

DECISION MEMO
for
Collins/Sugarloaf Loop Snowmaking Project and the Cross
Tow Grading and Culvert Extension Project
Alta Ski Lifts

Salt Lake County, Utah
Uinta-Wasatch-Cache National Forest
Salt Lake Ranger District

DECISION AND RATIONALE

I have reviewed Alta Ski Lift's proposals and the associated environmental review documentation and have decided to approve the elements described below. These elements constitute the proposed action addressed in this Decision Memo.

Collins-Sugarloaf Snowmaking Loop

- Install buried snowmaking utility lines from a tie-in point with the existing snowmaking system near the top of Collins lift down to the existing line on Devil's Elbow (approx. 2,600 ft.). The lines will be installed in the existing service road except for a section about 500 feet long near the Collins Gulch end (see attached figure). The service road will be relocated onto this section of the pipeline alignment, and the then redundant roughly 700-foot section will be reclaimed. Three new hydrants will be installed on spurs up to 150 feet off the main line. These lines will be installed in a trench roughly 3 feet deep and 3 feet wide. The main line disturbance width will be about 30 feet, spur lines about 15 feet.
- Install another snowmaking spur off this mainline running south to the top of Sugarloaf lift then west along the service road to a drain valve (approx. 1,200 ft.). This line will serve two new hydrants near the top of the line, serving the upper portion of Sugarbowl ski run. The dimensions of the trenches and disturbance zones will be similar to those described above.

Closing this loop in Alta's snowmaking system will substantially reduce the energy expended to move water from sources such as Cecret Lake, down to the base area, and then back up Collins Gulch. Closing the loop at the top will allow pumping in either direction from the up-mountain sources, saving energy and providing the ski area more flexibility in using its limited quantity of snowmaking water.

The project area lies entirely on National Forest System (NFS) land. The total area temporarily disturbed during construction will be about 2.87 acres. With the exception of about 0.27 acres where the service road will be relocated, all disturbance will be in an existing service road or previously cleared and graded ski run.

A tracked excavator, dozer, and hand tools will be used for construction. No new access roads will be built, with the exception of the relocated section of the service road. Standard rehabilitation and revegetation efforts will follow construction.

Cross Tow Grading and Culvert Extension

- Raise the ground level of the east end of the Cross Tow to the level of the Sunnyside lift maze and loading area.
- Extend the 30-inch diameter culvert that drains the area north of the Cross Tow northward by approximately 20 feet.

These improvements will eliminate the need for skiers to walk or pole from the Cross Tow to Sunnyside, which is awkward for lower ability levels. The drainage culvert would continue to create a choke point that further restricted skier circulation. The extension would also avoid creating a hazard on the summer hiking trail through the area.

The project area lies entirely on National Forest System (NFS) land. The total area temporarily disturbed to regrade the east end of the Cross Tow will be about 0.82 acres, and the culvert extension will involve another 0.2 acres. All disturbance will occur in areas previously cleared and graded as a ski run or terminal area.

A tracked excavator and a small dozer will be used for construction. No new access roads will be built, and standard rehabilitation and revegetation efforts will follow construction.

I believe that these projects will improve the recreational experience at Alta by providing skiers with a safe, consistent, and appropriately graded snow surface on key, high-traffic areas. The new snowmaking lines will improve the functioning of the existing system, making the most efficient use of energy and of currently available snowmaking water supplies. The Cross Tow project will improve skier circulation in an area important to beginning and lower-ability-level skiers. The projects have been designed in a manner that will minimize potential impacts on the project area. Overall, I am confident that approval of these proposed actions is in the best interest of the public.

MITIGATION MEASURES

Implementation of the mitigation measures listed below will be required as part of my decision. As the project areas are within Salt Lake City's municipal watershed, protection of water quality is a primary consideration.

Soil Erosion, Sedimentation, and Water Quality

1. Prior to beginning the project, submit an erosion control plan prepared in accordance with the BMPs typically agreed upon by the Forest Service and Alta for similar projects in the past. This plan must be approved by the Forest Service prior to construction on NFS land.
2. Include in the erosion control plan stockpiling of material excavated from the trench in windrows on the upslope side, where possible. If this is not possible, windrows on the downslope side may require sediment control barriers if in close proximity to any live

water. Efforts should be made to windrow topsoil separately from subsoil so it can easily be located and re-applied to the backfilled trench surface.

3. Include in the erosion control plan installation of trench blocks and relief drains for subsurface water at any areas where the snowmaking trench line or drainage culvert could intercept underground seepage.
4. Promptly revegetate disturbed areas using the Forest Service approved seed mix and standard techniques developed by Alta for this purpose.

Wetland and Riparian Resources

5. Minimize impacts on any wetland crossed by the snowmaking trench lines or drainage culvert by depositing no fill material in wetlands and securing any permitting required under Section 404 of the Clean Water Act for crossing wetlands with these developments (presumably authorization under Nationwide Permit No. 12).

