

03 January 2012

Cache County  
Planning and Zoning Commission  
179 North Main Street  
Logan, UT 84321

Re: Cherry Creek Ski Resort Master Plan

Dear Commissioners:

As a professional wildlife biologist I offer some comments on the “Wildlife Study” commissioned by the development staff of Cherry Creek Ski Area LLC. The study conducted, by Stantech Consulting Services, is superficial and lacking in several respects. This likely reflects the fact that it was almost exclusively a “desktop analysis” with only a single reconnaissance visit to the project area, conducted after the period of winter occupancy by big game animals. The current study suffers from several significant flaws, namely minimal or inadequate consideration of the following: (1) possible off-site effects of the development on wildlife; (2) disturbance to big game animals from night skiing as well as recreational activities during other seasons of the year; and (3) habitat loss and continuing increased levels of disturbance resulting from reconstruction of the road to the resort.

The study addresses principally the putative on-site impacts with only minimal and vague consideration of potential offsite effects. Moreover, the report focuses on “special status species” such as big game animals and to a lesser degree sensitive species, but does not adequately address impacts on the broader wildlife community and a unique ecosystem in northern Utah.

The disturbance aspects of the proposed development are understated, usually phrased as “may affect” rather than “likely to affect”. Moreover, the report does not include citations any of the numerous scientific publications resulting from studies of various kinds of disturbance to wildlife, including those from construction and recreational activities. It also fails to mention that a significant activity connected with the project will be night skiing with lighted runs. This means that the associated disruption of big game activities including feeding would encompass a greater portion of the animals daily cycle than a strictly day-time operation and likely decrease the functionality of the adjacent Richmond WMA.

Another weakness of the analysis is the minimal evaluation of the impacts of the road into the proposed development either in terms of physical loss of habitat (including some riparian habitat) or increased and long-term levels of disturbance to wildlife. The existing road will be widened and “improved” and project development will result in an increase in vehicular traffic both during the skiing season and presumably during the off-seasons as well. The impact of roads on wildlife is the subject of an extensive technical literature none of which is mentioned in the report. Big game animals can habituate to some levels of non-lethal disturbance but the consensus of numerous studies is that the negative “impact zone” of roads may extend 600-2000 ft. from the road itself.

The wildlife study states that the replacement of woodland by grassland and shrubs, partially as the result of revegetation efforts, will likely shift the species composition of the bird community from forest-dwelling species to those frequenting grassland ecosystems, thereby balancing the negative impacts of the development. However, this assumption ignores the relative conservation value of species “lost” vs. those gained. Generally, in this geographic region forest birds have a higher value by virtue of their relative rarity than the more ubiquitous species occupying open and disturbed habitats.

Although the economic viability of the proposed development may not have immediate wildlife impacts, it is an important consideration. The likely failure of the venture would leave an indelible negative footprint on the natural Cherry Creek ecosystem. At a minimum this would include long-term degradation of the original habitat such providing a focal point for the establishment of invasive weeds.

The recommendations provided in the Wildlife Study are at best palliative and by no means will mitigate any of the likely impacts of the project. None of them constitute any substantial investment on the part of the developer to truly compensate for the impacts incurred by the project. Comments on the study made by the Utah Division of Wildlife Resources appear “muted”, possibly reflecting pressure by the Governor’s Office not to impede potential economic development.

In closing I would note that the forgoing comments are not exhaustive. They were derived independently, but parallel closely those detailed in a more comprehensive and well documented analysis by Ms. Allison Jones of the Wild Utah Project (see her letter of 29 December 2011). Accordingly, I respectfully suggest that additional studies should be conducted to address and rectify the shortcomings identified here prior to a decision on the project,

Sincerely,

A handwritten signature in dark ink that reads "M.L. Wolfe". The letters are somewhat stylized and slanted.

Michael L. Wolfe, Ph.D.  
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Certified Wildlife Biologist  
Principal, LOBO Consulting