

CHAPTER I

PURPOSE AND NEED

CHAPTER I - PURPOSE AND NEED

A. CHANGES BETWEEN DRAFT AND FINAL

In December 2003, the Forest Service Washington Office approved administrative consolidation of the Rogue River and Siskiyou National Forests. Reference is made throughout the Final Environmental Impact Statement to the Rogue River-Siskiyou National Forest (**RR-SNF**) as applicable. When reference is made to the 1990 Forest Plan or land management direction applicable to the Rogue River National Forest, the phrase Rogue River National Forest (**RRNF**) continues to be utilized.

Minor edits were completed throughout this Chapter to provide clarification of information previously presented. Map I-1 was revised to show the correct RR-SNF boundary resulting from a land exchange, enacted in October 1998. Resulting from the “Oregon Public Lands Transfer and Protection Act of 1998”, signed by the President October 30, 1998 (PL 105-321), 634.42 acres previously managed by the USDI Bureau of Land Management (BLM) was transferred to the USDA Forest Service. This exchange involved six parcels of land within T.39S., R.1E., T. T.39S., R.1W., and T. 40 S., R. 1 E., W.M. This change does not directly affect the Mt. Ashland Ski Area but does affect all maps that show the northernmost portion of the Ashland Ranger District (throughout the Final Environmental Impact Statement as applicable).

The proposed Forest Plan Amendments associated with the RRNF and Klamath National Forest (**KNF**) have been dropped; minor inventory adjustments have been processed as an addendum or correction to the respective Forest Plans (see discussions in Chapter II, Section B, regarding these changes). In February 2004, the RR-SNF was authorized to make decisions regarding implementation of ski area expansion activities at Mt. Ashland under the terms of the 2/04/04 Intra-Agency Agreement (No. 03-IA-11061002-005), between the Klamath National Forest and the Rogue River-Siskiyou National Forest.

The Management Direction section has been updated to reflect the most current information. Noteworthy between the Draft and Final Environmental Impact Statement are the 2004 Records of Decisions enacting amendments to the Northwest Forest Plan affecting the wording associated with the Aquatic Conservation Strategy, and changes to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (see Section G, this Chapter).

Section H (Other Related Studies) has been updated to include the 2003 Upper Bear Assessment, designed in part, as an update to the 1995 Bear Watershed Analysis, and the 1996 Mt. Ashland Late-Successional Reserve Assessment. Section I (Scoping and Significant Issues) has been updated and supplemented to include all issues identified during the Mt. Ashland Ski Area Expansion Draft EIS Comment Period.

B. INTRODUCTION

This Final Environmental Impact Statement (**FEIS**), documents analysis of a site- specific project proposal to expand a portion of the Mt. Ashland Ski Area. This proposal and analysis is tiered to the *Final Environmental Impact Statement (FEIS)* and its *Record of Decision (ROD) for Mt. Ashland Ski Area*, released in July of 1991. The focus of this analysis is on a March 2002 proposal to develop a portion of the ski area programmatically approved in the 1991 “Master Plan”. Analysis of the current proposal also considers new information and changed circumstances since the programmatic 1991 decision on the Master Plan was made, i.e., the current conditions (see Affected Environment, Chapter III).

This Final EIS will not re-open the decision approving expansion based on the 1991 Master Plan that has already been made. This Final EIS will analyze options for authorizing expansion activities at this time, including the No-Action option. This Final EIS is prepared in accordance with the National Environmental Policy Act (**NEPA**), and the regulations for implementing the procedural provisions of NEPA (40 CFR parts 1500-1508). This Forest Service analysis involves categories of Federal actions (decisions) that procedurally require the preparation of an EIS (FSH 1909.15, section 20.6). This EIS contains analyses that are consistent with NEPA and the CEQ regulations (40 CFR 1500).

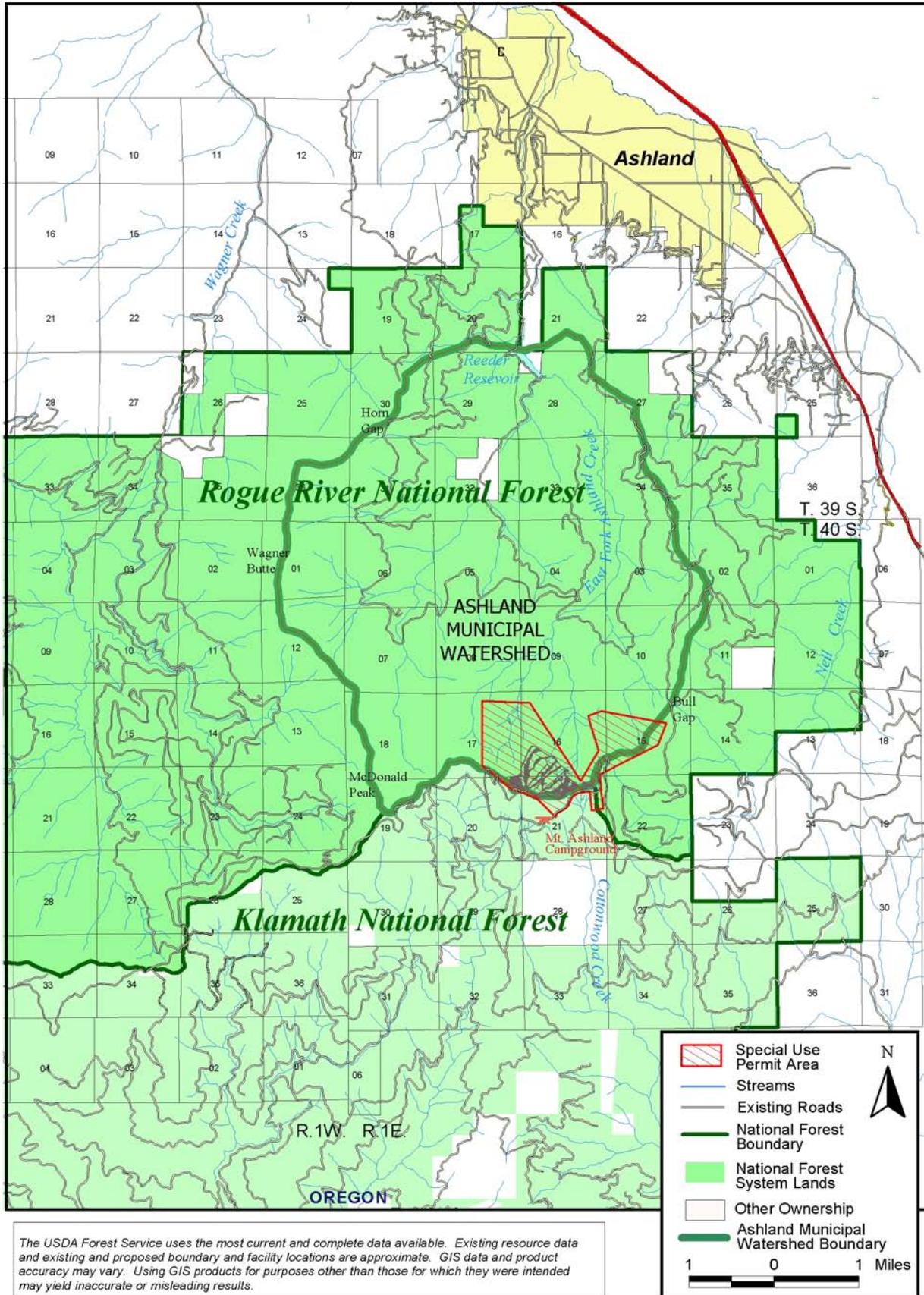
A Draft EIS addressing ski area expansion was released in February 2000, documenting detailed analysis of three alternatives including No-Action. The 2000 DEIS analyzed proposed expansion alternatives exclusively within the western portion of the Special Use Permit area. Extraordinary public response on that Draft EIS caused the Forest Service to conduct additional analysis that resulted in a new Draft EIS, released for public comment in July of 2003. This process is designed as a continuation of the ongoing environmental analysis and all input previously received has been utilized in the formulation of the Draft and Final EIS. The Proposed Action is based on an updated proposal received from the proponent (the Mt. Ashland Association; March 2002).

C. BACKGROUND

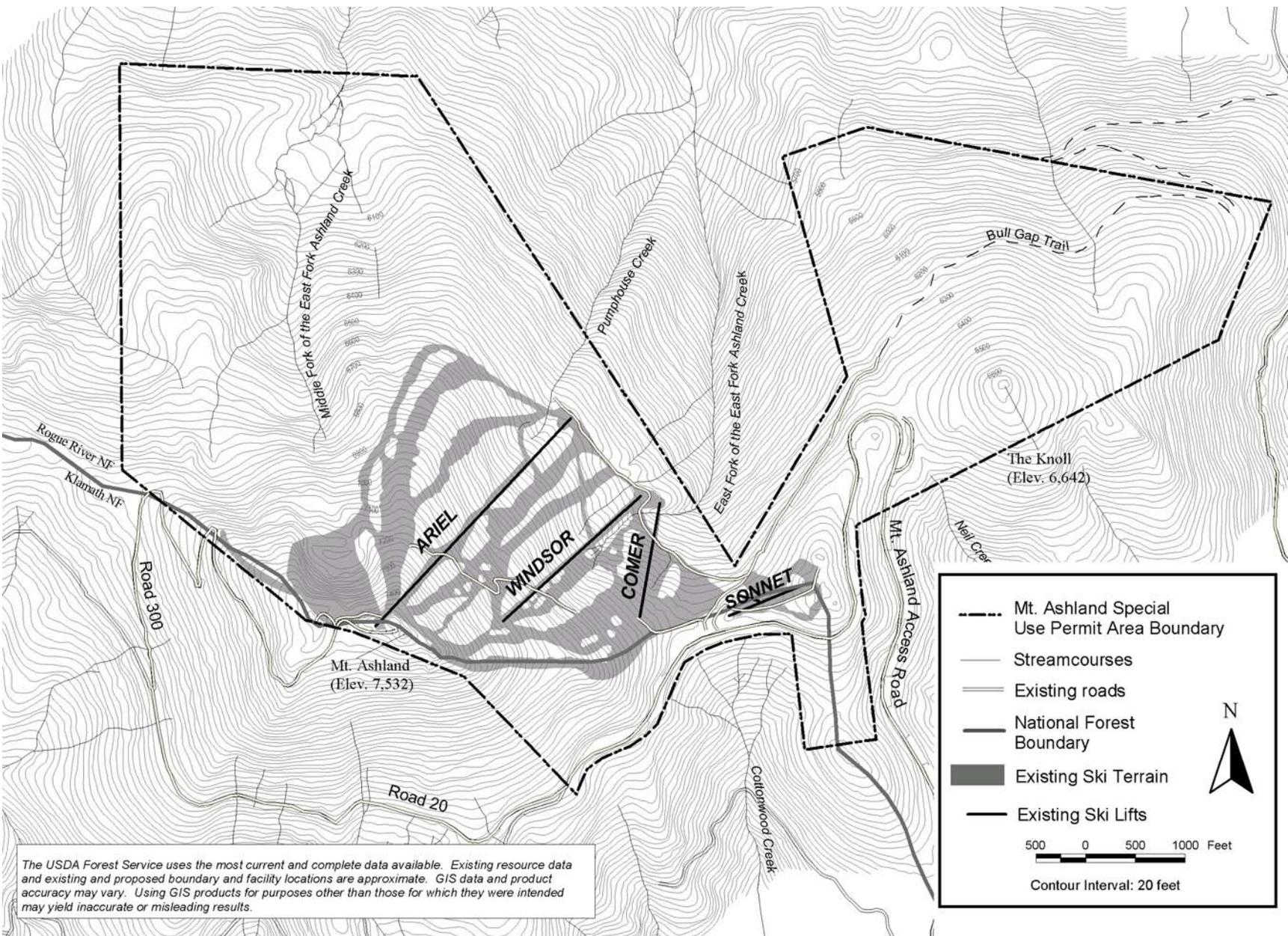
The **Mount Ashland Ski Area (MASA)** is an existing winter sports recreation area located within the Siskiyou Mountains in Southern Oregon on National Forest System Lands (**NFSL**), and is operated under special use authorization issued by the Rogue River-Siskiyou National Forest, Ashland Ranger District (see Vicinity Map, inside front cover). A small portion of the ski area is located on the Klamath National Forest. MASA is located about 7 air miles south of the City of Ashland, primarily within the Ashland Creek Watershed (see Map I-1). This municipal watershed serves as the source of drinking water for the City of Ashland.

Ski area construction began in 1963. The currently existing ski area development consists of a day lodge, a ski rental shop building, ancillary structures, four chairlifts, and approximately 125 acres of ski runs. A parking lot for approximately 550-600 vehicles is located south of the lodge along Forest Road 20 (see Map I-2). The legal location description for all actions being considered is T. 40 S., R. 1 E., within portions of sections 15, 16, 17, 20, 21, and 22, W.M., Jackson County, Oregon.

MAP I-1. Vicinity Map



The USDA Forest Service uses the most current and complete data available. Existing resource data and existing and proposed boundary and facility locations are approximate. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results.



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The **Mt. Ashland Association (MAA)** currently leases the ski area from the City of Ashland, holder of a Forest Service Special Use Permit (**SUP**) for the MASA. According to its bylaws, MAA operates the ski area for the City of Ashland as “a non-profit corporation organized under the laws of the State of Oregon exclusively to provide educational and recreational opportunities in Jackson County, Oregon, to members of the general public.”

MAA is proposing this expansion, and is therefore the “proponent”. MAA is responsible for all financial aspects of construction of improvements related to proposed ski area expansion. The role of the USDA Forest Service is to analyze a Proposed Action as it would affect National Forest System Lands and to consider authorization of MAA to implement actions. The Forest Service has not invested public funds to propose and design an expanded ski area; the responsibility for this lies with the proponent. The Forest Service has the responsibility (and obligation) to analyze a proposal for an action on Federally managed lands and to conduct analysis under NEPA, that would determine the appropriateness of authorizing action.

