



September 30, 2014

RE: Comments on the DEIS for Mt. Spokane PASEA  
Randy Kline  
PO Box 42650  
Olympia, WA 98504-2650

Dear Mr. Kline,

Please accept these comments into the official record for the DEIS on the Mt. Spokane PASEA land use classification, as well as alternatives if the classification were to allow ski area expansion. We appreciate the opportunity to comment on the future of Mt. Spokane State Park. In classifying the PASEA as Natural Forest Alternative (with Resource Recreation areas), per Alternative Two, the Commission would allow continued, minimally disruptive recreational activities. The Lands Council supports Alternative 2, with a clarification.

The State Parks has created confusion about existing uses and the potential of various forms of recreation allowed under an NFA designation. Existing use, including back country alpine skiing, mountain biking, hiking, snowshoeing, backcountry skiing and snowboarding should be allowed under Alternative 2. 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.

The Lands Council does NOT support Alternative 4 Alternative four does not adequately address the negative environmental impacts and the land use problems that will potentially occur if Alternative four is chosen. You simply cannot mitigate, in any way, old growth, never logged forests. Clear cutting a part of the PASEA is clearly a significant and probable adverse impact under SEPA. Number 10 in the 2.5.1 General Mitigation Measures will not be able to comply with cutting old growth because it can't be re-established. The cutting of old growth will be a cumulative negative effect.

This has been repeated many times to Parks Staff and the Parks Commissioners over the years. Yet the words Old Growth don't even show up in the DEIS, except for in the appendices with the adoption of the Pacific Biodiversity Institute's Report in 2010 which MS2000 paid for. The words old growth, are part of the currently accepted definition of Natural Forests as defined by

the State Parks System and said definition is a part of the appendices and the report that State Parks gave to the Parks Commission. The Pacific Biodiversity Institute describe the area as containing significant old growth, as does the DNR Heritage Program and Washington Department of Fish and Wildlife. Why is State Parks creating this confusion?

If you wanted an “accessible” DEIS, as you stated in a meeting with the Lands Council on April 3, 2014, then the definition of Natural Forest needs to be clearly defined in the DEIS, not just an appendix. Appendices are not likely something most of the public will read, so therefore, not accessible. We have a number of suggestions and concerns, arranged by topic:

### **Old Growth discussion**

There is little discussion of the nature of old growth or Natural Forests in the DEIS. Yet what exists is critical to the understanding of what the DEIS, and indeed, SEPA, is trying to do. The lack of this definition almost negates the DEIS because it’s at the heart of the land use classification and then the probable decision for what it will be used for. “By classifying park lands, the agency is able to consciously strike a balance between protecting park resources and providing an appropriate variety of recreational opportunities to park visitors.” Page 11-27 of the DEIS. Without even bare minimum discussion of the old growth in the DEIS, how can the balance be struck? The public commenting on the DEIS won’t be able to know if a balance can be made. Because they don’t know what the is in the PASEA and the concessionaire has repeatedly denied there is old growth. The FEIS must set the record straight.

As you know the Washington Dept. of Fish and Wildlife (WDFW) has sent numerous letters to Parks Staff and Commission on the high value of the PASEA forest over the years. In a letter from Karin Divens, biologist, dated 2-29-2007:

*“The managed private timberland that borders the State Park does not have the same ecological value as the intact mature forest ecosystem present on the north side of Mount Spokane. Only under the management of a non-profit entity like the Washington State Parks system could such a mature forest develop. This is what makes the Mount Spokane State Park property unique and it is the complexity that supports high species biodiversity and provides important refuge habitat for large ungulates and rare forest carnivores.”*

In other words, you can’t replace the PASEA when parts of it are cut. There is no other local forest that you could use for mitigation, and a mature old growth forest cannot be planted. In another letter by Karin Divens and Howard Ferguson, dated 4-22-2007, says:

*“Managed timberlands surrounding Mount Spokane are all privately owned and exist in a fragmented forest condition that does not have a comparable value for wildlife species and biodiversity. The conversion of the old growth forest habitat for ski area expansion in Mount Spokane State Park will result in a permanent irreplaceable loss of habitat function and value for the region.”*

and “15% of Eastern Washington forest are currently in an old growth condition, and nearly all of this is high elevation national forest or national parks.

