable that fully accounted for the historical distribution patterns they found. A broader circumboreal investigation of wolverine habitat associations was conducted by Copeland et al. (2010). They utilized data sets from North America and Fennoscandia, including winter telemetry locations, summer telemetry locations and 562 spatially referenced den sites. They tested the hypothesis that wolverine distribution is constrained by their obligate association with persistent spring snow cover for successful reproductive denning and by an upper limit of thermo neutrality. All of the den sites occurred at locations where snow coverage persisted from April 24 to May 15, which encompasses the end of the wolverine's reproductive denning period. Similarly, 95% of the summer telemetry locations and 86% of the winter telemetry locations occurred within the spring snow coverage. The average maximum August temperature was a less effective predictor of wolverine distribution. Based on these studies, the amount and distribution of wolverine habitat in the contiguous U.S. appears to be primarily a function of persistent spring snow pack (April 24 to May 15). Wolverines are dependent upon the availability of persistent spring snow cover for successful reproduction (Copeland 1996; Magoun and Copeland 1998; Aubry et al. 2007; Copeland et al. 2010; Inman et al. 2012). There are no records available to suggest that wolverines den at locations anywhere but in snow. While individual wolverines may occasionally pass through valley bottoms, these behaviors appear to be dispersal movements rather than foraging or reproductive behaviors (Inman et al. 2009). Therefore, the persistent spring snow cover model developed by Copeland et al. (2010) should be given special management consideration in determining habitat conservation priorities for wolverine. The proposed ski area expansion includes terrain where snow pack persists well into the late spring in most years and often into early summer. This observation would suggest that the upper St. Regis Basin and the Stevens Lakes Basin provided the habitat conditions upon which the life history of wolverines depend. Nowhere in the DEIS does the document describe the ecology of wolverines. Without this requisite "hard look", it is not possible to meaningfully describe the effects of the alternatives to the species. The Final EIS must do a better job describing the ecology of wolverines and the effects of the project to the species as required by NEPA.</p>	<p>types, as reported in Table W3. This species is analyzed at the landscape-scale, because of the species' ability to travel long distances and because of their typical large home range or territory size.</p> <p>The wolverine primarily eats carrion killed by other predators, but occasionally preys on small mammals and birds, and also eats fruits, insects, and berries. It occupies a variety of habitats throughout the year, but requires large tracts of land to accommodate large home ranges and extensive movements to search for food (Banci 1994; IDFG 2005). In the summer, the wolverine is most often found in higher-elevation, steep, remote areas, including wilderness and roadless areas. Winter foraging habitat consists of mid-elevation conifer forests. The wolverine dens in areas that are cold, have persistent spring (April 24 to May 15) snow, and where food stores may be cached (Copeland et al. 2010; USFWS 2013). Within these areas, it is typically found in north-facing high-elevation zones (Copeland et al. 2007, 2010). It is thought that persistent spring snow cover is important for denning, because den sites occur in areas with heavy snowfall; for these reasons, these areas are especially important for the continuance of the species (Copeland et al. 2010). Therefore, although the landscape-scale analysis area may be considered wolverine habitat for foraging and movement, it is unlikely the landscape-scale analysis area meaningfully contributes to wolverine reproduction.</p> <p>Threats to the species include loss of habitat, loss of connectivity between populations, displacement, climate change, and mortality (Forest Service 2013b).</p> <p>This species has been observed in the landscape-scale wildlife analysis area (IFWIS 2013), and may sporadically occur there. High elevation, north-facing zones with persistent spring snowpack occur in the landscape-scale analysis area and may support denning. However, because these animals have large home ranges (as large as 130–168 square miles), only a portion of an individual wolverine's home range would likely occur within the analysis area, although home ranges for multiple individuals may overlap (Copeland 1996).</p> <p>A programmatic biological assessment (BA) for the North American Wolverine was finalized in 2014 (Forest Service 2014e). The purpose of the programmatic BA is to describe and analyze a variety of actions routinely conducted on National Forest System lands within the Northern Region that are not likely to jeopardize the continued existence of the species. Recreational ski areas are included in the programmatic BA; therefore, the BA provides the basis for the analysis provided in this EIS.</p> <p>The following language has been added into Section 3.11.4.2.4 of the FEIS:</p> <p>As reported in Section 3.11.2.3, 292,334 acres (99%) in the landscape analysis area are considered wolverine habitat. None of this habitat (0%) would be directly impacted under the No-Action Alternative. Approximately 121 acres (less than 1%) would be directly impacted under Alternative 2, and 119 acres (less than 1%) would be directly impacted under Alternative 3.</p> <p>Areas important for wolverine reproduction consist of high-elevation, north-facing zones with persistent spring snowpack (Copeland et al.</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>2007, 2010). The persistence of wolverine reproductive habitat is important to maintain or grow local population counts. Although there is currently very little, if any, denning habitat for the species in the project area, habitat removal for the construction of high-elevation roads, ski runs, and ski lifts would reduce the availability of wolverine reproductive habitat and could discourage individuals from denning in these areas during future breeding years. However, because these animals have large home ranges (as large as 130–168 square miles), only a small portion of an individual wolverine’s home range would likely occur within the analysis area and be affected by the Proposed Action. If active dens are discovered in the project area, direct impacts to denning individuals would not occur because active dens would be protected in place until the pups disperse (see Appendix E).