

Chapter 2 - Alternatives

This chapter:

- explains how the public was informed of the Timberline proposal, and opportunities for public input;
- summarizes the issues that were identified as a result of public involvement;
- describes the alternatives that were considered to address issues and concerns;
- provides maps of the alternatives considered in detail;
- identifies the design features and mitigation measures that would be implemented to reduce the chance of adverse resource effects; and
- summarizes the effects of the alternatives in comparative form to clearly display the differences between each alternative and to provide a clear basis for choice among options by the decision maker and the public.

2.1 Public Involvement

Scoping is the process of gathering comments about a site-specific proposed federal action to determine the scope of issues to be addressed and for identifying any unresolved issues that are related to the proposed action (40 CFR 1501.7).

Public input on proposed Timberline activities was solicited from the general public, Forest Service employees, other public agencies, and organizations. Public involvement was sought through various means:

- 1) On October 1, 2007, the Timberline proposal was listed in the Monongahela Schedule of Proposed Actions (SOPA), a publication that is mailed to over 140 individuals and organizations and is posted on the Monongahela National Forest's website. The project has been listed in each subsequent issue of the SOPA.
- 2) On January 29, 2008, a scoping letter requesting input was sent to interested parties. This scoping letter summarized the purpose and need for action, the proposed action, and described various ways to get additional information and how to provide input.
- 3) On January 29, 2008, legal notices were published in *The Grant County Press* and *The Elkins Inter-Mountain* requesting input. These legal notices gave a short summary of the purpose and need and proposed action, and described how to get additional information and how to provide input.
- 4) On January 31, 2008, the proposal and request for input were posted for review on the Monongahela National Forest's website at www.fs.fed.us/r9/mnf/ under "Forest Planning".

Comments have been provided by individuals and organizations that have contacted us about the Timberline proposal in the form of letters, e-mails, or phone calls since the scoping process began (project record). Comments were used to define issues, develop alternatives, or identify environmental effects.

The official 30-day Notice and Comment period will begin with the publication of a legal notice in *The Elkins Inter-Mountain* newspaper. That notice will announce the availability of the draft Timberline Environmental Assessment (EA) and will request comments and input. After the Deciding Official and Interdisciplinary Team (IDT) review comments and input, the EA will be finalized.

2.2 Issues

The purpose of soliciting comments is to determine whether significant issues exist that affect the proposed action. An issue is a point of discussion, debate, or dispute (often about environmental effects). Not all issues are significant issues. Issues may be deemed significant because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflict. They are used to formulate alternatives, prescribe mitigation measures, or analyze environmental effects. They are also used to determine the scope (49 CFR 1508.25) of the environmental analysis.

The IDT reviewed information received from individuals, adjacent landowners, organizations, and other agencies. The disposition of the comments that were received during the initial scoping period is documented in the project record. No issues were identified that would lead to the development of additional alternatives to be analyzed in detail.

2.3 Alternative Considered but Eliminated from Detailed Study

During initial planning and scoping, one alternative to the Proposed Action was suggested and considered. The following is a summary of the alternative that was considered, but for the reasons noted here, was eliminated from detailed study.

2.3.1 Red Spruce Ecosystem Restoration

A suggestion was made that the permit authorization process be used as an opportunity to require Timberline to become involved in large-scale red spruce ecosystem restoration. While red spruce ecosystem restoration is a laudable goal, it is outside the scope of this Special Use Permit (SUP) process to require such involvement as a condition of a SUP. Past SUPs and the Proposed Action have required planting of red spruce and other mitigation measures to enhance red spruce habitat for the Cheat Mountain salamander.

2.4 Alternatives Given Detailed Study

The following section describes the two alternatives that were studied in detail: Alternative 1 (No Action); and Alternative 2 (Proposed Action). Acres or miles identified for activities have been identified from mapping and should be considered estimates. Figure 1 is a map that shows the Timberline project area. This map is located at the end of Chapter 2 for paper EAs, or as a separate file for electronic versions of the EA.

2.4.1 Alternative 1 – No Action

The National Environmental Policy Act (NEPA) requires an EA to include a “No Action” alternative to serve as a baseline to compare action alternatives. This alternative provides the decision-maker with a clearer basis for a reasoned choice among the alternatives studied in

detail. It responds to people who do not want management to take place on National Forest System (NFS) lands and only want nature to influence change in the project area, or who do not want a private entity (Timberline) to benefit financially from use of NFS lands.

The No Action alternative would not allow Timberline to use the NFS land portion of Salamander Run as part of their operation. Infrastructure on NFS lands associated with snowmaking would need to be removed. Those areas would be rehabilitated to prevent erosion. Salamander Run, the connector trail, and the abandoned road would not be rehabilitated under this alternative.

