

Certified Mail # 7020 3160 0001 9453 7257

Custer Gallatin National Forest

Hebgen Lake Ranger District

Attn: Master Development Plan Rendezvous Nordic Ski Area

PO Box 520

West Yellowstone, MT 59758

**RE: SCOPING FOR THE MASTER DEVELOPMENT PLAN RENDEZVOUS
NORDIC SKI AREA**

Hello,

Native Ecosystems Council, the Alliance for Wild Rockies, and Council on Wildlife and Fish would like to submit the following scoping comments for the upcoming National Environmental Policy Act (NEPA) for the Master Development Plan Rendezvous Nordic Ski Area.

1. Please provide an understandable description to the public as to how this proposed expansion of this development complies with the Custer-Gallatin (CG) Revised Forest Plan (RFP) in regards to the grizzly bear, including within this recovery area.

Although no information was provided in the scoping notice, we note that there are CG RFP requirements for how permanent developments in Recovery Habitat are managed, including various standards. These are provided below for CG RFP Standard FW-STD-WLGB, 04.

Developed Sites: inside the recovery zone/primary conservation area, new infrastructure designed to accommodate additional human capacity for administrative and/or public use shall be restricted to the area within the authorized footprint of a site that existed in 1998 or the area within 300 meters of a primary road that existed in 1998 (see appendix F for map of authorized footprints and primary segments affected). Any such increases shall meet the following conditions:

- a. All new infrastructure needed to accommodate increased capacity at existing developed sites shall be completed contained within the authorized footprint for the site. Exceptions may be made only for emergency administrative and maintenance infrastructure needed to reduce resource damage or minimize potential for bear-human conflicts where such infrastructure cannot feasibly be accommodated with the authorized footprint.
- b. Added capacity at existing resorts that operate under special use permit shall not exceed then percent increase over use authorized in 1998.
- c. All infrastructure associated with new developed sites along primary roads shall be: 1)located no more than 300 meters (approximately 1000 feet) from the edge of the primary road, 2) for day-use only (see glossary, 3) non-commercial in nature, and 4)located outside of known wildlife crossing areas, riparian areas, ungulate calving/fawning grounds, and whitebark pine stands. Any new roads associated with new developed sites within 300 meters of a primary road shall not reduce existing secure habitat below established baseline levels.

05 Developed Sites. Inside the recovery zone/primary conservation areas, the number and capacity of developed sites outside of authorized footprints, or more than 300 meters from a primary road shall be maintained at or below 1998 baseline levels. See glossary: baseline levels for grizzly bears, and appendix F for baseline developed sites. Construction of new sites or added human capacity at existing sites outside of authorized footprints or primary road buffers must be mitigated for by closure of, or reduction of capacity in a comparable site within

the affected bear management subunit. Mitigation must be in place before, or concurrent with, construction at new or existing sites.

Additional acceptable mitigation measures are listed below, and include:

b. Modifications to dispersed recreation sites (outside of authorized footprints and primary road buffers) are allowed only where necessary to address ongoing resource damage or reduce potential for human-grizzly bear conflicts. Modifications shall accommodate the same type (such as day use vs. camping) and level (human capacity) of use occurring at existing dispersed sites. Examples include, but are not limited to addition of toilets and/or bear-resistant food/garbage containers to address water quality, sanitation, and/or minimization of attractants.

c. Consolidation and elimination of dispersed recreation sites is acceptable mitigation for construction of a new developed site (such as campground, day use area) where needed to benefit bears and other resources. Dispersed sites replaced by the new developed site must be restored and those areas shall be closed to the public for future vehicle access and overnight use.

Please provide a clear, understandable description to the public, along with high quality maps, to demonstrate how this CG RFP direction will be met for this proposed development expansion.

2. Please provide an understandable description to the public as to how this development expansion will be mitigated within the adjacent recovery areas in the 3 grizzly bear subunits all impacted by the South Plateau Landscape.

We would like to note that the Forest Service provides complicated descriptions of how projects are to be coordinated with grizzly bears, and how the CG RFP will be implemented for a project, descriptions that are almost impossible for any

publics to interpret. This is an issue we are specifically raising for this project. We would like to have clear, understandable information provided as to how this project will be coordinated with the SPLAT project as per management of grizzly bears in the Recovery Zone, including how “take” of grizzly bears will be measured for each year that these joint adjacent projects will be in effect, including the permanent levels of “take” from the increased development of the Rendezvous Ski Area. Good quality maps that define proposed mitigation measures and activities are also important.

3. What exactly is the status of the 1,670 acres of the Rendezvous Ski Area for grizzly bears, and how is this status coordinated with adjacent areas where vegetation treatments are planned for the next 15 or more years?

It is not clear specifically how the combined effects of the SPLAT Project and this expanded development of the Rendezvous Ski Area can be done in grizzly bear recovery area, an area that is extensively used by bears, including the Madison #2 subunit. This coordination includes how together, these projects will result in significant public use of grizzly bear habitat throughout the SPLAT landscape. What level of increased “take” between these 2 long-term projects, impacts that not only include direct mortality, direct displacement, and habituation for a considerable number of bears, can occur without the triggering of significant adverse impacts to grizzly bears. Please provide the measure of how significant adverse impacts are triggered, measures that are independent of the CG RFP direction for grizzly bears, which are meaningless. These RFP criteria do not include valid measures of security habitat, valid landscape area requirements for security habitat, valid measures of motorized activity, or valid measures of mountain bike use. The current best science on grizzly bears needs to be used in defining measures of cumulative impacts to grizzly bears, so that measures of significant adverse impacts are valid.

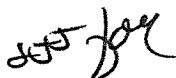
4. The Biological Assessment that will be prepared for this expanded development project in Recovery Habitat needs to provide enough detailed information to the public so that estimated direct and cumulative "take" of grizzly bears can be provided, as well as criteria as to what increased level of "take" results in significant adverse impacts on the grizzly bear.

We would like to see specifically how "take" on grizzly bears will be measured for the combined impacts of this development expansion and the SPLAT Project, and what increased levels is considered a significant adverse impact. This estimated level of "take" needs to include the likely "spillover" of recreation activity into the 56 miles of new roads proposed for the SPLAT Project, roads that will certainly attract recreational use from the developed ski area.

Regards,



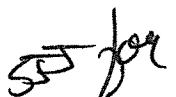
Sara Johnson, Director, Native Ecosystems Council, PO Box 125, Willow Creek, MT 59760; phone 406-579-3286; sjjohnsonko@ yahoo.com.



Mike Garrity, Director, Alliance for the Wild Rockies, PO Box 505, Helena, MT 59624; phone 406-459-5936. wildrockies@gmail.com.



Steve Kelly, Director, Council for Wildlife and Fish, PO Box 4641, Bozeman, MT 59772. Phone 406[920-1381. troutcheeks@gmail.com.



Kristine Akland, Center for Biological Diversity, PO Box 7274, Missoula, MT 59807; Phone 406-544-9863. kakland@biologicaldiversity.org.