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MaryEllen Fitzgerald  
Mt. Hood National Forest  
16400 Champion Way  
Sandy, OR 97055

Via email: [comments-pacificnorthwest-mthood@fs.fed.us](mailto:comments-pacificnorthwest-mthood@fs.fed.us)

Dear Ms. Fitzgerald,

The following comments come from Wilderness Watch responding to the proposal outlined in the March 11, 2015, scoping letter to install four new volcanic monitoring stations in the Mt. Hood Wilderness.

Wilderness Watch is a national nonprofit wilderness conservation organization focused on protecting the National Wilderness Preservation System. We utilize public education, citizen engagement, legislative lobbying, and litigation to protect Wildernesses such as the Mt. Hood Wilderness.

Our comments include the following:

**1. The proposal violates the Wilderness Act and cannot be allowed to advance as proposed.** Section 4(c) of the 1964 Wilderness Act states: “there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.” (1964 Wilderness Act, 16 U.S.C. 1131-1136.)

On page 8 of your scoping letter, the Forest Service directly acknowledges that the proposal violates the Wilderness Act: “The installation of the monitoring stations is a prohibited use identified in the Wilderness Act.”

That should have been the end of the proposal: the proposal violates federal law, so it should not be allowed. Yet the Forest Service next claims that this proposal falls under the special provision of the Wilderness Act for the “control of fire, insects, and diseases” and therefore is legal. That logic is specious and ludicrous, and suggests Forest Service personnel would rather grossly contort the Wilderness Act than uphold the letter and spirit of the law. If Congress had wanted to make an exception for earthquakes or volcanoes similar to the one for fire, insects, and diseases, it would have done so.

Page 8 of the scoping letter also states, “Where and when necessary, a helicopter would deliver external sling loads of equipment, tools and materials to and from each site during construction and occasional maintenance operations when transport of bulky gear over varied and difficult terrain by foot is impractical.” As stated above, the Wilderness Act prohibits the landing of aircraft inside designated Wilderness. Additionally, Forest Service regulations prohibit the dropping of supplies, equipment, and personnel from aircraft in wilderness, and the Forest Service manual is clear in stating that convenience is not a factor that the Forest Service may consider in authorizing a non-conforming activity. Accordingly, the use of helicopters as envisioned would constitute another violation of the Wilderness Act, even if access via non-motorized and non-mechanized means would be difficult. Even if the installations themselves would be legal, the Forest Service should work with USGS to find locations and designs that could be delivered and serviced using non-mechanized means of access.

Just because the proposal may generate some interesting or potentially useful monitoring data does NOT give the Forest Service the green light to violate federal law. The standard imposed by the Wilderness Act for approving non-conforming activities of the type proposed is specific: The Forest Service must demonstrate that each nonconforming activity, structure, or installation, is *necessary* to meet the *minimum* requirements for administration of the area *as wilderness*. This proposal clearly violates the Wilderness Act, plain and simple, and must not be allowed to advance.

**2. The scope of this project requires a full EIS under the National Environmental Policy Act.** If the Forest Service continues to consider this proposal in spite of its clear violation of federal law, the agency must conduct a full environmental impact statement (EIS) and consider a range of alternatives and carefully analyze each one. The scoping letter contains no detailed analysis nor other alternatives that would help the public further evaluate this proposal.

For example, are there alternatives for placement of the new monitoring stations in the non-wilderness areas where the current monitoring stations are located, in the areas just south and southeast of the peak?

What are the differences in the quality of monitoring data between the current monitoring stations and the new monitoring stations proposed in this proposal? In other words, why can't the current non-wilderness stations or additional stations placed in non-wilderness areas provide adequate data? What are the differences in the quality of monitoring data between the current monitoring stations and if new stations were installed in non-wilderness portions of the Mt. Hood National Forest close to the peak? Why does the Forest Service believe that degrading the wilderness character of the Mt. Hood Wilderness by the placement of illegal monitoring stations is the minimum required for protecting the area's wilderness character as required by the Wilderness Act?

An EIS could also address the need to conduct this project now. What do the experts predict is the likelihood of Mt. Hood erupting in the next 10 years, or even the next 100 years? If an eruption is not imminent, why not wait until other technology is available that could eliminate the need to intrude on and degrade the Mt. Hood Wilderness? Current satellite technology now is able to detect the amount of groundwater depletion underneath the surface of the earth; surely

new technology should soon be able to adequately monitor seismic activity or physical changes on Mt. Hood without the need to degrade the Mt. Hood Wilderness as proposed.

A full EIS is the only way to identify and analyze options, alternatives, and questions like these, and it appears that the Forest Service has not done any such analysis at this point.

This proposal also appears to be a long-range project that would continue for a lengthy period of time. This is all the more reason to conduct a full EIS.

**3. The proposal states that a MRDG has been completed, but it is not available on the project website.** Page 3 of the March 11<sup>th</sup> scoping letter states, “A minimum tools analysis following the Minimum Requirements Decision Guide (MRDG) has been completed for this project.” Page 9 of the March 11<sup>th</sup> scoping letter states, “A MRDG for the installation and maintenance of these stations has been completed.”

If indeed these analyses have been completed, they were not posted on the Forest Service’s project website at <http://www.fs.usda.gov/project/?project=46254>. If the Forest Service has completed these analyses, they should be posted on the website and made accessible to the public. Please make them available to Wilderness Watch electronically or as hard copies, and make them available to the rest of the public as well.

In summary, this proposal violates federal law and should not proceed. If the Forest Service decides to continue its consideration of the proposal, a full EIS must be completed. Mount Hood is unlikely to blow in the next few months; the Forest Service needs to take its time and seek out alternatives that don’t impair the area’s wilderness character nor violate federal law.

Please keep Wilderness Watch on your contact list for this project.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Proescholdt". The signature is written in a cursive, flowing style.

Kevin Proescholdt  
Conservation Director