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VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED and FACSIMILE

Ms. Daina Bambe
District Ranger
U.S. Forest Service
Hood River Ranger District
6780 Highway 35
Mt. Hood/Parkdale, OR 97041

**Re: Mt. Hood Meadows 2005 Snowmaking Proposal
Scoping Comments**

Dear Ms. Bambe:

This office represents the Friends of Mt. Hood ("FOMH") with respect to the management of Mt. Hood Meadows ("MHM") ski area on the Hood River Ranger District of the Mt. Hood National Forest. We submit these comments on behalf of FOMH.

FOMH is a 501c3 non-profit organization whose mission is to protect and conserve the natural beauties of Mt. Hood for future generations. FOMH is dedicated to monitoring development and management of National Forest lands on Mt. Hood. For over a decade, FOMH has been particularly focused on safeguarding the environment impacted by the MHM ski area and ensuring that development within the permit area occurs in a lawful and sustainable manner.

Thank you for giving FOMH the chance to comment on the proposed use of a Categorical Exclusion to permit the construction and installation of a snowmaking system at MHM. Pursuant to our communications, it has been agreed that FOMH will be provided an opportunity to provide further comments once you have issued a draft Decision Memo on this matter, and we appreciate that opportunity.

We set forth our understanding of the facts based on our meeting of March 18, 2005 as well as your letter, which is dated April 5, 2005. Some of these facts are also taken from the applications submitted to Oregon Water Resources Department by Mt. Hood Meadows.

~ MHM proposes to construct a snowmaking system involving 14,000 ft. (2.65 miles) of buried pipe initially serving 10-15 electric fan snowmaking

guns. The system is designed to serve up to 40-45 snowmaking guns or hydrants. The system is also designed to cover a total capacity of 1,768 acres.

- ~ At least part of the excavation would include areas within Riparian Reserves for either the EFHR and/or wetlands.
- ~ MHM intends to use two separate water rights to supply the snowmaking system. MHM applied for an increased use from a groundwater well (ID # 27150). MHM intends to use 50 gpm from November 1-April 30. MHM also intends to use up to 1.1 cfs of surface water from the East Fork Hood River ("EFHR") from November 1-March 31.
- ~ The surface water withdrawal would require the construction a diversion point within the Riparian Reserve of the EFHR adjacent to an existing culvert.
- ~ MHM intends to construct a 1 million gallon water tank with dimensions of 78 ft. in diameter x 29 ft. high. The construction of the water tank will require the removal of several old growth trees and large snags.
- ~ MHM would be prohibited from using chemical additives to the snowmaking system.

In general, FOMH is very disappointed that the U.S. Forest Service has proposed to rush this project out the door on a Categorical Exclusion. We met with Mr. Riley and Mr. Jones at the U.S. Forest Service Regional Office in Portland, Oregon, on December 8, 2005. The explicit purpose of that meeting was to discuss upcoming projects at the MHM ski area because of Forest Service's and MHM's perceived failures to provide adequate public notice and opportunities for public participation with respect to MHM projects. At that time, neither Mr. Riley nor Mr. Jones mentioned a snowmaking proposal. FOMH is also aware that MHM has previously contemplated the installation of a snowmaking system, and that MHM has been testing at least one snow gun at the ski area for the last two ski seasons. As a result, MHM's failure to raise the proposal at the meeting led FOMH to believe that there was no such plan on the table for this summer. The failure to raise the proposal undermines the sole purpose for the December meeting.

Furthermore, FOMH is extremely concerned that the Forest Service plans to move this project along such a quick timeline. As stated above, FOMH has repeatedly requested more advance notice and an adequate opportunity to participate in decisions affecting Mt. Hood. We originally thought the Forest Service would make a genuine effort to address those concerns; however, this project demonstrates otherwise. Implementing this project on a very short, 2-3 month, timeline under a Categorical Exclusion effectively shuts the public out of this process.

FOMH is not opposed to the concept of a snowmaking system on the mountain. FOMH would be happy and interested to work with both the Forest Service and MHM to help determine whether a snowmaking system would provide long-term benefits and to examine the possible resource impacts of the system and the best system design. FOMH is also willing to discuss whether the current Master Plan for the ski area should be amended to include a snowmaking system to supplement natural conditions. **However, the current proposal eliminates the public's opportunity to participate on equal footing and threatens to rush through yet another project without adequate public participation or environmental review.**

With these larger issues in mind, please give serious consideration to the following comments.

