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05/31/00 07:55 AM

To: roadlessdeis@fs.fed.us

cc:

Subject: Comment from the Stevens Pass Ski Resort on Roadless Area
Conservation Proposed Rule

Stevens Pass 7a,b

Greetings USDA Forest Service--CAET: The Stevens Pass Ski Resort does not oppose the proposed rule. We support the general philosophy of protecting roadless areas for their inherent values--ecosystem health, wildlife habitat, sources of pure water, undisturbed landscape, etc. However, we do believe it is vital to preserve language in the proposed rule, specifically section 294.14 (scope and applicability), which allows existing special use permit holders to continue to develop lands within their permit boundaries, even if they are now part of the roadless land base. This flexibility is essential to more closely meet the public's desire for winter-based developed recreation.

We do have one concern. In paragraph 2 of 294.14 is this sentence: "Requests to expand permitted use would be subject to the prohibition in 294.12." We interpret this sentence as referring to permit boundary expansion into inventoried roadless areas that might be adjacent to existing ski resorts. Stevens Pass believes the prohibition should not apply to permit boundary expansion into a roadless area if suitable NEPA analysis (through an EIS) indicates the overwhelming value of such boundary expansion.

In addition, we believe that the consideration of roadless area conservation during forest plan revisions should give serious weight to the values of ski areas permit boundary expansion into areas that are not now roaded (but not now part of the inventoried roadless areas). In other words, do not preclude during the forest plan revision process, without thorough analysis, ski area permit boundary expansion where the public need is strong.

Sincerely,

Chester Marler
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