

**To:** Recreation Manager Kevin Slagle - kslagle@fs.fed.us  
comments-pacificnorthwest-mthood-hoodriver@fs.fed.us

**From:** Friends of Mt. Hood  
12820 SW 20th Court  
Beaverton, OR 97008

**Re: Howitzer proposal at Mt. Hood Meadows (MHM).**

In principle, the Friends of Mt. Hood (FOMH) is supportive of the need to improve safety for patrollers and staff at Mt. Hood Meadows (MHM). The FOMH is also supportive of continued safety for backcountry access and compliance with federal environmental laws.

FOMH offer these comments to further the constructive dialogue the FOMH and its counsel Ralph Bloemers and Chris Winter from the Crag Law Center have had with MHM staff and personnel and with the Forest Service. We strongly encourage the Forest Service to improve the public process by disclosing the impacts of the proposal and developing binding mitigation and sideboards for construction of the building and use of the Howitzer accordingly.

**1. Size and the Design of the Building.**

The structure is approximately 30 feet by 30 feet and two stories high with a potential disturbed area of 50 feet by 50 feet. This is quite sizeable for this permanent structure and it will have a negative visual impact on the mountain environment from within and without the permit. For this proposed development, the FOMH asks that MHM consider alternatives that will blend the visual appearance of this structure into the mountain environment.

**2. Visual Impact on the Mountain.**

The FOMH seeks to support policies that enhance the natural beauty of the mountain and to avoid development which is an infringement on that natural beauty. The FOMH asks for the analysis to consider the visual impact from the Timberline trail, as this was specifically mentioned as a key concern and objective in the most current ROD published by the Forest Service. In this regard, the FOMH asks to see the building design drawings. Will it just be a concrete box or is there something more to it? At the very least, the FOMH asks that Meadows consider putting pine or fir on the outside, so that when it weathers to grey the building will blend in a bit more than a concrete cube.

**3. Noise and Avalanche Impacts Outside of the Ski Permit Area.**

The FOMH is disappointed that the scoping notice only puts forward and addresses the visual and physical impact of the construction of the structure. The proposal is to place a Howitzer, a military weapon with a range of over 6 miles, to target

a vast acreage of the permit area. The proposal impacts far more than 5 acres, because MHM plans to target areas to the North and East in Heather Canyon, Clark Canyon, the Basalt Cliffs and Superbowl.

The proposal that was circulated to the public does not specify whether there will be any limitations on the targeting of the weapon, the point of impact of the ordnance fired by the weapon and the potential for transboundary impacts causing avalanches and other movements of snow and ice in the adjacent Wilderness in Newton Canyon, Wy'East face and adjacent areas.

Ensuring the safety of MHM staff is important, but ensuring the safety of mountain climbers, backcountry skiers and boarders and any other users who may be in the adjacent Wilderness area is just as important.

The analysis must ensure that the rest of the mountain does not need to be shut down while the weapon is in use.

The Friends of Mt. Hood and others have posed these questions to Matthew Drake, Chairman and CEO of Mt. Hood Meadows (MHM) and staff of the organization. Matthew Drake has proposed that MHM limit targeting of the weapon within 200 feet of the permit boundary.

At the same time, Matthew Drake also proposed that Wilderness users observe a buffer of 200 feet from the MHM permit boundary. This proposal is problematic because it would mean climbers coming from Hood River Meadows could not ascend the mountain via Pea Gravel ridge above Clark Canyon. Climbers seeking to ascend Mt. Hood's Wy'east face or do the round the mountain tour would be limited to a narrower window, and constrained in their Wilderness use. In addition, it is very difficult, if not impossible, for a mountain climber to know with any degree of certainty whether the climber is within or without the upper end of the boundary.

Each year people climb Wy'east and these climbers typically start out their climb between midnight and 3 in the AM, and head to Wy'East from Timberline. Weather conditions may or may not allow MHM staff to see climbers before targeting areas in Superbowl and putting these at risk.

Again, the Wilderness areas of the mountain cannot be shut down completely. What is needed is a sufficient buffer exclusively within the permit area to protect wintertime mountain climbers who are ascending Mt. Hood via the Wy'East route from Timberline, from Pea Gravel ridge and elsewhere.

The within permit area buffer suggested by Meadows of 200 ft. is a step in the right direction. For blasting and avalanche control within the permit boundary in the Superbowl region, we strongly suggest that Meadows limit target activities to below the 500 ft. upper limit of the permit boundary and/or to consider limiting targeting and operation of the weapon to specific days and time of the week.

#### **4. Whitebark Pine.**

The Forest Service has indicated in the scoping letter that "several small saplings and shrubs would be removed.....possibly including 2 - 3 small white bark pine saplings..." FOMH ask to be given the opportunity to see the "saplings" before they are cut and ensure that they are saplings. We encourage the Forest Service to consider asking MHM to remove and replant these saplings in suitable locations, including near and adjacent to the building to help enhance and buffer the structure in the future.

The FOMH would like the opportunity to actually visit the site proposed for development before the Forest Service issues a scoping letter. The Forest Service deadline is April 30 for comments on this project. This is not enough time. We are unable to visit the site due to depths of snow and would like the opportunity to physically examine the site after the snow melts, before any trees are removed or ground broken so that we can confirm that this project will not have a negative impact on the mountain.

On page 2, 4th paragraph, the scoping letter mentioned that the total disturbance area has had previous disturbance "during ski run construction and boundary point installation." We do not accept "previous disturbance" as a rationale for "future disturbance." As a matter of standard practice, the Forest Service seems to try to justify or minimize the negatives of new disturbance on the basis that certain areas have already been torn apart in the past. We believe that the "previously disturbed areas" need to heal, or perhaps healing has already begun in previously disturbed areas. Previously disturbed areas should not be looked upon as "less than valuable" and therefore acceptable for further disturbance

#### **5. NEPA Compliance.**

Categorical Exclusion 31.2(3) provides:

“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.

Mt. Hood Meadows special use permit cover far more than 5 acres of land. This proposal seeks to modify that special use, not establish or modify a use that impacts less than 5 acres of land. The cited CE category is not proper for this use. Furthermore, the proposal is for a project which involves the construction of a building and the operation of a Howitzer which will impact far more than five acres of land. While it may be true that the building and temporary road will impact approximately 8,000 square feet, the Howitzer is going to be used to impact large areas within the permit area in Heather Canyon, Basalt Cliffs, Clark Canyon and Superbowl.

The Forest Service cannot use this CE category for this use, because the use will impact far more than 5 acres of land. The use will impact hundreds of acres of land. The CE is not being used to establish a separate use that is itself five acres or less, the CE is being utilized to make a use for the permit area, and therefore the permit area is the relevant metric for determining the appropriate NEPA analysis. The master plan does not contain any discussion or authorization for the construction of this use which impacts a large portion of the permit area. The examples provided in the CE category are not exclusive, but the examples specifically speak of “temporary facilities” and “no change in the physical environment.”

The use of this category is an attempt to put a square peg into a round hole. The category cited by the Forest Service in its scoping letter is not the proper category. The FOMH encourages the Forest Service to consider alternative CE categories and to discuss those with the FOMH directly or, in the alternative, to prepare an EA. The use of an EA would also be beneficial in that it would allow the public to engage in dialogue with MHM and the Forest Service regarding the targeting and Wilderness impacts.

Thank you for kind attention to these comments. We look forward to working with you and MHM to ensure safety for all mountain users and permit development in a sustainable and sensitive manner.

Sincerely,  
Barbara Wilson