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United States Department of Agriculture
Forest Service - CAET
P.O. Box 221090
Salt Lake City, UT 84122

Attn: Roadless Areas Proposed Rule

Re: Proposed Roadless Area Conservation Rule
(Roadless Initiative)

Gentlemen and/or Ladies:

As we previously informed you in our letters of June 27 and 28, 2000, this firm represents Mammoth Mountain Ski Area (MMSA). MMSA is the holder of various Special Use Permits (SUP) within the Inyo National Forest (INF), with MMSA operating resort and recreation facilities and enterprises within the INF, including Mammoth Mountain Ski Area, June Mountain Ski Area, Tamarack Resort and Cross-Country Skiing Center (Tamarack), and Mammoth Snowmobile Adventures.

This letter is intended to serve as comments by MMSA to the Roadless Area Conservation Proposed Rule (Roadless Initiative) and the Draft Environmental Impact Statement (DEIS) issued pursuant to the letter of Forest Service Chief Mike Dombeck dated May 11, 2000 (File Code 1950-3).

As of the date of this letter, and for the reasons expressed and outlined in this comment letter, MMSA has no official position regarding the various alternatives being considered, except that MMSA takes the position that the No Action Alternative should be chosen unless and until full and appropriate planning, collaboration, and public processes pursuant to, among other things, National Environmental Policy Act (NEPA), the Multiple-Use Sustained-Yield Act of 1960 (MUSY), and the National Forest Management Act (NFMA) are implemented and carried out by the USDA United States Department of Agriculture Forest Service - CAET

Further inconsistencies and areas of confusion are demonstrated by the document entitled ROADLESS AREA PROJECT QUESTIONS AND ANSWERS 11/12/99 issued by the Forest Service. Some examples are as follows:

1. In responding to the question, "What are the components of the action proposed in the Notice of Intent (NOI)?," the Forest Service responds in pertinent part: "Local Forest Plan amendment and NEPA processes, both of which require active public collaboration and participation, could be used to implement the procedures and criteria developed in part II. The final rule would delineate the framework for this forest-by-forest implementation process...."

The effect of the proposed action in the NOI is to amend or modify the existing Forest Plan, thereby avoiding or ignoring the appropriate public collaboration and participation required under NEPA.

2. In responding to the question, "What is the relationship between the draft planning regulations and this roadless proposal?," the Forest Service response states in pertinent part: "The proposed planning rule would rewrite the existing Forest Service Planning Regulations. The proposed planning rule would make ecological sustainability the **primary goal** of National Forest System land management...." (Emphasis added).

The flaw in this approach is ignoring people as part of the ecosystem of the National Forest System, and specifically the INF. This results in a change of policy currently expressed in the 1988 Forest Plan and the concept of multiple use.

3. In response to the question, "There are a number of ski resorts or expansion of ski resorts planned for national forests, is this an effort to shut them down?" The Forest Service response begs the question and fails to address the impact of the Action Alternatives in that access to and from such ski resort facilities would be substantially impacted by the Roadless Initiative. In point of fact, the effect of the Roadless Initiative on the proposed Sherwin Bowl Ski Area would be to make the ski area inaccessible. The same would apply to planned expansion of Mammoth Mountain.