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September 24, 2014

**VIA U.S. Mail**

Randy Kline  
P.O. Box 42650  
Olympia, WA 98504-2650

**Re: Draft Environmental Statement (“DEIS”) for Mt. Spokane’s Potential Alpine Ski Expansion Area (“PASEA”)**

Dear Mr. Kline:

Thank you for the opportunity to submit a comment on the Potential Alpine Ski Expansion Area that is being considered for Mt. Spokane (“PASEA”). I write in solidarity with the Gonzaga University Environmental Law Clinic, and I ask that you accept the comments contained in this letter and place them into the official record for the Draft Environmental Impact Statement (“DEIS”) for the Mt. Spokane PASEA Classification.

The Gonzaga University Environmental Law Clinic often undertakes representation of not-for-profit groups who aim to maintain the beauty, quality, and integrity of the environment in the Inland Pacific Northwest. Of the many environmental challenges facing policymakers, one of the greatest struggles at this point is the balance between preserving the natural environment and allowing – and even encouraging – recreational use of the natural wonders of the Inland Northwest.

To this end, I believe that the Natural Forest Alternative (NFA), Alternative Two, ought to be supported. For this, however, I do have one caveat, which is that backcountry alpine skiing should be allowed in the PASEA. While the current draft of the Natural Forest Alternative would not allow back country alpine skiing, given that it already occurs there and that mountain biking, snowshoeing, and equestrian activities would be allowed in the PASEA, it would be inconsistent and illogical to ban backcountry alpine skiing. *See* Combined Draft Environmental Impact Statement (“CDEIS”), August 2014, page 18, II-2.

## **1. Why Alternative Two Ought to Be Preferred**

With the goal of balancing preservation of the natural environment and recreational use of the natural beauty of the Inland Northwest, it is important to recognize that some attempts at mitigation of environmental damage must be made. As noted in the DEIS, the NFA (Alternative Two) would allow use of the natural resources, while ensuring that mitigating measures are taken, thus reducing the likelihood of irreversible environmental damage. *See* Combined Draft Environmental Impact Statement, August 2014, page 25, II-9.

Some of the irreversible environmental damage that would be caused by Alternatives three and four include clear-cutting existing, recognized areas of old growth and native forest; once old growth and native forest have been reduced or eliminated, the many benefits that they provide will cease to accrue.

For instance, the CDEIS notes, “Potential impacts from trail construction, trail use or ongoing maintenance include the following:

- impacts to plants and their habitats;
- direct harm to plants providing ecosystem services;
- loss or alteration of plant habitats;
- altered ecosystem function;
- increased spread of invasive species;
- displacement of native plants by non-natives;
- increased soil disturbance favoring invasive species establishment;
- soil compaction and associated changes in hydrology and plant growth;
- human, pet and wildlife travel leading to the spread of invasive species;
- changed vegetation community composition or function;
- changes in animal browsing patterns or trampling of vegetation; and
- increased risk of wildfire.” CDEIS, August 2014, pages 29-30, II-13 and II-14.

Some of the significant negative impacts generated by the above situation would have broader effects on the Spokane area, too. For instance, if the ecosystem is altered and the soil compaction changes hydrology, then the risk of wildfire increases, and the sequestration of carbon and retention of moisture by the soil decreases. The danger of the first result is self-explanatory, as it would endanger the environment, the habitat, and the life of animals in the PASEA area; it would also potentially endanger the lives of those who would be sent to fight the resulting fires. The dangers of the second and third, however, are less evident – but just as real. The sequestration of carbon by the old growth aids not only the production of additional oxygen, but it also helps decrease the likelihood of drastic environmental change; the effect of the old growth on global warming was not sufficiently analyzed in the DEIS. Similarly, the retention of moisture by the soil encourages the growth of native vegetation, helps reduce the likelihood of wildfires, and encourages proper maintenance of the snowpack and snowmelt. *See* CDEIS, August 2014, page 31, II-15.

Because of these impacts, and of many other negatives impacts that have, in fact, been explained in the Combined Draft Environmental Impact Statement as resulting from Alternatives Three and Four, Alternative Two ought to be preferred. However, I have additional contentions that ought to be addressed, as they represent ways in which even Alternative Two might be altered, based in factors that went unaddressed, or improperly addressed, by the CDEIS. According to the Washington Administrative Code, “The level of detail shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or referenced.” WAC 197-11-402(2). In the case at hand, the material of the DEIS that I address in the next section does not reflect a level of detail commensurate with the importance of the impact; rather, it was improperly summarized, consolidated, and referenced.

## **2. Contentions Regarding the Draft Environmental Impact Statement and Proposed Solutions**

### Improper Delineation of the Wetlands

According to the Wetland Delineation Report of March 2014, under 5.0 on page 9, “Wetland delineation fieldwork was conducted on July 29, 30, 31, and August 1, 2013 . . . .” While it is wonderful that wetland delineation work was done over multiple days, and, if the report is correct, using all of the proper methods of the *Wetland Delineation Manual*, there are some flaws from the approach taken. The most notable issue, which leads to subsequent problems, is the fact that delineation was conducted at an inappropriate time of year. Although the data goes into more detail, the hottest month of 2013 was July, and the longest stretch of abnormally warm weather began in early August of 2013. *See* <http://weatherspark.com/history/30356/2013/Spokane-Washington-United-States>. Clearly, if July was the hottest month, the measured existence of the wetlands would differ between the warmest month and a more reasonable delineation time – such as at the end of spring or at the beginning of the summer,

rather than at the end of the summer, when the wetlands were more likely to have reduced in size. This size of the wetlands, if interpreted based on the July and August delineation, would allow the PASEA's impacts on the wetlands to seem less significant than the impacts would really be. In order to get a better understanding of the environmental impacts on the wetlands, a more accurate delineation would be required. Thus, steps ought to be taken to perform another delineation at the proper time next year; failing that, an adaptation of the proposal to reflect the likelihood of a larger wetland area may also be appropriate.

#### Disregard for Visual Resources

Even if the enhancement of skiing capabilities were to be as great as the PASEA maintains it would be, the expansion of the ski area under Alternatives Three and Four would cause damage to the view of Mt. Spokane (what I will refer to in this comment as the "visual resources"). Even with the adaptation of allowing backcountry alpine skiing, the amount of clear-cutting that would be required under Alternative Two is not nearly as severe as what would be necessary under Alternatives Three and Four. As noted by the CDEIS, "Alternatives 3 and 4 contain elements that have the potential to result in visual impacts, primarily through the clearing and grading necessary for hiking as well as formal ski trails." CDEIS, August 2014, page 37, II-21. However, under Alternative Two, while some environmental adaptation would be required, it would not be to the extent that visual resources would be altered, inhibited, or damaged under Alternatives Three and Four. Additionally, in order to enhance the visual resources of the existing ski area, see my statements under "Neglect of Alternate Solutions and Park Upgrades."

#### Neglect of Alternate Solutions and Park Upgrades

One disadvantage of Alternative Two that the DEIS addresses is that there would be "a net loss in recreational opportunities available within the PASEA when compared to any of the other alternatives analyzed due to the more limited range of uses that would be allowed to occur. Unlike Alternatives 1 and 3, under Alternative 2, backcountry skiing would not be a permitted use." CDEIS, August 2014, page 38, II-22. However, there are several reasons why this disadvantage, if existing at all under Alternative Two, would be mitigated by adaptation of Alternative Two to include backcountry skiing. First, the "more limited uses" referenced in the CDEIS would be increased by continuing to allow backcountry skiing. Second, there are other alternatives that could encourage – and even increase – use of the park and skiing areas.

For instance, the lodges could be upgraded and/or rebuilt, the existing chairlifts could be improved, and the use of the ski lodges, trail areas, and parking lots could be expanded for year-round use. These alternatives were never addressed in the DEIS, yet they represent some of the most viable, environmentally-friendly, and cost efficient ways of increasing public use of Mt. Spokane's facilities, trails, and environment. These upgrades, if conducted by themselves, could encourage those who would otherwise seek an alternate skiing location to visit (or revisit) Mt. Spokane. Additionally, by renovating the parking lots and lodges, Mt. Spokane's facilities would be suitable for use during other times of the year; examples of this use includes renting out the lodges for groups, encouraging and allowing intercommunity uses (like concerts, local food events with farmers from Green Bluff, etc.), and providing access to summer visitors of Mt. Spokane (like hikers, trail riders, etc.).

If these alternatives were combined with the Natural Forest Alternative – adapted version, then the benefits of Alternative Two would exist, and the number of recreational opportunities would be increased without causing substantial damage to the visual resources inherent in Mt. Spokane's PASEA.

### **3. Overall Recommendation**

Ultimately, while the Draft Environmental Impact Statement addresses some major concerns, there are several considerations that ought to be examined in more detail before progress on the PASEA continues. Not only are there other options that would add to the economic benefits of the Mt. Spokane park, there are ways in which the facilities can be enhanced without causing severe detriment to the environment. Furthermore, given the significance of the old growth and the wetlands to the ecological stability and care of the Mt. Spokane area, the proposed uses ought to be evaluated with a higher emphasis on the damage that could result from adopting Alternatives Three and Four.

Recognizing that there is a balance between maintaining and preserving the environment and encouraging the outdoor adventures to take place in the beauty of the Inland Northwest, Alternative Two becomes increasingly promising, especially if backcountry alpine skiing is allowed. Further exploration of additional enhancements to the facilities, ski lifts, and parking lots could yield many advantages, especially if approached in connection with Alternative Two.

Thank you for the consideration of this comment, and for the reflection of thoughts prompted here in your subsequent deliberations on the Draft Environmental Impact Statement for Mt. Spokane's Potential Alpine Ski Expansion Area.

Sincerely,

UNIVERSITY LEGAL ASSISTANCE

Ruth E. Ptak  
Law Clerk



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September 28, 2014

Randy Kline, Environmental Program Manager  
mtspokane.planning@parks.wa.gov  
Washington State Parks and Recreation Commission  
1111 Israel Road S.W.  
Olympia, WA 98504-2650

**Re: Draft Environmental Impact Statement (DEIS) for the Land Use Classification for Mt. Spokane.**

Dear Mr. Kline:

We appreciate the opportunity to comment on the proposal for the future of Mt. Spokane State Park. The remaining native forest should be left undisturbed, and not harmed further by ski area expansion.

