



**H A W K I N S
E D W A R D S**

August 25, 2014

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

**RE: ENVIRONMENTAL IMPACT ON THE EXPANSION FOR THE NORTH SIDE
OF MOUNT SPOKANE**

Dear Mr. Kline:

It is my understanding that Mount Spokane ski area would like to expand on the north side of Mount Spokane. I am in favor of this being done.

I have three boys and every time I went skiing, I found the great skiers were kids who ski raced so I put my kids in the ski racing program SSRA at Mount Spokane. This was a great thing to do. We've skied many times up at Mount Spokane. I have found that the skiing in the winter did great things for my family and me. It got us together as a family driving back and forth from the ski hill and not only my kids but also their friends. More importantly with my kids being in the racing program it taught them discipline, how to be on time, do what was required of them, what hard work meant to get results, to put forth an effort and not necessarily how to win but how to compete. I feel like it kept my kids on a path to be great individuals. The thing I feel they got the most was they had a winter activity to keep them busy, focused and involved versus sleeping in or partying at night. They went on to participate in other sports in high school as they were growing up. I really enjoyed skiing and have met many friends who are long time friends now. You can't put a dollar figure on the memories, the friendships and the great times we've had, it is invaluable. I am 71 years old and I still have that passion to go skiing.

I feel that by opening up the back side of Mount Spokane it will give other people in the community more opportunity to ski a great mountain in the area that is close to town. I encourage you to proceed ahead and develop the north side as soon as possible.

Sincerely,

Dick Edwards
RSE/th

Cc: Brad McQuarrie brad@mtspokane.com
File

August 26, 2014

Randy Kline
Environmental Program Manager
111 Israel Road SW
PO Box 42650
Olympia, WA 98504-2650

Mr. Kline:

I recently read on-line the Combined Draft Environmental Impact Statement for Proposed Land Classification for the Area Known as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park and Ski Area Expansion, and I offer my comments on this proposal.

First, I would like to say that I am totally in favor of the proposal to expand the ski area on the west face of Mt. Spokane, with 7 new runs and a lift to service this area. The early donors of land to create the state park donated the land with the intention of providing a recreational park for the residents of the area. It was not their intention to create a wildlife refuge off-limits to public use. The intention of the donors should be respected. The west side was the site of a rope tow and ski runs back in the 1930's. I believe that the Selkirk Ski Club developed this area at that time. Mt. Spokane is the site of former logging and mining operations. It is not pristine, even though there is evidence of old-growth timber, below the Chair 4 road, and not in the PASEA. Much of the PASEA is littered with blow-down and dead snags-all potential fuel for a wildfire. Developing this area would, perhaps, help to mitigate this potential.

The PASEA covers approximately 2% of the park area, and tree removal of approximately 60 acres to develop a lift line and 7 runs comprises approximately .4% of the total park acreage. Furthermore it is possible to develop runs which are not clear-cut, but which, instead, leave some trees and small groves of trees sparsely scattered throughout the runs. This has been done quite successfully on the Mt. Morrissey area at Sun Peaks Resort in B.C., and at Whitefish Resort in Montana- specifically the Hell Roaring trail, where the bottom third of the trail is gladed. The islands of trees are spaced so that skiers and groomers can easily maneuver between them. These stands of trees allow skiers to get the feel of glade skiing, providing several pathways down the run, so that skiing a different line down the same run makes it feel like a different run. It provides variety for the skiers. Leaving some islands of trees could mean that considerably less than 60 acres would have to be cleared to create the proposed 7 new runs. Further, leaving the runs lightly timbered would be more visually aesthetic when viewed from US Hwy 2.