In March 1998, MAA submitted a proposal to the Forest Service (based on the previously approved 1991 Master Plan) that, if authorized, would have implemented a variety of ski area facilities improvements within a portion of the MASA SUP. In accordance with the programmatic decision made with the Master Plan, a NEPA process was initiated. Scoping notices were distributed that described this initially proposed action and the intent of the Forest Service to prepare an Environmental Assessment to document site specific analysis for implementation of a portion of the 1991 programmatic decision. This scoping effort resulted in numerous letters of response from groups and individuals. Four public field trips to the expansion area occurred and two public meetings were held in regard to the ski expansion proposal. The proposal was also reviewed and discussed with many Forest Service interdisciplinary resource and process specialists. This dialogue led the Responsible Official to a decision to prepare an Environmental Impact Statement.

In December of 1998, MAA resubmitted their proposal with modifications of design, modified locations of runs, lifts and facilities, and additional mitigation based on public concerns, additional field work and preliminary analysis of resource concerns.

Initially (January 1999), the Forest Service published a Notice of Intent (NOI), describing its intent to prepare a supplement to the 1991 Final Environmental Impact Statement and ROD for the Mt. Ashland Ski Area (Federal Register (FR) January 8, 1999, FR pages 2873-2874). Based on further review, the Forest Service determined that since a programmatic or “Master Plan” had been analyzed and documented in a 1991 ROD/FEIS, a project-specific Environmental Impact Statement (EIS) was the more appropriate type of document for complete disclosure of the analysis regarding a proposal for expansion of a portion of the MASA. As a result, the NOI for a Supplemental EIS process was rescinded and a new NOI for Mt. Ashland Ski Area Expansion was published in the Federal Register on October 12, 1999 (FR pages 55228 and 55228-55229).

A Draft EIS was prepared and a Notice of Availability was published by the Environmental Protection Agency in February 2000. An amended Notice of Availability was released on April 14, 2000 (FR page 5520156), which extended the Comment Period from April 3, 2000, to May 4, 2000. The extent of public and agency comment on that Draft EIS was substantial. Substantive comments and suggestions, especially regarding alternatives considered and additional components of actions or alternatives that were not considered in detail, caused the Responsible Official to decide to prepare a new Draft EIS.

This and all previous phases of the process are considered a continuation of the ongoing environmental analysis. A new NOI was issued on April 1, 2002 (FR page 15356, 15357). A Draft EIS was made available for comment under the provisions of the NEPA (40 CFR 1500-1508), and Notice, Comment, and Appeal Procedures for National Forest System Projects and Activities, (36 CFR 215). The Forest Service accepted written, electronic and oral comments as provided in §215.6. Pursuant to 36 CFR 215.6 (b), a 60-day public comment period for the Mt. Ashland Ski Area Expansion DEIS formally began on July 25, 2003 with publication of a Notice of Availability in the Federal Register (FR 44080). A press release announcing the availability of the DEIS was sent to local media in southern Oregon and northern California on July 22, 2003. At the request of the City of Ashland, the public comment period was extended for an additional 30 days on August 18, 2003. This extension allowed for a 90-day comment period that closed on October 23, 2003.

Ski area expansion was programmatically analyzed and decided in the Final EIS and ROD for the MASA, which was released in July 1991. The proposal for ski area expansion at this time tiers to this programmatic Master Plan decision. This analysis provides review and documentation of currently proposed actions, based on current policy and regulation (such as the Northwest Forest Plan, its allocations and Standards and Guidelines, and the Endangered Species Act). Analysis has been conducted and is documented that assesses the relationship of the current proposal to the 1991 programmatic "Master Plan", including items that have changed, are in need of correction, or have been "fine-tuned" (such as run locations, additional facilities, and the acreage contained within the expanded permit area boundary). It discloses and analyzes information that was not previously discussed, such as actions partially within an Inventoried Roadless Area.

D. SUMMARY OF DECISIONS MADE IN THE 1991 ROD/FEIS

This proposal and analysis is tiered to the FEIS and its ROD for MASA released in July of 1991. That decision established a programmatic Master Plan for MASA. That decision programmatically approved expansion and changed the SUP area boundary. The current site-specific analysis does not re-open the programmatic decision for expansion that has already been made in the Master Plan. This Final EIS analyzes options for authorizing expansion actions at this time within the SUP area, tiering to the 1991 decision, including the No-Action option.

The ROD for the Mt. Ashland Ski Area was signed by then Acting Forest Supervisor, David F. Alexander, on July 3, 1991. This decision established programmatic direction for future site-specific analysis of expanded facilities. Important and relevant excerpts from the 1991 ROD include:

In the ROD on page 3 it states, "A long-term Master Plan for the ski area will provide the direction and development of winter sports at MASA for the next 10-20 years. The long-term Master Plan will be the vehicle for implementing site-specific facilities (component projects) within the expanded ski area."

Also on ROD page 3, ***“It is my decision to select Alternative 7, the agency’s Preferred Alternative, described in the FEIS and shown on the enclosed map, as the new Master Plan for the Mt. Ashland Ski Area. Alternative 7 will expand the ski area primarily on the north face of the mountain.”*** On page 5 of the ROD it states, ***“It will provide for increased skiing and will enhance the quality of the recreational experience, particularly for beginner and intermediate skiers. This decision is based on a careful review of applicable laws, the FEIS and public comments.”***¹

“The long-term objectives of the Master Plan are to provide a high quality downhill ski experience that is in balance with other recreational opportunities at Mt. Ashland, is economically feasible, and is within the capabilities of the land to absorb the development.” ROD page 8.

“My decision in selecting Alternative 7 reflects the intention to allow Mt. Ashland Ski Area to expand the number and variety of skiers it serves, while protecting the environmental qualities and recreational attributes that make Mt. Ashland a unique, significant place.” ROD page 7.

As a “programmatically” decision (under NEPA, one that allows but does not require actions to take place and does not make irreversible or irretrievable commitments of resources, or site-specifically authorize), ***“Approval of this Master Plan will provide for the orderly expansion of the ski area. It does not approve the exact final locations of component projects nor does it indicate a specific time-frame for construction of those facilities. Additional detailed designs, plans, and environmental analysis will be required before on-the-ground construction of the Master Plan’s component projects. Each project included within the scope of the Master Plan will require an additional level of environmental analysis before construction is approved. A No-Action alternative will be analyzed for each component project submitted.”*** ROD page 5.

As described in the ROD, page 13, Alternative 7, the selected Alternative, ***“...would expand MASA’s capacity to 4,795 PAOTs, served by a total of eight lifts. Skiable terrain would be increased to 197 acres. One mile of cross-country trail would be groomed on Road 20. No permanent facilities would alter the character of the south side.”***² A transport lift would connect the existing lodge to a new facility at the Knoll. MASA’s permit area would be expanded to enclose a total of 1,180 acres³, primarily including areas north of the Bowl and the Knoll. Parking capacity would be increased to accommodate just over 1,900 vehicles. Summer uses would be developed.”

¹ Some copies of the 1991 ROD contain pages that appear to be miss-numbered; there is no page 4. The description of the decision begins at the bottom of page 3, and continues (without missing text) on the next page, which is identified as page 5. The remainder of the ROD then continues on in sequence. The original version included the selected alternative map as page 4; on subsequent copies that were reproduced, the map (without a page number) was attached at the end of the ROD.

² As defined in the 1991 FEIS, the “south side” extends west from the back parking lot to a point just west of Grouse gap. Its south edge follows Road 40S15 to a point just west of Grouse Creek. Its north edge (starting at the back parking lot) goes upslope and reaches the Crest about ¼ mile east of Mt. Ashland’s summit and follows the Crest to Grouse Gap. While this area has historically been used by alpine skiers and for other winter sports, it is not within the SUP area boundary. The 1991 ROD specifically and exclusively approves ski area expansion within SUP area.

³ Recent analysis, based on transferring the SUP area boundary area to current mapping, using more technically precise computer mapping methods, has calculated the area within the permit boundary to be approximately 960 acres. In addition to more precise technology, this magnitude of change may be due to an error in the assumptions for calculating or estimating the area during the 1991 FEIS analysis (the 1991 planning area was much larger than the current permit area). There is no change to the location of the boundary associated with the decision made in 1991, only to the calculation of the area contained within it. Also see Chapter II, Section B, 1.

As noted in the ROD under Appeal Rights, page 16; *“Decisions on the MASA Master Plan’s site-specific component projects are not made in this document. Final decisions on component projects authorized by this document will be made after site-specific analysis in compliance with the National Environmental Policy Act.”*

E. PURPOSE OF AND NEED FOR ACTION

The overall objective for MASA expansion proposal is two fold: 1) Provide facilities necessary for an enjoyable and diverse recreation experience, which would ensure long-term economic viability of MASA and maintain the competitive position of MASA with other ski areas in the local and regional market, and 2) Maintain and/or take advantage of opportunities to restore the conditions in the four affected sub-watersheds and be consistent with Forest Plan direction.

The Forest Service overall Purpose and Need focuses on maintaining and/or enhancing environmental resources and providing the public quality recreational opportunities in an outdoor natural setting on NFSL. The basis for accomplishing this is contained in Federal laws and Forest Service policy directives, the Forest Plans, and the Special Use Permit. This direction also provides the Forest Service the authority for ski area management on National Forest System Lands.

Therefore, the underlying Forest Service *Need* is:

- **To respond to a proposal by MAA that would expand facilities at this time, within the designated Special Use Permit area, and in accordance with the programmatic Master Plan approval made by the 1991 ROD/FEIS.**

In this environmental analysis, the Forest Service evaluates the MAA proposal and develops and considers alternatives to it in such a manner as to ensure compliance with applicable laws, regulations, policies and direction, and to maintain consistency with the Rogue River Forest Plan as amended by the Northwest Forest Plan, and the Klamath National Forest Plan. In the 1991 ROD and FEIS, the Forest Service decided that expanding MASA was an appropriate use of NFSL (see Section D, this Chapter). In this current process, the Forest Service is responding to a modified request (March 2002) by MAA to allow construction of some of the expanded ski facilities programmatically approved in 1991.

The proponent, MAA, has designed and submitted a proposal for action that would provide those facilities necessary for enjoyable skiing and a diverse and safe recreation experience. MAA, believes that:

- **Operations and economic viability at the MASA would be enhanced by construction of proposed new facilities, which are intended to bring the ski area up to date relative to ski industry terrain and safety standards.**

The Proposed Action would accomplish this by addressing existing shortcomings at MASA to meet current skier and future use expectations for a quality recreation experience, and would position MASA to take advantage of potential future growth in the local and regional skier market. This, in turn, would allow the ski resort to remain competitively viable within their market niche into the future. The Forest Service agrees that this proposal would meet the stated objectives and has agreed to consider options for meeting them.

Although the Forest Service and MAA have separate needs and objectives for the Proposed Action, they are connected through a committed long-term partnership to provide quality recreation opportunities on NFSL. By satisfying current and future visitors, MASA would remain a healthy and competitive ski resort. This would help fulfill Forest Service policy, objectives, and direction for ski area management in the respective Forest Plans.

The Forest Service and MAA have cooperatively determined six specific *Purpose* elements for ski area expansion at the MASA at this time. The Proposed Action includes various elements to address Forest Plan consistency, opportunities for watershed recovery, and the shortcomings at MASA. These elements of Purpose are designed to delineate the range of alternatives considered and to provide indicators for the alternative’s degree of attainment of Purpose and Need. These elements are further elaborated below.

1. Purpose #1: Terrain Balance and Diversity

One purpose for ski area expansion is to bring the terrain distribution at MASA closer to a balance as compared to ski industry standards; to qualitatively and quantitatively increase Beginner, Novice and Intermediate level skiing and snowboarding terrain; and to increase the diversity of terrain to allow for a greater variety of winter recreation at Mt. Ashland. This purpose was a key element of analysis in the 1991 Final EIS for the Master Plan.

a. Balance of Terrain by Ability Level

The availability of Novice to Intermediate level skiing terrain at MASA is currently inadequate, particularly for skiing groups and families with varying skiing abilities. When compared to ski industry standards, which are used to represent the public demand for terrain, MASA exhibits a deficit of Novice to Intermediate level terrain and a surplus of “best suited” Beginner and Advanced-Intermediate to Expert terrain, as shown in Table I-1.

Table I-1. Current MASA Terrain Distribution Compared to Industry Standards

| Ability Level | MASA Terrain ⁴ (% of terrain) | Industry Standard ⁵ (% of terrain) |
|-----------------------|---|--|
| Beginner | 2.6 ⁶ | 2 |
| Novice | 8.8 | 8 |
| Low-Intermediate | 0 | 18 |
| Intermediate | 10.7 | 35 |
| Advanced-Intermediate | 41.0 | 21 |
| Expert | 36.9 | 17 |

A specific Purpose of ski area expansion is to develop additional Novice to Intermediate level skiing and snowboarding terrain in order to address the current deficit, and to better meet the public demand for Novice and Intermediate level terrain, as expressed by industry standards.

⁴ Terrain distribution is based on most recent mapping techniques.

⁵ MASA Mountain and Base Area Specifications, SE Group 2003: DEIS and FEIS Appendix L, Recreation Analysis.

⁶ The existing Beginner terrain at MASA is currently not entirely suitable for beginners, due to the steep gradient at the top of the Sonnet lift. The Sonnet area is designated as Beginner because it represents the “best suited” Beginner terrain in the current ski area.

b. Suitable Terrain for Beginners

The existing Beginner terrain at MASA, which comprises 2.6% of the total existing terrain, is designated based upon its low slope gradient relative to the remaining terrain at the ski area, as well as its location relative to the Base Area. The actual Beginner terrain at the upper end of Sonnet, however, includes pitches with up to 20% slope gradient, which is considerably steeper than the 8-12% slope gradient that is considered by the industry as suitable for Beginner terrain. The lower portions of the ski runs in the Sonnet area exhibit the appropriate slope gradients. However the beginner must navigate the Novice-level slopes near the top of the chairlift in order to access the true Beginner terrain. The identified Beginner terrain at MASA is suitable for novice skiers, but not for beginners.

A specific Purpose of ski area expansion is to develop Beginner terrain with more appropriate slope gradients.

c. Accessibility of Existing Lower Level Terrain

As shown in Table I-1, over 75% of the existing terrain at MASA is rated as Advanced Intermediate to Expert level, representing a surplus of higher level terrain as compared to ski industry standards, and most, if not all, ski areas in the Pacific Northwest. This surplus of higher level terrain is partially the result of inadequate access into, or out of lower level terrain that currently exists.

