Mammoth

Mammoth Mountain Ski Area, LLC
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## Petition to Revise the Regulations

We would like to request the following revisions be considered:

§5357 Snow Avalanche Control Blasting

(a) General Requirements

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(4) Charges shall be placed, *dropped, tethered,* thrown or propelled to the desired location from a safe position by one of the following methods:

* * * * *

(E) Deployed from such remote control devices accepted by the Division as providing equivalent safety. ~~to the remote control devices allowed under subsection (e).~~

Explanation and Analysis:

Explosive use for avalanche mitigation is constantly progressing as the science of avalanche phenomena, initiation and forecasting improve. It has been shown that explosives deployed a meter above the snow surface have a greater sphere of influence and are more effective due to the airblast than eplosives on the snow surface. The difficulty of achieving such a blast has been a major concern of the avalanche mitigation industry and a source of increased innovation. Many RACS incorporate a tethering sytem to achieve such a blast since the worker is removed from the initiation/deployment sequence. Aerial Blasting Ropeways (ABR)'s and other explosive tram devices often provide the user a choice of dropping or tethering charges and these methods should be allowed.

As mentioned earlier, Remote Avalanche Control Systems (RACS) are the future of snow avalanche control blasting. By their very nature, RACS are designed to reduce worker exposure to recognized explosive and environmental hazrds by removing them from key points of the mitigation process. By removing the worker from the process of initiation and deployment of explosives in adverse weather conditions, RACS are inherently safer. The proposed revision still requires oversight and acceptance by the Division however these devices need to be evaluated separately from other launching systems as each has it's strengths, weaknesses and site suitability.

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In conclusion, we have shown that remote control devices, are well thought out and have safety features engineered into the design. The methodology is similar to hand charging procedures only safer and their use provides equivalent or improved safety to the Avalauncher as stated in regulation §5357(a)(4)(E). It is considerably safer than placing a Blasting Crew in adverse conditions and is a step forward in avalance mitigation. RACS require large initial investments of capital and therefore need a clear path forward for the users to adopt. Thank you for your consideration.

Respectfully:

Nathan Heit and Charles Megivern – Ski Patrol Managers

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