

Submitted via email

May 15, 2018

Polly Bergseng
USDA – Forest Service Intermountain Region
324 25th St.
Ogden, UT 84401
EMAIL:objections-intermtn-regional-office@fs.fed.us



Objection to the Alta MDP Improvement Project

Pursuant to 36 C.F.R. Part 218 (2016), the Utah Chapter Sierra Club objects to the Draft Record of Decision for the Alta MDP Improvement Project. The objecting entity provided the Forest Service with substantive, timely comments regarding the Project¹ and have standing to object per 36 C.F.R. § 218.5(a). Formal notice of the objection period was published in the newspaper of record, the *Salt Lake Tribune*, on April 11, 2018, initiating a 45-day objection period ending on May 29, 2018, making this objection timely.

For the purposes of this objection, and in accordance with 36 C.F.R. § 218.5(d), the lead objector should be identified as Will McCarvill, on behalf of Utah Chapter Sierra Club.

Objecting Entities:

The Utah Chapter of the Sierra Club is a grassroots volunteer organization dedicated to protecting and promoting Utah's outdoors and natural landscapes; educating and advocating for the responsible preservation of clean air, water and habitats; and supporting the development of sustainable renewable energy for the benefit of present and future generations. The Utah Chapter has over 5,000 members who have an interest in the preservation and management of the Uinta-Wasatch-Cache National Forest.

Name of Proposed Project: Alta Master Development Plan Improvement Projects

Names and Titles of Responsible Officials: Forest Supervisor, Dave Wittekiend

Implementation Area: Salt Lake Ranger District, Uinta-Wasatch-Cache National Forest

Reasons for Objection

- I. **The rationale provided for the Germania Pass-Mt. Baldy Tram is unconvincing and lacking support in the project record.**

The stated rationale for the Tram project is to provide ski patrol access to the top of Mt. Baldy in order to use conventional explosives for avalanche control rather than the 105mm Howitzer now used.

While the Draft DN and FONSI for this project state that "The new lifts are not designed to add capacity," and that the "Mt. Baldy tram would have a very low capacity and would serve primarily to transport ski patrol personnel," this statement is undermined by concerns raised in public comments on this project and in the Forest Service's own EA ("With even limited lift access, public use of the inherently dangerous Baldy Chutes would increase") (EA at 34).

¹ Including, but not limited to: Title and Dates of comments

No limitations on “lift access” are included in the final decision. The Tram will be used to allow skier access to the summit of Mt. Baldy, and would therefore significantly decrease the barriers to access to this area for most skiers. Therefore, without any noted restrictions or specifications included for this project that would, *in fact*, limit the use of the tram to ski patrol personnel, the Forest Service cannot rely on analysis of just one aspect of the Tram’s functionality to justify its project selection.

Fundamentally, by presenting the Tram as an “avalanche control structure,” the Forest Service is misleading the public and failing to provide sufficient information about the purpose and need, as well as the expected impacts, of this project, as required under NEPA.

Relief Sought:

- 1) Revision of the EA to include additional information about the expected recreational use of the Germania Pass to Mt. Baldy Tram and full analysis of impacts from increased skier access to Mt. Baldy.

II. The Forest Service’s scenic resource analysis for the Tram is flawed.

The Tram will mar another peak in the Wasatch Range with towers, cables, and additional structures for ski patrol and skiers. There will likely be additional structures built such as fencing to keep skiers from unintentionally accessing the steep and dangerous terrain on the north side of the peak. These structures will visually impact Mt. Baldy and also negatively impact the fragile alpine environment.

The EA states as much when it explains that public use of the Baldy Chutes, which is likely to increase with the Tram is “a safety management issue” which Alta has familiarity dealing with through the use of “rope lines and signage,” among other measures. (EA at 34-35). However, the impact on the scenic resources of Mt. Baldy from these likely components are never fully analyzed in the EA.

The Alta MDP Improvements Projects include using GaseX or other equivalent avalanche control technologies for other parts of the resort. These same technologies can be used for avalanche control on Mt. Baldy without construction of a Tram. While the EA tries to dismiss this option by stating that “This concentration of installations would disturb a substantial proportion of the area’s alpine habitat during construction and would permanently degrade its scenic character,” EA at 30, there is no evidence provided that the presence of these installations would degrade scenic character (or, for that matter, disturb habitat) any more significantly than the presence of the Tram structure and associated “safety management” infrastructure that the Forest Service assumes will be put in place.

The Forest Service cannot merely state that one alternative will degrade scenic character while failing to provide a similar assessment and comparison for other alternatives. Such a gap in analysis undermines the public’s ability to accurately assess this project and the alternatives presented and renders the current EA insufficient under NEPA.

Relief Sought:

- 1) The Germania Pass-Mt. Baldy Tram should be removed from the list of authorized projects under this decision.
- 2) Use GaseX to conduct avalanche control on Mt. Baldy as recommended for the rest of the resort.

III. Conclusion

The Wasatch are a very limited resource. Additional development, particularly projects for which a complete and thorough analysis and exploration of alternatives has not been sufficiently completed, should not be permitted.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. McCarvill".

/s/ William McCarvill
Chair, Utah Chapter Sierra Club
423 West 800 South Suite A103
Salt lake City, UT 84101
will@commercialchemistries.com