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Submitted online

USFS Hood River Ranger District
6780 Highway 35
Parkdale, OR 97041

Re: Comments – Mt. Hood Express Chairlift Replacement Project

Hood River Ranger District:

Thank you for the opportunity to submit the following comments on the proposal to replace and upgrade the Mt. Hood Express chairlift at Mt. Hood Meadows Ski Resort (MHM). These comments are submitted on behalf of Friends of Mount Hood (FOMH), which is a nonprofit organization dedicated to monitoring development and management of national forest lands on Mount Hood. For over three decades, FOMH has been acting to safeguard the alpine environment of Mount Hood, which is composed of the irreplaceable meadows, streams, wildlife, and forested slopes of this important public resource.

The FOMH has a special interest in this proposed action because of its proximity to the wetlands restoration at the main base area of the resort. And in that regard, we wish to

acknowledge again the efforts that MHM has made in the restoration of some of the wetlands that existed prior to the resort.

At this time, we are in agreement in principle to the upgrade of Mt. Hood Express. We support the concept of improving the safety and over all experience for the users of the resort.

However, we have issues with the idea that the project may fall within a category of actions under 36 Code of Federal Regulations (CFR) § 220.6 that may be categorically excluded (CE) from documentation in an environmental assessment (EA) or environmental impact statement (EIS).

While it is called a chairlift replacement project it is not to be misunderstood as a like-to-like replacement. The scoping letter of 06/11/2021 rightly describes a major upgrade project involving the construction of a completely new lift.

The new lift would be an increase over the existing lift in every category, and will have potential significant effects on very sensitive alpine and sub-alpine landscape. The only commonality between the two lifts is that they have the same general alignment.

The scoping letter describes two significant effects of the new chairlift:

- * 1,000 per hour increase in skier capacity due to six-person chairs;
- * at least three acres of new permanent disturbance, part of which is due to a wider corridor/over-story, and part due to an estimated 19 new towers and footings plus new terminals.

This is a significant increase in capacity which will cause new congestion issues at the top and base terminals. This issue needs analysis and documentation. The permanent disturbance of an estimated three acres deserves analysis and documentation due to potential tree removal and other impacts on the ground.

The letter does not state that the new lift will be longer than the existing one, but based on the provided map it appears the new top terminal will be at a higher elevation than the existing terminal. Of concern is that white bark pine is at the higher elevations, and there needs to be an analysis and documentation of this issue.

Most concerning, the letter makes no mention that the location of the new base terminal will be in or near wetlands. Without question, this needs analysis and documentation beyond a decision memo. The status of the to-be-abandoned existing tower footings is also not mentioned in the letter.

The FOMH does not agree that a project with this many potential significant effects on both the environment and the experience of the users could be considered excluded from documentation in an EA or EIS.

Some years ago, the FOMH presented our position on new and replacement chairlift construction. We have always agreed with the long held practice on the MHNH that chairlift projects fall under NEPA. Following NEPA guidelines, we concluded that the nature of chairlifts requires an established protocol, and we recommended an EIS for new lifts and at a minimum an EA for lift replacement and upgrade projects.

In 2013, FOMH submitted comments in opposition to the CE in the draft decision memo for the Buttercup chairlift replacement and upgrade at MHM. It is noteworthy that the project was re-evaluated and changed to an EA.

The following are excerpts from our 2013 Buttercup comments. The circumstances are basically identical to this project. Please refer to the comment letter for the complete discussion.

The intensity of scoping defines an EA

The National Environmental Policy Act (NEPA) in 36 CFR 220.6(b)(1) establishes the seven categories that must be considered when determining the existence of extraordinary circumstances. Wetlands is included in (ii) of this section. The draft decision memo documents the presence of wetlands and critical habitat, etc. (i).

NEPA further provides the following guideline when analyzing for the presence of extraordinary circumstances. 36 CFR 220.6(b)(2).

...It is the existence of a cause-effect relationship between a proposed action and the potential effect on these resource conditions and if such a relationship exists, the degree of the potential effect of a proposed action on these resource conditions that determine whether extraordinary circumstances exist.

Once it is determined that there is a cause-effect relationship, as described above, some level of analysis, or scoping, must be done to establish the "degree of the potential effect." The

intensity of analysis is case sensitive. The nature of each project will determine the intensity of the scoping. 36 CFR 220.4(e).

And,

NEPA provides the following guidelines to determine if a proposed action falls under an EA or an Environmental Impact Statement (EIS). 36 CFR 220.6(c).

If the responsible official determines, based on scoping, that it is uncertain whether the proposed action may have a significant effect on the environment, prepare an EA. If the responsible official determines, based on scoping, that the proposed action may have a significant environmental effect, prepare an EIS.

And,

In the view of the FOMH, there are striking similarities between the Project and Stadium Express, the most recent lift replacement project at MHM. They are close in location and time frame. They both involve the construction of new towers at new locations, and an extension in length. And they both impact a riparian reserve and wetland...Stadium Express was done with an EA, we ask that the Project also be done with an EA.

And,

The nature of ski lift projects warrant an established protocol

NEPA goes to great lengths to define the relationship between policy and specific acts. For example, there is a list of 35 actions, from painting a building to authorizing the collection of forest products for personal use, that do not require a supporting record and a decision memo. And there is a list of 41 actions that do require a supporting record and a decision memo. 36 CFR 220.6(d) and (e).

Clearly, the intent of NEPA is to be as specific as reasonably possible for purposes of objectivity, continuity, and clarity. In this spirit, it makes sense that a unique category of proposed actions, such as ski lift projects, would have established NEPA precedents.

For example, the most recent new lift project on Mount Hood, the Jeff Flood Express (aka the Timberline Express) was done under an EIS. And, as was stated previously, the most recent lift replacement project was done under an EA. The rationale for the NEPA choices is obvious and it is not necessary to go into great detail. For the purpose of this discussion it is sufficient to say that new lift equals EIS and replacement lift equals EA.

And,

Correction of past mistakes deserves a full NEPA record

The history of MHM is marred by terrible environmental mistakes. The wetlands associated with the meadows that are the namesake of the Mt. Hood Meadows Ski Resort were destroyed to create the base area. Now, 45 years after the fact, some of these wetlands are being restored.

The bottom terminal of the Project is in the riparian reserve of the very wetlands under restoration. For some time the management of MHM has been displaying a new sense of environmental responsibility. The wetland restoration project is the prime example of their new commitment. With the change that has occurred, and the beginning of correcting past mistakes, it does not make sense to exclude the Project from the documentation provided by an EA.

For all of the above reasons, the FOMH strongly suggests that the Buttercup Lift Replacement project be done with an EA.

In our opinion, we made the case in 2013 that replacement and upgrade projects require at minimum an EA. And, our case was upheld when Buttercup was, in fact, changed from a CE to an EA.

In addition, the record shows that a past practice has been established on the MHNF. The last two lift replacement and upgrade projects at MHM, Buttercup and Stadium Express, were done with an EA.

It is disappointing that the idea of a CE even found a place in the scoping letter.

In conclusion, for all the above reasons, and as discussed in detail in our 2013 Buttercup comments, the FOMH strongly recommends that the Mt. Hood Express Replacement Project follow past practice, and at a minimum an EA be done to create the supporting record and decision memo.

Sincerely,

/s/ Dennis Chaney

Dennis Chaney, Pres.

Friends of Mount Hood