Over the past few years, I have had discussions with several skiers at Mt. Spokane-many in favor, some opposed. What struck me is that, when I asked the objectors what their objections were, their opposition was never based on environmental concerns, but, rather, that development of the PASEA would ruin their somewhat isolated and private ski area, where they could ski in unpacked powder. Thus, their objections are based on their own self-interest. I do not know how many of these skiers are affiliated with, or allied with, the Lands Council, or if the Lands Council truly has environmental concerns about development of the PASEA. Is this somewhat like the logging issue in the '80's or '90's, when the spotted owl was used as a weapon to curtail logging on Federal lands? Is the Lands Council's objection truly about environmental concerns, or is it a group of disgruntled advanced and expert skiers who want to restrict who uses that area?

Mt. Spokane desperately needs expansion of its intermediate ski terrain, and the PASEA provides the terrain to do just that, taking some pressure off the east side of the mountain. As for the expert skiers who want to ski powder, there are still some 580 acres currently unclassified where they can tree ski in powder if they wish. Quite frankly, there currently exist several fabulous ungroomed tree runs full of powder on the east side of the mountain as well. You just have to look for them.

I urge the Commission to re-classify the PASEA as Recreation, so that this area can be developed.





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Planning Project*

developing lift and trails for skiing the N

Project you wish to comment on.

Date*

8/31/2014

First Name

alexander

Optional

Last Name

greer

Optional

Add to mailing list

Yes

Change to no to opt out

mailing list, unless you opt out to right.

This field must be a valid email address.

Organization

recreational skier for the last 49 years.

Phone number

Address2

City

State

Zip

The e-mail address as written is correct - you will
Site would not accept it? If you need more information
Let me know. I wish you success in this project!
APG

Comment*

The best side of any mountain for skiing is N and NW. Adding this would provide a better base and skiing. Adding this would add another option for visibility in foul weather. Such a development would again make Mt Spokane competitive other regional areas, which are improving their trails and slopes. Mt Spokane is ideally located for access from its local area.

Our three children all enjoyed training and competing with SSRA. They could add last minute truing on school nights with the lighting and easy access.

Forrest maintenance will improve adding the concerns that would come with such a development. I have been waiting for this for the last 55 years! [REDACTED]

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September 1, 2014

Washington Parks and Recreation Commission
1111 Israel Road. S. W.
P. O. B. 42650
Olympia, WA 98504

Attn: Mt. Spokane State Park Draft EIS (Randy Kline, St. Parks)

Dear Commissioners:

I worked as the state Land Steward for The Nature Conservancy (TNC) for 30 years (1979-2009). During the last twenty-five years (1984-2009) of my tenure, the Conservancy worked closely with State Parks on a number of fronts to protect mature/old growth forests throughout the State Parks system, initiating a number of State Park Natural Forests in nearly a dozen parks.

The Conservancy's involvement began with a media crisis when State Parks harvested mature and old growth trees in notable excess of blowdown at Deception Pass State Park in 1984. Local residents, in an effort to protect the park, registered complaints and continued to seek redress until State Parks formed an ad hoc Advisory Committee on Old Growth consisting of the Sierra Club, Washington State Audubon, and the Conservancy. Shortly thereafter, Parks created a new land classification within the system – Natural Forest – which was designed to protect mature and old growth forests within parks. With this classification in place, the ad hoc Committee and Parks moved forward, creating Natural Forests in a number of state parks.

This system worked well for nearly a decade, but, by the early 1990's, it became increasingly clear that a more thorough, scientific assessment of State Park forests was required. The Conservancy, working with State Parks and the Department of Natural Resources (DNR) Natural Heritage Program (NHP), commissioned the NHP to conduct a forest assessment and indicate which areas qualified for Natural Forest classification. The study, published in 1993, numbered the PASEA, among other areas, as qualifying for Natural Forest designation.

It is with this background with State Parks that I am commenting on the DEIS (2014) for the PASEA at Mt. Spokane.