Cultural Resources

6. Notify the Forest Service archaeologist immediately if and when any historic or prehistoric resources are exposed during construction activities.

SCOPING AND PUBLIC INVOLVEMENT

On October 24, 2008, the WCNF circulated a scoping notice summarizing the snowmaking proposal and soliciting input on associated environmental issues and concerns. A similar notice dated May 5, 2009, addressed the Cross Tow and culvert project. The notices were mailed to individuals, organizations, and agencies on the agency mailing list and posted on the WCNF website at <http://www.fs.fed.us/r4/wcnf/projects/proposed>. A 30-day scoping period was provided following each notice.

Comment letters were received from two organizations and one individual on the snowmaking project. They noted potential impacts on water quality, erosion, and vegetation; questioned the adequacy of the snowmaking water supply; and supported the recreational improvements to be achieved. One letter commenting on the Cross Tow project was received, noting concerns about landscape character, slope stability and erosion, and drainage effects.

Documentation of this public scoping process including a scoping analysis report (description of the process, list of commentors, synthesis of comments, and response to significant comments) is in the project file and available for review through the Salt Lake Ranger District.

In reaching my decision, I considered issues identified by Forest Service interdisciplinary team members who reviewed these proposals as well as the scoping results. Some of these issues fell under the headings of "extraordinary circumstances" and are discussed in detail below (see Reason for Categorically Excluding the Proposed Action). Other issues that warrant specific discussion include the following.

Collins/Sugarloaf Snowmaking

System flexibility. A commenter asked whether the ski area's limited water supply coupled with the proposed expansion would allow enough flexibility in the snowmaking system to address problem areas. An effective snowmaking system is one that allows a ski area to address priority areas, which can vary depending on a number of factors (e.g., variable patterns of natural snowfall and skier use). As noted in the scoping notice, this proposed expansion would provide the flexibility to make snow from top to bottom in the Sugarloaf skier pod.

Water supply. A commenter asked whether Alta would seek new water in conjunction with this expansion of the snowmaking system. The water to be used for the proposed snowmaking is within Alta's existing set contract with Salt Lake City.

Impacts on vegetation. Two commenters expressed concern over potential impacts on vegetation in the project area, particularly special status plants. All but about 0.27 acres of the project's 2.87-acre disturbance area lies in an existing road bed or other previously disturbed area, so impacts on undisturbed vegetation will be minor. The project site has been surveyed for special status plant species, and one recommended sensitive species, Utah ivesia, was found in the area potentially disturbed by the spur line to the top of Sugarloaf. The final routing will be laid out to avoid impacts on these plants.

Erosion and sedimentation. Two commenters asked that the potential for increased erosion and sedimentation be considered. Alta and the Forest Service recognize the critical importance of protecting watershed values within Salt Lake City's municipal watershed. Alta has a well established record of successful site rehabilitation efforts associated with their infrastructural development. These efforts draw on ski area BMPs developed by the Forest Service, which have been tailored over time to improve their efficacy given conditions specific to Alta. Similar rehabilitation efforts are required as part of the decision.

Cross Tow Grading and Culvert Extension

Landscape character. One commenter asked if the grading proposal would alter the project area's scenic or recreational qualities. Following site rehabilitation, we do not anticipate that the project will have any notable visual impact. It will still appear as a graded ski run. As discussed in the scoping notice, the project will improve the site's recreational quality by making the terrain and facilities more easily accessible to beginning skiers.

Slope stability and erosion. One commenter questioned whether the project would affect the stability of the site or create erosion problems. As to slope stability, the area is nearly flat. The edges of the graded area have been engineered, and gabions will be installed in locations where the stability of the fill is a concern. Also see the preceding response regarding erosion and sedimentation concerns associated with the snowmaking project.

Drainage flow. One commenter expressed concern regarding the impact of diverting a drainage into a culvert, specifically requesting information on the nature of the drainage and the effect on flow. To clarify, this seasonal channel is already diverted into a culvert to carry runoff under the Cross Tow and associated ski run from the area immediately to the north. This project will extend the culvert out to the edge of the new filled area so that the channel does not create a constriction in the run or a hazard to skiers and summer hikers. Flow in the channel will not be affected.

REASON FOR CATEGORICALLY EXCLUDING THE PROPOSED ACTION

I have determined that the proposed project, as described above, is consistent with the types of actions described under CFR 36 220.6.(e)(3) - Approval, modification, or continuation of minor special uses of National Forest System lands that require less than 5 contiguous acres of land. As noted above, the entire project will affect about an acre of NFS land, within the ski area's special use permit boundary. The potential direct, indirect, and cumulative effects of the entire project were reviewed and considered in my decision.