For example, to reach the Low Intermediate and Novice terrain on Lower Caliban, a skier must first negotiate the Advanced Intermediate terrain on Upper Dream. As a result, Caliban is rated as Advanced Intermediate, even though it contains terrain that would be suitable for Novice and Low Intermediate level skiers; this lower level terrain is not currently available to the novice because access to the terrain requires a higher level of ability.

Conversely, the upper portion of Circe contains Beginner and Novice terrain, yet the only available egress is along an Advanced Intermediate to Expert pitch. As a result, Circe is rated Expert even though it contains Beginner and Novice level terrain; the lower level terrain is accessible, but a lower level skier is required to negotiate Expert terrain at the lower end of the run.

A specific Purpose of ski area expansion is to provide appropriate access to the existing lower level terrain at MASA by eliminating the requirement for lower level skiers to navigate higher level slopes.

d. Special Programs and Competitions at MASA

The capacity of MASA to host special programs and competitions is currently limited by the concurrent need to accommodate the skiing public. MASA does not have sufficient ski run acreage to designate terrain for special programs (e.g., Special Olympics) and competitions (e.g., race courses), while maintaining sufficient area and skier densities for the general skiing public.

A specific Purpose of ski area expansion is to increase total available terrain at MASA, thereby allowing additional opportunities for special programs and competitions while maintaining adequate skiing opportunities for the general public.

e. Diversity of Non-traditional Terrain at MASA

MASA is unable to provide a diverse terrain offering at a time when the public demand is growing more and more diverse, including advances in shaped skis, twin-tip skis, terrain parks, half pipes, rails, etc. The existing acreage of ski terrain on the mountain constrains the ability of MASA to provide diverse recreational offerings that require greater open spaces (e.g., terrain parks), lower skier densities (e.g., half pipes), and off-trail skiing (e.g., gladed terrain). The current peak visitation at MASA occupies the available terrain, allowing little room for more non-traditional sliding.

A specific Purpose of ski area expansion is to increase the total acreage of available terrain, thereby allowing MASA to provide additional non-traditional attractions such as terrain parks, half pipes, and gladed terrain.

f. Recreational Opportunities for Non-skiers

The public demand for winter recreation opportunities has grown steadily throughout the Pacific Northwest, with many ski areas providing new or expanded non-skiing facilities (e.g., tubing facilities) to meet the growing public demand for recreational offering to the non-skiing public. As a community-owned developed recreation site, MASA currently provides no non-skier oriented winter recreation opportunities to its guests.

A specific Purpose of ski area expansion is to provide non-skiing recreational opportunities at MASA to meet the current demands of the non-skiing public.

2. Purpose #2: Guest Access and Circulation

Another purpose of ski area expansion is to improve guest access and circulation patterns within the ski area. This purpose was an element in the 1991 Final EIS for the Master Plan.

a. Lift Access

Access to much of the existing ski terrain currently requires guests to ride both the Windsor and Ariel Chairlifts. Additionally, access to the western portion of the ski area is precluded during periods of high wind, which make the Ariel Chairlift inoperable and effectively closes approximately 40 percent of the available terrain, causing increased crowding on remaining lifts and terrain.

A specific Purpose of ski area expansion is to enhance lift access to the western portion of MASA, thereby improving guest circulation and eliminating dependency on the Ariel Chairlift as the only access to the western portion of the ski area.

b. Skier Density and Access to Skier Service Facilities

Areas of Advanced Intermediate and Expert terrain within the vicinity of the Ariel Chairlift exhibit relatively lower skier densities as compared to the Windsor area, due to difficult access, inefficient circulation, and distance from skier service facilities. This results in disproportionately higher densities on the more easily accessed terrain associated with the Windsor Chairlift.

A specific Purpose of ski area expansion is to improve guest access to the terrain associated with the Ariel Chairlift and to provide easier access from the Ariel Chairlift area to skier service facilities.

3. Purpose #3: Update and Balance Guest Services and Facilities

Another purpose of ski area expansion is to update on-mountain and Base Area guest service facilities, and to balance their capacities with the lifts and ski runs at MASA. This purpose was a key element of analysis in the 1991 Final EIS for the Master Plan.

a. Proportionately Sized and Efficient Skier Service Facilities

The existing skier service facilities (e.g., food service, toilets, and parking) at MASA are not proportionately sized to balance with the capacities of the lifts and ski runs, frequently resulting in inadequate restaurant seating and/or other overcrowded conditions. The existing facilities are dated and do not meet the demands of the current skiing public. Inefficient guest service facilities detract from the overall quality of the recreational experience of MASA visitors.

A specific Purpose of ski area expansion is to enhance the guest experience by updating the quality of the existing skier services facilities (e.g., food service, toilets, and parking) and by increasing the quantity of services provided at MASA, to better balance with the capacity of the existing and proposed lifts and runs.

b. Accessibility of Skier Service Facilities

MASA currently provides guest services facilities in the Base Area, located in the eastern portion of the ski area, with no on-mountain guest facility in the vicinity of the majority of the ski lifts and runs. As a result, guests skiing in the Ariel area, in the western portion of the ski area, are required to return to the Base Area to use toilets, rest, warm up, or eat within an indoor setting. This situation causes increased cross-mountain skier traffic and places an increased burden on the Windsor and Comer Chairlifts. Additionally, the concentration of skiers in the Base Area results in congestion. The distance to Base Area facilities and crowded conditions detract from the recreational experience of the MASA guest.

A specific Purpose of ski area expansion is to provide additional guest services facilities at MASA to reduce crowding in the existing Base Area, to reduce the cross-mountain skier traffic, and to reduce the distance from the ski terrain to guest facilities.

4. Purpose #4: Skier Safety

Some existing ski runs present unsafe conditions and do not meet current ski area safety standards. In addition, any expanded terrain and facilities must provide for safety, including emergency access or egress.

A concurrent Purpose of ski area expansion at this time is to enact improvements that will provide for and improve skier safety.

5. Purpose #5: Economic Viability and Longevity

Another purpose of ski area expansion at this time is to ensure the economic viability and longevity of this community-owned ski area. This purpose was a key element of analysis in the 1991 Final EIS for the Master Plan.

a. Augment and Modernize MASA Facilities

Many of the existing ski area facilities are outdated or undersized, which reduces the effectiveness of the ski area in providing a quality recreational experience for the public. The winter recreational offering at MASA is below industry standards in regard to the variety of skiing and non-skiing related facilities. The lack of quality and variety at MASA threatens the current and future economic viability of the ski area. Based on the community's purchase of the ski area in 1992, the community has a strong desire to have a local ski area that is economically healthy and stable.

A specific Purpose of ski area expansion is to augment and modernize existing MASA facilities, thus ensuring the greatest possibility for an economically viable and stable ski area with a competitive and quality recreation experience.

b. Guest Awareness and Regional Competition

The ski industry is a highly competitive, market-driven business. Skiers make decisions about where to ski based upon the quality and value of the overall experience provided. Review and analysis of national and regional market data indicate that there is an ever-increasing level of guest awareness of quality, service and value in the ski experience, particularly for the beginners and lower level skiers.⁷ Ski areas that have invested in faster and more comfortable lifts, terrain expansion, increased run grooming and other quality improvements have typically maintained or captured additional market share. Conversely, lack of improved facilities has led to the erosion of market share, and a decline in skier visitation. MASA competes with other ski areas in the regional marketplace. Many of these ski areas have recently made, or are in the process of undertaking facility improvements aimed at improving the overall skier experience, particularly for lower level skiers (e.g., Mt. Shasta, Mt. Bachelor, and Willamette Pass). On this basis, MASA does not provide competitive facilities to attract beginner and intermediate level guests, which represent a major portion (approximately 62 percent)⁸ of the skier market.

A specific Purpose of ski area expansion is to provide facility improvements at MASA in order to appeal to the broadest spectrum of the skiing and snowboarding market place, thus ensuring its economic viability and longevity.

6. Purpose #6: Maintain and Improve Trend of Watershed Recovery

Ashland, Neil, Upper Cottonwood, and Grouse Creek sub-watersheds receive flow from the MASA SUP area. These sub-watersheds, located in granitic terrain, produce high amounts of sediment to watershed streams as a naturally occurring process.

⁷ UW-EMBA, 1996; RRC Associates, 1994a, 1996, 1997; Leisure Trends 1996

⁸ National Ski Areas Association, National Demographic Study, RRC Associates 1999

Watershed Analysis covering Bear Creek (including Ashland and Neil Creeks), and Beaver Creek (including Grouse Creek), determined human caused disturbance can accelerate detrimental sediment production (USDA FS RRNF 1995b, USDA FS KNF 1996b).

Although Watershed Analysis has not been completed for the entire Cottonwood Creek watershed, site-specific analysis conducted in association with this Final EIS found similar conditions associated with its granitic terrain. These watersheds are recovering as a result of natural processes and from watershed restoration efforts aimed at stabilizing soils and slope conditions (USDA FS 1987, USDA FS 1996b, USDA FS 1997a, USDA FS 1998e).

The development of the ski area in 1963 involved a considerable amount of vegetation and soil disturbance and was long considered to be a major source of sediment to Reeder Reservoir. However, a 1978 to 1983 study determined that while the original development of the ski area was a contributor of sediment, it was not a major contributor as once thought (USDA 1987). Erosion control work continues to be an important part of ski area operations (pers. com. Meek 2002); this ongoing work along with natural revegetation has reduced areas of active erosion and is contributing to an overall recovering trend in watershed conditions in the East Fork Watershed.

A concurrent Purpose of ski area expansion is to maintain and improve the trend of watershed recovery of watersheds associated with the MASA SUP area.

F. THE PROPOSED ACTION

This section briefly highlights the Proposed Action being analyzed in this Final EIS. **The Proposed Action (Alternative 2) is discussed in detail in Chapter II of this Final EIS.** In this document, the term “Proposed Action” does not imply the action that has been selected; it is the proposal received from the proponent that has caused the Forest Service to conduct site-specific analysis under NEPA, as required by the 1991 Master Plan ROD/FEIS.

Under the Proposed Action the Forest Service would allow MAA to construct two chairlifts, two surface lifts, and approximately 71 acres of associated new ski terrain primarily within the western half (the East Fork of Ashland Creek or “Middle Fork” area) of the MASA SUP area. There would be an additional 4 acres of clearing for lift corridors and staging areas.

In addition, MAA has proposed expanded features that would include a tubing facility in the southern portion of the permit area; three guest services buildings, a yurt, additional night lighting; additional maintenance access road segments; additional power, water lines and storage tanks, sewer lines; and additional parking areas resulting in an increase in vehicle parking by 200 spaces. Watershed restoration projects would be implemented, including structural storm water control, and non-structural controls, such as the placement of woody material.

The proposed expansion projects if authorized would be implemented and financed by MAA. Implementation could begin immediately upon Forest Service authorization and would be dependent on ongoing analysis by MAA of the priority for each project or group of associated authorized projects, and MAA’s availability of construction capital. Overall completion of authorized actions could take 10 or more years.

G. DECISION FRAMEWORK

This Final EIS is not a decision document. Its main purpose is to disclose consequences and provide disclosure of the consequences that could result from implementation of the Proposed Action, or alternatives to that action. Should an action alternative be selected, certain decisions will be documented in a forthcoming ROD. Accordingly, the Final EIS focuses on providing analysis sufficient to ultimately make the following Federal decisions:

- Which, if any, of the proposed ski area expansion improvements will the Forest Service authorize and allow?
- What mitigation and monitoring measures will be required if an action alternative is selected?

This Final EIS documents the environmental evaluations of the proposed projects and activities being considered within the SUP area boundary at this time. The Final EIS will not be used to revisit previous approvals and decisions made under NEPA.

The Rogue River-Siskiyou, and Klamath National Forests are jointly responsible for public land management of the Special Use Permit area. The Rogue River-Siskiyou has been authorized to make decisions regarding implementation of ski area expansion activities at Mt. Ashland under the terms of the February 4, 2004 Intra-Agency Agreement (No. 03-IA-11061002-005), between the Klamath National Forest and the Rogue River-Siskiyou National Forest. Under this agreement, “The Rogue shall...Accept, analyze and approve permittee’s project proposals and improvements, and administer all winter sports related Special Use Permit Activities. This includes, but is not limited to, all NEPA document and the future management of the Ski Area as defined on the Special Use permit map encompassing Klamath National Forest System Lands.”

The Responsible Official (the Decision Maker) for this analysis and forthcoming decision is therefore the Forest Supervisor of the Rogue River-Siskiyou National Forest. The RR-SNF is the lead unit for this NEPA analysis and the Ashland District Ranger under delegated authority from the Forest Supervisor has led the analysis, guided the interdisciplinary team and coordinated the public involvement process.

As the lead agency for this EIS, the Forest Service has many responsibilities pertinent to the process. NEPA allows the lead agency to select independent third-party contractors (consultants) to assist in the preparation of the EIS (40 CFR 1506.5(c)). The cost of the contractor is paid by the proponent (MAA); however, the consultants work under the direction of the lead agency. The agency directs the consultant's efforts, reviews and approves the work, and ultimately incorporates consultant work into the EIS as an agency product. The consultants are required to execute a disclosure statement specifying that they have no financial or other interest in the outcome of the project.

NEPA regulations (40 CFR 1501.2 (d)) strongly encourage agencies to advise potential private applicants of the likely information requirements and studies that may be necessary for later Federal review and decision making. The objective is to ensure that the planning of any proposed actions reflects the environmental values of an area, minimizes potential conflicts, and avoids delays in preparing an EIS.

Agencies are further directed to utilize information collected by applicants, their consultants, or other parties (40 CFR 1506.5 (c)), as long as agencies make an independent evaluation of the content and scientific credibility of the information. All such information used in this Final EIS has been subject to Forest Service review and scrutiny.