**There should be *no* ski area expansion allowed into the intact forest on the western slopes of Mt. Spokane in Mt. Spokane State Park. Land within the boundaries of Mt. Spokane State Park belongs to the public.**

State Parks continues to define backcountry skiing as alpine skiing. This definition is flawed. Alpine skiing, by definition is lift served. Alternative Two would prohibit the addition of a lift in the undisturbed sub alpine ecosystem in the Proposed Alpine Ski Expansion Area. With no lift, by definition, there would be no alpine skiing. Backcountry skiing on the other hand is a low impact activity that requires no alteration of the current environment. The prohibition of backcountry skiing is inconsistent with the allowance of mountain biking and equestrian use, both which impact the environment much more substantially. The prohibition of backcountry skiing can only be seen as a political maneuver attempting to shift skier support to other alternatives. Washington State Parks, as a state agency, should employ a more even handed approach. The PASEA, in its current condition, offers multiple user groups year around access to recreation. This is how it should remain. This habitat is unique to our area and we need to ensure the never-logged old growth forest on the western side of Mt. Spokane will remain intact and whole. Alternative Two, with the offered amendment, is the answer to both preservation and recreational needs.

Regardless of attempts to mitigate the impacts of fragmenting the intact forest on the remaining undisturbed on third of the mountaintop, a clear cut cannot be mitigated. The impacts to the forest are irreversible and should not be allowed. Other state agencies, the Department of Natural Resources and the Washington

Department of Fish and Wildlife, have repeatedly and consistently argued for Natural Forest Area designation for the land within the PASEA. Both of these agencies see the value of preserving this area that for some reason Washington State Parks fails to see.

State Parks and the concessionaire repeatedly deny the presence of old growth when the concessionaire's own study conducted by Pacific Biodiversity Institute (Biological Survey 2010, page 58) says, "There are significant areas of old growth in the Biological Survey Area (PASEA)." No matter how many times the truth is denied, it is still the truth. The forest within the area of the proposed chair lift is an old growth forest. It is unique and rare and should be preserved. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it must not be allowed.

A Master Concession Plan was to be part of the Mt. Spokane Master Facility Plan, but to date has not been completed. Why the free pass? The Concessionaire must be held accountable to its prior agreements with State Parks before another agreement is entered into. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically. This Master Concession Plan must be included in the Master Facilities Plan for Mt. Spokane State Park. The Plan should address the impacts to the *entire park* and not be limited to the impacts within the proposed expansion area. The park is a contiguous ecosystem, all activities and development within the park should reflect this.

Neglecting to address the potential impacts of global climate change is an oversight that must also be addressed. There is need to address the potential impacts of global climate change on the future viability of the ski concession. This should include the importance of intact sub alpine forest over clear cutting for a few more ski runs that may be obsolete in the absence of snow at Mt. Spokane's elevation. Additionally, there is continuous propaganda from the concessionaire about the western slope holding snow better as well as having snow cover earlier in the season. There are several problems with this argument. First, the western aspect has early season snow and holds snow because it is protected by old growth trees. The existing ski area has little cover on its clear cut runs. Of course the western side of the mountain holds snow better, a fact that will be negated should it be no longer shaded by old growth. The second problem? How do you get there? Access to the western slope still comes from the same parking area and lodges. Therefore, access to the western slope will still come from the eastern slope. If there is no snow east, the only access to the west would be skier powered. This is already a recreational pursuit by many, it is called backcountry skiing.

The DEIS does not adequately address cultural or archaeological matters of concern. Mt. Spokane has served as an important destination for local tribes for centuries, yet there has been no effort on the part of Washington State Parks to invite the tribes into the discussion, and no archaeological study conducted.

I support improvements to the existing ski area. Having skied there for many years, although not recently due to my difference of opinion with the concessionaire's business model, I can list many areas that, if improved, would enhance the skier experience at Mt. Spokane Ski and Snowboard Park. Among these improvements are upgrades in parking, and remodeling of the lodges.

The forest within the PASEA provides habitat for multiple wildlife species, as well as recreation for a variety of user groups. Fragmenting forest for the benefit of one user group while detrimentally effecting habitat and recreational use for all others is preferential policy. As a state agency, Washington State Parks

should serve all citizens equally. This will not be the case if a ski area expansion is allowed in citizen owned land. Public land should remain open to *all* citizens.

**It is critical that the native forests on Mt. Spokane remain intact. Permanently designating these lands as a Natural Forest Area will protect this unique area for future generations.**

Sincerely,

Chris Bachman, Upper Columbia River Group, Sierra Club, Spokane, WA

submitted electronically 9/29/14

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September 26, 2014

Randy Kline  
PO Box 42650  
Olympia, WA 98504-2650

Dear Mr. Kline,

I am a second-year law student at Gonzaga University School of Law, and I'm a life-long resident of Eastern Washington. I am currently a law clerk in the Environmental law clinic at the law school, and it is in this capacity that I am writing to you. Please accept these comments into the official record for the DEIS for the Mt. Spokane PASEA classification.

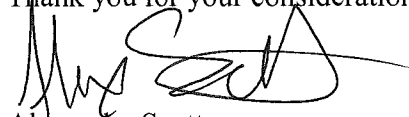
I am deeply concerned about the proposed expansion of the Mt. Spokane Ski Area. Old growth forest is one of our most precious natural resources, and as a young person, I am personally very anxious to preserve what little we have left in Eastern Washington, for me and my future children to enjoy.

From what I understand, the seven new ski runs and the area for the new chair lift will be clear-cut. This would be a tragic destruction of native forest that has, until now, never been logged. This kind of forest is irreplaceable, and such environmental damage cannot be mitigated, as would normally be the case. In addition to the loss of such precious trees, this fragmentation of the forest would have a devastating effect on many species of rare wildlife known to be present in the area.

Since 2007, the Department of Natural Resources and the Washington Department of Fish and Wildlife have consistently advocated for keeping old growth forests intact. The Pacific Biodiversity Institute (Biological Survey 2010, page 58) says "There are significant areas of old growth in the Biological Survey Area (PASEA)." If there is truly any question whether the land at issue is home to old growth (which there shouldn't be), great care should be taken in the environmental study process before such a project is allowed to begin. It appears, however, that this has not been the case. The delineation of wetlands for the environmental impact study should have happened in the spring, when the water is highest, not in late summer, when it is low. Wildlife modeling for moose, wolves, and other species has also not been correctly executed. In addition, cultural and archaeological implications have not been adequately considered. In short, the whole thing feels like a rush job. This is not how one of the most significant old growth forests in Eastern Washington should be treated.

I support, at minimum, Alternative Two, the Natural Forest Alternative. I also think that back country alpine skiing should be allowed in the PASEA. It already occurs there, and continued use of this area would greatly enhance Mt. Spokane's ski terrain. In addition, however, I think it is imperative for the ski area management to explore other means of growth. The ski park lies dormant for most of the summer months, a time when it could be hosting music festivals, beer fests, and other high potential recreational events. Rather than building a new lift, I wish the ski area would invest in a new lodge and upgrades to their parking lot and other facilities.

Thank you for your consideration.



Alexander Scott  
Law Clerk

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September 28, 2014

Randy Kline, Environmental Program Manager  
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Dear Mr. Kline:

We appreciate the opportunity to comment on the proposal for the future of Mt. Spokane State Park. The remaining native forest should be left undisturbed, and not harmed further by ski area expansion.

The Upper Columbia River Group and the Washington State Chapter of the Sierra Club support Alternative Two (2), Natural Forest Area. However, we offer one amendment. Alternative Two should allow for the continued recreational use of backcountry skiing.

**There should be *no* ski area expansion allowed into the intact forest on the western slopes of Mt. Spokane in Mt. Spokane State Park. Land within the boundaries of Mt. Spokane State Park belongs to the public.**

State Parks continues to define backcountry skiing as alpine skiing. This definition is flawed. Alpine skiing, by definition is lift served. Alternative Two would prohibit the addition of a lift in the undisturbed sub alpine ecosystem in the Proposed Alpine Ski Expansion Area. With no lift, by definition, there would be no alpine skiing. Backcountry skiing on the other hand is a low impact activity that requires no alteration of the current environment. The prohibition of backcountry skiing is inconsistent with the allowance of mountain biking and equestrian use, both which impact the environment much more substantially. The prohibition of backcountry skiing can only be seen as a political maneuver attempting to shift skier support to other alternatives. Washington State Parks, as a state agency, should employ a more even handed approach. The PASEA, in its current condition, offers multiple user groups year around access to recreation. This is how it should remain. This habitat is unique to our area and we need to ensure the never-logged old growth forest on the western side of Mt. Spokane will remain intact and whole. Alternative Two, with the offered amendment, is the answer to both preservation and recreational needs.

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State Parks and the concessionaire repeatedly deny the presence of old growth when the concessionaire's own study conducted by Pacific Biodiversity Institute (Biological Survey 2010, page 58) says, "There are significant areas of old growth in the Biological Survey Area (PASEA)." No matter how many times the truth is denied, it is still the truth. The forest within the area of the proposed chair lift is an old growth forest. It is unique and rare and should be preserved. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it must not be allowed.

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September 26, 2014

Randy Kline  
Washington State Parks and Recreation Commission  
PO Box 42650  
Olympia, WA 98504-2650

Dear Mr. Kline;

Please accept these comments into the official record for the DEIS for the Mt. Spokane PASEA Classification. I earned a Master of Science in Forest Resources at the University of Washington, where I studied ecosystems, recreation management, and policy and compliance. This comment letter details why I support Alternative Two (2) and why I oppose Alternative Four (4), with particular attention to major concerns I identified in the reports, facts, and science, which formed the basis for the four alternatives listed in the DEIS. Specifically, I am concerned with:

- Potential clear-cut logging of old growth and native forest and the lack of discussion of ecosystem impacts due to loss of old growth (WAC-197-11-402(1));
- Procedural errors with respect to the Watershed Delineation;
- The extent to which Alternative Four is inconsistent with Dept. of Natural Resources' (DNR) and Dept. of Fish and Wildlife's (WDFW) advocacy to leave old growth within the PASEA intact;
- The lack of discussion and consideration of impacts to the ecosystem that would result from upgrades to parking and lodges (WAC 197-11-402(1)); and
- Failure by the Commission in the past to comply with SEPA and other state laws, regulations, and policies

## Support for Alternative Two

In classifying the PASEA as Natural Forest Alternative (with Resource Recreation areas), per Alternative Two, the Commission would allow continued, minimally disruptive recreational activities. I support Alternative Two. However, back country alpine skiing should be allowed—not prohibited—per this alternative, because this activity is currently allowed. Alternative Two is consistent with the Dept. of Natural Resources 1992 Washington Natural Heritage Program survey, which determined that the PASEA area contains considerable natural resource value and should be classified as Natural Forest Area.