</p> <p>The following effects analysis is paraphrased from the programmatic BA for the North American Wolverine (Forest Service 2014e).</p> <p>Wolverine habitat is recognized to be generally inhospitable to human use and occupation because of the elevation and persistence of snow cover. It is also considered somewhat insulated from human disturbance resulting from industry, agriculture, infrastructure development, or recreation. Part of this insulation is because most wolverine habitat is federally managed in ways that must consider environmental impacts (78 <i>Federal Register</i> 23:7877, February 4, 2013). Overall, human disturbances have likely resulted in some minor, but unquantified, loss of wolverine habitat, but the wolverine has also been documented to persist and reproduce in areas with high human use and disturbance, including alpine ski areas (78 <i>Federal Register</i> 23:7877, February 4, 2013).</p> <p>The USFWS analyzed four categories of human use and disturbance that were estimated to account for most of the human activities that occur in occupied wolverine habitat (78 <i>Federal Register</i> 23:7877, February 4, 2013). The two relevant categories are addressed in more detail below with respect to the Proposed Action.</p> <p>Dispersed Recreational Activities</p> <p>These activities include snowmobiling, heli-skiing, hiking, biking, off and on-road motorized use, hunting, fishing, and other uses. The proposed rule recognizes that high recreational use may coincide with wolverine habitat in some areas, and that there may be some localized small-scale effects to wolverines in these areas. The best scientific information available does not substantiate recreational activities as a threat to wolverine (78 <i>Federal Register</i> 23:7878, February 4, 2013). Therefore, the dispersed recreational activities in the Proposed Action are not considered a threat to the North American wolverine.</p> <p>Infrastructure Development</p> <p>This includes all residential, industrial, and governmental developments such as buildings, oil and gas wells, and ski areas (78 <i>Federal Register</i> 23:7878, February 4, 2013). Such developments may affect wildlife directly by eliminating habitats, or indirectly by displacing animals from suitable habitat near developments (78 <i>Federal Register</i> 23:7878, February 4, 2013). The USFWS concludes that wolverines do not avoid human development of the types that occur within suitable wolverine habitat and that there is no</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>evidence that wolverine dispersal is affected by infrastructure development (78 <i>Federal Register</i> 23:7878, February 4, 2013). It further states that there is no evidence that human development and associated activities are preventing wolverine movements between suitable habitat patches (78 <i>Federal Register</i> 23:7878, February 4, 2013). The proposed actions related to infrastructure maintenance and developments are not a threat to the North American wolverine.</p> <p>Determination</p> <p>Based on concurrence from USFWS that dispersed recreational activities and infrastructure development are not a threat to the species (Forest Service 2014e) and implementation of design features to protect dens, any of the proposed alternatives would not jeopardize the continued existence of the North American wolverine.</p>
89	3.11 Wildlife: Species Specific Habitat	49-23	The Draft EIS frequently cites the availability of adjacent or other habitat or linkage areas as a basis for limited effects on wildlife from the Proposed Action. We recommend that this be further analyzed, with consideration of preferred areas or challenges of changing location, for example, for nesting birds or animals denning in snags at the time of timber harvest. The Draft EIS contains no analysis of the effect of reduced snags on wildlife habitat and sustainability (e.g., for fisher, pileated and black-backed woodpeckers, and rodents and their predators).	<p>The species included for analysis in the DEIS were divided into groups to be analyzed on differing spatial scales, depending on the size of the home range and propensity for movement of each species. These spatial scales are defined in Section 3.11.1.2 of the DEIS, and the species groups are displayed in Table W1 of the DEIS. Because the "migratory bird" group includes a diverse range of species and ecological adaptations, it is analyzed at both the project and landscape scales. The Forest Service believes the comparison of affected habitat vs. available habitat within the appropriate landscape scale, as provided in Tables W8, W9, and W10, is a sufficient analysis to provide context for the availability of habitat outside the affected area.</p> <p>However, the following design feature was added into Appendix E of the FEIS:</p> <p>To the extent possible, if fisher or wolverine dens are detected within construction areas, direct mortality of current year recruitment could be avoided by conducting activities in potential denning habitat outside of denning periods.</p> <p>The following analysis regarding the effects of snag reduction has been added into Section 3.11.4.2.6 of the FEIS:</p> <p>Respectively 11% or 12% of available black-backed woodpecker habitat would be impacted by the action alternatives because the species is restricted to narrower habitat requirements and would experience effects at the project scale. As part of this habitat loss, 9 acres (Proposed Action) or 17 acres (Alternative 3) would be gladed, removing individual beetle-infested trees. Beetle-infested trees serve as nesting, perching, and foraging habitat for this species. The project area and immediate vicinity comprise an extensive landscape of lodgepole pine that regenerated following the 1910 fire. These pine stands are generally small-diameter trees that experienced an extensive pine beetle outbreak 10 to 15 years ago. In many areas, most of the overstory trees are dead, namely snags (Kennedy 2016). Snags are most valuable for black-backed woodpeckers during the first to fifth years following the death of the trees, when the food source is most abundant. The 10- to 15-year-old snags present in the analysis area are past that age and no longer constitute high-quality foraging habitat. The small-diameter size of current snags also provide little nesting habitat for cavity-nesting species.</p> <p>Snags are important habitat features for not just black-backed woodpeckers, but also for fishers (denning), bats (day, night, and</p>
49-24	The Draft EIS contains no analysis of the effect of reduced snags on wildlife habitat and sustainability (e.g., for fisher, pileated and black-backed woodpeckers, and rodents and their predators).			