H. MANAGEMENT DIRECTION

In evaluating MAA's proposal for expansion, the Forest Service is required to ensure that management direction has been addressed for proposed actions and project areas and that actions are in the public interest. There are a variety of laws and regulations that call for the agency to work with private industry to provide needed recreational facilities, including downhill ski areas, on suitable NFSL. Special Use Permits are to be administered for public recreational uses that promote public health and safety and protect the environment. The major laws include the Organic Administrative Act of 1897, the Weeks Act of 1911, the Multiple-Use Sustained Yield Act of 1960, the Forest and Rangeland Renewable Resources Planning Act of 1974, the National Forest Management Act of 1976, and the National Forest Ski Area Permit Act of 1986. The Forest Service is authorized to provide recreational opportunities on NFSL funded through private enterprise (16 United States Code [USC] 497). Special Use Permits are to be administered for recreation uses that serve the public, promote public health and safety, and protect the environment. Further, as directed by the National Forest Ski Area Permit Act of 1986 (16 USC 497 and 26 CFR 251), a ski area is defined as:

“a site and attendant facilities expressly developed to accommodate alpine or Nordic skiing and from which the preponderance of revenue is generated by the sale of lift tickets and fees for ski rentals, for skiing instruction and trail passes for the use of permittee-maintained ski trails. A ski area may also include ancillary facilities directly related to the operation and support of skiing activities.”

Skiing is an important component of the recreational opportunities offered by the National Forests. Forest Service policy encourages year-round recreation opportunities at ski areas to serve the public, provide economic stability to local communities, and promote economic commercial ventures (FSM 2342.1). The *Recreation Agenda* (USDA FS 2000) details the Forest Service role in increasing outdoor recreation on NFSL through partnerships with other public and private entities (e.g., state agencies, the ski industry, and non-profit organizations).

Other management direction guiding use of the SUP area and vicinity are summarized below.

1. Rogue River and Klamath National Forest Plans

Pursuant to CEQ 1502.20, this Final EIS is tiered to the FEIS and ROD for the RRNF Land and resource Management Plan (**LRMP**) (USDA Forest Service 1990a) as amended by the Northwest Forest Plan (**NWFP**) (USDA Forest Service and USDI Bureau of Land Management 1994b). The Proposed Action and alternatives are located on lands allocated to Administratively Withdrawn under the Northwest Forest Plan. This Final EIS is also tiered to the FEIS and ROD for the Land and Resource Management Plan for the Klamath National Forest (KNF LRMP 1995c). See Section 3 of this Chapter for more detail on applicable management direction from the Northwest Forest Plan.

The RRNF LRMP (1990) provides long-range management direction for the RRNF; all uses on the Forest must address consistency with management prescriptions (strategies) applicable to specific management areas. Its overall Forest Management Goal is to “Provide a balance of resource management activities that will maintain a healthy forest ecosystem as well as helping to supply local, regional, and national social and economic needs. Maintain close coordination with adjacent landowners, both private and public...for better management of all resources. Seek opportunities for partnerships with other agencies and the private sector to enhance resource protection and local development.” (RRNF LRMP 1990, page 4-1). Specific goals for “Facilities” states “Provide and manage efficient administrative sites and facilities sufficient to accomplish land and resource management and protection objectives. Provide safe, efficient, environmentally sound access for the movement of people and materials involved in the use and management of National Forest lands.” (RRNF LRMP 1990, page 4-3). Under “Forest Management Objectives and Resource Summaries”, specifically “Recreation”, it states “The Rogue River National Forest will provide recreation experiences across the range of the Recreation Opportunity Spectrum. The Forest will be placing increased emphasis on all aspects of recreation...” (RRNF LRMP 1990, page 4-22). “The developed recreation program will emphasize the rehabilitation or upgrading of existing sites to modern standards. In addition, maintenance funding has been increased so that all sites will be managed at full service levels. The Forest will manage for 9,968 persons-at-one-time (PAOT) at the developed sites. Expansion of existing alpine ski areas will be emphasized over development of new ones.” (RRNF LRMP 1990, page 4-23).

The KNF LRMP (1995) provides long-range management direction for the KNF. The USDA Forest Service Mission, included in the KNF Land and resource Management Plan, is “To sustain the health, diversity and productivity of the Nation’s forests and grasslands to meet the needs of present and future generation.” (KNF LRMP, page 4-3). In stating the Forest Vision, the KNF is envisioned as a place where “A variety of pleasing environments are actively managed for the recreational benefits of both area residents and Forest visitors.” Under “Forest Program emphasis; Recreation Management” it states: “develop a program that is supportive to the communities’ efforts to diversify, strengthen and attract natural resource-oriented activities and businesses which will strengthen rural economies. Offer a wide range of recreation attractions and opportunities that are responsive to the demands of multi-cultural, traditions and non-traditional recreation users. Locate and manage developed recreation sites primarily to support recreationists as they participate in off-site recreational activities within the recreational emphasis areas...” (KNF LRMP, page 4-7).

The respective LRMPs designate the MASA SUP area as Developed Recreation (MA-4), or as Administratively Withdrawn. The 1991 ROD/FEIS for the MASA enlarged the SUP area and this area is currently being managed for Developed Recreation under the guidelines of the RRNF LRMP. The currently proposed facility expansion (under all Action Alternatives in this Final EIS) is contained totally within this expanded SUP area. **Of the 960 acres within the SUP area, 888 acres are located on the RRNF and 72 acres are on the KNF.**

The goals and objectives of the Developed Recreation Management Strategy are to provide quality outdoor recreation opportunities within a forest environment that is modified for visitor use, visitor satisfaction, and accommodation of large numbers of visitors (RRNF LRMP page 4-53).

2. 1991 Mt. Ashland Ski Area Master Plan ROD/FEIS

The 1991 ROD/FEIS authorized the programmatic Master Plan that currently controls development at MASA. This Master Plan programmatically authorizes MASA to expand (as described in the ROD, page 13) in accordance with Alternative 7. This Selected Alternative “would expand MASA’s capacity to 4,795 PAOT, served by a total of eight lifts. Skiable terrain would be increased to 197 acres. One mile of cross-country trail would be groomed on Road 20. No permanent facilities would alter the character of the south side of Mount Ashland. A transport lift would connect the existing lodge to a new facility at the Knoll. MASA’s permit area would be expanded to enclose a total of 1,180 acres (see footnote 1, this Chapter), primarily including areas north of the Bowl and the Knoll. Parking capacity would be increased to accommodate just over 1,900 vehicles. Summer uses would be developed.” Also see Section D of this Chapter for more information on the decisions made in the 1991 ROD.

3. Northwest Forest Plan

In June 1990, the northern spotted owl, (*Strix occidentalis caurina*), which lives primarily in late-successional forest in the Pacific Northwest and northern California, was listed as a Threatened species under the Endangered Species Act (ESA). Reasons for listing included past and projected losses of suitable habitat (caused primarily by timber harvest).

On April 2, 1993, President Clinton held a Forest Conference in Portland, Oregon, to deal with controversies over forest management and protection of species associated with old-growth forest in the Pacific Northwest and northern California. Scientists, economists, representatives from the forest products industry, environmental groups, Indian tribes, and others presented concerns, opinions, and proposals to the President about the various issues involved in managing the region’s forestlands. Following the conference, President Clinton established a Forest Ecosystem Management Assessment Team (FEMAT) to develop options for the management of Federal forest ecosystems to provide habitat that would support stable populations of species associated with late-successional forests. A FEIS assessing the potential effects of the options developed by FEMAT was completed in February 1994. A ROD adopted Alternative 9, which is based on a system of Late-Successional Reserves (LSRs), Riparian Reserves, Adaptive Management Areas, and a matrix of Federal lands interspersed with non-Federal lands.

The Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, is now commonly known as the **Northwest Forest Plan (NWFP)**. This ROD, jointly signed by the Secretaries of Agriculture and Interior, amended the Rogue River National Forest (RRNF) Land and Resource Management Plan (LRMP or Forest Plan) and other existing plans within the range of the northern spotted owl and provided management direction for completion of the Klamath National Forest LRMP.

This amendment to the RRNF LRMP, which became effective on May 20, 1994, provided new goals, objectives, standards, and guidelines for resource management. It added several new land allocations, each with its own set of Standards and Guidelines. These land allocations overlay and merge with the allocations from the 1990 RRNF LRMP and provide the management guidance for the KNF LRMP. The direction in the Northwest Forest Plan supersedes the RRNF LRMP where it is more restrictive or provides greater benefits to late-successional ecosystems. Direction from the RRNF Forest Plan is retained where it is more restrictive or unaffected by the Northwest Forest Plan.

Four land allocations occur within (bold text) **or** are adjacent to (non-bold text) the overall MASA SUP area, within the two National Forests. These allocations, in relation to the SUP area boundary are shown on Map I-3. Although these allocations overlay each other on this map, they are not mutually exclusive. In some cases, concurrent direction applies, e.g., most of the Ashland Watershed was allocated to Restricted Watershed by the 1990 RRNF LRMP, and to Late-Successional Reserve by the Northwest Forest Plan. Standards and Guidelines for Riparian Reserve overlay and take precedent over all land allocations, as applicable. The allocations are:

Administratively Withdrawn: areas associated with the RRNF and KNF Plans that emphasize recreation, scenery, botanical or other resources and that do not include (withdrawn from) regulated or programmed timber harvest. The majority of the (expanded) permit area resulting from the 1991 ROD/FEIS for MASA is allocated to Administratively Withdrawn in the Northwest Forest Plan; the permit area is identified as Developed Recreation, Management Strategy 4 in the 1990 RRNF LRMP, and Administratively Withdrawn associated with the 1995 KNF LRMP.

Late-Successional Reserves: (LSRs): areas to be managed to protect and enhance late-successional and old-growth forest ecosystems. LSRs are intended to provide habitat for species such as the northern spotted owl, which live in late-successional forests. The MASA permit area lies directly adjacent to, but **not within an LSR**, on portions of both the Klamath National Forest and the RRNF. The portion of the LSR adjacent to the Special Use Permit area within the Ashland Creek Watershed is also managed as Restricted Watershed, Management Strategy 22 under the RRNF LRMP.

Matrix: areas under the Northwest Forest Plan that include all other lands not otherwise designated. The MASA SUP area is adjacent to but **not within** lands allocated to Matrix, in a portion of the Cottonwood Creek watershed on the Klamath National Forest.

Riparian Reserves: lands along all streams, lakes, ponds, wetlands, unstable areas, and potentially unstable areas that are subject to special Standards and Guidelines designed to conserve aquatic and riparian-dependent species. Standards and Guidelines apply to activities in Riparian Reserves that may otherwise retard or prevent attainment of Aquatic Conservation Strategy (ACS) objectives at the fifth-field watershed scale, as defined in the 1994 ROD and refined by the 2004 ACS decision. The Aquatic Conservation Strategy (ACS) contains four components: Riparian Reserves; Key Watersheds; Watershed Analysis; and Watershed Restoration. Each part of the ACS is expected to play an important role in improving the health of the region's aquatic ecosystems.

Widths for Riparian Reserves necessary to ensure ACS objectives for different water bodies are established based on ecological and geomorphic factors. Widths are typically one site potential tree height (or a default width of 150 feet where site potential tree height has not been established) along each side of stream channels. Widths are twice this distance along fish bearing streams. These widths are designed to provide a high level of protection to fish and riparian habitats. The MASA SUP area and the surrounding watersheds, including all land allocations, contain an extensive network of Riparian Reserves (see Map I-3 and Chapter III). Key Watershed designation is an additional component of the ACS that is applied to watersheds that contain at-risk fish species or anadromous stocks and that provide high quality water and fish habitat. Key Watersheds are not a Federal land allocation but do overlay all land allocations.

MAP I-3. Land Allocations



The USDA Forest Service uses the most current and complete data available. Existing resource data and existing and proposed boundary and facility locations are approximate. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results.

Land Management Plan Allocations

- Private Ownership
- Late-Successional Reserve (KNF & RRNF)
- Administratively Withdrawn - Special Management (KNF)
- Riparian Reserve (KNF & RRNF)
- Matrix - Visual Emphasis (KNF)
- Administratively Withdrawn - Developed Recreation (RRNF)
- Late-Successional Reserve - Restricted Watershed (RRNF)

- Major Roads
- Streams
- Special Use Permit Boundary
- National Forest Boundary



The MASA SUP area includes approximately 796 acres of the Ashland Creek sub-watershed. The Ashland Creek sixth field sub-watershed does not allow anadromous fish passage above Reeder Reservoir but does support anadromous habitat below the reservoir (in Bear Creek). The Ashland Creek sub-watershed is a portion of the larger Bear Creek fifth field⁹ watershed (231,087 acres). Federal lands on the RRNF within the Ashland Creek Watershed are **not designated as Key Watershed.**

The MASA SUP area includes approximately 92 acres of the Neil Creek sub-watershed. The Neil Creek sixth field watershed does support resident and anadromous habitat as a tributary to the larger Bear Creek Watershed. Federal lands on the RRNF within the Neil Creek Watershed are however, **not designated as Key Watershed.**

The MASA SUP area includes a small portion (approximately 64 acres) of the Upper Cottonwood Creek sub-watershed (above Mill Creek). The watershed is a mix of interspersed private and Federally managed lands. The main stem of Cottonwood Creek is almost entirely within private ownership, and supports anadromous fish in its lowest reaches. Federal lands within the Cottonwood Creek Watershed are **not designated as Key Watershed.**

The MASA SUP area also includes a small portion (approximately 8 acres) of the Grouse Creek sub-watershed, a tributary to the larger Beaver Creek Watershed. This fifth field watershed supports anadromous fish populations downstream from the SUP area. Federal lands within the Grouse Creek Watershed are **not designated as Key Watershed.**

Detailed requirements in the NWFP further describe how land managers should treat the forest lands within the range of the northern spotted owl are described in NWFP ROD Attachment A, particularly section C. “Some Standards and Guidelines apply to all lands, others to a specific land allocation. More than one set of standards and guidelines may apply in some areas -- for instance Riparian Reserve requirements within a Late-Successional Reserve. In such cases, the more restrictive Standards and Guidelines generally apply.” (NWFP page 7, 8).

4. Amendments to the Northwest Forest Plan - 2004

a. Aquatic Conservation Strategy

The Aquatic Conservation Strategy (ACS) is an integral part of the Northwest Forest Plan and was developed to restore and maintain the ecological health of watersheds and aquatic ecosystems on public lands. Since 1994, Northwest Forest Plan timber harvest and restoration projects have been delayed or stopped due to court interpretations of certain passages in the ACS. The ACS has been interpreted to mean that every project must achieve all ACS objectives at all spatial and temporal scales (site or project, watershed, province, region). This interpretation suggests land managers must demonstrate that a project will maintain existing conditions (or lead to improved conditions) at every spatial and temporal scale. Any project that may result in site-level disturbance to aquatic or riparian habitat, no matter how localized or short-term, could be precluded under this interpretation.