We have two "significant" stands of old growth in Spokane County, and Mt. Spokane's PASEA is one of them. Ms. Divens says in another letter, dated 3-14-2008 that

*"WDFW reiterates both the importance of Mt. Spokane as a critically important core area for wildlife, and the uniqueness and value of the un-fragmented and mature forest habitat on Mt. Spokane, in its current state of forest structure and complexity, as key to biodiversity and ecological function for the region."*

Mt. Spokane is regionally important. Cutting 279 acres won't just impact the 14,000 acres of the State Park; it will negatively impact the region. It can't be mitigated.

The following letters, Feb. 15, 2007, from Rex Crawford, Ph.D of DNR; May 11, 2011, Feb. 17, 2012, (cc to MS2000) May 29, 2012 (cc to MS2000) from Steve Pozzanghera, WDFW Region 1 Regional Director; Peter Birch's testimony to the Parks Commission about the letter sent in March, 2011, by WDFW, April 16, 2007 letter by The Nature Conservancy's David Weekes. ALL of the letters clearly state that old growth exists, it's highly valuable for wildlife, it's unfragmented, and there is little of it left in Spokane County and Eastern Washington.

Keeping Mt. Spokane's PASEA intact is also extremely important in connecting wildlife habitat in the county. No amount of project specific permitting and agency-prepared operational plans will be able to mitigate the loss of the natural forest. Since the dating of these letters the PASEA has not changed expect to get biologically older and follow natural forest stages. Plus, the letters are comment on the first DEIS and final SEIS from 2012 as noted in the current DEIS on page 4, section. 1.

The Pacific Biodiversity Institute on page 58, state in their conclusion, that *"There are significant areas of old-growth forest within the BSA."* The Biological Study Areas in the PASEA are well-mapped in the report. It goes on: *"These forests provide habitat for wildlife species dependent on late-successional forest conditions. Much of the rest of the forests with the BSA also have some old, large trees and are moving toward old-growth conditions."*

The DEIS does not analyze the fragmentation of old growth and the loss of it in the context of public forests that are in the state already. Why would the state destroy what they already own? They couldn't afford to buy it. The state bought the Teanaway recently for several million dollars. Yet we are cutting down 270 acres of a never logged old growth forest the citizens of the state already own?

Clear cutting is a cumulative effect that can't be mitigated because the runs cut for the lift assisted skiing will have to be continually cut when trees and other vegetation try to re-seed. Alternative four will require clear-cutting on the west side of the mountain which can be seen from miles away on the mountain. They will impact views; there is no potential about it. In addition as the EIS mentions, clear-cutting parts of the PASEA will change the sensory impacts of summer activities. It's not just a loss of "solitude" for humans it's also a loss/change of habitat and animals that rely on it. And that's also a potential loss for humans for those who both watch wildlife and value its existence.

## Archaeological surveys

There is no disclosure that archaeological surveys 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, surveys must be completed.

The Historic, Cultural and Archaeological Resources, which the DEIS correctly states, are not analyzed in detail and will have cumulative visual and other sensory losses. The DEIS needs to discuss in greater detail the aspect of Mt. Spokane that many in most of the County view it as a beacon in some way. Mt. Spokane is a part of local gardening lore about when to plant gardens. It's the tallest peak in the area. It has a recognition to it that helps identify the County. County residents go there to pick huckleberries. There are other qualities about Mt. Spokane residents identify with that are not related to skiing, although that is a part of it. All those things need further study. We appreciate the realization of this in the DEIS, but this needs to be studied before the final EIS is released, and before a decision is made on classification.

Alternative four would increase the chances that the negative impacts on historic, cultural and archaeological resources would be great. Some of the aspects cannot be replaced. Page 24 of section 2 Alternative 4 says "Construction of facilities, such as recreational trails, ski runs and lift towers, have the potential to negatively impact historic, cultural, and archeological resources (see Section 3.7.1 Historic, Cultural, and Archeological Resources for a detailed analysis of the potential impacts associated with construction and operation of alpine ski facilities). There is NO detailed analysis. By your own admission it's "Not Analyzed in Detail" 3.7. Pg. 23 of section 2. Unfortunately the whole DEIS gives the impression of a cut and paste document (as was clearly done above) instead of one that is thorough. I provided a bit of context to State parks about the history of the PASEA in my scoping comments and it's well documented in other scoping comments from Last December.

