

DECISION MEMO
for
Single-Track Mountain Bike Trail
Snowbird Ski and Summer Resort

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

DECISION AND RATIONALE

I have reviewed two proposed alignments for a single-track mountain bike trail at Snowbird Ski and Summer Resort (Snowbird), the first described in our October 24, 2008, scoping notice and the second in our February 27, 2009 notice. Based on the proposals, their rationales, and associated environmental review, I believe that the environmental effects of constructing the trail on either alignment would be minimal and mitigable, but the recreational opportunity created would differ somewhat between the two. As a result, I have decided to approve trail construction on a hybrid alignment that will minimize potential impacts on watershed and vegetation resources while providing the best recreational opportunity.

This alignment is shown on the attached figure. It follows the second proposed alignment from the Mid Gad midway station down to Wilbere Cutoff, reducing the number of channel crossings and switchbacks. The alignment passes through the aspen stands on the hillside adjacent to Middle Emma ski run rather than switchbacking down the ski run itself. This portion of the alignment winds around trees and other landscape features to minimize visual and physical impacts and make the ride more interesting.

From its intersection with Wilbere Cutoff, the alignment joins the service road (Miner's Road). The alignment continues along the service road to the point that the road drops down slope to Bass Highway. Leaving the road, the alignment maintains grade and contours across ski runs and narrow strips of forested terrain before dropping down to join the Bass Highway near the intersection with the Barrier-Free Trail.

The approved alignment is about 1.3 miles long, 0.25 miles of which are on the service road. Its grade ranges from 3 to 7 percent, with a few areas of slightly higher grades, and appeals to a broader range of ability levels than either of the two previously proposed alignments did independently. It will have a finished tread width of about 3 feet (average 6 feet temporary disturbance during construction) and will cross three small, ephemeral drainages on post-and-plank bridges or other agency approved crossings. A number of Forest Service standard design criteria and construction practices will be utilized to minimize runoff and erosion from the trail and reduce visual impacts. The trail will be built using a mini-excavator and hand work. Vegetation removal will be minimal and done primarily by hand.

The project area is entirely on National Forest System (NFS) land. The total disturbance area will be approximately 1 acre or less, encompassing both the finished trail surface and the areas temporarily disturbed on either side during construction. No new access routes will be needed. Work may begin as soon as conditions allow in summer 2009.

I believe that this project will improve the recreational experience provided by Snowbird, responding to growing participation in mountain biking and demand for appropriate trails. With the incorporated design features and construction practices, the trail will provide an enjoyable recreational experience with minimal impact on the watershed or the area's other natural resources. Overall, I am confident that approval of the proposed action is in the best interest of the public.

MITIGATION MEASURES

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

Soil Erosion, Sedimentation, and Water Quality

1. Prior to beginning the project, Snowbird will prepare an erosion control plan for the project, in accordance with Appendix C – Best Management Practices for Ski Area Erosion and Sedimentation Control, Airborne Nuisance Management, and Resource Conservation, in the *Final Environmental Impact Statement for the Snowbird Master Development Plan*, November 1999).
2. The erosion control plan will include stipulations that:
 - The trail will have an off-sloping tread to shed water and grade reversals to keep water from running down the trail. Erosion control devices will be installed as needed in accordance with the Forest Service Trails Handbook (FSH 2309.18).
 - Cut banks will be back dressed to blend with the upper hillside, and downhill berms will be removed and roughened to better accept seed and water.
 - Any excessively erodable portions of the tread will be mechanically hardened.
 - Any channel crossings will have grade reversals at both ends to stop any flows from the tread.
 - Crossings may also be improved with rock armoring, half culverts, or boardwalks and bridges, as Forest Service resource specialists determine appropriate to a given site.
3. The trail has been aligned to avoid wetlands, but if any are encountered in the final alignment Snowbird will minimize impacts by:
 - Depositing no fill material in them.
 - Securing permitting required under Section 404 of the Clean Water Act for crossing the wetland with the trail.