⁹ A fifth field watershed is a hydrologic classification of stream basins applied to watersheds of 20-200 square miles. A sixth-field sub-watershed is typically one of several sub-watersheds within the larger fifth field watershed.

The Secretaries of Agriculture and the Interior proposed limited changes to language about how to implement the ACS. These changes would amend Forest Service and Bureau of Land Management plans throughout the Northwest Forest Plan area. USDA Forest Service and USDI Bureau of Land Management jointly prepared a Final Supplemental Environmental Impact Statement for Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan “Proposal To Amend Wording About The Aquatic Conservation Strategy.” This FSEIS was completed in October 2003. A Record of Decision was signed by Mark Rey, Under Secretary for Natural Resources and the Environment, USDA; and Rebecca Watson, Assistant Secretary for Land and Minerals Management, USDI, on March 22, 2004.

These limited changes clarify that the proper scale for federal land managers to evaluate progress toward achievement of the ACS objectives is the fifth-field watershed and broader scales. These changes also clarify documentation requirements for land managers to demonstrate that projects follow the ACS. It would remove the expectation that all projects must achieve all ACS objectives, but would reinforce the role of watershed analysis in providing context for project planning. The decision clarifies that the nine ACS objectives would be attained at the fifth-field watershed scale and not at the project or site level. All site-scale projects would continue to meet the protective measures in the Standards and Guidelines such as Riparian Reserve widths.

b. Survey and Manage

The Survey and Manage Standards and Guidelines were originally added to agency land and resource management plans as part of the 1994 *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl* (the Northwest Forest Plan). The Northwest Forest Plan primarily takes a landscape approach to providing habitat for late-successional and old-growth forest related species on Forest Service and Bureau of Land Management (BLM) administrative units in western Washington and Oregon, and northwestern California. The Survey and Manage mitigation measure was added to the basic elements of the Northwest Forest Plan to provide benefits for rare and little known species. In January 2001, the Agencies modified the Survey and Manage Standards and Guidelines by identifying needed management, clarifying language, eliminating inconsistent and redundant practices, and establishing an annual species review process. Those modifications were embodied in the January 2001 *Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*.

Agency managers and the public have raised concerns that the Survey and Manage Standards and Guidelines are frustrating the Agencies’ ability to meet the resource management goals and objectives as set forth in the Northwest Forest Plan. They assert that the costs of the Survey and Manage mitigation measures, both in dollars and time, are excessive. They also suggest that because 80 percent of federally managed lands within the Northwest Forest Plan area are allocated to reserves, it is not necessary to manage substantially more land for late-successional and old-growth forest related species. The Survey and Manage Standards and Guidelines require management of species sites within areas allocated to multiple use such as timber harvest or watershed restoration. Such management can prevent timber harvest and other activities such as habitat conservation and restoration from going forward.

The Secretaries of Agriculture and the Interior proposed to remove the Survey and Manage Standards and Guidelines by amending 28 land and resource management plans within the range of the northern spotted owl. USDA Forest Service and USDI Bureau of Land Management jointly prepared a Final Supplemental Environmental Impact Statement *To Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines*. This FSEIS was completed in January 2004. A Record of Decision was signed by Mark Rey, Under Secretary for Natural Resources and the Environment, USDA; and Rebecca Watson, Assistant Secretary for Land and Minerals Management, USDI, on March 22, 2004.

The Record of Decision for the Survey and Manage Mitigation Measure Standards and Guidelines results in continued species diversity and conservation while at the same time reducing costs and facilitating the agencies' ability to implement the forest management and timber production goals of the Northwest Forest Plan. For the Forest Service, the Under Secretary of Agriculture's March 2004 decision to abolish the Survey and Manage (S&M) Standards and Guidelines results in eligible species being managed under the Forest Service Sensitive species program.

None of the species that were covered by the Survey and Manage Mitigation Measure standards and guidelines are listed as Threatened or Endangered under the Endangered Species Act, nor are any proposed for listing. All of the Survey and Manage species were evaluated for inclusion in the agencies' Special Status Species Programs. For those that qualify, agencies must ensure that actions are consistent with the conservation needs of those species and that the actions do not cause the species to be listed under the Endangered Species Act.

5. Pacific Northwest EIS for Managing Competing and Unwanted Vegetation

This Final EIS document incorporates by reference the Region 6 FEIS for Managing Competing and Unwanted Vegetation (December 1988b), its Record of Decision and the terms of a Mediated Agreement (March 1989), which resolved litigation following publication of the FEIS. This analysis emphasized managing competing and unwanted vegetation; and is a basis for the *Rogue River National Forest's Integrated Noxious Weed Management EA* (1999d).

This Final EIS also incorporates by reference the Decision Notice signed by J. Michael Lunn, Rogue River and Siskiyou National Forest Supervisor on September 1, 1999 for the Environmental Assessment for Integrated Noxious Weed Management Plan (Weed Plan) on the Rogue River National Forest. Under this decision, a list of all Forest infestations and locations are maintained in the Weed Plan. Under the terms of this plan and the Special Use Permit, the ski area operator is required to help prevent new infestations, limit the expansion of existing populations, and report new sites.

6. National Recreation Agenda and Strategy

The primary goal of the *Recreation Agenda* (USDA FS 2000) is to provide quality recreation opportunities on NFSL in an ecologically sustainable manner. One of the purposes of this initiative is to promote local economic diversity by encouraging travel and tourism opportunities in collaboration with professionals in the private sector. Ski areas operated by the private sector provide a wide range of winter and summer outdoor recreation opportunities that can contribute to shaping local economies.

The *National Recreation Strategy* (USDA FS 1988c), a result of the 1987 President's Commission for Americans Outdoors, was an effort by the Forest Service to foster public/private partnerships for the provision of winter and summer recreational opportunities on NFSL. One of the purposes of this initiative is to promote local economic diversity through successful and responsible development of mountain resorts.

7. National Forest Ski Area Permit Act

Under this Act, the Forest Service is to provide recreational opportunities on NFSL funded through private enterprise. Special Use Permits are to be administered for recreation uses that serve the public, promote public health and safety, and protect the environment (16 USC 497).

The National Forest Ski Area Permit Act of 1986 (16 USC 49b; FSM 2700-92-13) authorizes the Forest Service to issue term ski area permits "...for the use and occupancy of suitable lands within the National Forest System for Nordic and alpine skiing operations and purposes: (Section 3 (b))". The Act also states that a permit "shall encompass such acreage as the Forest Service determines sufficient and appropriate to accommodate the permittee's needs for ski operation and appropriate ancillary facilities" (Section 3(b) (3))

8. Service-Wide Memorandum of Understanding

A Service-Wide Memorandum of Understanding (SMU) was made and signed in 1994, between the USDA Forest Service and the National Ski Areas Association. The purpose of this SMU was to establish a general framework of cooperation to achieve a common goal of improving public recognition of the cooperative role in providing high quality recreation experiences to a diverse sector of the public while protecting and managing ecosystems. This agreement was reaffirmed and expanded upon in September 2002. Seven central purposes are identified for both parties:

1. Recognition of the value of developed recreation;
2. The role developed recreation plays in the health, physical fitness and well being of Americans;
3. The importance of public/private partnerships in providing recreational facilities;
4. Multiple Use National Forest management;
5. Sustainable communities;
6. Viable local economies; and
7. Ecosystem health.

A central statement of this SMU is that the "National Ski Areas Association shares the USDA Forest Service's objectives of increasing public awareness of environmental responsibility, natural resource based recreation and the role that National Forests play in alpine recreation, and in improving one's quality of life." (USDA FS/NSAA 2002)

9. Ecosystem Management

Ongoing research and changing technologies have provided better insight regarding the consequences of traditional land management practices and the potential benefit of new approaches. In response to increasing public interest and improved scientific information, the Forest Service announced an Ecosystem Management Policy on June 4, 1992. Ecosystem management promotes the use of an ecological approach to achieve the multiple-use management of National Forests and Grasslands by blending the needs of people and environmental values in such a way that National Forests and Grasslands represent diverse, healthy, productive, and sustainable ecosystems.

Achieving desired future conditions is an integral part of the management philosophy. Ecosystem management recognizes that people are an integral part of ecosystems and that the social and economic needs of local communities should be balanced with environmental values. The Forest Service will insure equitable and sustainable access to resources for people who depend on the land for sustenance, livelihood, commerce, recreation, and spiritual growth.

10. Roadless Area Conservation

Controversy over roadless areas has been in public debate for decades. Chapter III, Section D, 4 briefly outlines the history behind roadless areas, and specifically for the McDonald Peak area, an area without roads, inventoried for its roadless characteristics and previously considered for potential Wilderness designation. The (expanded) permit area boundary associated with the programmatic decision made for MASA with the 1991 ROD/FEIS, includes lands within a portion of this Inventoried Roadless Area (IRA). The current ski area facilities and use overlap into this area by less than 1 acre, in the vicinity of the West Ridge Run (see Map III-12).

Background

FSM Interim Directive No. 1920-2001-1 (Roadless Area Conservation Rule - Federal Register January 12, 2001) temporarily revised decision authority for certain projects in IRAs. In a March 20, 2002 letter to the Regional Forester from the Acting Forest Supervisor for the Rogue River National Forest, the situation was outlined in regard to the MASA Expansion proposal. Approximately 298 acres of the SUP area is within the McDonald Peak IRA and ski area expansion would occur within this roadless area under several of the alternatives being considered in detail (including the Proposed Action). Vegetation clearing for ski runs and lifts that include removal of trees of commercial value would be required to implement these alternatives. Construction and/or reconstruction of maintenance roads construction and/or reconstruction are also being considered, however no road activities are proposed within the IRA.

The 2001 interim directive reserved to the Chief of the Forest Service, the decision authority for timber harvest projects in IRAs unless the project met one of the exception situations specified in the interim directive. Effective July 16, 2004, Federal Register (69 FR 42648), this Interim Directive (ID) was reinstated, with two changes, the direction previously issued in ID No. 1920-2001-1 to implement the Chief's 1250/1920 letter of June 7, 2001, regarding Delegation of Authority/Interim Protection of Roadless Areas. This roadless area direction has been reinstated because of the continued legal uncertainty of implementing the Roadless Area Conservation Rule at 36 CFR part 294 (66 FR 3244).

Because the timber harvest resulting from ski expansion activities is incidental to the construction of new ski runs or ski lifts, and ski area development is not prohibited in this area under the RRNF LRMP, MASA Expansion meets the exemption criteria in FSM 1925 .04a, 2, (2), b (*cutting, sale, or removal of timber incidental to the implementation of a management activity not otherwise prohibited under the LRMP*). Therefore, delegation of authority to approve or disapprove timber harvest associated with this proposed expansion project (within a roadless area) remained unchanged by the most recent roadless interim directive.

The Regional Forester concurred with the Forest Supervisor recommendation and determination in a May 8, 2002 letter that the authority and responsibility to approve process steps and sign decision documents related to the MASA Expansion would remain with the Forest Supervisor of the RR-SNF. The McDonald Peak IRA is located entirely on lands administered by the RR-SNF.

11. Forest Service Road Management Policy

When proposed road management activities (e.g., road construction, reconstruction, or decommissioning) would result in changes in access, such as changes in current use, traffic patterns, and road standards, or where there may be adverse effects on soil and water resources, ecological processes, or biological communities, those decisions must be informed by a Roads Analysis (FSM 7712.1). Site-specific projects may be informed by a watershed or project specific Roads Analysis, if the Responsible Official determines that the scope and scale of issues under consideration warrants such use.

Responsible Officials are directed to use a Roads Analysis process to ensure that road management decisions are based on identification and consideration of social and ecological effects. *Roads Analysis: Informing Decisions About Managing the National Forest Transportation System* (USDA FS-643 1999f) has been provided as guidance for conducting a science-based roads analysis.

Current policy requires the Forest Service to undertake a scientifically-based road analysis procedure, at appropriate scales and coordinated with other ecosystem analysis, in order to make better decisions regarding road management. Roads analysis at the forest-scale will generally provide a broad context for informing road management decisions. Site-specific projects may be informed by a project scale roads analysis.

At the Forest scale and in conformance of the Roads Management Policy, a more general assessment of roads in the southern portion of the Rogue River National Forest was conducted in 2002 (*Rogue River National Forest Roads Analysis 2003*); this document was made available in March 2003. The KNF Forest-wide Roads Analysis was completed in June 2002 and is available on the Klamath Forest Internet Web Page. These documents were utilized for analysis under this Final EIS and are incorporated by reference.

Many existing work roads within the MASA SUP area are managed by the MAA. Because these roads are roads by definition, they remain under the jurisdiction of the Forest Service. Because road management activities are part of the Proposed Action and alternatives, analysis under this Final EIS was conducted and documented as a project-level Roads Analysis, in conformance with the Road Management Policy. This Roads Analysis was conducted at a logical scale associated with the SUP area, in conjunction with this NEPA process. Documentation of the project-specific Roads Analysis conducted in conjunction with MASA expansion is contained in Appendix G.

12. Agreements Between the Forest Service and the City of Ashland

A Cooperative Agreement between the City of Ashland and the Forest Service for the management of the Ashland Watershed was originally created and approved in 1929. An Interim Watershed Management Plan drafted in 1979, providing direction for the protection of the Ashland Municipal Watershed, which was replaced by the RRNF LRMP in 1990. A Memorandum of Understanding (MOU) was created in 1985, and updated in 1996, 1999, and 2002. This MOU defines the roles and responsibilities of both the City of Ashland and the Forest Service in the management of the Ashland Watershed. Under these agreements, the Forest Service has the responsibility to administer the Ashland Watershed consistent with conserving and protecting the City's water supply, and to coordinate and communicate watershed management activities with the City of Ashland.

I. OTHER RELATED STUDIES

This Final EIS also refers to the Watershed Analysis process for Bear Creek (which includes Ashland Creek and Neil Creek), Beaver Creek (which includes Grouse Creek) and site-specific analysis conducted for Cottonwood Creek. Where appropriate, the results of these analyses and their relationship to this Proposed Action are summarized and/or incorporated by reference into this Final EIS. A brief description of these and other relevant documents is provided below.