"The PASEA exists in a relatively undeveloped state", Section 2, page 22. This is essentially what the biologists are saying. Anything that is done to the PASEA will alter it and very little can be mitigated. Invasive plants are a good example. The Pacific Biodiversity Institute (PBI) says that there were none in the Biological Survey area, Pg. 26. It's obviously has to do with the undeveloped state. Although common tansy exists, noxious weeds will definitely be a problem with clear-cutting. They thrive with disturbance. It means more work for parks staff. And it will potentially increase the spread of more invasive plants outside the park. The fact that there are few if any serious invasive plants, speaks to the biological integrity of the PASEA. And that is what the issue is about and is not adequately addressed. You can't minimize canopy removal, which is mitigation for invasive species listed in 2.5.2, section 2, pg. 7. Alternative 4 will cut down 279 acres of the canopy. That's not minimal.

The fact that there is state agency opposition to the expansion should figure more prominently in the DEIS. Rex Crawford, Ph.D. Dept. of Natural Resources Letter to the Parks Commission dated Feb. 15, 2007.

*"The forest vegetation communities composing the Blanchard Creek natural Forest are*

*representative of the subalpine and mid-montane forest of the Northern Rocky Mountains. Although the communities may be relatively common, their occurrence in a continuous forest block in a natural, unmanipulated condition is an uncommon quality. The area warrants special recognition and attention so that it continues to add to the diversity of the park as a important natural destination in Washington."*

Letters like these should be at least noted in an introduction or better yet, and executive summary. The Parks Commission has been notified of the special natural qualities of Mt. Spokane's PASEA for years. The public needs to know this. This is part of the accessibility issue you are trying to achieve.

We would also suggest that the Parks Commission values, core and mission be stated in an executive study. This gives the public accessibility in forming their comments. If the Parks Commission is to look in part, at the decision they have to make to make within the above context, then that needs to be clearly stated. It could also be a part of each alternative. We asked this to be analyzed in our scoping comments in Dec. 2013. The DEIS should also acknowledge that the Parks Commission has a role in promoting and protecting biodiversity in the state and that can be seen in the State Biodiversity Executive Study. We asked that to be scoped in our scoping letter of 2013.

Another part of the relatively undeveloped state of the PASEA is soils and slope stability. This is noted on Page 6, section 1 of the DEIS. The severe to extreme erosion that you noted about the soils is a hazard (pg. 8, Section 2). The negative impacts are not adequately disclosed in Alternative Four. The detailed analysis one paragraph. Development will have a great impact in water quality, the proposed chairlift base is at the headwaters of Blanchard Creek. The PASEA in an undisturbed condition will continue to be a buffer for invasive plants, and protect water quality.

### **Hydrological Impacts**

On a site visit to Mt. Spokane on Saturday, September 20th, 2014 there was a strongly flowing stream approximately 100 feet from where the proposed ski lift terminal would be located. The groundwater retention may be affected by the vegetation removal which would cause erosion in the area, especially near the ski lift terminal. Subsurface flow is likely to change due to the loss of tree canopy cover and impact late season flows downstream. These impacts should be disclosed in the EIS.

The DEIS states that "Previous construction projects on Mt. Spokane have changed sediment yield, soil compaction and impermeable surface between pre-development conditions and present day recreational area development. Changes in sediment yield and soil compaction are primarily temporary and associated with construction activities; however, permanent developments such as roads and buildings would continue to result in increased impermeable surfaces."

The threat of increased sediment yields, runoff from construction, and increasing water temperatures due to more sun exposure from the lack of trees are all potential problems. How are

these going to be mitigated especially if there isn't a baseline for water quality currently on Mt. Spokane? Without a control to compare to, how is the expansion going to prove that the water quality hasn't changed? In order to prove that there is no change in water quality wouldn't the expansion need to demonstrate evidence that compares the control to post-construction?

The expansion claims that there are no direct impacts on the water quality. However, there are indirect impacts to consider--consequences of construction that are potentially just as dangerous as direct effects. These are the headwaters for Blanchard Creek that runs through old growth and provides crucial habitat for a wide variety of plant and animal species. So we are asking, is "indirect" sediment or run off pollution any less devastating than the impact of direct pollution?