2.4.2 Alternative 2 – Proposed Action

Alternative 2 is the Proposed Action that was presented to the public during the scoping period. This alternative was developed to meet the purpose and need for action described in Chapter 1. As noted in Chapter 1, activities are proposed on National Forest System (NFS) land in Management Prescription (MP) 4.1 areas. Any permit resulting from this analysis and subsequent decision would not authorize activities on private land without permission of the landowner or on NFS lands in other areas.

Timberline has submitted an application to issue an SUP. This action requests continued year round use and maintenance of the section of Salamander Run crossing NFS land, continued use and maintenance of a “connector” trail (not a FS system trail) that runs from the eastern apex of the ski slope to an abandoned road (formerly FR 80), and continued use of the section of the abandoned road that runs south to the Canaan Valley Wildlife Refuge. This alternative would approve a permit for 10 years and would specifically include:

- The portion of the existing downhill ski slope (Salamander Run) located on NFS lands along with the existing snowmaking infrastructure. Existing snowmaking infrastructure on the NFS section of Salamander Run consists of 13 electrical pedestals, 13 water hydrants, and 4 “water stick” snowmaking guns. Pedestals are connected by underground electrical wiring. Hydrants are connected by underground steel pipe. Summer and winter inspections are completed on electrical pedestals and water hydrants. Maintenance and replacement procedures would be addressed in the annual Operation and Maintenance (O&M) Plans, which would be a requirement of the SUP authorization. Snow grooming machines are currently used on the ski slopes throughout the ski season. Snowmax ®, a snow inducing protein and the only ingredient added to the water, is used for making snow. Ski season snowmaking routinely starts in November and ends by March 15th. No motorized vehicle use occurs on the ski slope except for maintenance and administrative use. Mountain biking, hiking, and occasional horseback riding on Salamander Run generally occur from April through October, weather dependant. Timberline rents bicycles, but is not authorized to offer “guided” services for these recreational uses.
- The connector trail runs from Salamander Run to the abandoned road. This trail is used year round for hiking, mountain biking, cross country skiing, and horseback riding. This trail is not a system trail as identified or defined by the FS. The proximity of Salamander Run to the abandoned road and the adjacent Dolly Sods Wilderness boundary “paved the way”, so to speak, for folks to bush-whack a short “Y” trail connecting each area to the other. Currently, this is a well-used established trail. The Forest has worked with

Timberline on maintenance needs (e.g., water bar installation) for the connector trail and would continue to do so. This would be covered in the annual O&M Plans.

- Approximately 4,100 feet of the abandoned road running from the connector trail to the Canaan Valley Wildlife Refuge boundary.

The proposed action also includes the following items specific to the known Cheat Mountain salamander (CMS) population and habitat adjacent to Timberline and NFS land, including, but not limited to Salamander Run:

- Cheat Mountain salamander population monitoring would be continued annually by a biologist agreed upon by the USFWS and the MNF. Monitoring costs would be the responsibility of Timberline for the duration of this permit or until the USFWS and the MNF deem this action unnecessary. Additional habitat assessment or population inventories needed on Timberline property would be completed and associated costs would be the responsibility of Timberline.
- Timberline would purchase and plant additional spruce (i.e. native red spruce, but not Norway spruce) throughout the wooded area within the hairpin curve of the ski slope. Specific numbers, sizes, and locations of trees would be determined by site-specific analysis when the trees are available to be planted. Costs for this activity would be the responsibility of Timberline.
- Timberline would purchase, install, and annually maintain additional leaf fences within and throughout the hairpin turn in the wooded area. Specific numbers, sizes, and locations of fences would be determined through discussions with USFWS and the MNF. Costs for this activity would be the responsibility of Timberline.
- Timberline would purchase and install cover slabs throughout the hairpin turn in the wooded area. Specific numbers, sizes, and locations of cover slabs would be determined by site-specific analysis when the materials are available. Costs for this activity would be the responsibility of Timberline.
- Timberline would pay for the chemical analyses of soil pits to be dug on both NFS land and Timberline land.
- Additional mitigation measures may be required, depending on the results of soil and water chemistry testing, and Endangered Species Act (ESA) consultation with the USFWS.

At the discretion of the MNF, the MNF may assist Timberline in the purchase, planting, and installation of the items above (i.e. trees, leaf fences, cover slabs).

Permit authorization would not include ski-lifts, buildings, parking lots, or other facilities of the ski resort not specifically listed above.