1. Watershed Analyses

a. Bear Creek

The *Bear Watershed Analysis* was completed in 1995 by the Ashland Ranger District, RRNF. The 40,412 acre Bear Creek Watershed Analysis Area is comprised of the Ashland, Neil, Clayton, Tolman, Hamilton, and Wrights Creek sub-watersheds. The Bear Watershed Analysis Area also includes about 4,672 acres in the headwaters of the Wagner Creek sub-watershed; all sub-watersheds are tributary to Bear Creek. The Watershed Analysis Area included Federally managed and private lands, as well as forested lands managed by the City of Ashland. None of the sub-watersheds analyzed within the Bear Watershed Analysis Area, including the Ashland Creek Watershed, are Federally designated as Key Watersheds by the Northwest Forest Plan.

The Bear Watershed Analysis was based on existing information and was conducted using the “eight step” process outlined in the 1994 (version 1.2) *Federal Agency Guide for Pilot Watershed Analysis*. The objective for completing watershed analysis is to determine the overall health of both the terrestrial and aquatic systems within a watershed, provide recommendations for future watershed management, and to identify potential restoration opportunities. Important watershed issues and values associated with the current condition, which were identified during the analysis process include:

- The exclusion of fire since the early 1900s has changed the composition, structure, and distribution of vegetation types. In addition, overstocked vegetative conditions have contributed to lowering the ecosystem’s resistance to natural disturbances that include wildfire, insects, and disease.
- There is a high risk for large-scale, high intensity stand-replacing wildfire to occur within the Watershed Analysis Area.
- Maintenance of water quality and quantity within the Ashland Creek Municipal Watershed.
- Maintenance of Late-Successional Reserve characteristics and values.
- Providing for increasing demands for recreational opportunities while protecting resources within the Watershed.

b. Beaver Creek

The *Beaver Creek Ecosystem Analysis* was conducted by a KNF core Forest Ecosystem Analysis Team and documented in July of 1996. The Beaver Creek Watershed lies within the Klamath Mountains Physiographic Province in the KNF. Beaver Creek is tributary to the Klamath River and its watershed encompasses about 70,000 acres. The northwest boundary of the watershed is the Siskiyou Crest, which separates the Klamath River and Rogue River Basins, as well as the KNF and the RRNF.

Most of the Beaver Creek Watershed lies in California, with about one-third in Oregon. Nine sub-watersheds have been delineated for the Beaver Creek Watershed. The focus in regard to ski area expansion at Mt. Ashland is the 6,520-acre Grouse Creek Watershed in the upper northeast portion of the fifth field watershed.

The Watershed Analysis identifies Grouse Creek as having a high risk ratio and high percent of undisturbed sediment input based on the landslide sediment model used for the Watershed Analysis. It has a low threshold of concern resulting from the high soil erodibility and high slope sensitivity associated with the granitic soils of this sub-watershed. Grouse Creek also has high channel sensitivity and instability concerns. Grouse Creek is considered to be an Area with Watershed Concerns, under KNF LRMP reference.

Watershed conditions were further analyzed under a NEPA process conducted for *The Beaver Creek Project - Environmental Assessment*, October 2002. This analysis focuses on a proposed action that would implement management actions that are designed to move the Beaver Creek watershed closer to the desired conditions identified in the KNF LRMP and the 1996 Watershed Analysis. Analysis under this process further serves to update resource conditions for this landscape. A Decision Notice and Finding of No Significant Impact was signed on December 12, 2002 for this project; this Environmental Assessment and Decision Notice are incorporated by reference to this FEIS analysis.

c. Cottonwood Creek

Cottonwood Creek drains an area of about 110 square miles (70,400 acres) and enters the Klamath River near the town of Hornbrook, California. The current ski area parking lot is located within the headwaters of the Upper Cottonwood Creek Watershed. Ownership patterns in the headwaters of this fifth field watershed include both private and National Forest. The main stem is almost entirely within private ownership except for a small Forest Service parcel below the town of Hilt. Cottonwood Creek is not designated as a Key Watershed by the NWFP and no Watershed Analysis has been completed. However, site-specific analysis of conditions associated with the MASA SUP area was conducted as part of the analysis for this Final EIS and in support of restoration needs and projects being proposed. This analysis is documented herein and contained in Appendix F.

2. Mt. Ashland Late-Successional Reserve Assessment

The 51,512-acre Mt. Ashland LSR straddles the Siskiyou Crest surrounding (**but excluding**) the current MASA SUP area. The current SUP area, based on the decision made with the 1991 ROD/FEIS, does not include LSR because it is allocated by the NWFP to Administratively Withdrawn. The northern portion (20, 829 acres) of the LSR is located in southern Oregon on the Rogue River National Forest, and the southern portion (30,683 acres) is located in northern California on the Klamath National Forest. The northern portion of the LSR includes the majority of the Ashland Creek Watershed, excluding the MASA SUP area, as well as adjacent drainages.

A Late-Successional Reserve Assessment (LSRA) was completed in June 1996. The objectives for completing the assessment were to gain a better understanding of current conditions within the LSR, to determine how current conditions relate to LSR function and meeting the objectives of the NWFP, and to provide a framework for the management of this LSR consistent with NWFP objectives.

The LSRA considered the potential removal of adjacent late-successional habitat associated with the 1991 ROD/FEIS for the ski area expansion. Based on information contained in the 1991 ROD/FEIS, the LSRA did not identify conflicting or adverse effects to the overall LSR function that would result from removal of habitat associated with the adjacent ski area. The LSRA deferred making determinations of the potential effects to plant and animal species, stating that site-specific project-level ski area environmental analysis would determine the effects, if any, on populations of species potentially occurring in the adjacent LSR as a result of implementing actions associated with ski expansion.

3. Updates to Bear Watershed Analysis and Northern Portion of Mt. Ashland LSR

The 2003 *Upper Bear Assessment* is an analytical effort to validate and supplement the environmental condition information for the ecosystem and landscape associated with the Ashland Watershed, and the larger Upper Bear Creek Analysis Area, to 2003 conditions. This includes updating the 1995 Bear Watershed Analysis, and the 1996 Mt Ashland Late-Successional Reserve Assessment, under recommendation of the Northwest Forest Plan 1994. Vegetation and disturbance factors are organized by Plant Association Groups (PAGs), and form the majority of the Late-Successional Reserve Assessment update. This process also includes an assessment of fire management conditions, providing the basis for future approval of a Fire Management Plan for the Federally managed portions of this landscape (National Fire Plan 2000), and a scientifically based site-specific Roads Analysis (per FSM 7712.1).

A primary objective of this effort was the preparation of an integrated assessment of current conditions and scientific and professional identification of opportunities and priorities for Federal actions regarding elements of the environment that ought to be actively managed if the goal of resiliency to large-scale disturbance (such as wildfire) is to be realistically achieved. This 2003 Assessment is incorporated by reference. The Assessment is the basis for Ashland Forest Resiliency, a landscape based hazardous fuels reduction project initiated in 2004.

J. SCOPING AND SIGNIFICANT ISSUES

1. Scoping Process

Scoping is the name for the process used to determine the extent of the environmental analysis to be conducted. It is used early in the NEPA process to identify (1) the issues to be addressed, (2) the depth of the analysis required, (3) alternatives to the Proposed Action, and (4) potential environmental effects of the Proposed Action. This Final EIS has been developed with extensive public participation. The public involvement requirements of NEPA (40 CFR 1501.7) have been met in order to develop and publish a Final EIS for release to an informed public.

The scoping process for the 1991 Master Plan FEIS began in October 1984. Public involvement continued for six years through November 1990. See pages I-4, 5 and Appendix J in the 1991 FEIS for a full discussion of public involvement that contributed to the Record of Decision signed in July 1991. Scoping for a site-specific proposal for ski area expansion unofficially began in October of 1997. On March 4, 1998, MAA submitted to the Forest Service a proposal to implement a variety of on-mountain improvements, including expansion into the Middle Fork area (similar to the proposed action in this Final EIS). On March 18, 1998 a scoping letter was sent out to approximately 260 individuals, businesses, organizations, and others who were on the 1991 FEIS mailing list. Additional letters were sent to people and organizations who had expressed interest in MASA and other Ashland Ranger District projects since 1991.

The initial scoping letter for this proposal was followed by two public meetings held on April 7, 1998 in Medford, OR and April 8, 1998 in Ashland, OR. The Medford meeting was attended by approximately 91 individuals and the Ashland meeting by 136 individuals. The Ashland meeting was carried on television by the local cable access channel. On April 11, 1998, a ski trip to the expansion area was led by the Ashland Ranger District's Snow Ranger in which three individuals participated. On June 2, 1998 the Forest Service and MAA representatives gave a presentation to 14 members of the Southwest Oregon Province Advisory Committee. This committee is comprised of various local Federal and non-Federal land management and governmental representatives and public individuals. During the initial scoping process, four field trips led by the Ashland District Ranger, other Forest Service resource specialists, and MAA representatives occurred. Approximately 65 individuals participated in the field trips on July 25, August 6, September 12, and September 16, 1998.

Extensive media coverage of the proposed ski area expansion occurred throughout late winter, spring and summer of 1998, including both skiing and hiking trips into the Middle Fork expansion area by a reporter from the area's largest circulation newspaper. A few community members also accompanied Forest Service resource specialists during their summer fieldwork in the area. Concurrently, the District Ranger met with various organizations (civic, business, and environmental) to discuss the project. Likewise, MAA officials gave a number of presentations explaining the proposal to numerous organizations and groups.

In September 1998, the Ashland Ranger District announced that a Supplemental EIS would be prepared instead of an Environmental Assessment. This announcement was reported by both newspaper and broadcast media.

On December 21, 1998, MAA submitted a refined and more detailed proposal to the Forest Service that was again extensively reported by the press. Another scoping letter was sent on January 15, 1999 and a Notice of Intent was published in the Federal Register. Both documents announced the Forest Service's intent to supplement the 1991 FEIS. Four informal public meetings (workshops, each lasting seven hours) were held on March 8, 15, 22, and 29, 1999 at the Ashland Ranger District to discuss the Proposed Action and to ask for further public input on issues and alternative aspects of the Proposed Action.

The initial Notice of Intent for a Supplemental EIS was published in the Federal Register on January 8, 1999; FR page 2873-2874. Based on further review, the Forest Service determined that a project-specific EIS was the more appropriate type of document for complete disclosure of the analysis regarding a proposal for expansion of MASA, tying to an existing (1991) decision. The NOI for a supplement was rescinded and a new NOI describing this intent was published in the Federal Register on October 12, 1999 (FR pages 55228 and 55228-55229).

The Forest Service prepared a Draft EIS and a Notice of Availability was published by the Environmental Protection Agency in February 2000. An amended notice of Availability was released on April 14, 2000 (FR page 5520156), which extended the Comment Period for the Draft EIS from April 3, 2000, to May 4, 2000. The extent of public and agency comment on that Draft EIS was substantial. Substantive comments and suggestions, especially regarding alternatives considered and additional components of actions or alternatives that were not considered in detail, caused the Responsible Official to decide to prepare a new Draft EIS; this document was considered a continuation of the ongoing environmental analysis.

A press release for announcing the decision to proceed with a new Draft EIS was issued June 15, 2001. This press release was sent to 21 newspapers, television, and radio stations. On March 29, 2002 a scoping letter was sent out to approximately 2,375 individuals, businesses, organizations, and others who were on the 2002 mailing list.

Based on the decision to issue a new Draft EIS, a new NOI was issued on April 1, 2002 (FR page 15356, 15357). This new EIS resulted in an analysis that reflects active citizen participation and improves the range of alternatives considered in detail. This process was designed as a continuation of the ongoing environmental analysis and all input previously received is incorporated into the new EIS. The stated Purpose and Need was modified from the February 2000 Draft EIS. The Proposed Action, as received from the proponent, was also modified to reflect further refinements designed to reduce environmental effects.

All written input submitted to the Forest Service was organized into “phases” for efficiency of tracking. “Scoping Phase 1” includes comments received from October 1997 through the release of the 2000 Draft EIS (February 2000). Written input was read and organized for substantive comments and project issues by the Forest Service and a 27 page “Scoping Report” was prepared.

Based on the release of the 2000 Draft EIS, the Forest Service read and coded all DEIS comment letters submitted from February 2000, through March 2002. Due to volume of comments, only clearly understandable, supported by logic and non-opinionated comments were tracked as substantive. Because of the decision to issue a new DEIS, a Response to Comments document was not prepared for that DEIS and no reports were developed regarding demographic or preference data.

Reports were done to establish number of occurrences of each code and link for which letters contain what codes. Coding was organized and documented in an 8 page listing of codes entitled “Coding for Response to Comments on 2000 DEIS.” All substantive comments are considered as ongoing scoping and were utilized in the preparation of the new Draft EIS.

Because of the decision to prepare a new Draft EIS, scoping was essentially re-initiated in March 2002, with the release of a (new) scoping letter. “Scoping Phase 2” has been ongoing from March 2002 through May 2003, based on release of the new Draft EIS. Written input from this phase of scoping was tracked via a process similar to that of the substantive code tracking used for the input to the 2000 DEIS. A 3 page listing of additional substantive comments (not previously tracked) is documented in “Coding for Scoping Comments Phase 2.”

The Draft EIS was made available for comment under the provisions of the National Environmental Policy Act (40 CFR 1500-1508), and Notice, Comment, and Appeal Procedures for National Forest System Projects and Activities, (36 CFR 215). The Forest Service accepted written, electronic and oral comments as provided in §215.6.

A 60-day public comment period for the Mt. Ashland Ski Area Expansion DEIS formally began on July 25, 2003 with publication of a Notice of Availability in the Federal Register (FR 44080). A press release announcing the availability of the DEIS was sent to local media in southern Oregon and northern California on July 22, 2003. At the request of the City of Ashland, the public comment period was extended for an additional 30 days on August 18, 2003. This extension allowed for a 90-day comment period that closed on October 23, 2003.

Three hundred paper copies and 75 compact discs of the full DEIS were produced along with 150 paper copies of the Summary. Copies of the full DEIS were distributed to federal and state agencies, local governments, elected officials, six Federally recognized tribes, media representatives, libraries, organizations, and businesses (See DEIS, Chapter VII, for a listing). The full DEIS was provided to others upon request, until all copies had been distributed. The document was also made available on the Rogue River National Forest website at <http://www.fs.fed.us/r6/rogue/>. Copies were available at five libraries in Jackson and Siskiyou Counties. Copies were also available for review at Forest Service offices in Medford and Ashland.