Because of the many streams, permanent and not, in the PASEA, particularly near the base of the proposed lift, clear-cutting will negatively impact those streams. It is impossible to mitigate the alteration of the water patterns that may occur from clear cutting. There needs to be more discussion of this under cumulative effects in 3.2.4 pg. 12, section 2. The Pacific Biodiversity Institute's report notes several "uncommon or possibly unique" plant associations in wetlands in the BSA on page 54. Also on page 54, old growth is again mentioned as there are several polygons with those forest characteristics.

Because "wetlands and streams are a type of special habitat feature that are very important to many wildlife species" (PBI, page 55) more detail should have been put into the DEIS about water and water quality. It needs to be made clearer that the PASEA is a wet forest. It could be assumed that because it's on the dry side of the state it's not a wet forest. That is part of why it's special and people need to know that when they read the DEIS.

In addition to the construction and operation of the facilities that could have potential negative impacts to water amount and quality; it's also the loss of 279 acres. Clear cutting forests were extremely common at one time and still occur. There is science on the impacts and fragmentation that occurs with clearcuts. None of the scientific studies that were given to you during scoping are in the appendices.

The science is lacking for some of your assertions. For example 3.3.4 on page 15, section it mentions alteration in snowpack and snow melt on vegetation communities in the PASEA. It is stated that there will be "longer snow retention in cleared areas." This ignores the function of a forest, which is to store and slowly release snow and rain through the summer and fall. Several scoping comments were concerned that snow retention would be less because the trees help keep the snow levels in. Snow retention in the PASEA due to the cutting of 279 acres is a serious subject that is not addressed at all in the DEIS But no studies are offered. You have to have data on this to make the DEIS credible.

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, we oppose Alternative Four.

### **Soil impacts**

According to the NRCS Soils Resource Report, the soils in PASEA have a "severe to extreme erosion hazard." This is primarily due to the parent soil material being crystalline granitic bedrock. Field surveys revealed no signs of major soil erosion or landslides. This is primarily due to the undisturbed condition of the expansion area being primarily vegetated with native grasses and trees. The DEIS says that "soil mobility would be minimized during and after construction through implementation of temporary and permanent erosion and sediment control measures."

What are these control measures proposed by the DEIS? What are the explicit plans of the DEIS? How have they gone about in the past controlling the soil's erosive quality? Will they replant native species if non-native species take over and alter the ecosystem? Please provide a more detailed explanation of the control measures that the DEIS is proposing.

Currently, tree root systems and underbrush on Mt. Spokane--the same infrastructure that would be removed with the expansion--are preventing soil erosion. If they were cut, how would the potential soil erosion and landslide danger be dealt with? As years go by the roots will begin to decay, underbrush will change and erosion potential will grow. How will this be dealt with? These variables and possibilities need to be taken into account in order to properly understand the long term effects that any expansion might have on the environment.

The report also states "The expansion suggests that in areas of prescribed tree removal the root system would be left in place to minimize soil mobility; however, the ground cover would be "re-vegetated" where it is disturbed by tree removal activities." What will happen when root systems begin to decay?

What is the management's plan when it comes to erosion over the long term? Will the ecosystem's slope-face suffer? How can we be certain the run off won't change the hydrology of the ecosystem and the quality of the water? There needs to be more details about what the proposed re-vegetation plan will include, and studies done determining what will be required in order to safely and most effectively prevent erosion.

### **Access to PASEA by skiers and other recreationists**

Another assertion that needs to be more examined is in section 2 on page 30, under Alternative two: "However as Alternative 2 would likely result in the removal of the PASEA from the concession area boundary, management/safety related issues may be fully or partially shifted to park staff which would potentially create additional demands on public service providers." The PASEA already is managed de facto as an NFA, which is how alternative 2 would keep it. We already know what the general issues are there as far as this subject goes. Several scoping comments asked for data that proved there were numerous rescues in the PASEA each winter. It's commonly claimed but there's no data. That whole issue was not addressed in the DEIS in any way or in the appendices.

The search and rescue group in the County is the group that needs to be responsible for rescuing skiers in the PASEA. Staff has talked about this. It was noted at a meeting with Parks Staff and TLC on April, 3, 2014. Staff could maybe use a few areas widened to get rescue sleds in. You should go back and reread scoping comments on this. You may have more ability to get to a person needing rescue because of increase facilities, if Alternative 4 is chosen, but that's where you also may need more staff to do it.