A. The information provided by the U.S. Forest Service is either incomplete or contradicts other available information.

FOMH is very concerned that the information provided by the Forest Service is incomplete, contradictory and/or unclear. Questions regarding the quality of the information provided to the public make it extremely difficult if not impossible to provide adequate comments on the proposed project.

1. Size of the system.

The scoping notice states the MHM will initially use only 10-15 snowmaking guns to cover 31.5 acres of snow. This information, however, appears to be dramatically inconsistent with other information regarding the size of the snowmaking system.

During the March 18, 2005 meeting, Mr. Riley and Mr. Warila disclosed that the proposed snowmaking system is designed to accommodate 40-45 snowmaking guns. Draft notes from March 18, 2005 Meeting at 3. MHM has also circulated an email (attached) to its customers stating that the snowmaking system will involve "40 hydrant locations." Furthermore, the application for the new ground water right specifies that the water will be used to create snow across 1,768 acres of land. Meadow Utilities LLC Ground Water Application (March 6, 2005) (attached).

The scoping letter also conflicts with the water rights applications with respect to the length of the excavation required to lay the water pipes and utility lines. The scoping letter states that the construction will require 14,000 ft. (2.65 miles) of pipe. In contrast, the water rights applications to WRD state that the system will require 16,669 ft. (3.15 miles) of buried pipes, which is 19 percent larger than stated in the scoping letter. Which figure is accurate, and why is there conflicting information?

It appears that the Forest Service has failed to disclose to the public the total capacity of the snowmaking system. MHM clearly intends to build out this system far beyond the 10-15 guns across 31.5 acres of snow. Without disclosing to the public both the capacity of the system as well as its projected future use, the Forest Service cannot expect to receive comments that accurately address the potential environmental impacts of the system.

In order to consider the cumulative impacts of the snowmaking system, the Forest Service must analyze impacts from reasonably foreseeable future uses. Given the fact that MHM has both disclosed the design capacity for the snowmaking system and requested a water right for this capacity, the Forest Service must analyze the cumulative impact of an additional 25-35 snowmaking guns covering up to 1,768 acres of land and including 3.15 miles of buried pipes in addition to the 10-15 snowmaking guns proposed to be implemented this season.

2. Resources to be impacted.

The scoping letter fails to provide clear and accurate information on the resources that may be impacted by the proposed project. Without an accurate description of these resources, the public has inadequate information to determine whether this project may have a significant impact on the environment.

First, the Forest Service states that the excavation will not impact any wetlands or any "significant riparian areas." How does the Forest Service know that this design will not impact any wetlands? MHM commissioned a wetland delineation from Terra Sciences in February 2001, which is on file with the Forest Service. The study only looked at "replacement ski lifts and facility locations." Wetland Delineation at ii. Has the Forest Service performed a wetland delineation for the area to be impacted, and, if not, how does the Forest Service know whether wetlands will be impacted? The base area of MHM is a huge network of connected alpine wetlands that have been heavily impacted and fragmented as a result of past ski area activities. How can the Forest Service be sure there will be no wetland impacts without a delineation? Without this information, the public cannot provide accurate comments on whether the proposed project complies with the requirements of the Clean Water Act and the Northwest Forest Plan

Furthermore, the scoping letter states that "no significant riparian areas would be entered by the trenching." At the March 18, 2005, meeting, the Forest Service admitted that the maps shown to my clients did not include the Riparian Reserves for the wetlands, but only included perennial and intermittent streams. As you know, the Northwest Forest Plan requires that the Forest Service designate riparian reserves for wetlands. For wetlands greater than 1 acre, the Forest Service must designate a Riparian Reserve that includes at least 150 feet slope distance from the edge of the wetland (and possibly further). For wetlands less than 1 acre, the Riparian Reserve must include, at a minimum,

100 feet slope distance from the edge of the wetland. Northwest Forest Plan Record of Decision at C-31 ("NFP ROD").

Has the Forest Service designated Riparian Reserves for all wetlands in the vicinity of this project? If not, how can the Forest Service demonstrate compliance with the Northwest Forest Plan requirements for Riparian Reserves? Is there a difference between significant and insignificant riparian areas?