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>maternity roosting), and other small mammals and squirrels. Snags also serve as important food sources for fishers and wolves. The current snag count in the proposed ski expansion area, as reported in Section 3.4.2.2.5, is an average of 22 snags per acre. Tree removal for the creation of roads and ski trails under both action alternatives would reduce the available snags to an average of 16 snags per acre, or a decrease of 27% of available snags (Table FV11). A reduction of snag density under either action alternative would lower the local habitat quality for these species, and potentially displace individuals into other areas with available snags.</p> <p>Direct impacts to breeding bats (<i>Myotis</i> species) could occur if maternity roost trees (including snags) are removed during the time period when bat pups are unable to fly, which is typically approximately 4 to 6 weeks during mid-summer. The species of sensitive bat that could occur in the landscape analysis area create maternity roosts singly or in small groups under loose or shaggy bark or in tree or rock cavities and crevices. Because these maternity roosts are distributed widely across the landscape, and because of the short time period when the pups are unable to fly, it is unlikely a large number of individuals would be affected by tree removal. Avoidance of direct impacts to bat pups is difficult because of the high level of effort needed to find the location of each maternity roosting location.</p>
90	3.11 Wildlife: Traffic	49-26	<p>The Draft EIS predicts that traffic will increase by approximately 5% during the ski season as a result of either Action Alternative, and concludes that this increase will result in minimal direct effects due to it being a relatively small increase over existing conditions. We recommend that cumulative transportation effects be specifically considered, including project effects and other reasonably foreseeable growth in traffic. If cumulative effects are anticipated, we recommend that the Forest Service consider mitigation for effects of increased traffic, e.g., through identification of wildlife movement corridors and construction of wildlife crossing structures to restore ecological connectivity and prevent wildlife- vehicular collisions.</p>	<p>Identification of wildlife movement corridors and construction of wildlife crossing structures to mitigate highway traffic would fall under the responsibility of the state transportation departments, and is out of the scope of this project. However, the Forest Service has updated Section 3.11.4.4 of the FEIS with the following language to consider, qualitatively, how cumulative traffic impacts could affect area wildlife:</p> <p>Section 3.7.2.5 discloses I-90 traffic patterns recorded over the past two decades. These trends show a gradual increase of traffic that is consistent with population growth trends in the region. Identified reasonably foreseeable projects (see Appendix D) predominantly emphasize biological goals that would not lead to increased traffic activity above normal growth trends. However, implementation of the Recreation Events 5-year Permits and Summer Trails Motorized Management projects could result in traffic changes. Quantifying the exact increase in traffic attributable to these management projects is not feasible because improvements to ATV/OHV trails could result in both local and nonlocal visitation; however, recreation events would likely generate high-volume but temporary traffic impacts. This traffic increase coupled with the projected traffic increases from increased visitation at Lookout Pass Ski Area and typical growth patterns on I-90 could increase potential for wildlife to be struck by vehicles and could decrease the permeability of the highway to wildlife movement. Cumulative traffic increases over time could impact populations of wildlife that are susceptible to vehicle strikes and road avoidance, especially if pulses of high traffic activity are timed with sensitive seasons for specific species, such as breeding or migration. However, an existing passage under I-90 approximately 2 miles southeast of the ski area where the abandoned Northern Pacific railroad crossed under the interstate has documented wildlife usage and would continue to provide passage for some wildlife individuals (Kennedy 2016).</p>
91	3.11 Wildlife: Grizzly Bear	49-27	<p>The Draft EIS discloses that approximately 126 to 129 acres of vegetation removal would occur in the Lookout grizzly bear linkage zone. The Draft EIS indicates this removal accounts for less than 1% of existing habitat in the grizzly bear "action area", which is</p>	<p>The 126 to 129 acres of vegetation removal refer to vegetation removal within the entire action area, and not just in the linkage area. It would be</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
	Linkage Zone		larger than the Lookout linkage zone. For determining significance of effects to the project area, it may be appropriate to disclose the percent of the Lookout grizzly bear linkage zone being altered by vegetation removal.	misleading to define the percentage of vegetation removal from the project solely within the linkage area because the boundary of the linkage area is not clearly defined in Servheen et al. 2001. Its outer western and eastern edges are portrayed on a map, but it is not defined as a polygon with which acres of a linkage area can be calculated. The overall percentage of vegetation removal compared with the size of the action area is the most accurate contextual information that can be conveyed. No changes were made to the FEIS.
