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Organization:

Title:

Comments: Comments: Plan amendment being objected to

This objection concerns the programmatic Forest Plan amendment for the Grand Targhee Master Development Plan Projects. The amendment would convert approximately 866 acres now managed under Management Prescription 2.1.2 Visual Quality Maintenance, including 125 acres overlain by Management Prescription 2.8.3 Aquatic Influence Zone, to Management Prescription 4.2 Special Use Permit Recreation Sites.

The Final EIS states that this amendment is specific to an 866-acre area, applies to all future projects and activities within that area, and would remain effective for the life of the current Forest Plan.

Responsible Official: Jay Pence, Teton Basin District Ranger. Issues and parts of the amendment objected to

This objection applies to the proposed conversion of the South Bowl and Mono Trees expansion areas from Visual Quality Maintenance and Aquatic Influence Zone prescriptions to Special Use Permit Recreation Sites.

The objector specifically objects because the amendment would:

Replace land-management direction intended to protect visual quality and aquatic influence values with a recreation-site prescription designed for concentrated private resort use.

Apply not only to the currently proposed expansion but also to future ski-area-related projects within the 866-acre area for the life of the current Forest Plan.

Open an area now managed for visual quality and aquatic influence protections to a management emphasis that expects the area to function as a ski area.

Objection statement

The programmatic amendment should not be approved because it would permanently shift the management emphasis of a presently protected landscape toward intensive resort development in a way that threatens ecological integrity, scenic character, and the small-town atmosphere of the surrounding community.

First, the amendment is not minor in practical effect. Although the FEIS describes the acreage as less than one-tenth of one percent of the forest, it also states that the amendment would apply to all future projects and activities within the 866-acre area for the life of the current Forest Plan. That means the decision is not limited to the immediate construction proposal; it would establish long-term management direction favoring ongoing ski-area expansion and associated development pressure in South Bowl and Mono Trees.

Second, the amendment removes or weakens the force of the current prescriptions most directly tied to the values at stake. The FEIS explains that the purpose of the amendment is to convert land now managed under Visual Quality Maintenance and Aquatic Influence Zone prescriptions to Special Use Permit Recreation Sites because the current prescriptions would not accommodate the intended developed recreation uses. That admission shows the amendment is being used to overcome existing plan direction that protects scenic and aquatic resources, rather than to maintain those resources while evaluating a narrower project footprint.

Third, the amendment risks long-term degradation of natural character. The FEIS acknowledges that the programmatic amendment would have direct, indirect, and cumulative impacts on terrestrial and aquatic

ecosystems, watersheds, riparian areas, and plant and animal communities within the conversion area, even though the agency concludes those impacts would not be significant at the ecosystem scale. Ecosystem-scale insignificance is not the right measure for residents and users who experience this landscape at the local scale, where the loss of undeveloped terrain, visual openness, habitat security, and riparian protection can be substantial and lasting.

Fourth, the amendment undercuts the visual and community values that make the area distinctive. Converting land from Visual Quality Maintenance to Special Use Permit Recreation Sites changes the expected function of the area from conserving scenic character to serving concentrated recreation use. Even if future projects require separate NEPA review, the amendment would predispose the area toward additional resort-oriented development, infrastructure, clearing, and use intensity that are incompatible with preserving a natural setting and the small-town atmosphere valued by nearby communities and visitors.

Fifth, the amendment is especially troubling because the FEIS itself states that future ski-area-related projects would likely be proposed beyond those included in the current FEIS. A programmatic change with that breadth should not be adopted where the principal public concern is that expansion will industrialize a landscape presently valued for its natural environment, scenic quality, and quieter community character.

Link to prior substantive formal comments N/A

Suggested remedy

The reviewing officer should instruct the responsible official to modify the draft decision in one of the following ways:

Deny the programmatic Forest Plan amendment and select an alternative that does not convert South Bowl and Mono Trees to Management Prescription 4.2 Special Use Permit Recreation Sites.

At a minimum, remove the South Bowl and Mono Trees boundary expansion areas from the amendment so that the current Visual Quality Maintenance and Aquatic Influence Zone prescriptions remain in place.

If the agency insists on any amendment, narrow it so it applies only to specifically approved, presently analyzed facilities and does not authorize future ski-area-related projects within the 866-acre area without a new Forest Plan amendment.

Require stronger, enforceable plan components that preserve scenic integrity, riparian function, wildlife security, and the undeveloped character of the area before any management prescription change is approved.

Concise improvement statement

The proposed decision may be improved by declining the broad programmatic conversion of these lands to a recreation-site prescription and retaining existing plan direction that better protects visual quality, aquatic influence values, ecological integrity, and the community's interest in maintaining a natural landscape and small-town setting.