Furthermore, **I oppose Alternative Four** because the mitigation measures listed in the DEIS are not based on sound factual information such that any land use management suggestions based thereupon are faulty and lack merits for the following reasons:

## Old Growth Forests

The DEIS fails to address possible impacts of Alternative Four on old growth forests. WAC 197-11-402 requires the drafter of the EIS to analyze “reasonable alternatives and probable adverse environmental impacts that are significant.” Section II, 3.3 Vegetation includes a discussion of the composition of forests within the PASEA, but lacks discussion of old growth and its most striking characteristic: it is impossible to replace.

It is undisputed that “there are significant areas of old growth in the Biological Survey Area [PASEA]” as indicated in the Pacific Biodiversity Institute’s “Biological Surveys Conducted in the SEIS Analysis Area at Mt.

Spokane State Park During 2010,” which was funded by Mt. Spokane 2000.” Old forests on the Eastside [of Washington] are far more complex than those on the Westside, due to more diverse environmental conditions and complex and varied disturbance and management histories.” (Habitat Conservation Plan for State Trust Lands: 2008 Annual Report, DNR).

This DEIS is both inaccurate because it cannot inform a comprehensive land management decision, and insufficient because the environmental impact is simply not identified nor is it adequately addressed. Without discussion of characteristics of the old growth stands within PASEA, any mitigation discussion for potential alternatives is similarly lacking. Old growth disturbance, therefore, is critical to understanding the environmental impact, and thus the DEIS fails to adequately comply with WAC 197-11-402 with regard to Alternative Four. Alternative Two, however, would not implicate the same concerns.

#### Wetlands Delineation Error

The DEIS fails to provide impartial and accurate data regarding the current wetland delineation within PASEA. The purpose of an EIS is to provide impartial discussion containing data to inform policy makers and the public of environmental impact, alternatives, and mitigation measures for proposed plans and decisions. (WAC 197-11-400). EIS shall be supported by necessary environmental analysis (WAC 197-11-400), and shall include a description of the existing environment (WAC 197-11-402). The DEIS failed to contain information to inform policy makers and the public of environmental impacts since it is based on procedurally faulty technical and scientific data for both watershed delineation.

Hydrologic processes vary by time. The Wetland Delineation Report for Mt. Spokane, by ICF International (Project No: 00353.13), is based in part on field observations and sampling that occurred July 29, 2013—August 1, 2013 (Report, page 9). This is late in the summer months. A common recommendation for wetland delineation is that it be conducted during peak hydrology/runoff season and when plants are growing in the spring, which is usually May or June. Although field sampling is not the exclusive method for wetland delineation (U.S. Army Corps of Engineers, 1987), when it IS conducted, it should represent the common sampling practices. At the very least, the report and the DEIS failed to note the implications of sampling hydrology in the late summer. This renders the DEIS insufficient per WAC 197-11-402. For this reason, **I oppose Alternative Four.**

#### Department of Natural Resources, Department of Fish and Wildlife PASEA Advocacy

The Washington State Department of Natural Resources (DNR) and Department of Fish and Wildlife (WDFW) provided the Washington State Parks and Recreation Commission with multiple, written concerns regarding a change like Alternative Four to PASEA.

On February 15, 2007, DNR indicated: “The Washington Natural Heritage Programs strongly recommends that any ski area expansion be limited to the east side of Mt Spokane and the Blanchard Creek Natural Forest on the west remain intact and not be developed.”

On January 29, 2007, Fish and Wildlife indicated: “WDFW is opposed to the Potential Alpine Ski Expansion Area (PASEA) proposal due to the unavoidable and extensive impacts to wildlife habitat and wildlife species associated with such a proposed ski expansion.” On March 21, 2011, a letter from Fish and Wildlife reiterated: “This proposed land use action will have unavoidable impacts to native old-growth forest habitat by fragmenting and eliminating a large portion of the subalpine fir forest ecosystem.”

Both DNR and WDFW, agencies with particular expertise and understanding of lands in Washington State, expressed consonant and consistent concern with ski area expansion, and a preference for leaving the old growth lands intact. The Washington State Parks and Recreation Commission should therefore give deference to the agencies opinions. **Please reject Alternative Four.**

#### Parking and Lodge Upgrades

The DEIS fails to provide necessary information regarding potential changes and upgrades to parking and existing lodges. WAC 197-11-402 requires the drafter of the EIS to analyze “reasonable alternatives and probable

adverse environmental impacts that are significant.” Parking amenities usually include an increase in impervious surface, removal of vegetation, and cause an increase in traffic, noise, pollution, and litter. These characteristics and activities often lead to compromises in biogeochemical cycling, recreational aesthetics, and ecosystem balance. Therefore, the DEIS is insufficient because an EIS shall be supported by necessary environmental analysis (WAC 197-11-400), upon which policy makers and the public may rely for informed decision-making.

Previous lack of compliance

The Commission failed to comply with SEPA and other state laws, regulations, and policies. The Court of Appeals Division II stated, in an opinion addressing the appeal filed by The Lands Council against the Commission’s failure to file an EIS for the PASEA in 2011:

The Commission determined that an EIS was required for expansion of the ski area. The Commission approved that expansion in May 2011, subject only to the director's subsequent review of the precise location of the runs. The Commission failed, however, to prepare an EIS when it approved the use. Instead, it postponed its preparation until the later review of the precise location of the runs.

Docket No. 43158 - 1 – II, page 19.

The importance of the Commission’s duty to properly manage public lands, and to comply with the laws cannot be understated:

Over 40 years ago, with the adoption of SEPA, we first read in Washington law that each generation is trustee of the environment for succeeding generations. We read also that it is the “continuing responsibility” of the state and its agencies to act so we may carry out that trust. RCW 43.21C.020(2). SEPA demands that this trust be more than merely a stirring maxim or artful slogan. Instead, it is the quickening principle in the application of the statute. Consistently with the statute's purposes, the Commission's failure to prepare an EIS for the 2011 classification decision violated the terms of SEPA and its rules and was contrary to governing case law.

Docket No. 43158 - 1 – II, page 20.

A single, isolated instance of failure to comply cannot fairly characterize all further activities and decisions by the Commission. However, it defies logic that the Commission would produce a DEIS with blatant omissions and errors, after a loss in the Washington Court of Appeals.

**For the reasons stated above, I oppose Alternative Four.**

Please add me to the notification list for this project, including notification of any Commission meetings where this matter will be discussed.

Respectfully,

Grace King, M.S.  
Legal Intern  
Gonzaga University Legal Assistance  
721 N. Cincinnati St.  
Spokane, WA 99220  
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September 29, 2014

**VIA: Email Randy.Kline@parks.wa.gov**

To: Randy Kline  
Position/Title: Environmental Program Manager  
Washington State Parks and Recreation  
Address: 1111 Israel Road SW  
Olympia, WA 98504-2650

**RE: Mount Spokane PASEA Ski Area Expansion;  
Draft Environmental Impact Statement**

Dear Mr. Kline:

This is in response to your request for comment and recommendation regarding Mt. Spokane Ski & Snowboard Park's application to install a chairlift and seven cleared runs within the portion of land located within the Concession Agreement with MS2000 that is known as the PASEA.

I have carefully and thoroughly reviewed and analyzed the two-part Combined Draft Environmental Impact Statement (DEIS) which is currently posted on the Washington State Parks website. I find that the document, as written, is very comprehensive and describes the environmental consequences of the expansion in great detail relative to all alternatives and proves that there are great benefits to be gained by the expansion of adding one chairlift and seven cleared runs. In short, the benefits far outweigh the impacts and the impacts can be mitigated to an acceptable degree. As such, I believe that MS2000's proposal should be approved and the expansion should proceed immediately with Alternative Number 4 of Part 1 and Alternative Number 2 of Part 2 (Enhanced Recreation, one chairlift and seven cleared runs).

I am a long time season pass-holder on Mt. Spokane, having started skiing there in 1957. I am active in the ski community, volunteering for Mt. Spokane's youth ski racing team (SSRA) and volunteering for MS2000. I spend many hours each year on the mountain skiing, teaching skiing, and working on ski races. I know the mountain and its needs very well. I ski virtually every run every week. I purchase ski school lessons for my grandchildren all the winter long. I purchase food and utilize both lodges every week. I carefully observe the Ski Patrol operations at all times. I just as thoroughly watch the mountain operations at all times. There are probably not more than a handful of folks who have as much knowledge of the mountain and experience there as I. As such, I have seen the good and the bad as far as concessionaires. The current management does an excellent job of operating the ski area and managing the concession, the best of any so far in the past 57 years anyway, and State Parks should recognize that fact by approving this expansion proposal with dispatch.

I also know the needs of today's youth. I have volunteered thousands of hours in my lifetime to coaching and assisting young people to become proficient skiers and ski racers, accomplished

athletes of many other sports, proficient students, and solid citizens. This sort of a recreation facility is just what is needed to assist our youth to become all of those. The DEIS describes that this expansion will provide just those sort of opportunities for youth. Additional beginner and intermediate terrain is just what is needed to teach youth how to ski and snowboard and thus achieve some success in this athletic endeavor and the self-confidence that comes along with. That is all important in this age of overweight and inactive kids so that they can get the exercise they need and achieve some successes and accomplishments. Plus, being on the mountain in the fresh air working their muscles and away from the temptations of downtown gives them a better chance of leading a healthy lifestyle and staying away from the temptations of drugs and alcohol and all the rest and getting their education accomplished. State Parks should support getting today's youth onto the mountain and into a healthy lifestyle by approving MS2000's proposal.

All of this is recognized too by Governor Inslee's Blue Ribbon Task force on Recreation where it advocates the utilization of public lands to promote healthier citizens, stronger communities, and a more thriving economy. The MS2000 plan would provide all that, and more. The MS2000 planned investment in the facility would provide many hours of outdoor recreation opportunity for the area's youth to learn the skills of skiing and snowboarding. As well, there will be more terrain available for adults to learn and improve their skills. And the economy of the region, as well as State Parks' coffers, will benefit.

The Lands Council opposes the expansion. But they do not speak the truth in their opposition. Just look at the true reason for their opposition. They are not opposing because of some environmental harm. The DEIS shows that the harm they claim is false; it simply does not exist. The LC spokespersons oppose for reasons that benefit only them.

The Lands Council is simply a selfish group of skiers who are attempting to lock up the proposed terrain so that only they can use it. They ask for NFA, but they hypocritically ask to have that classification modified so as to allow them to ski in the PASEA. What they want is to ski the proposed expansion terrain by themselves but preclude others by denying the installation of a chairlift or the clearing and grooming of runs. They simply want their own private playground. That is not State Parks' obligation, nor right, to provide.