92	3.11 Wildlife: Lynx and NRLMD	32-11	The DEIS does a better job describing the ecology of lynx. However, it fails to describe whether or not the action alternatives are consistent with the Northern Rockies Lynx Management Direction ("NRLMD"). The NRLMD is an amendment to the Forest Plan for the Lolo National Forest and was incorporated by reference in the 2015 Revised Forest Plan for the Idaho Panhandle National Forests. The NRLMD is referenced on Page 197 of the DEIS, but nowhere is the document where the relevant goals, objectives, standards, guidelines and monitoring requirements described and whether or not the actions alternatives meet these requirements. The Final EIS must describe whether or not the action alternatives satisfy the NRLMD. Furthermore, the Final EIS must describe how the monitoring requirements of the NRLMD will be fulfilled.	Analysis of project compliance with relevant NRLMD goals, objectives, standards, and guidelines was conducted as part of the BA. This analysis is included as Appendix N in the FEIS. The Forest Service will conduct monitoring in compliance with Forest Plan monitoring requirements (Section 2.8 of the DEIS). The IPNFs and LNF will also be responsible for any project-specific monitoring necessary to ensure compliance with the implementation of project BMPs, as well as any provisions established in timber sale or construction contracts.
93	3.11 Wildlife: Lynx and Parking	49-25	The adverse effects of the planned parking lots on the lynx linkage within the project area was disclosed in the Draft EIS, and page 7 of Appendix E states that new permanent roads should not be built in areas identified as important for lynx habitat connectivity. It is not clear if the planned parking lots were considered in making the determination that the Proposed Action may effect, but is not likely to adversely affect, Canada lynx. In the determination of effects on Canada lynx in the Final EIS, we recommend including and discussing the effect of the parking lots on the lynx's linkage area, as well as consider mitigation for this effect.	Analysis of project compliance with relevant NRLMD goals, objectives, standards, and guidelines (including permanent road construction in areas of habitat connectivity) was conducted and is included as Appendix N in the FEIS. The findings report that "LAUs would not become isolated post-project implementation. Although the project area is on the border of two LAUs, a large portion of this border would remain undeveloped. The linkage area in the Lookout Pass Ski and Recreation Area would not be significantly altered." This finding is based on analysis provided in Section 3.11.4.2.2 of the DEIS, which considers impacts to the linkage from construction of three new parking areas. Because of the steep terrain, the parking area expansions are generally just widening an existing road so that vehicles can park on both sides. Mitigation for lynx will be implemented if the U.S. Fish and Wildlife Service reviews the BA and determines that an adverse effect to the lynx would occur from the proposed ski area expansion.
94	3.11 Wildlife: Cumulative	12-2	All impacts of all stages of development past, present and future on Grizzly Bear and Lynx.	Thank you for your comment. As addressed elsewhere in this response to comments attachment, consideration of future expansion plans for Lookout Pass Ski and Recreation Area in the St. Regis Basin is considered beyond the project decision scope because, per CEQ regulations, cumulative actions must be reasonably foreseeable and Lookout Pass Ski and Recreation Area does not currently have any documented plans filed with the Forest Service for a Phase 2 expansion. However, Section 3.11.4 of the DEIS does disclose potential direct, indirect, cumulative effects to lynx and grizzly bear (including habitat loss and effects to linkages) from project actions and other reasonably foreseeable projects. No change has been made in the FEIS.
		44-11	Inadequate assessment of impacts to wildlife species. The Lookout Pass area is an important wildlife corridor and identified lynx habitat. The impacts of expansion do not adequately address this, especially with regard to future expansion plans.	
95	3.11 Wildlife: Grizzly Bear Analysis	6-1	Last week I heard that the Grizzly Bear has been taken off of the Endangered list for western Montana. I was glad to find that out. Since the original evaluation of the Ski Area had restrictions imposed by the Grizzly Bear status, I think that any restrictions may now be of less importance. If there are constraints due to the Grizzly Bear, let's put a lower significance to the Grizzly Bear in both alternatives two and three.	A petition to remove the Cabinet-Yaak population of grizzly bear from the list of threatened and endangered species was received by the USFWS on July 27, 2015. The USFWS found the petition did not present substantial scientific or commercial information indicating that delisting may be warranted; therefore, no status review was conducted, and the Cabinet-Yaak population remains listed as discussed in the DEIS. The DEIS discloses potential project impacts to the grizzly bear in Section 3.11. However, the DEIS states that because of the low probability that individuals would pass through the area, the limited (5%) habitat removal, and the potential availability of other habitat linkages along the I-90 corridor, any of the action alternatives may affect, but are not likely to

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				adversely affect, grizzly bear. Therefore, no specific, additional mitigation measures for grizzly bear are recommended in the EIS. Because the DEIS does not disproportionately analyze or mitigate for impacts to grizzly bears, as compared to other affected resources, no change has been made in the FEIS.