Numerous radio, television and newspaper stories followed publication of the DEIS. A variety of organizations throughout the region discussed the DEIS in their newsletters, websites, and/or prepared special mailings for their memberships.

Forest Service employees, including the IDT that analyzed the six alternatives in the DEIS, held an Open House to facilitate public comment and to clarify the alternatives before the October 23 public comment deadline. A formal public hearing was also conducted on September 2, where numerous individuals provided oral comments to the Forest Supervisor (Scott Conroy) and the Acting Ashland District Ranger (John Schuyler). Four public field trips to the MASA were led by Forest Service personnel. Further field trips were also conducted for City of Ashland officials. Other organizations also led field trips to the ski area.

City of Ashland staff and council members conducted one study session and two city council meetings devoted to the DEIS. Public attendance at these meetings showed a high interest in issues associated with the proposed expansion of MASA. The City, as part of their comments to the DEIS, included over 230 pages of comments that they received from the public. All of these comments were carefully read by Forest Service personnel.

A total of 3,269 comments to the Draft EIS were received by the Ashland Ranger District. All comments received by the close of the Comment Period were reviewed and were considered as part of the comment analysis process. Comments received following the close of the Comment Period were reviewed for substantive content but were not entered in the database (these people do not have “standing” for appeal under 36 CFR 215). All comments were read and coded based on content and intent, by a Forest Service planning team, with District Ranger oversight, review and concurrence. The District Ranger read all unique comment letters.

Pursuant to 36 CFR 215.6 (b), (1), A “Response to Comments” appendix documents the Responsible Official’s consideration and response of all substantive comments submitted in compliance with paragraph (a) of this section. This document is contained in FEIS Appendix A.

In addition, the following also occurred in support of the ongoing scoping process:

- Government to Government consultation letters mailed to six Native American Indian Tribes;
- Listing in the Forest's quarterly Currents newsletter under the "Schedule of Proposed Actions" beginning in spring 1998;
- Klamath National Forest – notification (Forest Plan mailing list) regarding non-significant amendment to KNF Forest Plan, 11/26/99;
- Briefings with City of Ashland officials;
- Informal meeting led by Ashland City Councilor with MAA and environmental organizations;
- Briefings with USFS Region 6 Office and RRNF and KNF personnel;
- Consultation and Briefings with U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS);
- Local Media briefings;
- Scoping notices and news articles on the RRNF Internet Web Page;
- Coordination with Oregon Department of Environmental Quality (ODEQ);
- Ashland Chamber of Commerce Forum;
- Headwaters (local environmental organization) Forum;
- Local Media Briefings (including guest opinions, letters to the editor, etc.) by MAA representatives, Forest Service officials, environmental groups and others;
- Numerous "one-on-one" discussions between the Ashland District Ranger, Interdisciplinary Team Leader, Forest Environmental Coordinator, Interdisciplinary Team Hydrologist, and interested individuals;
- Ashland High School Political Forum with representation from the Forest Service, MAA, and Headwaters;
- Forest Service attendance at Rogue Valley Civic League meeting;
- Radio talk show discussion on local public radio;
- Forest Service participation in field trip at request of World Wildlife Fund;
- Two Forest Supervisor field trips to expansion area with interested individuals, and
- Numerous responses to informal requests for information and to formal Freedom of Information Act (FOIA) Requests.

2. Significant Issues for Developing and Comparing Alternatives

NEPA requires Federal agencies to focus analysis and documentation on the significant issues related to a proposed action. The interdisciplinary team with Responsible Official involvement and approval has identified the following as Significant Issues associated with the Proposed Action presented in this analysis.

Issues are defined herein as points of discussion, debate, or dispute about the environmental effects of a Proposed Action. Significant Issues as used in this environmental analysis are those that are used to formulate alternatives or drive alternative themes, affect the design of component proposals, prescribe Mitigation Measures, or describe important and variable environmental effects. They are significant because of the extent of their geographic distribution, the duration of the effects, or the intensity of interest or resource conflict.

The following Significant Issues are organized by broad resource or area categories, with subsequent issue statements and discussion. Issue statements identify indicators that are used throughout the Final EIS to describe the effects or consequences of implementing the various alternatives considered in detail. **The issue statements also contain a reference (Chapter and Section, in parenthesis) for where in this FEIS document a description or discussion of the effects of each alternative considered in detail is located, relevant to these issues.** A summary of responses to Significant Issues is contained within alternative comparison tables, at the end of Chapter II.

Significant Issues are presented in a format that intends to answer the question “what action may have what effect, on what resource or value? These Significant Issues serve primarily as the basis for developing and comparing alternatives, and may serve as decision factors. While the Final EIS focuses on the Significant Issues, all relevant issues identified through scoping are considered and documented in the various resource analyses (see next section: Other Issues).

Issue Category: *Effects on Soils and Site Productivity*

Direct and Indirect Effects of Erosion and Sediment Delivery to Streams

The removal of vegetation and ground disturbance associated with clearing for ski runs and lifts could displace and create direct soil erosion effects within the SUP area. This erosion could increase sediment production and indirectly, affect sediment delivery to streams in the Ashland Creek and/or Neil Creek Watersheds on the RR-SNF, and in the Cottonwood Creek and Grouse Creek Watersheds on the KNF. **(III & IV, C, 5)**

Indicator: Predicted sediment delivery quantities (cubic yards per year) in affected watersheds, by alternative, and major activities

Effects on Site Productivity

Implementation of ski expansion activities could affect site productivity and/or create detrimental soil conditions (through compaction, loss of site organic matter and loss of topsoil) as a result of the operation of heavy equipment, removal of vegetation and woody material, etc. **(III & IV, C, 6)**

Indicator: Estimated acres of compaction, loss of site organic matter, loss of topsoil etc.

Issue Category: *Effects on Hydrologic Function*

Effects to Streams and Wetlands

The removal of vegetation and ground disturbance associated with clearing for ski runs and lifts could directly and/or indirectly affect streams, wetlands, and hydrologic function such as runoff and stream flow within the Ashland Creek and/or Neil Creek Watersheds on the RR-SNF, and in the Cottonwood Creek and Grouse Creek Watersheds on the KNF. **(III & IV, C, 8)**

Indicator: Stream effects disclosure at Site and Watershed Scales; acres of wetlands affected, effects on runoff and stream flow

Effects to Riparian Conditions

Ski expansion activities, such as ski lift and run development may occur within and could affect riparian areas, NWFP Riparian Reserves, and their associated functions. **(III & IV, C, 10)**

Indicator: Direct and indirect effects to Riparian Reserves (change in forested cover, acres), and assessment of compliance with Riparian Reserve Standards and Guidelines, at the Site, Watershed, and 5th field Watershed Scales

Issue Category: *Effects on Water Quality*

Effects on Water Chemistry

The removal of vegetation and ground disturbance associated with clearing for ski runs and lifts within or near streams could change pH, increase water temperatures, introduce bacteria, and/or introduce petrochemical pollutants, particularly in Ashland Creek Watershed, a municipal watershed. **(III & IV, C, 9)**

Indicator: Consequences in terms of pH, water temperature, and likelihood of introduction of bacteria and petrochemicals

Cumulative Watershed Effects

Implementation of the ski expansion activities have the potential to contribute to an increased risk for adverse cumulative watershed effects, considering this and other foreseeable actions in the Upper Ashland Creek Watershed, the Upper Neil Creek watershed, the Upper Cottonwood Creek watershed, and the Grouse Creek watershed. **(III & IV, C, 9)**

Indicator: Risk ratings based on the Equivalent Roded Area (ERA) methodology

Issue Category: *Effects to Engelmann Spruce*

Direct Effects

Ski expansion activities could directly affect a locally rare stand of Engelmann spruce. Although not listed or protected by law or policy, this stand is at the extreme end of its range and may represent a unique component of biodiversity. There is a high degree of local public interest regarding effects to this species. **(III, D, 1; IV, D, 2; III & IV, D, 7)**

Indicator: Acres and number and size of Engelmann spruce trees affected; effects on population viability

Effects on Stand Health

Ski expansion activities, such as clearing, could affect Engelmann spruce by creating an “edge effect”, potentially changing stand health conditions and resistance to disease. **(III & IV, D, 2)**

Indicator: Degree of effect, extent of edge, and risk of adverse effects on stand health

Issue Category: *Effects to Mt. Ashland Lupine and Henderson's Horkelia*

Direct and Indirect Effects

The implementation of ski expansion activities, particularly in the area of the West Ridge (on the summit between the National Weather Bureau radar site and the area locally known as the "Rabbit Ears" rock outcrop) may affect two rare vascular plant species listed by the Forest Service as Sensitive: Mt. Ashland Lupine (*Lupinus lepidus* var. *Ashlandensis*), and Henderson's horkelia (*Horkelia henderosonii*). (III & IV, D, 4)

Indicator: Direct effects (acres of habitat affected), and indirect effects (including snow loading, increased skier use, and summer uses)

Long Term Viability

Ski expansion activities may have an effect on long-term population viability of Mt. Ashland Lupine and Henderson's horkelia. (III & IV, D, 4)

Indicator: Risk rating and effects on long-term viability

Issue Category: *Effects Associated with Human Social Values*

Effects to Inventoried Roadless Area

Although allocated to Developed Recreation as an existing ski area (RRNF LRMP 1990), and as decided in the 1991 Master Plan ROD/FEIS, ski expansion activities could affect the McDonald Peak IRA and could affect the current unroaded character and value, primitive recreation, as well as the potential value for additional future Wilderness. (III & IV, E, 4)

Indicator: Acres and percent of inventoried area affected; effects to roadless character; potential for wilderness designation

Effects to Undeveloped Areas

Ski expansion activities could affect other undeveloped areas adjacent to the McDonald Peak IRA (but not inventoried as Roadless), currently possessing roadless characteristics, and similarly affect values and opportunity for primitive recreation. (III & IV, E, 4)

Indicator: acres and percent of area affected; change in character

Effects to Spiritual Values

Removal of large or old-growth trees and changes to late-successional ecosystems associated with ski expansion activities may conflict with human spiritual values that people place on large trees, and the natural environment. (III & IV, D, 1; D, 2; D, 3; D, 7; D, 10; E, 4)

Indicator: Direct effects to large or old-growth trees, relative effects on late-successional ecosystems

Issue Category: *Effects Associated with Economics*

Effects Related to Skier Demand

There is a concern that skier demand is insufficient to establish and support the need for expansion. (III & IV, E, 8)

Indicator: Projected market demand, capture, visitation, and comparison of estimated capital costs by phase and alternative

Long-term Operational Ski Area Feasibility

As an economic concern, ski expansion may affect the long-term operational economic feasibility (i.e., economic viability during drought years, competition from other ski resorts given the extent of expansion commitment, etc.) of MASA. (III & IV, E, 12; IV E, 13)

Indicator: Net Present Value by action alternative, including cost of improvements, annual operation, and maintenance costs compared with estimated revenues based on projected visitation

3. Other Issues

The interdisciplinary team, with Responsible Official involvement and approval, has identified the following non-significant, or Other Issues associated with the Proposed Action. Other Issues are defined as points of discussion, debate, or dispute about the environmental effects of a Proposed Action. Other Issues as used in this environmental analysis are those that have been determined to be relevant, are used to disclose consequences, may affect design of component actions, require prescribed Mitigation Measures, or whose disclosure of environmental effects are required by law or policy.

Other Issues as used in this environmental analysis differ from Significant Issues in that they are not used to formulate alternatives or drive alternative themes. In addition, these issues often describe minor and/or consistent consequences among the alternatives considered in detail.

The list of Other Issues presented below, is based upon public and agency comments received during the scoping process. The issues and concerns identified in these comments have been condensed and consolidated and are not intended to be all-inclusive. It is recognized that there are numerous sub-issues associated with these issues, as well as suggestions for approaches to addressing the issues (e.g., research needs and mitigation). This list is limited to those issues that specifically identify potential effects resulting from implementation of the Proposed Action, and their corresponding effects are documented in this Final EIS. Issues that are related to satisfying Federal, State, and local requirements and standards (e.g., Threatened and Endangered species or air quality) are also included.

This list is also presented in a format that intends to answer the question “what action may have what effect, on what resource or value? This listing also contains a reference (Chapter and Section, in parenthesis) for where in this document a description or discussion of the effects of each alternative considered in detail is located, relevant to these Other Issues. A summary of responses to Other Issues is also contained within alternative comparison tables, at the end of Chapter II.

Climate Change and Snowfall

There is concern over the variance in snowfall conditions and **adequacy of average snowfall**, and spring snowfall conditions, especially with expansion at lower elevations. Snowfall, including climate change could have effects on long-term economic viability of the ski area. (III & IV, C, 1; IV, E, 13)

Avalanches and Natural Hazards

An expanded ski area may increase the risk of an avalanche or put people in **high-risk avalanche zones**. (III & IV, C, 2)

Geology - Slope Stability

Implementation of ski expansion activities could affect **slope stability** within the SUP or surrounding areas, via effects on geologic Landslide Hazard Zones. (III & IV, C, 3)

The placement of lift towers; geologic stability of footings, and stability of facilities could be affected during **seismic events**, etc. (III & IV, C, 4)

Other Hydrologic Processes

Ski expansion activities could increase **access to natural wetland and meadow areas** e.g., from humans and cattle. (III & IV, C, 6)

Ski expansion activities could create compacted snow (from run grooming) that could remain on the slope later into the season (snowmelt), affecting **runoff patterns or the ability to effectively filter and process domestic water**. (III & IV, C, 5; III & IV C, 9)

Ski expansion could affect the **Caliban II or the Mt. Ashland Switchback snow survey sites**. (III & IV, C, 1)

Ski area expansion could affect the current or potential Oregon Department of Environmental Quality **303(d) listings under the Clean Water Act for Ashland Creek and Neil Creek**. Ski area expansion could affect current or potential North Coast Regional Water Quality Control Board **303(d) Clean Water Act listing for Cottonwood Creek**. (III & IV, C, 8 & 9)

Air Quality

Implementation and maintenance of expanded ski area facilities may increase vehicle use and/or add other **sources of pollution that could affect air quality**. (III & IV, C, 11)

Development of expanded ski area facilities may involve **slash burning or prescribed fire that could affect air quality**. (III & IV, C, 11)

Landscape Ecology

Ski expansion activities may affect **the Siskiyou Crest Corridor**, an important genetic and migratory link (spatial and temporal **habitat connectivity**) between the Cascade and the Siskiyou Mountains at the ecosystem/landscape scales. (III & IV, D, 1, & 9)

Other Botanical Resources

Ski expansion activities may affect other rare vascular plants listed on the Regional Forester's Sensitive species list, including, **nerved sedge** (*Carex nervina*), and **Whitney's haplopappus** (*Hazardia whitneyi* spp. *Dissoidea*). (III & IV, D, 4)

Ski expansion activities may affect **bryophytes, lichen and fungi** identified as Survey and Manage under the Northwest Forest Plan. (III & IV, D, 5)

Ski expansion activities may affect other botanical species that are considered locally rare or **important elements of biological diversity**: (III & IV, D, 6)

Whitebark pine (*Pinus albicaulis*)
Polypore fungus (*Climacocytis borealis*)
Subalpine fir (*Abies lasiocarpa*)
Casacade parsley fern (*Cryptogramma cascadenis*)
Jayne's Canyon buckwheat (*Eriogonum diclinum*)
American sawort (*saussurea americana*)
Kalmia (*Kalmia polifolia*)
Bolander's bluegrass (*Poa bolanderi*)
One-flowered bleeding heart (*Dicentra uniflora*)
Western juniper (*Juniperus occidentqalis*)
Monument plant (*Swertia radiata*)
Pygmy monkeyflower (*Mimulus pygmaeus*)

Type Localities: sites where plants, previously unknown to science, were collected and used to describe new taxa in a scientific publication for the first time.