The Lands Council campaigners prove their selfishness and true purpose by asking that the NFA alternative be modified to allow them to hike-up, ski down on the existing clearings and through the trees, but disallow the installation of groomed runs and a chairlift that the majority of guests need. Of course that works for the few of them who can hike to get back up the hill after each run. But what about the rest of us? The majority of users on Mt. Spokane?

I am a cardiac patient. I can still ski to a degree, but I cannot do that sort of hiking up the hill. So the Lands Council's request would preclude me from accessing and skiing on the proposed terrain. The Lands Council would lock me out of the PASEA. That situation would apply to the majority of skiers; because most are not suited to, or don't desire to, hike back up the hill after enjoying a run down. Most need a lift to the top. That is why chairlifts were invented in the first place. There are hundreds of thousands who ski and ride a chairlift back up to the top; there are only a few who hike to the top.



Additionally, the majority of us want and need groomed trails, not tree skiing. If that weren't true, the ski areas, including Mount Spokane Ski & Snowboard Park, would not spend millions of dollars each year on groomers and grooming efforts.

And this situation remains true even for the concept of allowing skiing down the existing terrain, trekking across to Chair4 on the snowmobile road, and then riding that chairlift back up to the top as might be allowed by a Resource Recreation classification (Land Classification Alternative 3) or some other modification. That trek is brutal and takes a long time. Only a few are able to do it now and only a few would do it in the future if that is only what is approved. That again is just what the Lands Council wants; to have only the select few be able to utilize that backside terrain. The select few that only they choose or that only have the physical ability and conditioning that they are lucky enough to have:

Only a few have the skill and conditioning to ski those ungroomed runs. So just as above, only a few would utilize the terrain under such a classification. The few who would have the Commission approve such a plan instead of what has been proposed by MS2000 do not speak for the majority. Recreation (Land Classification Alternative 4), with the chairlift installation and seven groomed runs is what the majority need, seek, and deserve.

Think also of the disabled group who utilize the mountain virtually every weekend. MS2000 supports that group without exception. The work that the volunteers do is extraordinary. But they would not ever be able to push those sleds back up the hill or even across the road to Chair4. Simply, classifying the land in the manner which the LC wants, would preclude the disabled group from utilizing the PASEA terrain. Once again, good for the LC, not for another group.

Please do not reward the selfish and intolerant Lands Council campaigners by locking out the thousands of the rest of us.

As to land classification, the appropriate course of action here is for the Commission to classify the PASEA acreage as Recreation (Land Classification Alternative 4) as proposed by MS2000. That classification would match the classification for the rest of the resort and would make for consistent management of the entire concession area. Such a classification would, as well, make for the best and most consistent recreational experience for the vast majority of the skiing and snowboarding public. That is, after all, the group who will benefit from such an action, who has waited for so long for this process to conclude, and who has overwhelmingly served notice to the Commission that the chairlift and seven run proposal should move forward. That classification would also result in the safest experience for the resort's guests who would ski and snowboard in that part of the concession area.

To classify as either NFA (Land Classification Alternative 2) or Resource Recreation (Land Classification Alternative 3) the 279 acres where the chairlift and seven runs are proposed, would not meet the needs of the majority of the skiing and snowboarding public, would not meet the terms of the concession contract between State Parks and MS2000, would go against the wishes of those who donated the land to the State, would not be in keeping with the recreational aspect of State Park's mission, and would not result in the most safe alternative.

To quote the State Park Volunteer Host Guide regarding State Park's Mission: "The Commission fosters outdoor recreation and education statewide to provide enjoyment and enrichment for all, and a valued legacy to future generations." (Emphasis mine). State Park's Facebook site states

that State Park's Mission is to "connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives." (Emphasis mine). Recreation is what this proposal is all about, and recreation that would be available to all Washingtonians, not just the few who want to lock this area up for themselves.

Further as to classification, I remind you that the 1999 CAMP process, against the majority of public input, already restrictively classified over 1/3 of Mt. Spokane State Park's approximately 14,000 acre land inventory for the purpose of protecting natural plant and animal communities. In the subject application here and the DEIS, it looks like the vast amount of acreage below the Chair 4 Road will add even more acreage to the Park's large inventory of NFA protected lands. When is enough, enough? When do the people who utilize the mountain get some rights? When will humans become as important, or even more, as flowers and trees and wild game? Now is that time. Classify the PASEA area above the Chair 4 road as Recreation (Land Classification Alternative 4) as proposed by MS2000 and described in the DEIS and allow continued and expanded use of that land for alpine skiing and snowboarding in the only location where it is possible to provide the much needed expansion of usable terrain and uphill transportation.

Remember too that the multiple State Parks plan options which were presented by the Daniel Farber group in the 2006-2007 timeframe produced many more, and more expensive, alternatives than MS2000 ever wanted or would have constructed. There simply are no other options to consider than those which that group brought forth. The cogitation over options has been exhausted. The Optimized Experiences options that Mr. Farber presented as potentials for State Parks to consider included several multi-million dollar projects in the PASEA and were, via the vetting process and follow-on hearings and such, moved and shrunk down to what is currently before the Commission in this proposal. The public and State Park's staff and sister agencies have testified or been provided the opportunity to testify on all of the options, including especially the one proposed here now. It is time to issue an approval and get constructing.

All the information that could ever be provided has been provided. All of the opponents' objections, real and faux, are known. All alternatives have been studied and described in the DEIS. All the science and environmental conclusions have been presented. Nothing that the opponents have presented has refuted the science shown by Mt. Spokane 2000's contracted studies and there is simply no more science out there for them to present. If anything, the further environmental field work that MS2000 commissioned recently only reinforces its consultants' and State Park's previous conclusions presented in the 2012 Mount Spokane Ski and Snowboard Park Final Supplemental Environmental Impact Statement.

That is one reason, I suppose, why the opponents are refusing to acknowledge the truth and have changed much of their tactics from discussing science to be that of personal attack and demonization. They don't discuss the truth of the impacts and of the benefits of the proposal. Instead, they would have the Commission believe that anyone who disagrees with their position of no expansion is some sort of demon, is ignorant, is mean, hates the environment, is corrupt, and is hell bent on destroying the park. That is not the truth.

The MS2000 Board of Directors consists of highly devoted volunteers who provide guidance and oversee Mt. Spokane Ski & Snowboard Park with care and compassion and tolerance and forward thinking and business acumen. MS2000's managers carry out the BOD's directives with great professionalism. There will still be many acres of tree skiing and hiking terrain available

after this expansion is constructed. No one in the MS2000 management is seeking to restrict the opponents. To the contrary, it is the opponents who are seeking the restriction of the majority.

But regardless of the methods employed by the opponents to stall and delay this process, there is no need for more meetings, hearings, or testimony. Further time spent is merely unreasonable delay. Let's get on with it. Approve the plan. Allow Recreation. Build the chairlift and open the runs. Approve MS2000's proposal; Land Classification Alternative 4.

State Parks also does not need any other input in order to fulfill its statutory obligations. The WAC does not require any meetings and the court did not order any more. The court simply said that State Parks got the EIS out of order in the process. The order has now been changed to meet what the court ruled and so it's time to get this process moving. Enough is enough. The mistakes have been corrected. Please approve the proposal for Recreation (Land Classification Alternative 4) so the skiing and snowboarding public can enjoy the PASEA terrain.

And speaking of the court, the court did not order all of this process. The court ordered the correction of certain procedural errors. The court ordered that the Environmental Impact Statement be prepared before the land was classified. All that had to be done was classify the land after the EIS was prepared. The prior EIS could have been utilized. The court did not require more. Amendment #3 to the MS2000 Concession Agreement is still in effect. That amendment approved MS2000's development plan for the PASEA. Nothing in the court order took that approval away or modified it or voided it in any way. Nothing else has changed that either. All the additional monies that MS2000 has spent to do this additional DEIS process has been far in excess of what was really needed or directed by the court. Any discussion of whether State Parks should approve the MS2000 plan is superfluous, since the plan has already been approved and the contract amended. All that is really needed now is the Recreation classification (Land Classification Alternative 4) so that construction can begin.

Regarding the topic of Recreation, without a doubt, Mt. Spokane is predominantly a winter recreation park. The DEIS makes that clear. It is utilized for winter recreation activities by tens of thousands of Washington residents each year. And the number of guests grows each year because MS2000 has done such a good job of managing the concession. Providing that type of winter recreation is just what MS2000 has the right and obligation to do under the Concession Agreement with State Parks. Supporting MS2000 in its quest to provide such winter recreation is State Parks' obligation under the Concession Agreement. Such recreation is a major part of State Park's mission. The DEIS recognizes State Park's mission. The PASEA is the only available terrain for the expansion of alpine skiing and snowboarding on Mt. Spokane in order for MS2000 and State Parks to meet the public's demand for growth and it should not even be considered as NFA or modified NFA or Resource; but only as Recreation (Land Classification Alternative 4) with the requisite chairlift to carry the guests back uphill.

Skiing and snowboarding are important recreation activities to the citizens of Spokane and the surrounding community. Many residents live here in large part because of the winter recreation opportunities. The DEIS recognizes that fact. These recreation activities are offered by MS2000 at an affordable pricing structure. More so than the other neighboring resorts; all of which charge more for their lift tickets plus all of which are further travel distances from Spokane. I have to believe that serving the many, at reasonable pricing, meets with State Park's mission. I have to further believe that recreating close to home, and minimizing driving times and distances, also

meets with State Park's mission. It all should. And for sure having a chairlift and groomed runs also serves the many in their quest for recreation. The many should matter to State Parks.

While I do admire the conditioning of the few who climb to the top instead of riding a chairlift, who have the money to purchase the expensive backcountry type of equipment, and who have the ability to ski un-groomed runs, I believe that serving only those few individuals and providing them their own private playground is not within State Park's mission. Simply, most of the public needs to ride uphill on a chairlift and most need grooming for the downhill portion of the round trip as they learn and practice and expand and enjoy their skiing and boarding skills. The very few who pursue backcountry skiing and snowboarding as hikers are a small portion of the overall skier population and virtually none of the snowboarding community. Thus, the area of this proposal would be much better utilized for teaching the much larger group of youth and beginner skiers and snowboarders as well as to provide an opportunity for all higher skill level users to improve their technique. There still will be hundreds of acres of backcountry terrain and tree skiing for the elitist hikers to use. The groomed runs of this proposal only touch a few of the 14,000 acres of the Park, less than 1% actually. I ask the Commission to serve the many, not the few, as I believe that to be State Parks' mission.

