

Data Submitted (UTC 11): 8/28/2018 11:26:03 PM

First name: Richard

Last name: Spotts

Organization:

Title:

Comments: I wish to submit my comments on the Lee Canyon EIS.

I do not believe that this EIS evaluates a "reasonable range of alternatives" as required by the relevant NEPA CEQ regulation. The EIS action alternatives provide for the expansion of summer commercial recreational uses. This is too limiting and prejudicial of an analysis.

The Forest Service should have developed and included an EIS alternative which allows expansion of winter activities while not permitting summer recreation expansion. This alternative would maintain the relatively undisturbed conditions on the mountain during the summer.

As you know, about two years ago the U.S. Fish and Wildlife Service listed the Mount Charleston blue butterfly as an endangered species.

The federally protected critical habitat for the rare insect includes much of the resort, which has operated on Forest Service land under a long-term permit since 1962.

Along with some butterfly experts, I realize that, if properly designed and implemented, some resort work could open up the forest canopy and improve the species habitat. However, because the species breeds during the summer, the expansion for summer commercial recreation could offset these potential benefits and possibly cause more adverse impacts on the species than the status quo situation. These potential pros and cons are precisely why another EIS alternative is reasonable and necessary so that an objective analysis may occur, including a fair comparison of a reasonable range of alternatives. Therefore, a supplemental EIS is needed with the additional alternative.

In addition to concerns about this listed butterfly species, I am concerned about the potential for summer resort expansion to convert this relatively remote and fragile area into an industrial zone. I believe that protecting the remote and fragile character of this area is more important than increasing profits for a commercial venture. These are federal lands that belong to all Americans, and they should be managed to reflect the national public interest.

Please add me to the mailing list for this proposed project. I hope that my comments are helpful.

Thank you very much for considering my comments.

Richard Spotts

Saint George Utah