Cultural Resources

4. Snowbird will notify the Forest Service archaeologist immediately if and when any historic or prehistoric resources are exposed during construction activities.

SCOPING AND PUBLIC INVOLVEMENT

The Uinta-Wasatch-Cache National Forest, Salt Lake Ranger District (Forest Service), issued a scoping notice summarizing a number of proposed projects or activities currently under review, including this proposal. The notice solicited comments regarding the issues and concerns to be considered, noting that comments should be submitted within 30 days. The notice was mailed on October 24, 2008, and posted on the agency's website, <http://www.fs.fed.us/r4/wcnf/projects/proposed>. The 30-day scoping period closed November 24, 2008. Comment letters were received from two organizations and two individuals.

Following initial scoping and internal, interdisciplinary review of the proposal, Snowbird and the Forest Service revisited the proposed trail alignment to determine whether it was the best choice in terms of providing a quality recreational experience and minimizing watershed impacts. Based on this review, Snowbird engaged a professional trail design and construction firm, Alpine Trails, Inc., of Park City, Utah, to assess and revise the alignment. The Forest Service advised those who had responded to the initial scoping notice of the changes to the proposal and offered them a second opportunity to comment. A second scoping

notice was mailed and posted on the agency website on February 27, 2009, soliciting any comments beyond those submitted originally. The second scoping period ended March 27, 2009. One additional comment was received.

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 the proposal and by the other agencies, organizations, and individuals who submitted scoping comments. Issues that warrant specific discussion include the following:

- *Has the issue of mountain biking trails been addressed as a need which a ski resort can fill?*

Discussion: Mountain biking use continues to grow throughout the Wasatch Range as evidenced by the increasing number of user-created trails and increased use on existing trail systems. The Forest Service is unable to provide additional mountain biking opportunities on NFS lands for a number of reasons including reduced staffing and budgets. The Forest Service has entered into discussions with all four Cottonwood Canyons ski areas regarding the potential to create new mountain bike trail systems at the resorts to help meet the increased demand and use. Ski resorts have the infrastructure to handle the capacity in the form of parking, restroom facilities, and staffing. In this respect, the ski areas can play an important role in helping to address the real need of increased mountain bike use in the Wasatch Range.

- *Who will be responsible for the maintenance and upkeep of the trail?*

Discussion: Snowbird will bear these responsibilities, with Forest Service oversight to ensure a quality recreational experience with minimal resource impact.

- *Is the proposed trail in the best possible terrain for carving and cutting a beginner/intermediate mountain bike trail?*

Discussion: As noted above, two alignments were scoped, one (the original) that minimized impacts on less disturbed forested habitats, and a second that minimized potential watershed impacts. Analysis indicated that either would have minimal environmental impact and that any adverse impacts would be mitigable. However, the recreational experience provided would differ somewhat between the two alignments, the first being potentially easier for beginning riders, the second appealing to a broader range of ability levels. I am confident that the trail on the hybrid alignment will provide a widely enjoyable experience without notable impact on the area's natural resources.

- *What kind of impacts will this trail have on the terrain? What measures will Snowbird and the Forest Service take to protect the sensitive areas this trail will traverse, including Riparian Habitat Conservation Areas which are vital for watershed resource protection?*

Discussion: The primary environmental concern associated with the original alignment was its potential contribution to erosion and sedimentation, particularly since it crossed drainage channels on Middle Emma three times. The second alignment reduced crossings on this portion of the trail to two. The measures listed above to mitigate watershed concerns will be required as part of this approval and will adequately address watershed concerns for the approved alignment.

- *What impacts will this create for the view shed; will this trail have a visual impact on the mountainside and the scenic qualities of the surroundings?*

Discussion: Much of the approved alignment is on Middle Emma ski run and service roads. Its visual impact will fit in against that developed backdrop. The remainder passes through less undisturbed terrain where some sections may be visible, especially before revegetation is complete, but much will be screened by intervening shrubs and trees.