96	3.11 Wildlife: Alternative 3 Impacts to Wildlife	49-32	In Alternative 3, we support protecting watershed health by eliminating all temporary road construction by using skid trails. We recommend that the Final EIS provide further explanation for why the following changes from the Proposed Action would result in less impact to watershed health and wildlife: * eliminating three ski trails (one of which would be replaced with additional gladed terrain) to expand the size of some inter-trail leave islands, and * increasing the size of the gladed area to remove more insect-damaged trees. Specifically, we recommend that the Final EIS describe expected benefits from increasing the size of the inter-trail islands. We also recommend describing the watershed and wildlife benefits and impacts associated with removing insect damaged trees. For instance, the Final EIS could assess whether and to what extent the sensitive black-backed and pileated woodpeckers that are present in the analysis area could be negatively affected by the loss of dead trees.	<p>As discussed elsewhere in this response to comments attachment, Section 1.7 of the FEIS and Appendix A have been expanded to provide a more robust description of the alternatives development process, as well as justification for why only a select number of resources ultimately drove the development of Alternative 2 (Proposed Action) and Alternative 3.</p> <p>Although Chapter 3 of the DEIS currently analyzes the impacts of all considered alternatives (including Alternative 3), this analysis has been expanded in the FEIS to explicitly evaluate wildlife benefits and impacts from expansion of inter-trail leave islands and removal of beetle-infested trees within gladed areas.</p> <p>The following language has been added to Section 3.11.4.2.1 of the FEIS:</p> <p style="padding-left: 40px;">Under Alternative 3, three fewer ski trails would be built. These actions would decrease the intensity of construction noise produced in certain portions of the analysis area. Eliminating these ski trails would also create larger inter-trail islands within which wildlife individuals could flee construction noise, especially those species that are mildly to moderately sensitive to noise effects.</p> <p style="padding-left: 40px;">The skid trails proposed under Alternative 3 would present less of a barrier for some species than the temporary roads proposed under the Proposed Action because of their narrower clearing width. Additionally, the potential for topsoil and seed bank to be left in place would allow reclamation to occur on a faster timescale. For these reasons, skid trails would be more permeable to wildlife that are susceptible to road-barrier effects, resulting in a reduced intensity of fragmentation under Alternative 3 when compared with the Proposed Action.</p> <p>The following language has been added to Section 3.11.4.2.6 of the FEIS:</p> <p style="padding-left: 40px;">Respectively 11% or 12% of available black-backed woodpecker habitat would be impacted by the action alternatives because the species is restricted to narrower habitat requirements and would experience effects at the project scale. As part of this habitat loss, 9 acres (Proposed Action) or 17 acres (Alternative 3) would be gladed, removing individual beetle-infested trees. Beetle-infested trees serve as nesting, perching, and foraging habitat for this species. The project area and immediate vicinity comprise an extensive landscape of lodgepole pine that regenerated following the 1910 fire. These pine stands are generally small-diameter trees that experienced an extensive pine beetle outbreak 10 to 15 years ago. In many areas, most of the overstory trees are dead, namely snags. Snags are most valuable for black-backed woodpeckers during the first to fifth years following the death of the trees, when the food source is most abundant. The 10- to 15-year-old snags present in the analysis area are past that age and no longer constitute high-quality foraging habitat. The small-diameter size of current snags also provide little nesting habitat for cavity-nesting species. Additionally, this species typically lives in an environment that is ephemeral, such as beetle- or fire-killed tree stands, and therefore has a well-developed dispersal ability (Dixon and Saab 2000). In other words, the species is able to</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
				<p>easily find and disperse to other suitable habitat patches. Therefore, if individual black-backed woodpeckers were displaced from the project-scale wildlife analysis area habitat, individuals would be able to readily take advantage of resources available in adjacent habitats.</p> <p>The following language has been added to Section 3.11.4.3.1 of the FEIS:</p> <p>Alternative 3 could result in a slightly lesser magnitude of wildlife displacement because three fewer ski trails would be built and larger inter-trail leave islands would remain. Wildlife individuals sensitive to human noise could flee into the leave island habitat until the disturbance ceased.</p>
97	3.10 Wildlife: Aquatic Species	7-3	What should I expect for the populations of giant salamanders in the area when considering the watershed changes?	<p>As the DEIS notes, Wetland B is the only wetland that would be impacted, and only a portion of it (1 acre) would be impacted by removing trees and shrubs. All surface and underground hydrology would remain intact. For this reason, the DEIS assumes that most individuals would be able to move to a different part of the same wetland. However, the commenter is correct that some individuals could be killed during construction. The following analysis has been added to Section 3.11.4.2.5 of the FEIS:</p> <p>Because of the strict habitat associations of the sensitive aquatic species, only two species in this group are likely to be affected by the Wetland B alteration: the boreal toad and northern leopard frog. Both of these species can be found in wet meadows and marshes. Individuals of these species could be temporarily displaced from the impacted wetland during construction or could be crushed by machinery. It is unknown whether boreal toad and northern leopard frogs currently breed in Wetland B; however, if they do, breeding locations may be lost or altered in the long term because of localized vegetation alterations. Because the surface and subsurface water flow would remain unchanged, however, it is likely that temporarily displaced individuals would return to this portion of the wetland once construction ceases. Both of these species are highly mobile and would also be able to travel overland (boreal toad) or through the existing hydrology (both species) to access other breeding sites within this wetland complex.</p> <p>Also, the following clarification has been added to Section 3.11.4.2.5 of the FEIS:</p> <p>As part of Alternatives 2 and 3, Tributaries CA2 and SR2 would require permanent culverted stream crossings with associated fill material. A new road with two culverts would be constructed on Tributary CA2, while the existing ford crossing on Tributary SR2 would be replaced with a culvert. The total disturbance area of these stream crossing installations would not exceed a total of 0.01 acre. There is potential for all three sensitive aquatic species to occur in the habitat provided by these tributaries.</p> <p>The following language regarding the Idaho giant salamander has been added to Section 3.11.4.2.6 of the FEIS:</p> <p>Because of its narrow habitat requirements, the Idaho giant salamander would not be impacted by the alteration of Wetland B but could be affected by culvert placement on Tributaries CA2 and SR2. However, as mentioned in Section 3.11.4.2.4, the design of the culverts would not discourage travel and would not block the movement of this species from one reach of the tributaries to another.</p>
		24-7	The fourth sentence in the third paragraph on page 216 reads: "Displaced wildlife (meaning sensitive aquatic species) could move into adjacent undisturbed wetland habitat." Some, if not most, aquatic species aren't very mobile. Even for those species which could migrate, other habitat is probably already occupied which would probably mean at least a reduction in the number of individuals. This same comment would apply to the reference to effects on the Idaho giant salamander mentioned in the first paragraph on page 218. It's not ecologically responsible to keep adversely impacting wetlands and the species which occupy them.	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
98	Technical Edits	49-36	We assume that the "2003 ROD" refers to the determination for the previous ski area expansion at Lookout Pass, but it is not included in the list of references. Please clarify and include the appropriate reference in the Final EIS	Thank you for your comment. The FEIS has been updated to incorporate your proposed wording and mapping edits.
