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David Whittekiend
 Forest Supervisor
 857 S Jordan Pkwy
 South Jordan, UT 84095

Rebecca Holtz
 District Ranger, Salt Lake Ranger District
 6944 South 3000 East
 Cottonwood Heights, UT 84121

RE: Proposed Alta MDP Improvement Projects

Dear Mr. Whittekiend and Mrs. Holtz,

Friends of Alta is Alta's local land trust. We have been working to protect the environment of Alta and to preserve Alta's unique character and heritage since 1981. Over the years Friends of Alta has worked very closely with the USFS and the Alta Ski Area, often working to accomplish the same recreation and conservation goals. We sincerely appreciate the opportunity to provide input on the scope of the NEPA review for the authorization of these projects.

We feel that many of the projects that the Alta Ski Area hopes to complete in the next five years will enhance the skier experience. It is important to Friends of Alta and the Alta community that the Alta Ski Area remains a viable and thriving business, yet at the same time we cherish the opportunity to guide future uses on our public lands. We also want to note that all of these projects are within the ski area's existing special use permit boundary with the USFS. The focus on this boundary is generally consistent with other planning processes including Mountain Accord.

Generally speaking, we request that an inventory of the flora and fauna is conducted wherever ground disturbance is proposed so that habitats for designated sensitive species (identified by a Regional Forester) are not reduced or lost. All disturbance areas must be restored with native vegetation following best practices. As of late, the Alta Ski Area has enhanced its restoration efforts by skimming the top soil and vegetation to be saved and replaced when work is completed. We encourage the ski area to continue with this technique.

According to SkiUtah, Alta receives an average of 560 inches of snowfall each year. Undoubtedly, this means that the snow safety programs on highway 210 and in the Alta Ski Area are a vital function to our community's well-being. The use of military artillery (avalauncher and howitzer recoilless rifle) to manage snowpack conditions should not be taken for granted. Alta Ski Area has a good record with military artillery, but there are risks to the public using this method. For enhanced public safety reasons, we understand the effort to phase out military artillery and we support finding solutions with the least environmental impacts that meet public safety standards.

Counsel

Patrick A Shea

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Mount Baldy is one of Alta's most iconic and visually stunning mountain peaks. The Baldy Tram is likely the most controversial project being proposed. Let us preserve as much of a natural setting as we can atop this iconic mountaintop. Avalanche control on Mount Baldy impacts a significant portion of the ski area's terrain. We have preliminarily considered alternatives to the proposed tram location and its function of transporting ski patrol to the top of Baldy. We feel that the visual impacts of a tram in alternative locations such as the Peruvian Ridgeline (Baldy Shoulder) or Sugarloaf Pass would be worse than the proposed location. It is also our understanding that only a very small portion of the top terminal would crest the skyline if looking at Mount Baldy from the perspective of highway 210 near the Shallow Shaft Restaurant. We don't necessarily like the visual impacts of a manmade structure in an otherwise natural area (area free from manmade structures), but feel that in keeping with tradition, the ski area has made an effort to minimize the visual impacts of the top terminals on their lifts. We want to encourage the USFS and Alta Ski Area to continue to find ways to minimize impacts from manmade structures to the skyline. We also ask that other alternatives, such as avalanche control work via the Snowbird side be considered in lieu of the Baldy Tram. We also hope that as conditions allow, skiers are also allowed to access the peak by hiking and are not restricted to only accessing the top via the tram.

Another alternative to the tram and using military artillery include Gazex type systems. It is our understanding that the application of this type of remote control system could mean the installation of numerous devices which has the potential to be more visually degrading than the proposed tram alignment.

Another concern of ours is the potential for this to be a means of summer access. There is great potential for the highly specialized alpine vegetation on top of Mount Baldy to be negatively impacted from higher use of the area. For this reason, if approved we ask the USFS to restrict the tram and not allow it to be used for public access in the summer.

Additionally, we are fearful that the tram is a stepping stone for further development on the peak. What can we do to assure there will be no additional development? There is concern that someday the owners of Alta may want to follow suit with their neighbors, Snowbird, and develop on top of the peak. Friends of Alta certainly has concern about adding a tram to an untouched area, but given the alternatives we don't seek to prohibit it.

As previously stated, for public safety reasons we support efforts to minimize military artillery, however we are disheartened by the visual impacts that manmade structures such as the GazEx type systems would have on Sugarloaf Mountain, East Devil's Castle, and Patsey Marley. The placement of these manmade structures detracts greatly from the natural beauty of area. Preference should be granted to systems such as O'Belx where, when not in use (summer months), the majority of the system can be removed leaving only a platform.

According to the information provided on the Cecret and Supreme lift combination and realignment, it is not clear where the clearing of tall shrubs and trees from a 30-foot wide, 600-foot long corridor is located. Our interpretation is that the clearing area is located between Cecret lift tower 6 and the bottom terminal of the existing Supreme lift which is a wetland area. Approximately half of the current Cecret lift is located in the Albion Fen, the largest wetland in Albion Basin. Albion Basin serves as the headwaters of the Little Cottonwood Canyon Watershed. New lifts and towers should not be placed in designated wetland areas and the clearing of trees and shrubs in wetland areas should not be approved to protect the ecosystem services of the wetland. While we appreciate the effort by Alta Ski Area to minimize the addition of new tower pads to the landscape, due to the presence of the Albion Fen, other alignments that steer clear of the wetland should be considered in this analysis. We do support of the removal of the unused Cecret lift towers from the wetland and restoration of these disturbances.

When considering the full MDP, the new Flora lift obviously provides an alternative means of getting from the top of Sugarloaf lift to the top of Collins lift if the East Baldy Traverse is not maintained. To minimize visual impacts from manmade structures on the ridgeline we request that the top terminal be located below the ridgeline.

In regards to the proposed restoration of Lake Flora our largest concern centers on the lack of a summer trail plans. There are very few lakes in the Central Wasatch and each one is a major destination. A trail plan must be incorporated to protect the vegetation. Additionally, an Army Corps of Engineers wetland delineation should be conducted for the existing wetland, and the mitigation for the loss of the current wetland should be required to happen in Alta at a similar elevation. The legality of water rights and contracts should be considered prior to a decision by the Forest Service.

Thank you for the opportunity to comment,
Jen Clancy on behalf of the Friends of Alta, Board of Directors