The DEIS correctly notes impacts on the PASEA if Alternative #4 is selected, including:

1. Impacts on wildlife habitat
2. Impacts on wildlife habitat connectivity
3. Natural Forest and native plant communities
4. Soil and slope stability
5. Water quality
6. Introduction of invasive species
7. Compromising of viewsheds

I recommend you add "Noise" to this list. I note where it is treated later in the DEIS, but noise will certainly have an impact on wildlife and current human enjoyment of solitude and should be part of the

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impacts listing. Noise will certainly be part of any construction, but it will also continue with significantly increased use by humans.

I also notice the list of possible mitigation measures to address the impacts, if Alternative #2 is *not* selected as the preferred alternative. It is worth examining the applicability of the various mitigation measures listed if Alternative #4 is selected.

1. Avoiding the impact. **Not applicable.** Unavoidable impacts will occur.
2. Minimizing impacts by limiting the degree/magnitude of the action. **Not applicable.** The proposed expansion appears to be at maximum build-out, given financial and environmental constraints. Moreover, the impacts extend beyond the 279 acres in the construction zone.
3. Rectifying the impact. **Difficult to envision.** Parks would need to explain how it can rectify a 279 acre project intrusion into an existing natural environment.
4. Reducing or eliminating the impact over time. **Not applicable.** Impacts from any ski expansion will continue indefinitely.
5. Substituting resources. **Not applicable.** No substitution is proposed for the 279 acre ski expansion in Alternative #4.
6. Monitoring impact/take corrective action. Many, if not all, of the likely impacts are known prior to the implementation of Alternative #4. How monitoring will rectify these impacts, and what corrective action could be taken is unclear.

Cumulative effects (3.1.4) needs to be modified to reflect what actual impacts might occur from Alternative #4. As it reads, it seems that effects would be from trails, roads, buildings, and structures, all of which would continue to result in an increase of impermeable surfaces. Noting these is certainly appropriate, but we know quite well from existing timber harvest on state and private lands throughout Washington that tree removal accelerates water and soil removal, especially on steep slopes, and certainly in an area that the NRCS has classified as having “severe to extreme erosion hazard” (p. II-8). The ski runs themselves need to be specifically addressed as adding to cumulative impacts under this section. This should be especially clear to State Parks at MSSP where impervious surfaces and previously cleared areas (for skiing) combined to provide a catastrophic run-off in May, 2008, which significantly damaged the primary road to the summit.

In a second section on **Cumulative effects (3.6.4)** the DEIS is misleading. After stating that Alternative #2 will result in a loss to recreation, the DEIS continues “Additionally there would be a loss of solitude during the summer...” This currently reads as a second loss due to Alternative #2. In fact, the paragraph needs to be revised to reflect that this loss is associated with Alternative #4.

Archaeological surveys have not, apparently, been done in the potentially impacted area. If there is any likelihood that Indigenous quest sites or other Native American areas are at risk from the project, the lack of a survey seems unusual for a State agency.

Finally, it appears that Parks has needlessly complicated a portion of the alternatives. As noted in Cumulative effects (3.6.4) above, the way Parks has constructed its alternatives places Alternative #2 as negatively impacting recreation. Currently, while the PASEA is *de facto* managed as a Natural Forest, back-country skiing is permitted. Why wouldn't Parks contact proponents of Alternative #2 and discern whether they feel it imperative to prohibit back-country skiing in Alternative #2? If not, a modified

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Alternative #2 could be created permitting back-country skiing as a conditional use in the Natural Forest. This seems to be a logical solution to what may be an artificially created problem.

In conclusion, ***I support Alternative #2, the Natural Forest classification for the PASEA***, and urge Parks to adopt this as its preferred alternative. Given likely future impacts from climate change and the requests of both the Department of Wildlife and DNR's Natural Heritage Program, as well as a host of local and regional organizations, this would be both a prudent and ecologically sound approach to natural resource management. Indeed, Natural Forest classification of the PASEA would be a measurable gift to all Washingtonians, as befits a state park, and to visitors from beyond our borders.

Thank you for the opportunity to comment.

Sincerely,

A large black rectangular redaction box covering the signature area.