		49-37	Clarify in the "Management Framework" sections which provisions are desired conditions vs standards vs guidelines.	
		49-38	Map labeled streams and proposed development and rivers on Figures A6 and WR1, respectively.	
		49-39	Map both proposed development and labeled streams and rivers on Figures CR1 and F1.	
		49-40	Map ski trails on Figure SO1.	
		49-41	Map proposed development on Figure WR2.	
		49-42	Disclose what activities may be subject to permitting requirements on Table WR5, as was done for the crossing of tributary CA2 and the Idaho Stream Channel Protection Act.	
		49-43	Change "EO 11990 - Management of Wetlands" to "EO 11990 - Protection of Wetlands" in Table WR5.	
		20-1	The State boundary is question. This matter needs to be cleared up before any construction can be done around the main lodge. If Mineral Counties claim and the Montana Highway department maps are correct, Mineral county would have jurisdiction over the sewer permits needed on a new shop near the main lodge. Shoshone county showed an assessment map that corresponded to the management area of the ski area but does not match the original staking notes of the BLM of the actual state line. I think originated from and only coincides with the ski area management map of the Panhandle Forest. It matches no other old map showing the Montana/Idaho border. These original monuments must be reset by the BLM to correct this mistake. In the meantime, your maps should not show the incorrect state line to confuse, misrepresent or influence the continuance of the inaccuracy.	
37-6	The correct location of the boundary between Montana and Idaho should be recognized and noted in the statement. The Idaho Panhandle Lookout Pass Ski Area management area should be noted as just a management area and not used as a boundary demarcation.			
99	Cumulative Analysis: General	24-8	For several resources covered in the Environmental Consequences section of the DEIS, adverse effects of the proposed action are described and then are immediately followed by the word "However," which begins a rationale for why the adverse effects are not felt to be significant. Every year more and more resources are subjected to losses or damage, some large and some rather small, but adverse nevertheless. In this case, a tenth of an acre of whitebark pine trees and habitat and a relatively small wetland are resources I feel I need to speak up for. Too often, losses in one situation aren't noticeably large, as here, but no one seems to be keeping score to help decide when enough is enough when considering a larger focus. I wonder if the Forest Service or other Federal land managing agencies keep a tally on these losses on a national scale or if the U.S. Geological Survey or the Environmental Protection Agency does. And what about the rest of the world, I wonder if any entity gathers this information on a coordinated worldwide basis. If not, someone should. Otherwise, a little here and a little there will add up to a significant amount, but who would realize that in a timely way? My comments about this larger focus are beyond the scope of the subject DEIS, but I felt I had to bring up the matter in the hope of perhaps stimulating a discussion of the issue in your agency in another forum.	Thank you for your comment. The DEIS discloses the cumulative impact of proposed project actions on affected resources within cumulative analysis areas, which consist of clearly defined geographic and temporal boundaries. Evaluating project impacts at a national or global scale is beyond the scope of this EIS and would not result in meaningful analysis of cumulative project impacts. No change has been made in the FEIS.
100	Cumulative Analysis: General	49-34	CEQ's guidance, Considering Cumulative Effects under the National Environmental Policy Act, stresses importance of defining accurate baselines for the affected environment and thresholds beyond which cumulative effects significantly degrade or enhance a natural resource or ecosystem. The Draft EIS does not define baselines or thresholds for cumulative impacts; therefore, we recommend that, to the extent possible, the cumulative effects analysis be expanded in the Final EIS to incorporate such benchmarks.	The FEIS has been revised to remove conclusionary statements in the Chapter 3 cumulative effect sections and has incorporated cumulative thresholds established by the IPNFs and LNF, where applicable. The FEIS does not establish new thresholds; if a threshold is not identified in the Forest Plans, the FEIS discloses this fact and reports cumulative analysis findings but does not assess significance.