It also appears that the construction of a diversion point for the surface water withdrawal will be either in the EFHR or adjacent to the EFHR within the Riparian Reserve. Will this require a permit under section 404 of the Clean Water Act? How will construction impact the Riparian Reserve?

During the summer of 2004, MHM illegally placed several lift towers within Riparian Reserves while constructing Lift 21. This was an unlawful action with irreversible consequences that would likely have been avoided through greater public involvement. Lift 21 was not the first such mistake, but instead reflects a history of the Forest Service approving projects that violate existing protections for resources within the MHM permit area. FOMH is weary of these continued transgressions and is adamant that the Forest Service must adopt a new ethic regarding its responsibilities in overseeing the MHM permit area. Given this most recent experience and the history of similar problems, it would be prudent for the Forest Service to provide the public more information on the impacts to Riparian Reserves and aquatic habitat.

The Forest Service has also failed to provide any information on soil quality at the project site. The excavation certainly poses the risk of sedimentation and erosion. FOMH has documented tremendous erosion and sedimentation throughout the ski permit area as a result of previous construction. What types of soils exist on site and are they highly erosive soils? How will MHM prevent erosion and sedimentation? How do we know MHM's chosen techniques or mitigation measures are actually effective at reducing erosion? What long term impacts on soil productivity will occur as a result of excavation? The public cannot comment on impacts to soils without some information on the types of soils that exist on-site and how MHM plans to avoid or address impacts to soils.

B. The Forest Service cannot move forward until it amends the Master Plan for MHM to include a snowmaking system.

The current Master Plan for Mt. Hood Meadows was approved in a Record of Decision dated January 24, 1997. MHM ROD at 38. According to the terms of the ROD, the Master Plan defines the "Desired Future Condition for an expanded permit area" and it also "conceptually approves the number and approximate location of lifts, additional ski terrain, base area expansions, other winter facilities and uses, access and service roads, and summer uses." MHM ROD at 5. The Forest Service specifically

stated that the Master Plan was incorporated into the Mt. Hood National Forest Land and Resource Management Plan as a non-significant amendment. MHM ROD at 4. The Master Plan itself does not authorize any specific facilities or uses. Id. "Implementation will require additional site-specific environmental analysis pursuant to NEPA requirements." Id. Site-specific NEPA analysis will "tier to the [Master Plan] and the Final SEIS and the public will have the opportunity to participate." Id. Furthermore, the Master Plan is a precondition to receiving a 40 year special use permit. 36 C.F.R. § 251.56(b)(2).

MHM fully understood the implications of the Master Planning process and the importance of including all aspects of development as part of that process. MHM specifically stated in its comments on the DSEIS that the Master Plan will "establish the maximum expansion of the ski facilities that Mt. Hood Meadows will be able to offer the public for the next 10-20 years." Letter from Mr. Dave Riley to Ms. Roberta Moltzen at 13 (August 23, 1996) (on file with the Forest Service). The Forest Service specifically stated that the Master Plan establishes the Desired Future Condition of the ski area and that future decisions would be tiered to the Master Plan. MHM ROD at 5.

The Master Plan "provides the vehicle to develop a range of services and facilities in both the short and long term to serve existing and projected visitors, including downhill and Nordic skiers and summer visitors." MHM ROD at 20. MHM shall submit a "phased development plan" to the Forest Service "prior to implementation of any authorized Master Plan components." MHM ROD at A-2. MHM shall then submit a Vegetation Management Plan for each phase of development. MHM ROD at A-7. MHM shall also submit a Restoration Plan prior to implementation of the Master Plan. Id. The Restoration Plan shall set forth: a) areas in need of restoration, b) actions to address the identified restoration needs, c) an implementation schedule, and d) a monitoring program to document the progress of the restoration activities. Id.

As you set forth in the Scoping Letter, the current Master Plan for MHM does not include or mention a snowmaking system. Furthermore, to the best of our knowledge, MHM has never included a snowmaking system in the Phased Development Plan. **The Forest Service cannot approve a brand new snowmaking system without amending the current Master Plan.**

The scoping letter states that the Forest Service need not amend the Master Plan, because construction of a snowmaking system is an "operational change" and does not involve constructing a new building "other than a [1 million gallon] storage tank and pump house." This rationale is unconvincing and FOMH is concerned that the Forest Service appears willing to approve what is now a series of projects none of which are included in the Master Plan. For example, the Forest Service also recently approved the construction of the Super Half Pipe on a Categorical Exclusion without amending the Master Plan.