September 1, 2014

Randy Kline
PO Box 42650
Olympia, WA 98504-2650

Dear Mr. Kline,

We have enjoyed winter recreation at Mt. Spokane for many years. Expansion of the down-hill ski area will be good both for area skiers, and also for people who work at the facilities. There are vast areas of mountain timberland in N.E. Washington. There will be no significant impact to the wild lands of N.E. Washington if the expansion takes place. Spokane is fortunate to have a nearby recreation area as nice as Mt. Spokane. It is unreasonable to think that expansion of the facility will cause significant environmental loss. The expansion will improve the recreational quality of the ski area, and help provide jobs that are particularly valuable at this time.

Your consideration is appreciated.

Sincerely,





September 2, 2014

Mr. Randy Kline
Environmental Program Manager
P.O. Box 42650
Olympia, WA 98504-2650

Re: Potential Alpine Ski Expansion Area at Mt. Spokane State Park

Dear Mr. Kline:

As a Spokane resident with a long history of enjoying the natural beauty of Mt. Spokane and its surrounding area including the Potential Alpine Ski Expansion Area (PASEA), I write in support of keeping the old growth and native forest that has never been logged intact for future generations of people and wildlife, including several species of rare wildlife and to support fish health downstream from the base of the proposed chair lift. Clear-cutting the area for the proposed seven runs and chair lift can never be mitigated or the native forest replaced. Also the area is on the west side of the mountain where spring sun would make the ski runs icy and less desirable for skiers.

Since 2007 the Department of Natural Resources and the Washington Department of Fish and Wildlife have advocated for keeping the old growth intact. The Pacific Biodiversity Institute (Biological Survey 2010, page 58) says "There are significant areas of old growth in the Biological Survey Area (PASEA)." This survey should receive the weight of respect.

Aside from habitat, old growth forests help reduce climate change by sequestering carbon and holding soil moisture. Associated wetlands should have been delineated in the spring and not late summer for a more accurate assessment of their location. There are questions about how adequately Cultural and Archaeological Resources were addressed.

Presumably there would be more skiers who would need to park cars and visit lodges, but those upgrades, which would require more space, were not discussed.

Given all these reasons, I ask that you support Alternative 2, Natural Forest Alternative (NFA) with one caveat. Back country alpine skiing should be allowed in the PASEA. It already occurs in the PASEA, but is not allowed under Alternative 2. Inconsistently, mountain biking, snowshoeing, and equestrian use are allowed. I support those uses of the area without clear-cutting and expanding the alpine ski area.

Sincerely,

Elcon Construction Inc.

P.O. Box 13037
Spokane, WA 99213-3037
Phone: 509-926-8366
Fax: 509-892-6748

September 2, 2014

Washington State Parks and Recreation Commission
Mr. Randy Kline, Environmental Program Manager
1111 Israel Road SW, Olympia WA 98504-2650

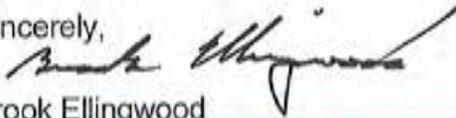
Dear Mr. Kline,

I am writing this letter after reviewing the Combined Draft Environmental Impact Statement for the Classification of Land and Ski Area Expansion. I applaud the DEIS for its thoroughness and accuracy. I urge the Commission to adopt **Alternative 4 – Recreation, Resource Recreation, and Natural Forest Area.**

Alternative 4 is the only compromise alternative, which will set aside most of the PASEA for the natural plant and animal processes while still addressing the purpose and need of the concession area. The vast majority of the public is in favor of the ski area expansion and is aware of the concessionaire's stewardship in balancing the environmental concerns with the need for expanded recreational opportunities.

The time is long overdue for Washington State Parks to allow for the expansion of Mt. Spokane Ski and Snowboard Park.

Sincerely,



Brook Ellingwood
President