It is quite evident that many of the opponents of this application have not been to Mt. Spokane for a long time, if ever. The Commissioners have witnessed that in testimony. The opponents seem totally uninformed as to how Mt. Spokane Ski & Snowboard Park has been operated by MS2000, of MS2000's non-profit mission, of its dramatic forward progress over the years, and its investment of millions of dollars into facility improvements. They also seem unaware of the fact that Mt. Spokane Ski & Snowboard Park, during the time of MS2000's management, has been consistently voted in independent polls to be one of the best resorts in the region; such voting by the masses. They also seem to be unaware, or choose to ignore, that the DEIS reports additional studies which show that the claim of old growth in the expansion area is false and misleading.

The truth is that many of the opponents of this project simply do not state the truth. The opposition seems to be in many ways fueled by a personal vendetta of animosity of a few individuals. Catering to that vindictiveness, intolerance, and myopia is not within State Park's mission. Finding and acting on the truth is. Recreation for the masses is the truth.

The truth is that MS2000 has invested millions of dollars back into the concession in the form of lodge, chairlift, trail, and facility improvements and enhancements; more than \$7,200,000 by General Manager Brad McQuarrie's accounting. Understand now, that amount is over and above normal routine every day maintenance. That amount is capital improvement investment. Such is the basic concept of the MS2000 non-profit status; all profits are reinvested in the facility instead of being paid out to corporate executives and stockholders. The opponents' accusations that MS2000 has not improved and reinvested are simply not the truth. The DEIS further reflects that many more hundreds of thousands of dollars will be invested by MS2000 to install the proposed chairlift and runs and after that more funding will become available for investment in the entire operation. That is all to the benefit of State Parks and the many guests who enjoy Mt. Spokane Ski & Snowboard Park each year.

The truth is that the number of visitors to the facility has increased several-fold since MS2000 took over the concession from the prior failed operator. That was the basis for awarding to

MS2000 in the first place and that truth is proven by the public's return to the facility in droves such that there even exists a need for more uphill transportation and groomed terrain and further by their positive votes in the media surveys. The opponents' accusations to the contrary are simply not the truth.

The truth is that the MS2000 Ski and Snowboard School teaches many young folks and many not so young persons and many disabled individuals of all ages how to ski and snowboard each year. The truth is that the school and its instructors rank among the best in the region. The truth is that this expansion will serve to increase that accomplishment several fold. Nothing that the opponents can say about MS2000 can take that truth away.

The truth is that the slopes are now groomed with the best of them and that the run-down lodges which MS2000 inherited from the prior failed operator have been improved dramatically. If the opponents would ever actually visit the resort they could see the truth.

The truth is that the expansion as proposed would reduce congestion on the slopes and make for a more enjoyable and safer experience for the public on the entire mountain. The traffic on the cat-track would be reduced and the congestion caused by class lessons would be reduced since they would be able to spread out on more of the mountain. The proposal simply makes sense. The opposition simply tries to obstruct with lies.

The Commissioners have seen the truth. The DEIS reports the truth. Let the truth be the basis for this Commission decision. The truth is that MS2000 has been a good partner to State Parks and has managed the concession extraordinarily well; dramatically better than any prior concessionaire. The truth is that this proposal for a chairlift and seven groomed runs is the best alternative (Land Classification Alternative 4). The truth is that the opponents oppose the project for individual and selfish reasons, not because of any overriding public policy concern or a better alternative or failure of MS2000.

And speaking of funding truth, State Parks has to consider how it funds its own operations. State Park's financing has been shifted away from the relative certainty of mostly General Fund support to a budget in which the majority of operating funds have to be earned by State Parks. Thus, State Parks is now in an era when it must be creative in revenue generation and receptive to alternates and expansion of revenue flows. State Park's own reports recognize that truth.

Since State Parks no longer receives automatic annual amounts from the state each year, State Parks simply must look at how all proposals, including this one, will affect its own funding in the future. State Parks has lately expressed a desire to build new partnerships with concessionaires in an effort to make State Parks more sustainable. State Park's own reports recognize that partnering with private entities is one of the preferred methods of meeting future State Parks funding goals. In the MS2000 Concessionaire, State Parks has its most valuable partner already. That is the funding truth. Mt. Spokane Ski & Snowboard Park pays more in concession rent than any other State Parks concessionaire, by far. Such payments will only increase with approval of this proposal and construction of the proposed lift and seven groomed runs.

MS2000 has long ago submitted financial data showing how the proposal will increase revenue to State Parks. That has all been a part of the DEIS process. State Parks reviewed and approved those financials. Yet the treatment of MS2000, at least by some staff, has been in many ways

more of animus rather than one of good faith partnership and working to improve State Park's funding position.

Here is the largest revenue generating concessionaire, a non-profit which plows all earnings back into the operation and facility instead of taking out bonuses and stockholder profits, that is making significant capital improvements to State Parks' property, with a goal of exceeding the Public's needs, seeking to pay more revenue to State Parks and yet, the proposal MS2000 submitted to State Parks in 2004, is still being debated and subject to delay for no good reason, especially by the selfish Lands Council and even to some degree by obstructive State Parks staff members and the ever obstructive sister agency WDFW; who offers nothing positive but only detracts with no basis in truth. The truth is simple; wild game thrives in the existing ski/snowboard area and will in the expansion area as well, no matter what malarkey bunk WDFW attempts to put forth. Those who venture out in the wild, whether for hiking or berry picking or similar, know the truth. They encounter the game daily on the existing cleared runs. And those who hunt the surrounding area, know the truth; that game thrives regardless of WDFW, not because of them. What does all this sort of treatment say to other, would be, private partners? For its own good as well as the good of the skiing and boarding public, State Parks needs to approve this application for Recreation classification (Land Classification Alternative 4) in a spirit of cooperation and with dispatch so as to allow for whatever additional funding will flow to State Parks.

Finally, I ask that the Commission make its decision based on the merits and not on the emotional untruths espoused by the Lands Council and its supporters and not based on the obstructions put forth by those in government who would hold back anything that indicates any sort of progress for mankind. This process has been made extremely burdensome, expensive, long, and has been as obstreperous as possible. It never had to be this way. The court did not require all that has been done. But doing so has truly reinforced the fact that the emotionally charged negatives claimed by the opponents are fictitious. Simply, the Lands Council has lied over and over and continues to do so.

But no matter all of that, it is the Commission who is charged with making this decision and acting without emotion or bias or fear. Please approve this recreation expansion (Land Classification Alternative 4) based on the overall merits which will benefit the skiing and snowboarding public, the MS2000 Concessionaire, and State Parks.

I respectfully ask the Commission to approve Alternate Number 4 of Part 1 and Alternative Number 2 of Part 2, (Enhanced Recreation, one chairlift, and seven cleared runs).

Thank You,



ROBERT H. CRICK, JR.



September 30, 2014

Washington State Parks  
Mount Spokane State Park  
DEIS Comment Letter

To whom it may concern :

I am writing to request the Parks Commission to adopt Alternative 2, Natural Forest Area designation, for the Land Classification portion of the DEIS for Mount Spokane State Park's PASEA. Of all of the alternatives, this is the alternative that is the best-fit for the area in question. Of the other alternatives, alternative 3 would be the second most acceptable alternative. Alternatives 1 and 4 should under no circumstances be considered viable alternatives. Should this progress to part two and project action, I would only support the no action alternative.

The PASEA should be classified as a Natural Forest Area. According to its own Natural Resources documents, State Parks defines mature forests as trees 90+ years and old growth as plant communities including large old-growth trees of 150+ years, large snags, large downed logs, and large logs in streams. Some trees within the PASEA have been determined to be over 200 years old (from core samples). It is impossible to mitigate for fragmentation (via instillation of a chair lift and ski runs) of a forest community that includes specimens of over 200 years within the mature forest community. Furthermore, A Washington State Parks Core Value, listed along with the “State Parks Vision, Mission, and Core Values” on State Parks documents, states “Stewardship that preserves the State’s natural, cultural, and ethnic heritage in perpetuity” is a core value of state parks. As the only mature old growth forest in Spokane County, and as a publically owned old growth forest, it is in the public’s best interest to preserve this as a Natural Forest Area. This is additionally supported by the Department of Fish and Wildlife in its January 29, 2007 letter: “The native mature forest habitat on the northern aspect of Mt. Spokane is an extremely unique forest ecosystem with a high value for wildlife and species biodiversity. Considering its size, its un-fragmented condition along with its stage of forest succession and structure, a similar forest could not be found anywhere else in Spokane County nor replicated.” One could add, nor mitigate for the loss of such a forest. Finally, the DEIS itself includes a footnote stating "Commission direction regarding the management of natural resources within areas classified as “Recreation” is discussed in *Commission Policy 73-04-1 Protecting Washington State Parks Natural Resources*. Subsection A(1) states that “State Parks will maintain native plants and animals (biodiversity) that occur, or seek to re-establish them where they historically occurred, within those park lands classified by the Commission as Resource Recreation Areas, Natural Areas, Natural Forest Areas, or Natural Area Preserves. When consistent with recreational use, cultural resources integrity, and other agency objectives, native plants and animals will also be preserved in lands classified as Recreation and Heritage Areas” (pg. II-4 of DEIS). Rather than choose a recreation designation and then make an effort to preserve biodiversity despite the removal of large swaths of the currently intact forest for the singular use of the alpine ski concession, it would be better to preserve cultural resource integrity and biodiversity by choosing to protect this unique area in perpetuity through Natural Forest Area designation. For these reasons, Alternative 2 is the best classification for the PASEA.

The DEIS lists mitigation measures that would be undertaken should the PASEA be designated via Alternative 4. I cannot state strongly enough my support for Alternative 2, but I did wish to take the time

to comment on some of the mitigations listed within the document. Mitigation measures from section 2.5.1, numbers 6, 7, 8, 10, 13, 18, and 19 (page II-6-7); section 2.5.2, numbers 1, 8, and 9 (page II-7); and section 2.5.3, number 3 are not being followed within the alpine ski area's current concession area. The document does not indicate how State Parks would address a failure on the part of the concession to address mitigation concerns, and I find it deeply troubling that the proposed mitigations for the expansion are not currently being followed within the existing footprint. See the pictures below, taken during the summer of 2013, for a visual of the current problems:



Photo #1 taken from the chair 3 cat track and above chair 5 and Lodge #2. Yellow flowers in foreground are klamath weed (also known as common St. Johnswort); pink flowers are knapweed. No evidence of measures to control noxious weeds, nor to reestablish native vegetation. Tire tracks show failure to keep vehicle traffic to a confined area (notice off-established route tire tracks in the upper portion of the photograph heading to the lower right quadrant of the photo and off cat track). Road is overly steep and no erosion controls are in place (neither for wind nor water erosion).