		49-35	In various places the Draft EIS states that subjecting construction and vegetation removal to design features and practical mitigation measures indicates that significant cumulative effects to resources would not occur. Design features and practical mitigation measures do not necessarily mean that actions will have no cumulative effects; therefore, we recommend that these conclusions be removed in the Final EIS and be replaced by consideration of estimated cumulative effects in relation to the thresholds for significant effects.	
101	Past, Present, and Reasonably Foreseeably Projects	12-3	Lookout Pass Ski Area has expanded its ski area over the last several years. I would like to see a comprehensive environmental review addressing all past, present and future expansion plans (NEPA).	Consideration of future expansion plans for Lookout Pass Ski and Recreation Area in the St. Regis Basin is considered beyond the project decision scope because, per CEQ regulations, cumulative actions must be reasonably foreseeable, and Lookout Pass Ski and Recreation Area does not currently have an accepted MDP filed with the Forest Service for a
		32-8	It is well known and publicized, since 2010, that LPSA has a 20 year expansion plan that calls for a total of 8 new lifts, adding 2,000 new acres, and a second base area, parking and new lodge (this includes the two lifts and 600 acres proposed in Phase 1). ⁵ The 20 year expansion plan includes the addition of six lifts on the south side of St. Regis River and along the St. Regis-Copper Lake	

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			divide (within the proposed non-motorized winter recreation area). The LPSA Phase 1 expansion would only be a viable ski area investment with the additional development proposed in LPSA's 20 plan. Otherwise, the proposed Phase 1 expansion is a poorly designed, unsound, and uneconomic ski area expansion. However, the DEIS does not address these future plans. Indeed, while the DEIS describes several other past, present, and reasonably foreseeable activities ranging from weed and pest treatments to the Montana Snowbowl proposed expansion, there is no mention of future expansion of the Lookout Pass Ski Area. The final EIS should include a Cumulative Impact Analysis per 40 CFR 1508.7, of the current proposed expansion along with foreseeable future expansions of Lookout Pass Ski Area that includes the impact on the winter recreation resource in the proposed Stevens Peak backcountry area and vicinity.	<p>Phase 2 expansion. Any future expansion proposals would require development of a stand-alone MDP to be accepted and signed by the Forest Supervisor. Additional environmental analysis would also be required at that time.</p> <p>Appendix D of the DEIS discloses past and present expansion plans for the ski area. These actions are analyzed in each resource cumulative effects section of Chapter 3, as applicable.</p>
		36-4	Failure to address Lookout's future expansion plans in the St. Regis Basin and the proposed Stevens Peak Backcountry Area.	
		44-7	The failure to include the long term expansion plans and foreseeable future cumulative impacts also violates the intent of NEPA. The proposal either needs to preclude any further expansion or potential expansion needs to be part of the analysis.	
		48-6	The DEIS fails to properly disclose and analyze the current expansion in the context of other past, present, and reasonably foreseeable future actions. Specifically, Lookout Pass Ski Area has identified several possible expansion phases in its long term plans. The current project does not fully disclose or consider these plans. NEPA imposes a duty to disclose and evaluate such cumulative impacts, which include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" In particular, future phases appear to contemplate express closure of certain winter recreation routes and/or staging areas. The public is entitled to know that the current project is potentially an incremental step toward such additional significant effects on the human environment.	
		50-4	The issue of cumulative effects of the proposed expansion was also included in numerous scoping comments. The DEIS fails to properly disclose and analyze the current expansion in the context of other past, present, and reasonably foreseeable future actions. Specifically, Lookout Pass Ski Area has identified several possible expansion phases in its long term plans. The current project does not fully disclose or consider these plans. Lookouts long term plans appear to severely impact the NP snowmobile trail. NEPA requires that an EIS evaluate these reasonably foreseeable future impacts.	
102	Other Issues: Climate Change	4-1	i am not in favor of turning this nations sorest into commercial endeavors. When you put up a ski area these days, they want the lodge and the housing and eventually any natural land is gone, destroyed, we don't need another ski area, particularly not when the snow is leaving us and melting because of warming earth temperatures. All the indications are that skiing will be wiped off the map as an activity in the future so i see no reason for allowing this commercial endeavor.	<p>The Forest Service has incorporated consideration of climate change on affected resources within Chapter 3, as applicable.</p>
		9-1	I AM TOTALLY OPPOSD TO EXPANSION OF SKI AREA AT LOOKOUT PASS. THE FACT IS CLIMATE WARMING WILL DO AWAY WITH MANY NATURAL SNOW PACKS	
		49-20	The Draft EIS also states that snowmaking is not required in the Lookout Pass Ski Area; however, with continuing climate change, the decreases in snowpack cited above may to continue. While Appendix A of the Draft EIS points to the Council on Environmental Quality's (CEQ) 2010 draft guidance that guides agencies to "recognize the scientific limits ... to accurately predict climate change effects, especially of a short-term nature, and not devote effort to analyzing wholly speculative effects" as reason for why climate change effects were not considered in the Draft EIS, we note that this draft guidance was revised in 2014 and no longer includes this language. We also consider currently available data on trends and predictions related to temperature increases and snowpack decreases to be robust and not of a short-term nature. Therefore, we recommend that the Forest Service analyze predicted effects of future climate change on area resources and the project itself, including its effects on snowpack in the ski area and the potential for snowmaking to be needed in order to provide skiable terrain. The Climate Impacts Group at the University of Washington (https://cig.uw.edu/) may be able to help direct the Forest Service in determining what information is available for the analysis area. Including future climate scenarios in the Final EIS would help decision makers and the public consider whether the environmental impacts of the alternatives would be exacerbated by climate change and if additional management considerations and/or mitigation measures may be warranted. If it is determined that there may be a reasonably foreseeable need for additional snow, we recommend the general effects of snowmaking be analyzed and disclosed in the Final EIS.	