- *The modified route takes a notable portion of the proposed trail construction out of the ski run and into a wooded or forested area between two cleared ski runs. This part of the Forest is already highly fragmented. The modified alignment would add cumulatively to the fragmentation of the forested habitats in the area. This means cumulative impacts to habitats if not also populations of big game animals, and possibly Forest Service Sensitive species.*

Discussion: The habitat in the project area is highly fragmented, as is expected within the boundaries of a mature mountain resort. Habitat fragmentation and its implications for wildlife species of all types occurring at Snowbird have been extensively studied in the course of NEPA review of the resort's master development plan (1999 Final EIS and associated documentation) and numerous other projects proposed and implemented in and around the project area. The results of these past reviews were considered in the multidisciplinary assessment of the proposal's potential impacts, and no substantive concerns were raised regarding the cumulative impact of additional fragmentation on either the mule deer population that occurs at the resort or on Forest Service sensitive species. The approved alignment avoids the largest block of intact conifer forest above the service road.

- *We believe an EA needs to be prepared for a couple reasons. The different alternatives that have been considered are driven to resolve different conflicts among alternative uses of available resources. Also, the potential for direct, indirect, and cumulative impacts to wetlands/aquatic resources, municipal watersheds, and sensitive species/habitats are probably going to be something more than nonexistent or minor... "The Responsible Official must be able to demonstrate that...the potential effects on the listed resources are minor or nonexistent" FSH 1909.15, Ch. 30, sec. 30.4 'Extraordinary Circumstances.'*

Discussion: In regard to the first reason, the changes in trail alignment were not made to create an alternative *per se* but rather to assess different approaches before finalizing the proposed action. Recent changes to the federal regulations regarding Forest Service NEPA process provide for incremental changes in proposed actions based on analysis and comment (36 CFR 220.7,B,2,iii). Consideration of these alignment options is consistent with pertinent regulations and not a reason to prepare an EA, as long as the approved action continues to meet the criteria for a CE. As discussed below, I believe it does.

In regard to the second point, the agency's requisite, interdisciplinary review of the alignment options indicated that, with the noted mitigation in place, all anticipated environmental effects of the trail will be minimal or non-existent under all alignments considered. As a result of these considerations, it was determined that the approved alignment meets the criteria for categorical exclusion.

- *The City would like to ensure that the fragile alpine environment of the watershed area is protected at all times and that Best Management Practices are incorporated into all construction and restoration activities... Salt Lake City requests that Snowbird provide a drainage plan for both pre- and post construction of the new bike trail. The City would like to see a detailed plan that describes methods and protocols that will provide appropriate erosion control measures during the construction and long-term maintenance of the trail.*

Discussion: See responses under the third and fourth bullets, above. In addition to the design and construction aspects and mitigation measures noted there, Snowbird will prepare an erosion control plan for the project, as indicated in the cited Appendix C of the master plan EIS. This will address construction and post-construction BMPs.

- *Please identify the source of trail standards that the trail will be used to construct the trail.*

Discussion: Design and construction aspects of the trail were developed in conjunction with Alpine Trails, Inc., of Park City, Utah, a professional trail design and construction firm with 15 years of experience. Their project portfolio includes numerous popular, successful, mountain bike trails in the Central Wasatch, other parts of Utah, and other regions. Reflecting Alpine Trails' involvement, the proposed trail design features

and construction practices will be up to the latest industry standards. Final trail design and construction are required to meet Forest Service trail standards set forth in FSH 2309.18.

- *In the trail plan, please identify if there will be any limitations or restrictions on the trail during wet periods of time to avoid increased erosion and trail degradation.*

Discussion: The trail design features and construction practices discussed above will avoid most impacts of wet season trail use on both erosion/sedimentation and trail quality. Snowbird and the Forest Service will coordinate to determine whether seasonal opening and closing dates for the trail are needed.