Photo #2 taken from the chair 3 cat track within the alpine ski concession area. Yellow flowers are klamath weed (aka, St. Johnswort), a recognized noxious weed. Just above center left of photo, note highly eroded section near chair riblet. No indication of noxious weed control or attempt to reestablish native vegetation. The DEIS mitigation measure 2.5.2 #8 states that trails must be regularly monitored to identify and eradicate all non-native and invasive species before they become established. Both photo #1 and #2 indicate a failure to do so within the current concession area, and imply a high likelihood that the concession would continue to fail to address this concern within the PASEA, where there are currently no established populations of invasive weeds, and no erosion problems.



Photo #3 depicting derelict bus and equipment left at the top of chair 3 within the alpine ski concession area. Within the DEIS, the document states the concession must enforce measures to ensure trash or refuse associated with construction is minimized. The trash from this photo may or may not be connected with construction, but it has been in place for years. No measures have been undertaken to clean the site.



Photo #4 depicting derelict equipment left at the top of chair 3 within the alpine ski concession area.

Under mitigation measure 2.5.4, #1 (page II-8), fall should additionally be considered under seasonality of trail use by wildlife populations. The huckleberry patches (and other wild berries) within the PASEA are of critical use to a wide variety of wildlife during the late summer/fall. It is unclear why the fall season was left off the mitigation list, but it is clear that cutting large swaths of forest for a chair lift and ski runs would have a negative impact on berry patches. The concession currently uses brush cutters to clear runs within the concession area (posting a recent photo of a ski run groomer pulling a brush hog to its Facebook page). Huckleberry bushes are slow growing, and cutting them with a brush hog would prevent berry production for several years. These berry patches are critical wildlife foraging sites in the fall season. The huckleberry patches are also considered culturally significant to the Spokane Tribe, and are therefore a cultural resource within the park (along with the bear grass that currently grows within the PASEA, another slow-growing plant that would be impacted for years should it be disturbed).

Other concerns raised by the DEIS include:

Under section 3.2.1.2 pertaining to wetlands: the "Impacts on Vegetation, Figure EIS 6" document shows runs crossing through wetlands. This is unacceptable, and cannot be mitigated for.

Page II-17 lists types of skiing. The list provided on this page is straightforward and easy to understand. Page II-2 adds an additional category of "Alpine 'backcountry' skiing" that is nowhere defined within the document, and is misleading/confusing to the reader. In conversations with the General Manager of MS2000, I have been led to believe that this term refers to lift-assisted skiing within the PASEA should it be classified under Alternatives 1 through 3. However, nowhere is this term defined, and MS2000 has a



history of making misleading statements in its own best interest (see also: current MS2000 website material claiming the PASEA contains no old growth trees, that the PASEA does not qualify for NFA designation, and that no snowshoe trails will be affected). Due to a history of misleading information presented to the public, I have little faith in the verbal definition of "alpine 'backcountry' skiing" that was presented to me. State Parks itself need to clarify what exactly is meant by the term as it is used on page II-2 of the DEIS document, as well as clarify why this activity would not be granted as a conditional use. Other regional ski areas allow lift-assisted access to backcountry areas adjacent to their concession areas, so it is unclear why MS2000 differs in this regard (see Silver Mountain's Wardner Peak area, or Lookout Ski Area's lift-assistance for backcountry skiers accessing the Stevens Peak area). The term as presented within the DEIS is misleading, since it could also refer to all backcountry skiing (alpine touring, randonee skiing, or telemark skiing using climbing skins, all forms of skiing that are most closely related to the allowable "cross-country ski trails, off-trail hiking, off-trail cross country skiing (i.e., Nordic skiing) and snowshoeing" stated as "examples of permitted facilities and activities in Natural Forest Areas" (II-2).

Finally, on the maps that accompany the DEIS, the legend terms are not defined. It is impossible for a layperson to understand what they are looking at when the legend is so grainy as to be practically illegible, and what terms can be deciphered include things like "ABLA/ATFI" and "ABLA/LUGLH," to list merely two of the confusing items in the list. What do these legend items refer to?

Sincerely,

Holly M. Weiler

Randy Kline, Environmental Program Manager  
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### **Mount Spokane EIS comments**

Jackie Corley, B.A. Anthropology, California State University Northridge  
Tribal Archaeologist Spokane Tribe of Indians Archaeology and Preservation Program

### **Alternative preference:**

EIS 1 (land classification): Alternative 2 (natural forest land classification)

EIS 2 (ski area expansion) Alternative 1 (no action alternative)

The following comments are recommendation from the Tribal Archaeologist of the Spokane Tribe to address the *“Draft Mount Spokane State Park and Mount Spokane Ski and Snowboard Park Combined Draft Environmental Impact Statement for the Classification of Land and Ski Area Expansion”*. After reviewing this document there were many questions left unanswered throughout the text. I have major concerns with the lack of archaeological research that has been performed up to this point, and the EIS does not adequately address the processes that will be taken to protect cultural resources. The sections that do mention archaeology are left rather vague, and lack adequate information. Mount Spokane has recently been recorded as a Traditional Cultural Property (TCP) with the Department of Archaeology and Historic Preservation (DAHP). The mountain also has many stories related to the mountain itself about creation, and traditional collection of huckleberries and bear grass.

The original requests from the Spokane Tribe included the requirement of a TCP study, consideration for traditional plants that are collected by the tribe, and a full archaeological survey of the mountain. Both the TCP study and archaeological survey are yet to be conducted. In the EIS it is stated that Mount Spokane State Park has had a long history with Native Americans, yet the prehistory has not been fully established (II-23). Mount Spokane needs more archaeological surveys to be conducted to further explore the prehistoric importance of the area. Historically there have also been several archaeological studies that have yielded ten features that were eligible for the National Register. On page III-16 it is stated that the draft EIS will contain descriptions and the existing conditions of historic, cultural, and archaeological resources. The analysis is said to comply with the governor’s executive order 05-05 and consultation with interested tribes and the State Historic Preservation Officer (SHPO). The sections in the EIS are very brief when it comes to the topic of cultural resources and although the tribe was contacted many of the requests from the Spokane Tribe were not addressed.

My preference for the land classification is alternative 2 (II-2) keeping the land for preservation, restoration, and interpretation of natural forest processes while providing for low- intensity outdoor recreation activities as subordinate uses. Activities that already are practiced at Mount Spokane such as hiking and biking could still continue, however this land would be protected as natural forest. The questions that arises with alternative 2 is why backcountry skiing has been prohibited, when it is already allowed in the PASEA currently. Spokane County including Mount Spokane is zoned as Rural Conservation in which downhill, cross- country/ backcountry skiing, snowmobiling, and ice- skating are permitted uses(II-27). If such activities as snowmobiling and snow shoeing are allowed as before, why has backcountry skiing been prohibited? This needs to be further explained in the EIS, and the relationship that the removal of alpine or back country skiing has in the land classification change that would likely result in removal of the PASEA from the current MS 2000 Concessionaire Agreement.

Soil as stated in the EIS at Mount Spokane is considered to have a severe to extreme erosion hazard (II-8). Due to the soil being composed of granitic bedrock, erosion is a very real hazard if the ski expansion takes place. Due to the undisturbed condition of the PASEA erosion has not been a problem, but with the removal of trees and soil, erosion becomes a factor. This will not only affects the soil but water, animals, and safety will be affected as well. Large amounts of soil will be affected by the addition of seven new runs. Although these are intended to be beginner to intermediate runs, the clearing of the area and the impact of snow cats and seasonal melt will cause a level of erosion. According to page III-108, there are inadequate runs for beginners to low intermediate. Several of the chairs are characterized as advanced slopes but some of the runs can also be characterized as intermediate through expert due to manmade terrain. Several of these runs contain either park features or moguls with significantly increase the difficulty of the run. It is not addressed on page III-109 in the description of slopes which of the runs are not only considered expert due to terrain, but it should also be stated which runs have manmade terrain on them, increasing the intensity level. The proposed runs within the PASEA would slightly increase the number of beginner through low intermediate, yet the change would be minimal. The market still far exceeds the beginner levels, which is what the PASEA argues that it needs (III- 113).

Mount Spokane has the highest point in the county and the highest elevation habitat that is found in the local area (II-12). Due to its unique habitat which houses many different species of animals and plants Mount Spokane should be preserved as it is now. It has already been cleared on the south side for the ski resort and the north side should be preserved as natural forest land. The Spokane Tribe is largely concerned about huckleberries and bear grass being affected due to the expansion. According to page III-43 *Subalpine fir* or bear grass and several species of huckleberries make up a large percentage of vegetation in the PASEA area. These plants are culturally significant to the tribe and are still collected today. The expansion would have a large affect on the plants and would eradicate a large percentage of them, and the tribe does not want to see this happen. Alternative two would have less potential impacts on forest stands due to the limited amount of activities that can take place on the PASEA land. This will help preserve the oldest forest and highest peak located in the area for generations.

With the expansion of the Mount Spokane Ski and Snowboard Park it is expected that sales will increase, and more visitors will frequent this mountain rather than drive to further locations. In the EIS it clearly states that the topography and terrain for new parking facility or new roads is not accessible and would unlikely be constructed. Although on the weekdays generally the park receives modest use and

relatively low demands for parking (III-122), it briefly discusses weekends and holidays. Although there would be an increase in demand for tickets at the mountain it is not anticipated that parking would exceed the supply. I believe this situation has been entirely overlooked. Just last weekend I visited Mount Spokane, and although the roads are in good condition, there is room for improvements. The parking lot has potholes and gravel all over and the roads are very narrow. Such narrow roads with a significant increase in traffic would pose safety hazards with ice on the road for cars and people. I have experienced the parking lot at Mount Spokane during the weekends and holidays, and the roads are very unsafe in my opinion. They pose a safety hazard; there is not enough parking near the lodge so cars are parked along the road leading to the resort. On busy weekends cars are even told to park in the middle of the road with two lanes of cars on either side. This situation has been overlooked much like the condition of the lodge. I believe it would be in the mountains best interest to improve the resort to draw in customers, invest in snow makers due to the southern location of the runs, and improve the park they already have, before expanding.