We have a difficult time determining what standards the Forest Service is using to determine when the Master Plan must be amended to include a new proposal. What purpose does the Master Plan serve if it does not guide development at the ski area? How can the Forest Service plan for responsible growth and management if the site-specific proposals conflict with the programmatic document? How does the Forest Service determine whether it has to amend the Master Plan? It appears from our point of view that there are no standards governing amendment of the Master Plan, and that instead the Forest Service simply refuses to amend the Master Plan regardless of whether the proposal was included in that plan. We submit that the Forest Service will be taking an action that is both arbitrary and capricious if it moves forward without amending the Master Plan.

The importance of amending the Master Plan is obvious. The FEIS for the Master Plan included a cumulative affects analysis, which looked at the Plan as a whole to determine its cumulative impact on a host of issues, such as wildlife, soils, vegetation, water quality and habitat. The Forest Service properly relied upon the Master Plan to provide an area-wide analysis, and then stated that each stage of implementation will require site-specific analysis. MHM ROD at 5. As part of the analysis around the Master Plan, The Forest Service also addressed in great detail the ski area's use of ground and surface water and the resulting impact on aquatic resources. The Forest Service, after considering these environmental impacts, incorporated the Master Plan into the LRMP. The Forest Service now proposes to ignore this process by proceeding with a site-specific project under a CE without amending the Master Plan. The Forest Service's apparent decision on this project undermines the very purpose and value of preparing and implementing a Master Plan that guides development on the mountain.

C. The use of a Categorical Exclusion is inappropriate in this case.

The Forest Service asserts that it intends to approve this project on a categorical exclusion. FOMH strongly disagrees with this analysis and emphasizes that this is one of the most fundamental issues that must be addressed.

NEPA requires federal agencies to prepare an Environmental Impact Statement ("EIS") for major federal actions that significantly affect the quality of the human environment. 42 U.S.C. § 4332(2)(C). "Major Federal action" includes "approval of specific projects, such as construction or management activities located in a defined geographic area. Projects include actions approved by permit or other regulatory decision as well as federal and federally assisted activities." 40 C.F.R. § 1508.18(b)(4). To analyze the effects of a project or to determine whether an EIS is required when one has not been established to be required categorically, the agency must prepare an Environmental Assessment ("EA"). 40 C.F.R. § 1501.4(a), (b); Nat'l Parks & Conservation Ass'n v. Babbitt, 241 F.3d 722, 730 (9th Cir. 2001). If the agency determines on the basis of the EA not to prepare an EIS, the agency must prepare a Finding of No Significant Impact ("FONSI") setting forth a "convincing statement of

reasons” explaining why the action will not have a significant impact on the environment. 40 C.F.R. §§ 1501.4(e), *see also* 40 C.F.R. § 1508.13.

In limited circumstances, NEPA regulations authorize agencies to use a Categorical Exclusion (“CE”) for a “category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations.” 40 C.F.R. §§ 1508.4, 1500.4(p). NEPA regulations require Federal agencies to provide for “extraordinary circumstances” and consider whether an individual project has significant environmental effects in which an otherwise categorically excluded action would require an EA or EIS. 40 C.F.R. §§ 1507.3(b)(2)(ii) & 1508.4.

Each federal agency must develop specific criteria for the identification of actions that qualify for a Categorical Exclusion. 40 C.F.R. § 1507.3. The Forest Service’s procedures and criteria are found in its Forest Service Handbook (“FSH”) at section 1909.15. The FSH describes what decisions can be issued using a Categorical Exclusion (“CE”) and documents the agency list of categorically excluded activities. *Id.* The FSH identifies three broad classes of categorical exclusions – categories established by the Secretary of Agriculture, categories established by the Chief of the Forest Service, and categories for which a project or case file and decision memo are required. FSH 1909.15 §§ 31.11, 31.12, 31.2. A proposed action may be categorically excluded from documentation in an EA or EIS only if: (i) the action is within a category listed in FSH at Sections 31.1b or 31.2 and (ii) there are no extraordinary circumstances that may result in significant individual or cumulative environmental impacts. FSH 30.3(1)(b).