- *I hope that the 1.4-mile-long trail is only the beginning of the mountain bike trail plans for the resort. It would be great to see Alta, Snowbird and the Forest Service work together to link trails from the mouth of Little Cottonwood Canyon (Temple Quarry Trail) all the way up and through Snowbird and Alta resorts into the Park City trails.*

Discussion: Snowbird has not proposed any mountain bike trails beyond this one at this point, but they have identified this trail as the first phase of trail system at the resort. No formal proposal for subsequent phases has been presented to the Forest Service. A larger, area-wide trail network is beyond the scope of this analysis.

In summary, we have considered the issues and concerns raised through public scoping and internal, interdisciplinary review and found nothing that requires further analysis. Extraordinary circumstances that could preclude use of a categorical exclusion are discussed below.

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 this project. 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 project would not impact any Forest Service sensitive plant or animal species. Surveys and analysis of potential impacts on special status species addressed the entire project area. Based on these considerations, threatened and endangered species or their critical habitat do not constitute an extraordinary circumstance for this proposed action.
- B. **Flood plains, wetlands, or municipal watersheds.** The project area is in Salt Lake City's municipal watershed, but potential impacts are adequately addressed by the design features, construction practices, and mitigation measures listed above, particularly preparation of the required erosion control plan. The trail alignments are intended to avoid wetlands, but mitigation measure no. 3 will provide adequate protection if any are encountered. With these mitigation measures in place, flood plains, wetlands, or municipal watersheds do not constitute an extraordinary circumstance for this proposed action.

- C. **Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas.** The project area does not include any designated wilderness, wilderness study area, or National Recreation Area, so such areas do not constitute an extraordinary circumstance for this proposed action.
- D. **Inventoried roadless areas.** The project area does not include any inventoried roadless areas, so such areas do not constitute an extraordinary circumstance for this proposed action.
- E. **Research Natural Areas.** The project area does not include any Research Natural Areas, so such areas do not constitute an extraordinary circumstance for this proposed action.
- F. **American Indian and Alaska Native religious or cultural sites.** The 1999 master plan EIS (p. S-16) states that "Little Cottonwood Canyon and Mineral Basin were used by Native Americans beginning about 8,000 years ago. They came into these areas on short-term forays to exploit seasonally abundant resources. This pattern of life continued until the arrival of European-American settlers in the late 1840s. This resource use pattern leaves few artifacts, and no Native American sites have been identified in or near Snowbird's project area." The two relevant Tribes in the area were contacted during the EIS scoping period, and neither responded to identify any concerns regarding the project. Based on these considerations, American Indian and Alaska Native religious or cultural sites do not constitute an extraordinary circumstance for this proposed action.
- G. **Archaeological sites, or historic properties or areas.** In the course of completing the 1999 master plan EIS (see 3-24 and 3-25), the history of the area and investigations of archaeological sites and historic properties were reviewed, and sites affected by that proposal were surveyed. No sites were identified as eligible for listing in the National Register of Historic Places. Mitigation measure no. 4 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 this proposed action.

Based on the findings summarized above, I am categorically excluding this decision from documentation in an Environmental Assessment or Environmental Impact Statement. Based upon experience with management activities similar to this and upon the environmental review conducted for this project, the effects of implementing this action 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 action has been evaluated for consistency with the goals, objectives, standards, and guidelines of the 2003 Revised WCNF Forest Plan. The project area is 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 action is consistent with the management area prescription. In terms of more specific Forest Plan direction, my review indicates that the proposed action, with required mitigation measures in place, is consistent with all applicable standards and guidelines.

IMPLEMENTATION DATE

This project may be implemented immediately.

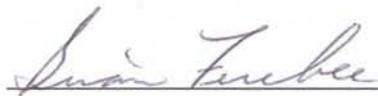
ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

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.

CONTACT PERSON

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Brian Ferebee
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6/15/09
Date

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snowbird
Single Track
Bicycle Trail

LEGEND:

- Approximate Single Track Alignment
- Drainage/Stream
- Property Boundary
- Stream Crossing Locations



SNOWBIRD
TRAILS