A major concern that has been discussed in many different departments opposing the PASEA is the old growth forest that is located within the Mount Spokane PASEA location. During the surveys performed by Pacific Biodiversity Institute in 2012, it was concluded that 14 of the 92 stands in the approximately 490- acre Biological Survey Area located in the PASEA area, contained potential old growth forests (III-7). Yet the EIS contradicts itself on page III-45 where it states that in the study area frequent natural disturbances like fire damage decrease the likelihood of encountering classic old growth forest. These studies are incomplete and raise questions of how accurate the information in the EIS is if there are several pages that contradict themselves. It has been stated that Mount Spokane is one of the last examples of old growth in the Spokane area, and to clear cut a forest for ski runs would be irresponsible and would eliminate not only an amazing forest, but also a diverse habitat. Areas which contain old growth within the PASEA trail alignments have some of the largest diameter trees, as well as numerous streams and wetlands. The tribe would like to see this old growth preserved for years to come, and for the PASEA to be abandoned. According to the document recreation is widely recognized and is becoming an increasingly important factor which affects wildlife and vegetation, yet information on recreational impacts is lacking (III-68). Studies on the wildlife in the area such as the gray wolf, Canadian lynx, and wolverine have little to no information on the effects of ski runs, and the direct presence of humans can cause stress and abandonment. Other animals such as the Brown Creeper bird and American martin do not have any information on the direct effect people may have on them. Outcomes for the forest and wildlife in the PASEA cannot be determined yet because the information just does not exist, and a project this big should not be attempted with inadequate information.

This solitary peak dominates the Spokane landscape standing at over 5,000 feet tall, and can be seen from miles away. It is stated in the EIS that hiking trails, grading, construction of lifts, roads, and buildings contribute to the developed landscape that is visible to visitors at Mount Spokane and within the park (III-105). Yet it also states that the PASEA expansion will be screened from view by topography, and you will not be able to see the expansion outside of the park. This mountain can be seen from many miles away. The clear cutting of the ski runs stated in the PASEA will be seen from miles away both inside and outside of the park. Once these runs are cleared this forest will never return to the state it is in now. Downplaying the visibility makes the runs seem like a small issue, but people who live near the state park or prairies surrounding the park will see a scarred mountain where a once intact state forest used to stand. The EIS states "It is impractical to conduct a visual analysis of the entire area as a whole",

which does not make sense. Any where someone can see the north face of Mount Spokane they will be able to see the effects of the clear cutting for the ski runs.

Sincerely,

Jackie Corley



## **CONSERVATION BIOLOGY CENTER**

919 S. Adams St.  
Spokane, WA, 99204  
509-835-5233

To: Washington State Parks & Recreation Commission

Date: 30 Sept 2014

***Re: Comments on Draft Environmental Impact Statement for Mt. Spokane Land Classification Rezone for Ski Area Expansion***

Dear Mr. Kline

I submitted a specific request regarding the scope of topics to be addressed for Environmental Impact Statement concerning rezone to allow for the Mt. Spokane Ski Area expansion, as per Washington State SEPA regulations.

I specifically asked then that the Washington State Parks' EIS review the unique terrestrial invertebrate community that occurs in the sub-alpine forest zone on Mt. Spokane that would be directly impacted by the rezone to allow for alternation of existing old-forest stands to permit forest clear cuts for new chairlift, ski runs, glades, or other new ski area operations. I have formally surveyed terrestrial invertebrate communities in Washington State Parks and Conservation Areas since the early 1990s, including Mt. Spokane State Parks.

In particular, I requested that the Mt. Spokane EIS review the conservation status of the species of *Grylloblatta* (Insect, Notoptera, Grylloblattidae, "ice crawlers") that I have documented occur in the upper elevation zones on Mt. Spokane. This is the only known population of the exceptionally unique and rare flightless insect in Washington State east of the Cascades Mountains. Over the last year, under collecting permits from both the Washington State Department of Fish & Wildlife and the Washington State Parks, we have continued to survey the Mt. Spokane ice crawler population for additional information about its geographic distribution, habitat, other life history characteristics, and potential status as an undescribed species. In October 2013 I send Dr. Sean Schoville (University of Wisconsin, Madison) live specimens for study.

Schoville's DNA analysis indicates (personal email, 30 September 2014) "genetic divergence of Mt. Spokane grylloblattids, which differ by slightly more than 5% on a per nucleotide basis (at the mitochondrial COII locus) from all other populations. The most similar populations are in British Columbia. They differ by about 7% from *Grylloblatta occidentalis* (Mt. Baker) and 10% from *G. campodeiformis*" (a southern Montana population). I would say this supports species status, relative to *G. occidentalis*, but perhaps they are conspecific with populations in British Columbia."

Therefore, at this time, very recent comparative DNA analysis suggests the Mt. Spokane population may be a unique, as yet undescribed ice crawler species associated with the South Selkirk Mountains. Our current understanding of these populations are that they are probably very localized at high elevation on regional "sky islands" such as Mt. Spokane, individuals have long live spans and low reproductive potential which make their populations very vulnerable to an increase in mortality factors associated with habitat and climate change. Their extremely low power of dispersal (flightlessness) greatly confounds their ability of colonize new habitat.

This exceptional, high-elevation Mt. Spokane insect species is most likely an indicator of many other plant and animal species that are highly localized on the upper elevation zones of the greater Mt. Spokane massif whose fate has not been addressed in the Draft Environmental Impact Statement concerning the proposed ski area expansion.

Furthermore, a significant expansion of the ski area into the natural old forest zone on the upper slope of the massif is not necessary to greatly improve the *quality* of the Mt. Spokane Ski Area and therefore improve the ski area's ability to attract skiers.

Additional information on Mt. Spokane's ice crawlers is available at:

Grylloblatta, ice crawler species incognitus:

[http://odonata.bogfoot.net/oes/OES\\_Bulletin\\_2013\\_Winter.pdf](http://odonata.bogfoot.net/oes/OES_Bulletin_2013_Winter.pdf)

Systematic account and bibliography of Notoptera:

[http://odonata.bogfoot.net/oes/OES\\_Spring2014\\_Bergdahl.pdf](http://odonata.bogfoot.net/oes/OES_Spring2014_Bergdahl.pdf)

Sincerely,

James Bergdahl, PHDC



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September 30, 2014

Re: Mt Spokane Potential Alpine Ski Expansion Area (PASEA) Draft EIS (DEIS)

The Upper Columbia United Tribes (UCUT), consists of the Coeur d'Alene Tribe, the Confederated Tribes of the Colville Reservation, the Kalispel Tribe of Indians, the Kootenai Tribe of Idaho, and the Spokane Tribe of Indians. The five tribes that comprise the UCUT unify in a cost-effective and efficient de-centralized manner on issues of common concern – to protect, preserve, and enhance treaty and executive order tribal rights, sovereignty, culture, fish, water, wildlife, habitat and other interests and issues for the benefit of all people.

The UCUT supports the Spokane Tribe of Indians (STOI) in preferring to see the PASEA area classified as a natural forest area and that it should be preserved in close to its current condition. DEIS Alternative 2 of the Land Classification best fits this desire – which renders the alternatives under the Proposed Ski Area Expansion moot.

It is disappointing that tribal Historic, Cultural, and Archaeological resources were not analyzed in detail (DEIS, pg II-23), especially given the deeply sacred significance this area has to the original inhabitants. The STOI have recorded the area as a Traditional Cultural Property with the Washington Department of Archaeology and Historic Preservation.

The UCUT is concerned that the only reference to consultation with affected tribes is after the fact – if the Land Classification allows ski area expansion, and after a report on "...a pedestrian survey by a professional archaeologist chosen by State Parks..." (DEIS, pg. III-117) is submitted for tribal review.

In addition, Tribal consultation requirements are not limited to Traditional Cultural Properties, but also include all of the resources that the tribes co-manage with the federal and state government – including fish, wildlife, water quality, and vegetation. The DEIS only refers to consultation with state and federal departments on these resources, not tribes.

Thank you for this opportunity to express our concerns regarding the DEIS adequacy in examining the impacts to natural and cultural resources. Please contact me at 509-954-7631 ([dr@ucut-nsn.org](mailto:dr@ucut-nsn.org)) whenever you or your staff have questions or require additional information about our cultural heritage and our work to protect and enhance natural resources.

Sincerely,

D.R. Michel, Executive Director

Dear Randy Klein and Washington State Parks Commissioners,

*“Once upon a time in WA state, in my lifetime, there were ski areas named Hurricane Ridge, Mt Pilchuck, and Yodelin. These are gone now. Maybe that is the future of skiing at Mt Spokane.” – quote from a friend, regarding the problems and issues the Lands Council and other environmental activists are hurling at the ski area.*

Good afternoon,

My name is Lisa Pirkkala. This letter is to establish my endorsement for the expansion of Mount Spokane Ski and Snowboard Park. I have previously written in support and will include copies of my letters in this email. Briefly, I want to hit on key points:

I am endorsing Alternative 4, Recreation and Resource Recreation. This will allow expansion, but also allow other recreation opportunities. Also, very important: added revenue. With increased skier visits projected as a result of the expansion, more income to the ski area means more revenue for Washington State Parks. In addition, further expansion will allow for additional much needed employment opportunities, supporting job growth in Eastern Washington and North Idaho.

Alternative 2 (Natural Forest Area) will not be feasible. Skiers, snowshoers, mountain bikers, hikers and horseback riders will access the area no matter if it has an NFA designation. This area is too close to two major metropolitan areas and has easy access. People will use this area, bottom line. It is better to have Recreation and Resource Recreation where the area can be enjoyed by park visitors and monitored and maintained by park and ski area managers.

Please consider the Mission Statement of Washington State Parks.

The Natural Forest Area designation I believe is incongruous to the state parks mission.

*The Washington State Parks and Recreation Commission cares for Washington's most treasured lands, waters, and historic places. State parks **connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives.***

#### *Vision*

*Washington's state parks will be cherished destinations with **natural**, cultural, **recreational**, artistic, and interpretive experiences that all Washingtonians enjoy, appreciate, and proudly support.*

#### *Core Values*

*The agency has adopted the following core values:*

- **Commitment to stewardship** that transmits high quality park assets to future generations
- **Dedication to outdoor recreation and public enjoyment** that welcomes **all** our citizens to their public parks

- *Excellence in all we do*
- ***Involving the public in our policy development and decision making***
- ***Support for one another as we translate our mission into reality***

In 2011, Don Hoch, Washington State Parks and Recreation Director sent a message sent regarding budget cuts and public input to the 61 Initiative Project. Question: Did the Discover Pass raise the projected 65 million, as predicted? Did much of that go to DFW and DNR? It seems to me the need for revenue is always growing. With the ski area expansion, this will become a reality, and propel the ski area and Mount Spokane State Park further into this century as a beneficial plan for all.