Ski expansion activities may also affect **outstanding or unusual plant communities** identified by the Forest Service to possess unusual characteristics and represent locally important elements of biological diversity: (III & IV, D, 7)

Engelmann Spruce Grove
Upper and Lower Wetlands
Mt. Ashland candidate Botanical Area

Invasive Non-native Plant Species

Implementation of ski expansion activities may introduce or encourage **exotic (non-native) and undesirable (noxious) plant species**. (III & IV, D, 8)

Wildlife

Implementation of ski expansion activities could affect **terrestrial and amphibian species** (including rare species) that utilize riparian and/or wetland habitat. (III & IV, D, 9)

Implementation of ski expansion activities could affect old-growth and/or **late-successional habitat** adjacent to the Mt. Ashland Late-Successional Reserve, potentially affecting late-successional associated species. (III & IV, D, 9)

Ski expansion activities could affect **terrestrial species listed under the Endangered Species Act: (III & IV, D, 10)**

Northern spotted owl *Strix occidentalis caurina*, including habitat used for winter roosting (thermal regulation); Northern Bald Eagle, *Haliaeetus leucocephalus*; and Canada Lynx, *Lynx canadensis*.

Implementation ski expansion activities could affect **Sensitive terrestrial animal species** listed by the Forest Service in Region 5 and/or Region 6: **(III & IV, D, 10)**

Black Salamander, *Aneides flavipunctatu*,
Siskiyou Mtn. Salamander, *Plethodon stormi*
Foothill Yellow-legged Frog, *Rana boylei*
Cascades Frog, *Rana cascade*
Oregon Spotted Frog, *Rana pretios*
Northwestern Pond Turtle, *Clemmys marmorata marmorata*
Common Kingsnake, *Lampropeltis getula*
American Peregrine Falcon, *Falco peregrinus anatum*
Northern Goshawk, *Accipter gentiles*
Great Gray Owl, *Strix nebulosa*
Willow Flycatcher, *Empidonas trailii*
Gray Flycatcher, *Empidonax wrightii*
Tri-colored Blackbird, *Agelaius tricolor*
Pacific Shrew, *Sorex pacificus cascadiens*
Pacific Pallid Bat, *Antrozous pallidus pacificus*
Pacific Fringe-tailed Bat, *Myotis thysanodes vespertinus*
Townsend's Big-eared Bat, *Corynorhinus townsendii*
California wolverine, *Gulo gulo*
Pacific Fisher, *Martes pennanti*
American Marten, *Martes americana*
Oregon Shoulderband, *Helminthoglypta hertelini*
Chace Sideband, *Monadenia chacena*

Implementation ski expansion activities could affect **other terrestrial wildlife species: (III & IV, D, 10)**

Red tree vole
Migratory birds
Other aquatic amphibians
Butterflies
Franklins Bumblebee

Implementation of ski expansion activities could affect **Management Indicator Species (MIS)**, as identified in the RRNF and KNF LRMPs: **(III & IV, D, 11)**

RRNF: Black-tailed deer, Roosevelt elk, American marten, northern spotted owl, and pileated and other woodpeckers

On the KNF, MIS species are described by assemblages including: Hardwood Species Association, River/Stream Species Association, Marsh/Lake/Pond Species Association, and Snag Species Association

Night lighting associated with ski expansion activities could affect **terrestrial species** (including rare species) that utilize habitat in the Mt. Ashland area. **(III & IV, D, 9)**

Fish and Aquatic Habitat

Implementation of ski expansion activities could adversely affect downstream **aquatic habitat** in Cottonwood Creek, Grouse Creek, Neil Creek, and Ashland Creek (below Reeder Reservoir) sub-watersheds for **fish species**, including coho salmon listed under the Endangered Species Act or chinook salmon, steelhead, and coastal cutthroat trout identified as Forest Service Sensitive species **(III & IV, D, 12 & 13)**

Implementation of ski expansion activities could adversely affect downstream aquatic habitat designated as Essential Fish Habitat (EFH) by NOAA Fisheries under the Magnuson-Stevens Act. **(III & IV, D, 12 & 13)**

Implementation of ski expansion activities could adversely affect downstream habitat for **resident fish species** within these same sub-watersheds. **(III & IV, D, 12 & 13)**

Scenic Quality

Implementation of ski expansion activities could affect the **scenic (visual) quality** as seen from within the ski area as well as from along valued viewsheds and viewpoints in the surrounding area. These effects could reduce the natural character and cause the area to have a more developed appearance. **(III & IV, E, 1)**

Implementation of ski expansion activities could also affect **night-time scenic (visual) quality** resulting from additional night lighting, from various viewpoints in the surrounding area. **(IV, E, 1)**

Cultural (Heritage) Resources

Ski expansion activities may affect **archaeological or historical sites**. **(III & IV, E, 2)**

Ski expansion activities may affect current **Native American use, values, or perception** of the area. **(III & IV, E, 2)**

Recreation

The implementation of certain proposed ski runs could **change the character of cross-country (Nordic) skiing**, particularly in the northwest and southwest portion of the SUP area.

Implementation of the Proposed Action could also increase crowds affecting parking for Nordic skiers. **(III & IV, E, 10)**

The implementation of additional ski runs could open up the area to increased **unauthorized (summer) mountain bike or (winter) snowmobile activity**. **(III & IV, E, 10)**

Increased development may affect **summer recreational uses** such as backcountry hiking, etc. **(III & IV, E, 10)**

Increased development may affect the future individual **recreational costs** (i.e., increased lift ticket price to finance expansion). **(III & IV, E, 9; IV, E, 13)**

The location of proposed winter recreation facilities may be subject to **strong and undesirable wind conditions**. **(III & IV, E, 9)**

Noise

Development of expanded ski area facilities may create “**noise pollution**” from the use of heavy construction equipment and/or helicopters. This noise pollution could affect humans and/or wildlife. **(III & IV, E, 11)**

Development and maintenance of expanded ski area facilities may also create **noise from avalanche control explosions and ski maintenance equipment**, such as snow groomers. **(III & IV, E, 11)**

Fire Risk and Hazard

Development of expanded ski area facilities may affect **fire risk** (of ignition) and change vegetation conditions that could affect **fire hazard** (fuels and fuel loading). **(III & IV, D, 3)**

Monitoring

Development and operations of expanded ski area facilities may necessitate **monitoring** of effects associated with these activities (including implementation monitoring as well as monitoring the effectiveness of Mitigation Measures). **(II, G, 9)**

Public Safety

Ski area expansion may increase **skier safety hazards and/or change emergency access**. An expanded ski area may make emergency medical treatment and transportation to medical facilities difficult. **(II, G, 8)**

An expanded ski area may increase **vehicle traffic** thereby affecting **safety conditions** on the main access road or other SUP area roads. **(III & IV, E, 5 & 9)**

Commercial Timber

Ski area expansion may result in run clearing and consequently trees (timber) of commercial size and value. The **potential use of commercial timber** could require a determination of the quality and value of the timber, as well as **Federal administrative disposition of timber**. **(II, F, 8; Appendix D)**

Other Human and Social Values

Implementation of ski expansion activities could **change ski area character** (increased crowds, increased trash, vandalism, more development, etc.). **(III & IV, E, 9)**

The expansion of MASA may detract from the recreational experience of those who believe that the **current condition is preferable to any form of expansion**. **(I, E)**

4. Issues Determined to be Out of Scope

The interdisciplinary team, with Responsible Official involvement and approval, has classified several issues identified during scoping as being non-significant and out of the scope of this environmental analysis. These issues include those that cannot be addressed or solved in a project level analysis, issues already decided by law, regulation, or other higher level decisions, issues irrelevant to the decision to be made, and/or issues that are conjectural or not supported by scientific evidence. These issues are listed along with a rationale for their being determined “Out of Scope”, in this Final EIS, Appendix B.

K. RELATED PERMITS, PLANS AND ACTIONS

The Mt. Ashland Association (MAA) currently leases the ski area from the City of Ashland, holder of a Forest Service Special Use Permit (SUP) for the MASA. MAA operates the ski area for the City of Ashland as a non-profit corporation. MAA is proposing this expansion, and is therefore the “proponent”. MAA is responsible for all financial aspects of construction of improvements related to proposed ski area expansion.

The SUP area boundary was expanded in 1991 with the ROD/FEIS for the programmatic Master Plan. This SUP includes all management direction and Mitigation Measures identified in the 1991 Master Plan, as well as permit clauses that govern the Forest Service/permittee relationship (i.e., the extent of commercial operations allowed, food and beverage services, facility maintenance, etc.).

The Action Alternatives presented and analyzed herein are designed to represent a reasonable scenario for authorization of ski area expansion. The environmental analysis process requires that the EIS describe the environmental consequences of each alternative relative to ground-disturbing activities, not to be prescriptive of what takes place in an operational sense. The Forest Service believes that MAA and their consultants are in the best position to determine where, for example, services are located. Exact locations and function of each building(s) would be determined at implementation. Final and exact facility, lift, ski run locations and other design features may be refined to a reasonable and logical extent during implementation (see Mitigation Measures for Action Alternatives).

An operating plan is required and is updated annually prior to operations, and the operating plan includes authorization and scheduling of development activities. The annual operating plan includes the Summer Work Plan, and describes how MAA would carry out construction and operations in accordance with the terms of the SUP. This operating plan would also be in accordance with the Mitigation Measures required by any forthcoming decision, for each project or component projects selected.

Actual construction would not occur until the Forest Supervisor or delegated Responsible Official approves the operating plan. Compliance with the operating plan would be monitored by the Ashland Ranger District staff and Forest Service resource specialists.

Currently, the SUP requires a \$200,000 bond for ski area restoration in the unlikely event that operations (currently managed by MAA) declare bankruptcy and a subsequent decision is made to abandon the ski area. This amount was based on an April 1992 Restoration Environmental Assessment and Decision Notice for the current facility.

The City of Ashland, under their current lease agreement with MAA, requires MAA to have this amount available in “readily available liquid assets”, thereby meeting this requirement. If ski area expansion activities are authorized, the bond or assets available amount under the SUP would be proportionally adjusted to account for the increase in developed area, and the subsequently increased need for funding for restoration (above the current amount) of an expanded ski area. This SUP provision would only be adjusted upon a decision and implementation of selected expansion actions, and cannot be determined at this time.

State and local agencies would have regulatory responsibilities for many activities and actions being considered during the design, construction, and operation phases of expansion, if authorized. Licensed professionals are required to prepare the construction drawings for facilities, utilities, structures, parking areas, etc. These proposals would then be reviewed by the appropriate state or local agency departments of environmental quality, planning, building, or health. Approval by these agencies is a condition of the SUP issued by the Forest Service.

The US Army Corps of Engineers (Corps) would provide the regulatory authority necessary to evaluate the Action Alternatives under Section 404 of the Clean Water Act. The Proposed Action and alternatives evaluated in the Final EIS have been developed with the objective of placing no dredged or fill material in jurisdictional wetlands or other Waters of the United States. As such, no Corps permit would be required, provided that the approved project can proceed with no placement of fill into jurisdictional streams or wetlands.

In the event that minor discharges of dredged or fill material would be required, these activities would be designed to meet the requirements of the new and/or modified nationwide permits (e.g., Nationwide Permit #18 - Minor Discharges or Nationwide Permit #42 - Recreational Facilities).

Similarly, the Oregon Department of Environmental Quality (ODEQ) would provide the water quality certification for such a permit action under Section 401 of the Clean Water Act. This certification could include additional permit conditions.

In 1998, the Environmental Protection Agency (EPA) published the final notice for General Permits for Stormwater Discharges from Construction Activities Disturbing 5 acres or Greater (63 FR 7898, February 14 1998). The General Permit, issued by the ODEQ under Section 402 of the Clean Water Act, is required for construction projects, including clearing, grading and excavation that disturb five or more acres of land. In March of 2003 the disturbance limit was reduced to one acre. Components being considered in the Action Alternatives (e.g., ski runs) would require disturbance to one or more acres of ground, including clearing and grading. As a result, these activities would require a 1200C Permit from ODEQ. In conjunction with the issuance of the permit, a Stormwater Pollution Control Plan (SWPCP) would also be developed for each proposed development item (see Mitigation Measures, Chapter II).

Approval of any proposed sewer lines and/or modifications to wastewater treatment systems would be addressed in a Water Pollution Control Facilities permit, issued by ODEQ.

The Jackson County Roads, Parks and Planning Services has jurisdiction of the Mt. Ashland Access Road (County Road 1151). Expansion of parking facilities would be coordinated with this Department, who would issue appropriate permits and provide inspection within the road right-of-way. This Department has indicated that the road has adequate capacity to accommodate traffic resulting from proposed ski area expansion.