In regard to extraordinary circumstances, the Forest Service Handbook lists several topics that should be considered (CFR 36 220.6.(b)). Forest Service and contractor resource specialists have visited the project area on numerous occasions, reviewed relevant studies and other published information, and documented their findings regarding these and other potential extraordinary circumstances in the project file and are summarized below.

- A. **Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.** A biological assessment (BA) was prepared for these projects. The determination reached was that no federally listed or candidate plant or animal species will be affected. A biological evaluation (BE) was also prepared, concluding that the projects will not impact any Forest Service sensitive plant or animal species. Surveys and analysis of potential impacts on these special status species in the project area were completed. One recommended sensitive species, Utah ivesia, was found in the area of the line to the top of Sugarloaf lift, but the final alignment will avoid these plants. Based on these considerations, threatened and endangered species or their critical habitat does not constitute an extraordinary circumstance for these proposed actions.
- B. **Flood plains, wetlands, or municipal watersheds.** The project areas lie in Salt Lake City's municipal watershed. Implementation of mitigation measures 1 – 4 above will preclude any notable adverse impacts on the watershed. As currently laid out, the new line to the top of Sugarloaf lift will pass near several wet areas but not intersect them, but extension of the culvert could not involve wetlands. Mitigation measure no. 5 above precludes deposition of fill material in any wetland that is potentially affected by the final design and calls for appropriate permitting under Section 404 of the Clean Water Act, which requires minimization of impacts. Based on these considerations, flood plains, wetlands, or municipal watersheds do not constitute an extraordinary circumstance for these proposed actions.
- C. **Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas.** The project areas do not include any designated wilderness, wilderness study area, or National Recreation Area, so such areas do not constitute an extraordinary circumstance for these proposed actions.
- D. **Inventoried roadless areas.** The project areas do not include any inventoried roadless areas, so such areas do not constitute an extraordinary circumstance for these proposed actions.
- E. **Research Natural Areas.** The project areas do not include any Research Natural Areas, so such areas do not constitute an extraordinary circumstance for these proposed actions.
- F. **American Indian and Alaska Native religious or cultural sites.** The 1996 MDP Draft EIS (Section 3.4.1.1) states that "prior to European settlement the ski area was used by

Native Peoples for both hunting and plant gathering in a lifeway that was otherwise tied to the more abundant resources of the adjacent Salt Lake Valley. This short-term use leaves little archaeological imprint, and few examples of Native sites remain anywhere in the canyon.” No Native American sites have been found in or near the project area. The two relevant Tribes in the area were contacted during the scoping period, and neither responded to identify any concerns regarding the projects. Based on these considerations, American Indian and Alaska Native religious or cultural sites do not constitute an extraordinary circumstance for these proposed actions.

- G. **Archaeological sites, or historic properties or areas.** In the course of completing the 1996 MDP Draft EIS (see Sections 3.4.1.2 and 3.4.1.3), the history of the area and investigations of archaeological sites and historic properties were reviewed, and sites affected by that proposal were surveyed. The only site identified as eligible for listing in the National Register of Historic Places was the Old Watson Shelter. This structure will not be affected by these proposed actions. Mitigation measure no. 6 above will protect any archaeological resources discovered during construction. Based on these considerations, archaeological sites, or historic properties or areas, do not constitute an extraordinary circumstance for these proposed actions.

Based on the findings summarized above, I am categorically excluding this decision from documentation in an Environmental Assessment or Environmental Impact Statement. Based on experience with management activities similar to this, and upon the environmental analysis conducted for these projects, the effects of implementing these actions will be limited in context and intensity. Connected and cumulative actions have been appropriately addressed, an appropriate category for exclusion has been established by law and documented in the Forest Service Handbook, and our review indicates no extraordinary circumstances to preclude its application.

FINDINGS REQUIRED BY OTHER LAWS

The only finding required by other laws not addressed directly or indirectly above is Forest Plan compliance in accordance with the National Forest Management Act. The proposed actions have been evaluated for consistency with the goals, objectives, standards, and guidelines of the 2003 Revised WCNF Forest Plan. The project areas are located within a 4.5 Management Area, which emphasizes providing developed recreation opportunities, often under the terms of a special use permit. Thus, the proposed actions are consistent with the management area prescription. In terms of more specific Forest Plan direction, my review indicates that the proposed actions, with required mitigation measures in place, are consistent with all applicable standards and guidelines.

IMPLEMENTATION DATE

This decision is not an authorization to proceed. Once all conditions and mitigation measures have been met, authorization to begin work will be issued.

ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

This decision pursuant to 36 CFR 215.12(f) is not subject to appeal. These permitted actions are not one of the 10 activities subject to notice and comment under Forest Service regulations at 36 CFR 215, as clarified on October 19, 2005, by the Federal District Court for the Eastern District of California in Earth Island Institute v. Ruthenbeck.

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6/22/09

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