“The proposed action would also require a contemporaneous, project-specific Forest Plan amendment that would not change overall Forest Plan direction or associated outputs. Amend Forest-wide Standards TE07 at page II-23 as follows:

“Allow authorization of a special use permit for Timberline Four Seasons Resort Management Company, Inc. to continue use and maintenance of a portion of Salamander Run, a portion of the abandoned road, and a non-system connector trail on National Forest

System lands that may result in adverse effects to a TEP species (Cheat Mountain salamander) and its habitat.”

Table 2.1. Monitoring applicable to action Alternative 2

Resource	Monitoring Description	Who's Responsible for Monitoring?
Wildlife	CMS: population & habitat	USFWS & MNF to determine monitoring needed; Timberline to pay for monitoring; Monitoring to be done by agreed-upon biologist.
Wildlife	Leaf fence maintenance needs	Timberline to do monitoring.
Wildlife	Spruce planting survival rate	MNF to do monitoring.
Soils, Water	Soil and water chemistry analysis should be looked at in 3 different areas: soils under FS management adjacent to the use area; soils under trail management that are grassed over; and soils under native vegetation (i.e. spruce cover) under Timberline Management. Analyses conducted on the soils should include a full soil chemistry profile of each horizon and physical description. Monitoring of soil chemistry should occur at a minimum every 5 years to show establishing trends that are influenced by Timberline activities, FS management, or other outside influences such as acid deposition.	FS to dig soil pits and collect material and water. Timberline to pay for chemical analyses.

All alternatives have been designed to meet applicable state and federal laws and regulations, Forest Service policy and directives, and Forest Plan standards and guidelines. The implementation practices or features shown in Table 2.2 would be used with the specified activities, if selected, to help meet Forest Plan direction. This table gives additional detail on how to implement Forest Plan direction, especially when Forest Plan direction is general, or a specific method of implementation is recommended to ensure the desired results.

Table 2.2. Design features and implementation strategies applicable to action Alternative 2

Resource and Concern	Forest Plan Direction	Implementation Practice or Feature
Soils. Failure to spell out the erosion prevention measures in logical, easy to use format could result in failure to implement all appropriate and required measures.	FP: pages II-9 through II-11	In the Annual Operating, Maintenance, & Monitoring Plans, Forest Plan direction should be listed to prevent soil erosion from any ground disturbing activities.
Soils. Failure to revegetate disturbed areas could result in erosion.	SW 19, page II-11	Apply seed and mulch to all disturbed soils after winter use. Use weed free mulch (straw or coconut fiber, but not hay) and native, non-invasive seed mixtures, unless other species are more suitable for specific site locations (e.g., lawn type grass on Salamander Run).

Resource and Concern	Forest Plan Direction	Implementation Practice or Feature
Non-Native Invasive Species. Maintenance or construction equipment that has been operated in other locations may introduce NNIS species.	VE 22, page II-20	Any maintenance or construction equipment that has been operated or stored off-site must be clean before being brought onto National Forest land. Equipment must be free of all soil, seeds, vegetation, or other debris that could contain or hold seeds. Washing of equipment is not allowed on National Forest land. Washing requirements do not apply to equipment that is stored and used exclusively on the permittee's property.
Non-Native Invasive Species. Some seed mixes contain invasive species.	VE 23, page II-20	Seeding for any soil stabilization must use a Forest Service-approved non-invasive seed mix. Seed shipments must be accompanied by the vendor's test results showing the seed to be substantially free of noxious weeds.

The mitigation measures shown in Table 2.3, if selected for implementation by the Deciding Official, would be used with the specified actions to help reduce or eliminate potential negative impacts and to help meet Forest Plan direction. In many cases, the mitigation measures apply to specific units, areas, and/or alternatives.

Table 2.3. Mitigation measures applicable to Alternatives 2

Resource and Concern	Mitigation Measure	Effectiveness Information & Reference
Wilderness. Illegal use of bikes within Wilderness may be facilitated by Timberline's rental of mountain bikes and the connector trail, which provides access between Salamander Run and the Wilderness.	Timberline will inform bike users that bike use is illegal within Designated Wilderness (Dolly Sods Wilderness) through appropriate information in brochures/signage and public contacts.	Education can help prevent inadvertent illegal bike use within Wilderness.
Non-Native Invasive Species. Hay and horse feed may introduce NNIS species.	Do not allow users to feed horses or bring hay on to NFS lands. Do not use hay for mulch – substitute straw or MNF-approved weed free mulch.	This prohibition would reduce a source of NNIS introduction.
Non-Native Invasive Species. NNIS may be introduced by the permitted uses in spite of the other mitigation measures designed to prevent such infestations.	Sites under permit should be monitored by the MNF for NNIS at least once every three years. If infestations with the potential to cause ecosystem disruption occur, and the MNF can reasonably attribute those infestations to the permitted use, the permittee must collaborate with the MNF to develop and implement an MNF-approved control strategy.	NNIS infestations can be most readily controlled and eliminated if detected early before they spread.
Wildlife	Wind-thrown trees within the CMS colony should not be removed.	Wind-thrown trees are a part of the natural ecosystem and would be beneficial to CMS and other species.