***With the real potential for no general fund support, State Parks must rethink our approach to providing recreation opportunities and stewarding park resources. We face a basic choice:***

1. ***Keep the agency as we know it, but dramatically smaller to reflect reduced funding and hope to rebuild in better times, or***
2. ***Use the current crisis as an opportunity to transform the agency, diversifying funding sources, engaging support, building expertise and creating an agency adapted to operating without state general funds.***

*I recently established a task force to explore the latter choice and craft a revenue and efficiency strategy to help set the agency on a conscious course towards **long-term financial stability**. The task force convened work groups with agency staff and stakeholders and developed **61 distinct revenue and efficiency initiatives**.*

*Now we need your help. As a State Parks' supporter, we need to know from you whether we're on the right track. Attached is a document that describes all 61 initiatives and which ones we're recommending to implement first. Please give us your thoughts. We've set up a special e-mail inbox to collect your input: [transformation.strategy@parks.wa.gov](mailto:transformation.strategy@parks.wa.gov). **Your input will help us create a revenue and efficiency strategy to help guide us into our second century of service.***

Contrast the above with the Lands Council:

*Lands Council Statement*

*We preserve and revitalize Inland Northwest forests, water, and wildlife **through advocacy, education, effective action, and community engagement.***

*We **collaborate** with a broad range of **interested parties** to seek **smart and mutually respectful solutions** to environment and health issues.*

*We're **enriched by the beauty of nature**. We're energized by **the recreational opportunities** it affords. And we're inspired to preserve its legacy for future generations.*

*At The Lands Council, that's the work we do, every day!*

I would like to say that the Lands Council has only blocked and provided negative feedback and incorrect information and emotional tactics to derail the ski area expansion project. They should adhere to their mission statement as effectively as Washington State Parks, and Mount Spokane Ski and Snowboard Park. "Smart and Mutually Respectful" solutions fell by the wayside regarding the ski area, when mountain management and other environmentalists have been supportive and constantly upgrading/changing the expansion. It is now under 300 acres. The Lands Council would have better served their public by collaborating with the ski area in useful dialog and expertise. It is unfortunate that they decided not to partner with such a large project and worthy cause.

The following is my letter dated March 15, which still holds true. Also, is an email which I wrote in support as well. Thank you for allowing input. Please allow the expansion.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

In 2011 I wrote on behalf of the Mount Spokane Ski Area expansion.

Good Afternoon,

I am writing on behalf of Mount Spokane Ski and Snowboard Park . I feel the expansion at Mount Spokane Ski and Snowboard Park is not only critical but is also a good investment to the future of the area. I have been a resident of Washington State for 40 years, a resident of Snowblaze Condominium Association for 15, and had been a parks employee at Mount Spokane previously, and am a registered voter.

I have seen the changes Mount Spokane has gone through over the years, and have seen the positive growth and changes the Mount Spokane 2000 board and current employees have brought to the mountain throughout the years. The current management is always looking for



ways to improve the quality of skiing and snowboarding experiences, offers new improvements every year such as the Children's Choice Tube Hill, provides excellent opportunity for Junior Olympics through SSRA to give opportunity to young people for advancement, and provides daily services in the way of grooming and food service to continue to provide to season pass holders a quality experience. The board did exactly as they said: continual improvement for the mountain and proper use of resources. Because of this, the numbers of skiers and snowboarders attending the mountain has grown. There was a recent study that even in the bad economy, people are still enjoying the winter sports in the mountains, and the sport has not declined as it has in other areas. People still love to ski and snowboard in spite of downturns in the economy.

I have seen the numbers of visitors increase, the quality of the mountain experience increase through the years. It is for this reason I feel the ski area is a good investment for the future of Spokane . Not only that, but the entire history of the mountain, from Mount Baldy to the World's First Double Chairlift, to the history of support from Davenport, Cowles families, and the Civil Conservation Corps, all too numerous to name, should be preserved. Residents of the Spokane area and the state of Washington should embrace Mount Spokane as an important historical and cultural resource, and a new lift, plus expansion, can help with commemoration of this history. It can and will pay for itself in the years to come.

I feel it would be a shame to let such an opportunity slide by if the expansion would not go through. It would show a lack of concern for an important historical facility in Spokane . Realize that the expansion of other mountains, such as 49 Degrees North, Lookout Pass , and improvements by other resorts have increased visitation and revenue. The same could happen for Mount Spokane , only increased twofold. Spokane as you know is much closer to a major metropolitan area, both the city of Spokane and Coeur d'Alene and serves residents of Idaho as well. I believe the expansion is good for our community and our friends and neighbors in Idaho .

I would like to see the documentation and studies that reflect how a new chair and expansion of around 200 acres would negatively impact wildlife habitat. Also how wolverines are present on Mount Spokane . Living at Snowblaze, we have in fact elk, moose, deer, cougar, bear, bobcat, coyote, and other multitudes of wildlife that we frequently encounter, often right in our backyard, and they do not seem negatively impacted. We are coexisting with wildlife, sharing our home with these animals. Please ensure these negative impacts are based on sound scientific research and not hearsay or personal feelings.

Remember: Mount Spokane was, and always has been, put aside for recreational use. Because of the recreational development, it can be better cared for due to the frequency of employees and park users. We have a natural area past the Nordic area, and this area is misused by atvs as it is not frequently patrolled. The simple fact is that Mount Spokane is too close to major urban development, and too many people can have the potential of abusing the natural areas. It is much better to have recreational use areas that are frequented by park staff, visitors and volunteers to control this, as they will better maintain the resource, prevent abuse and environmental degradation, and repair any damage that occurs.

One important thing: Mount Spokane is used by families with children. If we do not expand and open the gates to the park and expose young people to the wilderness, how will children, the

future environmentalists, be able to enjoy the outdoors, and ultimately become good stewards of natural resources? How will people be able to share this with their children if we close up parks and turn them all into locked-down natural areas? If the area is expanded, it will only increase future enjoyment of natural habitat. Skiing and snowboarding are much needed healthy outdoor activities for children, and to expand will allow even more families to enjoy the area. Think of the reason why you, in parks, became stewards of the resource. It was because you were exposed to positive experiences in parks and other natural areas when you were young. Think of the happiness and excitement the new lift and expansion would bring to young people.

Please consider the future of the city of Spokane , the cultural and historical impact that new runs and the chairlift can offer. We are now embarking on a new decade. See the vision, the important historical moment in securing a new lift for visitors of tomorrow, and realize this expansion as the next chapter in our state's vibrant history. Be the planners who were creative enough to find a way to make it happen. Remember, during the economic downturn years ago, we had active legislators, planners and assistance in securing funds for the Centennial Trail, leaving a legacy of improved lifestyle for the city of Spokane .

Please support the expansion at Mount Spokane Ski and Snowboard Park

[REDACTED]

[REDACTED]

What they need is to reduce spending

[REDACTED]

Dear Mr. Kline,

I want to express my support of the backside expansion.

I hope it is not too late to issue comment, I realize that the 12<sup>th</sup> was the deadline, however would still like to include my comments if at all possible. I have been so busy that I have been unable to complete my formal notice, so hope this email will be considered. I wish I had more time. But I did respond in earlier emails in support of the expansion project.

I feel the backside expansion should go through.



I have been a skier since 1989, I have owned a condo at Snowblaze next to the ski area since 1992, and am a year-round permanent resident. I have been an employee of Mount Spokane ski area since 1989, currently assisting the marketing department with the snowline. I have also been a park aid for Mount Spokane for Washington State Parks. Today, I use the park year round for hiking, mountain biking, snowshoeing, picking berries, as well as skiing both downhill and backcountry. The mountain is my home. I also have an AAS Degree in Natural Resources from Spokane Community College , where I tutored dendrology under the direction of instructor Bill Burke, and studied forestry and surveying with Monica Spickar. So I have a vested interested in the park, and in using the park on a daily basis, am familiar with all the natural features of the area.

I feel that the expansion should go through as planned.

I would like to see further study by an independent group with sound scientific background. I want to see actual data (numbers, stream surveys, edge effect studies, etc) and cited. In short, I want to see a **professional draft** done by professional independent contractors. To me, the last studies seem to have been done by environmentalists with emotional attachments that make up data and terminology as they go along, not looking at the benefits and the 'larger picture' of the park users, and the resource. I need better data, please.

And especially noted: **there have been no studies done on the benefits of the expansion.** I feel that the expansion would clear out deadfall, removing catastrophic fire conditions, improve light, improve habitat for elk, moose and deer, as well as raptors and other predators. There are numerous studies on Edge Effect and by qualified foresters performing selective cuttings, which have improved forest ecology. By opening up the backside with even minimal cutting, there would be a remarkable improvement in forest health and wildlife habitat, I feel, and we need a study to show this. Please consider more study on this issue.

Please continue to actively pursue the recreational aspect, which I feel will benefit the skiers and snowboarders tremendously, and improve the revenue for Washington State Parks. Current park management has been very professional and very accommodating to all involved, even to reducing the expansion to under 300 acres, and this latest block is to the point of what I would call a 'witch hunt' against current management. However I am mostly interested in long term health of the forest, especially worried about the fire reduction issues and the soil health. Because we have systematically suppressed fires, and therefore eliminated a natural occurring event therefore changing the ecology of the forest, it is in a poor state of health as a result. A managed clearing would be beneficial.

I feel that the last EIS was done poorly. I will give one example:

*a) Old-growth forest communities that have developed for one hundred fifty years or longer*

*and have the following structural characteristics: Large old-growth trees, large snags, large*

*logs on land, and large logs in streams; or*

*(b) Mature forest communities that have developed for ninety years or longer; or*

*(c) Unusual forest communities and/or interrelated vegetative communities of significant ecological value*

Finally! Old growth defined! Large logs on land! In streams! etc.

Large logs in streams? Many folks have large logs in streams on their property, yet they do not have an old growth forest. In what way does a statement like this define the archaic term 'old growth?' How does this define old growth?

Firstly an 'old growth forest' is a term that is out of date. A shifting mosaic, or late-successional forest would be a more appropriate term, in which the ecosystem has reached it's maximum potential and age, and is in the state of decline. If you want to see 'old growth,' or this sort of forest the EIS has so passionately referred to, please refer to the Hoh rain forest, or the Roosevelt Cedar Grove, or even the Hobo Cedar Grove. Remember, a few old creakers does not make an old growth forest. A forest goes through many changes, and these constitute centuries of birth, output and decline. Think of the history of Mount Spokane , such as previous fires, logging, habitation, etc. And remember that the expansion is under 300 acres.

Thank you for your consideration.

