

Data Submitted (UTC 11): 10/5/2022 2:59:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Comments: I do not wish to object and am submitting my comments anonymously. I want you to do the right thing as explained below.

The USFS needs to complete an environmental assessment, biological assessment, and Decision Notice that incorporates design criteria and special use permit stipulations to protect the environment. Use of a categorical exclusion is not consistent with USFS policy as stated below.

FSH 1909.15

32.11- The proposed project is not consistent with any of these categories.

32.12- The proposed project is not consistent with any of these categories. The proposed project is more than an administrative change. It increases the scope and intensity of authorized activities by providing significant increases in overnight capacity, restaurant odors and garbage, and associated uses of trails in grizzly bear and lynx habitat, recommended wilderness, and sensitive species habitat. It would also alter a development with historic significances

USFS policy states that a categorical exclusion may be used for:

(10) Amendment to or replacement of an existing special use authorization that involves only administrative changes and does not involve changes in the authorized facilities or increase in the scope or intensity of authorized activities, or extensions to the term of authorization, when the applicant or holder is in full compliance with the terms and conditions of the special use authorization.

31.2- In considering extraordinary circumstances, the responsible official should determine whether or not any of the listed resources are present, and if so, the degree of the potential effects on the listed resources. If the degree of potential effect raises uncertainty over its significance, then an extraordinary circumstance exists, precluding use of a categorical exclusion.

The listed resources are present and there is uncertainty over the significance of effects. The project, as proposed, May Effect TES species either directly, indirectly or cumulatively. Potential significance of effects necessitates a biological assessment and analysis of cumulative effects that considers the effects of reasonably foreseeable spin-off effects associated with greatly increasing overnight capacity at this site. The existing special use permit does not include terms and conditions needed to mitigate the effects of the proposed expansion.

32.4-(b) RULE OF CONSTRUCTION.-For purposes of subsection (a), the ministerial issuance or amendment of an authorization occurs only when the issuance or amendment of the authorization would not change the physical environment or the activities, facilities, or program of the operations governed by the authorization, and at least one of the following apply.....

The proposed action would change the physical environment, facilities, and program of operations covered by the current authorization.