

## Mount Hood Meadows 7a,b

Dear Roadless Areas Staff:

Please accept this as our formal comment regarding the Roadless Area Conservation Proposed Rules and Draft Environmental Impact Statement regarding National Forest System roadless areas, published in the Federal Register on May 10, 2000. Mt. Hood Meadows operates a ski area within the Mt. Hood National Forest.

The proposed roadless rules could negatively impact the future development of lands allocated as A-11, Winter Recreation in the Mt. Hood National Forest Land and Resource Plan, and adjacent to our current permit boundary.

The Northwest Forest Plan (NFP) Record of Decision created additional land allocations such as Late Successional Reserves and Key Watersheds, as well as new requirements under the Aquatic Conservation Strategy. We therefore believe it is not beneficial to the public, or necessary from a resource management point of view, to adopt the proposed roadless rules in areas under the NFP.

We request exemption from the proposed rules for three reasons:

A) We operate within lands already designated in, and managed under, the NFP. The NFP guidance is more than sufficient to address ecosystem management and another set of roadless rules is not necessary.

B) The areas already designated as A-11, but not yet developed, should be exempt from the areas proposed in the roadless rules. This land is critical for us to meet the demand for developed recreation and was allocated for this purpose in the forest planning process which included substantial public and inter-agency comment.

C) The agency's roadless protection should exempt lands surrounding ski areas to allow for flexibility for future growth and development for the benefit of the public users. This exemption should acknowledge the "zone of influence" surrounding existing resort developments.

These three reasons for exemption are important because as access to the more remote areas of the forest becomes more limited to the public, the more important the role in developed recreation becomes to meet the shift in public uses. The decision making for these future developments should be left up to the local forest officers under the guidance of the forest plans and regulations. This is more practical than a "one size fits all" approach. This is especially true in the northwest considering the fact that the NFP already satisfies the conservation objectives that are intended by the proposed roadless conservation rules.

We believe the final decision should exempt lands within the NFP, exempt lands already designated for future developed recreation in approved forest plans, and exempt lands surrounding existing developed ski areas.

I thank you for your consideration of these comments.


Sincerely,  
MT. HOOD MEADOWS OREG., LTD

Dave Riley

Table S-30: Proposed Actions Potentially Conflicting with ACS Objectives

Action	Alternative
Main Lodge base expansion	S2-S5
Westside base expansion	S2-S5
Lift 15	S2-S5
Lift 17	S2-S5
Lift 22	S3, S5
Lift 26	S5
Maintenance Facilities	S2, S4, S5
Service Road A	S3, S5
Service Road E	S5

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#### Impacts by Alternative

(Impacts are cumulative by alternative, except where noted. That is, the impacts in Alternative S2 would also occur in S3, and so on.)

#### *Alternative S1*

As discussed under Affected Environment, 19 percent of the current permit area has been altered in some fashion to accommodate ski area development. Approximately 36 percent (230 acres) of this alteration has occurred within Riparian Reserves (Table S-26). This magnitude of impact within Riparian Reserves would likely not be authorized today for new land management activities because it would not meet ACS objectives.

Under this alternative, there would be no further impact to Riparian Reserves. Mitigation measures, e.g., planting, energy dissipation devices, may offset past impacts or help the stream system reach a more stable state sooner. Although a large percentage of Riparian Reserve would remain impacted, Alternative S1 would best meet ACS objectives.

#### *Alternative S2*

This alternative would impact approximately 305 acres over that in Alternative S1 (676 acres total), including 11 additional acres in Riparian Reserves (241 acres total).

#### Winter Use Direct Impacts:

The proposed three-acre expansion of the Main Lodge base parking lot would be located immediately upslope from the Stringer Meadows SIA near Umbrella Falls. This parking lot expansion would remove a large portion of what little buffer remains between the lot and the meadows complex. This action may be inconsistent with the ACS (Objective #9), since it reduces the potential of this meadow/wetland complex to provide for riparian and late successional associated species. The slope of the present parking lot drains runoff directly toward the meadows. Careful consideration in site design would be needed to avoid or mitigate these potential impacts.