103	Other Issues: Greenhouse Gases	49-21	We also recommend that the Final EIS quantify and disclose greenhouse gas (GHG) emissions that would result from both project activities and expected increases in vehicle traffic. The EPA does not recommend comparing GHG emissions from the proposed action to global emissions. As noted by the CEQ revised draft guidance (https://ceq.doe.gov/current_developments/docs/nepa_revised_draft_ghg_guidance_searchable.pdf), "this approach does not reveal anything beyond the nature of the climate change challenge itself: the fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." The EPA also recommends that the lead agencies do not compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a project-level analysis. Consider providing a frame of reference, such as an applicable federal, state,	<p>The Forest Service appreciates your comment but dismissed GHGs from analysis on the basis that "project emissions would be negligible and would result in insignificant differences between the alternatives" (Appendix A of DEIS). To illustrate, carbon dioxide equivalents associated with an additional 328 one-way trips per day during peak visitation (assuming an average travel distance of no more than 100 miles) would yield an estimated 2,597 metric tons of carbon dioxide for the Proposed Action (Alternative 2) and Alternative 3, per year. In comparison, Idaho</p>

Response #	EIS Section / Topic	Letter No. - Comment No.	Comment	Forest Service Response*
			tribal or local goal for GHG emissions reductions, and discuss whether the emissions levels are consistent with such goals.	vehicle traffic produced an estimated 7.25 million metric tons of carbon dioxide equivalents (GHGs) in 2010, with 7.67 million metric tons estimated for 2020 (Center for Climate Strategies 2008). Montana GHG estimates were 4.8 and 5.7 million metric tons of GHGs in 2010 and 2020, respectively (Center for Climate Strategies 2007). Therefore, operations-related GHGs would increase state total GHGs by no more than 0.05%. As noted, this quantity would not differ between action alternatives. Although construction-based GHGs would also be emitted, these emissions would be limited in duration and magnitude. This rationale for dismissal has been added to Appendix A in the FEIS.
104	Other Issues: Air Quality	49-22	We recommend the Final EIS also include mitigation measures, such as building efficiency upgrades and use of clean energy sources and/or variable- frequency drive motors, to reduce emissions. As part of this, we recommend that the Final EIS disclose how the project will align with Executive Order (EO) 13693, Planning for Federal Sustainability in the Next Decade, which replaced EOs 13514 and 13423. We suggest that the Final EIS highlight some of the main sustainability components that would be incorporated into the proposed facilities, with consideration of whether some components of the project could be designed to be certified as LEED Gold or LEED Platinum.	Appendix E details all design features that would be incorporated into the project design to minimize resource impacts (including visual resources and air quality). Lookout Pass Ski and Recreation Area has stated an intention to purchased lift materials from other ski resorts and recycle existing lift materials on-site. Although the Forest Service encourages structure construction to meet LEED ratings, implementation by Lookout Pass Ski and Recreation Area is voluntary and at their discretion based on financial or other business considerations.
105	Other Issues: NEPA Process	55-1	As expected, the Draft Environmental Impact Statement for Lookout Pass has revealed no more than the usual and expected impacts of other similar projects. All the identified negative impacts are minor and could have been addressed in an Environmental Analysis at a fraction of the cost and in half the time. The DEIS documents that each year this project is delayed costs recreationists a much better experience. Each year of delay also costs approximately \$1,000,000 in wages, and taxes that will never be regained. It also delays millions in construction spending that will provide additional jobs and taxes. The focus of the NEPA process should now be to wrap up as quickly as possible to avoid further delays and expenses. The Friends of Lookout Pass is most concerned that: <ul style="list-style-type: none"> • The NEPA and Permit processes be concluded quickly and construction move forward. • That the Forest Service and Consultant remain committed to the budget. Remember this budget is already \$100,000 over the low bidder. • The project remain a high priority until completed. <p>This project has tremendous public support and represents the best use of our public lands. For over 50 years Lookout has provided affordable winter recreation for regular working-class citizens including a free ski school. Winter recreation is an essential part of our lifestyle in the northern Rockies but many of us are getting priced out of skiing. These small ski area expansion projects are proven to have minor negative impacts and tremendous benefits.</p>	Thank you for your comment. The Forest Service will provide a FEIS and draft record of decision in fall 2016.

* See the References Cited chapter in the FEIS for references cited in this response column.

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