Council of Environmental Quality (“CEQ”) regulations implementing NEPA state that a categorical exclusion may not “individually or cumulatively have a significant effect on the human environment.” 40 C.F.R. § 1508.4. The agency must consider the effect of the project, “when added to other past, present, and reasonably foreseeable future actions regardless of what agency . . . or person undertakes such other actions.” *See* 40 C.F.R. §§ 1508.4, 1508.7, and 1508.27(b)(7). *See also Washington Trails*, 935 F. Supp at 1122.

The use of a CE for the proposed snowmaking project is inappropriate for several reasons.

1. This project does not fit within CE category 31.2(3)

While the scoping letter makes no reference a specific categorical exclusion, Doug Jones has informed us via an email communication on April 12, 2005, that the proposed snowmaking system will qualify under CE 31.2(3), which covers:

3. Approval, modification, or continuation of minor special uses of National Forest System lands that require less than five contiguous acres of land. Examples include but are not limited to:

- a. Approving the construction of a meteorological sampling site.
- b. Approving the use of land for a one-time group event.
- c. Approving the construction of temporary facilities for filming of staged or natural events or studies of natural or cultural history.
- d. Approving the use of land for a 40-foot utility corridor that crosses one mile of a National Forest.
- e. Approving the installation of a driveway, mailbox, or other facilities incidental to use of a residence.
- f. Approving an additional telecommunication use at a site already used for such purposes.
- g. Approving the removal of mineral materials from an existing community pit or common-use area.
- h. Approving the continued use of land where such use has not changed since authorized and no change in the physical environment or facilities are proposed.

FSH 1909.15 § 31.2(3).

The Ninth Circuit has held that the determination of whether an action fits within a specified CE is guided both by the express language of the categorical exclusion, and by any types of projects that may be listed as examples. *See West v. Secretary of the DOT*, 206 F.3d 920, 928 (9th Cir. 2000). The proposed snowmaking project simply does not fit within the class of projects excluded from review by this CE. For example, the sheer size of the 1 million gallon water tank dwarfs any of the examples set forth in the handbook, such as a telecommunication or meteorological site. Furthermore, the snowmaking system is designed to cover a total of 1,768 acres of land, far beyond the five acre maximum for this CE.

The proposed activities also fail to fit into the definition of "minor" special uses. MHM has been granted a ski area permit pursuant to 16 U.S.C. § 497b, which are issued for up to 40 years. In order to qualify for a ski area permit, the applicant must establish that the "number and magnitude of planned facilities, as detailed in the Master Development Plan, clearly require long-term financing and/or operation." 36 C.F.R. § 251.56(b)(2). Clearly then, ski area permits, such as the one issued to MHM, do not fall

under the category of "minor special uses." The simple fact that MHM has a ski area permit demonstrates the significant scope of activities authorized under that permit.

2. The Forest Service must analyze the direct, indirect, and cumulative impacts of the proposed project because the project was not included in the Master Plan.

The Forest Service must still analyze the direct, indirect and cumulative impacts of the proposed project even if a CE is employed. With respect to MHM, the Forest Service has repeatedly relied on the EIS prepared for the Master Plan when questioned about cumulative impacts. According to the Forest Service, the EIS for the Master Plan contains the cumulative impacts analysis for all of the projects proposed in the Plan.

The snowmaking system, however, was not included as part of the Master Plan. The cumulative impacts analysis in the FEIS and SEIS must therefore be redone or updated to include and account for the snowmaking proposal. The Forest Service may not simply authorize this project without considering the cumulative impacts of this project in conjunction with all the other developments approved in concept under the Master Plan. In order to do so, we suggest that the Forest Service update or amend the Master Plan in order to include this proposal.

3. Extraordinary circumstances exist.

The Forest Service cannot approve a project on a CE if extraordinary circumstances exist. FSH 1909.15 § 30.2. The Forest Service shall consider the following in determining whether extraordinary circumstances exist:

- a. Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.
- b. Flood plains, wetlands, or municipal watersheds.
- c. Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas.
- d. Inventoried roadless areas.
- e. Research natural areas.
- f. American Indians and Alaska Native religious or cultural sites.
- g. Archaeological sites, or historic properties or areas.

Id. "The mere presence of one or more of these resource conditions does not preclude use of a categorical exclusion. It is the degree of the potential effect of a proposed action on these resource conditions that determines whether extraordinary circumstances exist."
Id.

