Data Submitted (UTC 11): 4/27/2024 1:03:08 AM

First name: Michael Last name: Graw Organization:

Title:

Comments: Hello,

Thank you for allowing the public a chance to comment on this proposal. I am a backcountry skier who regularly accesses the areas of the proposed Heliotrope Ridge and North Twin hits. My comments below relate to the 3 overnight huts (including the Anderson-Watson hut). I am supportive of the warming shelter proposed by the Whatcom County Snowmobile Club and do not have additional comments about it.

My overall comment about the 3 huts is that there is insufficient information available to the public to make an informed decision about the proposal(s). The scoping letter is extremely brief and does not include critical details related to public access, ecological impacts, water and waste management, and more. The full text of the proposals has not been made available to the public to provide further information.

I have a number of concerns that are not currently addressed by the scoping letter:

- Public Access: Will any of the three huts offer public access (i.e. without hiring a guide)? If so, what percentage of time or space in the huts will be open to the public? How will the public be able to make reservations, and is there a rough estimate of cost? These details are important to determine whether the huts being placed on public land will be beneficial to the ski community as a whole, or pay-to-play operations that benefit only wealthy clients of ski guiding operations. I do not support any hut project that does not offer equitable access to the ski community at large.
- Conflicts between user groups: Two of the huts are located immediately adjacent to/within popular snowmobile areas. What measures will be put in place to ensure that there is no conflict between user groups? Additionally, how will the companies proposing the huts contribute to upkeep of the groomed roads used to access the huts? Significant opposition from the snowmobile community to these huts is a problem not just for the hut operators, but more broadly for the ski community because of the tensions the huts inflame.
- Equitability: The North Twin hut is leveraging a private deal with a logging company, but placing a hut on public land. This feels designed to undercut the ski community. It may be much more difficult for public (i.e. non-guided) skiers to secure access from the logging company in the future if the company can argue that it is allowing (a very limited and high-paying paying) subset of backcountry users.
- Location: The Heliotrope hut's location is not ideal for skiing. While it has access to excellent alpine terrain, this terrain is unsafe due to avalanche hazards and low visibility for much of the winter and spring. On days when the alpine is unsafe, there is very little terrain for skiers to use, and the terrain that is available directly conflicts with areas used by snowmobiles. This is likely to have two effects: (1) increased tensions with snowmobiles and (2) long-term underutilization of the hut.

I also have concerns about ecological impacts, although I assume these will be addressed by a NEPA review. Briefly, concerns include whether the North Twin hut will require cutting old-growth to install, impacts on wildlife, and how water and human waste will be managed at each hut.

Thank you again for your work on this project, Michael