2.5 Comparison of Activities and Effects by Alternative

Table 2.4 summarizes the activities that may be implemented under each alternative.

Table 2.4. Summary comparison of activities proposed, by alternative

Activity	Alternative 1 - No Action	Alternative 2 – Proposed Action
Salamander Run – Use	No permitted use by Timberline, but the public could still use	Yes – both permitted use by Timberline and use by the public
Salamander Run - Maintenance	No maintenance by Timberline	Yes – by Timberline
Connector Trail – Use	No permitted use by Timberline, but the public could still use	Yes – both permitted use by Timberline and use by the public
Connector Trail – Maintenance	No permitted use by Timberline, but the public could still use	Yes – by Timberline
Abandoned Road - Use	No permitted use by Timberline, but the public could still use	Yes – both permitted use by Timberline and use by the public
Cheat Mountain salamander population and habitat monitoring	The current level of monitoring would not be continued. Any future monitoring would depend on specific needs and funding.	Yes – paid for by Timberline
Soil pit chemistry monitoring	Would not be required. Monitoring needs would be directed and prioritized by the FS Wildlife Biologist in cooperation with the Forest Soil Scientist as part of the Forest-wide Soil Chemistry Monitoring Program.	Yes – work done by MNF; chemical analysis paid for by Timberline
Placement of cover slabs for CMS habitat enhancement	No	Yes – slabs purchased and installed by MNF
Planting of red spruce and other trees for CMS habitat enhancement	No	Yes – trees purchased by Timberline and planted by MNF
Placement of leaf fences for CMS habitat enhancement	No	Yes – fences purchased and installed by Timberline

Table 2.5 summarizes how the alternatives differ in regards to their resource impacts (described in more detail in Chapter 3).

Table 2.5. Summary comparison of environmental effects, by alternative

Resource	Alternative 1 – No Action	Alternative 2 – Proposed Action
Soils/Geology/ Impacts		
Prevention or minimization of erosion.	Yes	Yes
Prevention of changes to soil chemistry resulting from Timberline’s use of Snowmax ®.	No	No
Air Impacts		
Primary Criteria Pollutants	No violations of the NAAQS for criteria pollutants.	No violations of the NAAQS for criteria pollutants.
Wildlife Impacts		
Prevention of impacts to wildlife TES species.	<ul style="list-style-type: none"> • May affect Cheat Mountain salamander • May affect northern flying squirrel • No effect to 6 other Threatened species. • All Sensitive species: either No impact – or – may impact individuals, but not likely to cause a trend to federal listing or a loss of viability. 	<ul style="list-style-type: none"> • May affect Cheat Mountain salamander • May affect northern flying squirrel • No effect to 6 other Threatened species. • All Sensitive species: either No impact – or – may impact individuals, but not likely to cause a trend to federal listing or a loss of viability.
Aquatic Species Impacts		
Prevention of impacts to aquatic TES species.	Yes	<ul style="list-style-type: none"> • Redside dace: may impact individuals, but not likely to cause a trend to federal listing or a loss of viability. • No effect to all other Sensitive species. • No species listed as Threatened or Endangered under ESA.
Botany Impacts		
Prevention of Impacts to TES species.	Yes	Yes
Prevention of NNIS introductions	Yes	Likely
Environmental Justice Impacts		
Effects to minority and low-income populations [EO 12898]	Slight economic impact to local seasonal workers and community	No disproportionate impact on minority or low income populations.

Resource	Alternative 1 – No Action	Alternative 2 – Proposed Action
Heritage Resource Impacts		
Impacts to heritage resources	None	None
Recreation Impacts		
Developed and Dispersed Sites	0	0
Public Access Roads	No change	No change
Recreation Special uses	SUP would not be issued to timberline. Other Special Uses would be considered on case-by-case basis.	Current Special Use activity would continue. Other Special Uses would be considered on case-by-case basis.
Wilderness	Yes – Consistent with law.	Yes – Consistent with law.
Trails	Connector trail would not be maintained by the permittee.	Connector trail would receive trail maintenance from Timberline.
Scenery	Slight changes	No changes
Achievement of Project Objectives, Purpose & Needs		
	No	Yes