Several extraordinary circumstances exist in this case. The project area includes federally listed species and critical habitat, most notably for the Northern Spotted Owl and Steelhead. As stated above the permit area includes a diverse array of wetland complexes and floodplains, which would potentially be impacted by this project. The project area may also contain Native American and cultural sites. Lastly, the project area includes at least one Forest Service sensitive species, *Calamagrostis breweri* (shorthair reedgrass).

B. The Forest Service should address the potential significant environmental impacts of the snowmaking proposal.

FOMH is concerned that the Forest Service has not and will not adequately consider the potential significant environmental impacts resulting from this project. The information provided in the April 5, 2005, scoping letter is simply inadequate to determine the extent of potential impacts. What is clear from the limited information available is that this project involves significant construction and excavation as well as a dramatic increase in water use. FOMH requests that the Forest Service provide the public with adequate information to assess the potentially significant environmental impact.

In an effort to provide the Forest Service with additional information regarding potential impacts, we have submitted comments from Jon Rhodes, a professional hydrologist with over more than 20 years experience. Mr. Rhodes is intimately familiar with the planning area, having participated in previous disputes regarding the same groundwater wells involved in this proposal. Mr. Rhodes' work has focused on the effects of land management activities on water quality, streams channels, and habitat for salmonids and other aquatic species. He has tremendous experience reviewing and assessing projects implemented under the Northwest Forest Plan and is intimately familiar with the Aquatic Conservation Strategy and associated Objectives. He has authored a peer-reviewed report that comprehensively compared and evaluated the efficacy of aquatic protection measures in several land management plans, including the Northwest Forest Plan: A Comparison and Evaluation of Existing Land Management Plans Affecting Spawning and Rearing Habitat of Snake River Basin Salmon Species Listed Under the Endangered Species Act. Please accept and consider Mr. Rhodes' comments.

The Forest Service should address direct, indirect and cumulative impacts of the proposal with respect to the following issues:

1. Reduced streamflows from water withdrawals and snowmaking – The proposal threatens to have a significant environmental impact as a result of extensive water use. Groundwater and surface water are connected in the East Fork Hood River basin. Removal of groundwater will have a direct impact on surface water flows downstream from the project site. Furthermore, snowmaking causes a loss of water from evapotranspiration, and the snowpack incurs significant amounts of water loss from sublimation before melting. Soil compaction and trenching also threatens to reduce subsurface flows to streams.
2. Reduced soil productivity and soil erosion. Trench construction threatens to cause increased erosion and sediment delivery, which can have corresponding impact on stream health and aquatic habitat. Sediment can travel far downstream, and salmonids such as the steelhead trout are particularly susceptible to these impacts.
3. Increases in water temperature. Reduced flows and increases in the channel/width depth can increase summer water temperatures, impacting salmonids, amphibians and other aquatic species.
4. Elevated peak flows. All the water stored as snow will return to stream during snowmelt and rain on snow events, which will increase peak flows.
5. Riparian areas and wetlands. The scoping letter provides inadequate information to determine how wetlands and riparian areas will be affected, but the Forest Service must provide an analysis of these impacts.
6. Upland habitat – impacts of cutting old growth trees and large snags; noise of snow guns.
7. Energy consumption – impact of use of large and continued amount of electricity to run system.
8. Air pollution – impact of diesel generators or other devices used to run system.


C. The Forest Service should consider a range of alternatives.

The public has been given absolutely no opportunity to determine what other alternatives exist to address the purpose and need for the project. In fact, the Forest Service has not yet set forth a purpose and need for the public to review. FOMH requests that the Forest Service first determine the need that MHM is trying to address through a snowmaking system. The Forest Service should then develop a range of alternatives in cooperation with the public.

Furthermore, FOMH questions whether the installation of a snowmaking system is economically profitable. What is the predicted impact on the length of MHM operating year? How much will the system cost to implement? Given climate trends, how long will this snowmaking system remain profitable to operate?

Thank you for taking our comments into consideration. FOMH is extremely concerned that the Forest Service would rush this project through the process on a CE. FOMH specifically asked for advance notice of projects coming up this summer, and both the Forest Service and MHM said nothing. FOMH is not opposed to a snowmaking system, but the Forest Service cannot skirt the legally required public process by trying to fit this large project into a CE for minor special uses.

Sincerely,



Chris Winter

cc: Dave Riley