### **Climate Change not addressed**

The DEIS completely ignores global warming, yet climate change is a reasonable and probable adverse environmental and economic impact. Even SE Group in their Oct 2013 report for MS2000 stated that global warming will be a factor in the ski expansion and one of the reasons to do it. We think it's a good reason not to expand. This was also mentioned in several scoping comments as important to address and studies were sent to Parks Staff. In our scoping comments dated Dec. 12, 2013, we asked that you analyze global warming. See the studies previously sent. Global warming could impact profitability for the ski area. If Mt. Spokane Snow and Skiboard Park were a private business that would be their problem, but they are in the largest state park in the state. It is citizen owned. That's why it's important to discuss global warming economic impacts. Private ski areas are no doubt planning for global warming impacts.

### **Wildlife Analysis**

Global warming will negatively impact pika. Even though pika are listed in the DEIS, nothing except a table of this status is shown. That doesn't give the public any information. Pika has no other place to go if Mt. Spokane gets warmer. That is true of other species, listed. The forests around the PASEA are fragmented and not for the highest quality. There may be no suitable habitat for plants and animals that can't go higher because there is no colder, higher. Mt. Spokane hosts the only known group of pika in the County. WDFW discusses pika in their May 29, 2012 letter. They are being evaluated for state listing.

Almost half of the twenty one focal species are listed in some way as WDFW species of Concern and four have federal status of some sorts. I appreciate the discussion of potential impacts to

wildlife from recreational use but the DEIS should include potential impacts to the specific animals listed. Lynx for example seriously need the entire habitat they can get. Amphibians are globally on the decline. They are the most imperiled vertebrate species in the world. Western Toads are not just on the decline on Mt. Spokane but also in most of their entire range. Mt. Spokane could be a haven for them and other species. One of our members found two western toadlets on the Chair Four Road on July 20, 2014. Others species that are currently doing ok could also suffer from an expanded ski areas. The DEIS gives the impression that it's only the listed species WDFW is concerned about. Wildlife will also likely be impacted by the loss of berries and other native species that will no longer exist in the ski runs, or may be impacted by the loss of late season water.

Modeling for wolves and moose is based on elevation, while these animals and others move around in the winter based on snowpack and access to food. In winter animals react to snow depths, not elevation, this makes the wildlife models inaccurate. The Habitat Management Plan Field Studies were conducted in Summer 2013. Northern Goshawk sampling; Woodbridge and Hargis (2006) recommend that one Broadcast Acoustical survey be conducted during the nesting phase and one after the young birds have fledged (i.e., left the nest). However, because of timing constraints, both of the Broadcast Acoustical surveys and the Intensive Search survey were conducted during the post-fledging phase. This means these surveys were not done following the best science, and need to be done during the nesting phase.

### **Mitigating Impacts**

We are very concerned that the list of mitigation measures do not adequately compensate for the loss of native and old growth forest under Alternative 4. It appears as though unavoidable impacts will occur, yet will not be mitigated or compensated for. The impacts for the runs and lift will occur indefinitely, yet nothing is proposed to compensate or substitute for the impacts.

### **Comments on Part Three of the Mt. Spokane DEIS, 2014**

The Lands Council strongly support s Alternative One in section three of the Combine Draft Environmental Impact Statement for the Aug. 2014 MT. Spokane DEIS.

### **Background Section**

The history and background is incorrect, please read again, the 2012 scoping comments by Steve Reynolds of the Mountaineers, based on historical documents and several comments on the correct history of the PASEA. SE Group has not done any further research on this. They have only rehashed their Oct. 2013 report. Even if the background history were true, it does not have bearing on what is happening on the mountain today. But it is pushed by pro-expansion groups as one of a few important reasons to expand.

The DEIS needs a discussion of what already exists as a ski area and how it can be improved instead of assuming, which the whole issue does, that expansion is a needed option. There is nothing in the whole document that examines the need to expand, it's an assumption. There is

mention of needing additional intermediate terrain, yet most of the mountain is suitable for intermediate skiers. There is a need to realign chairlifts near the lodge, so that intermediate and advanced skiers do not race through the beginner area, but plans to mitigate this problem are never discussed.

The DEIS should include summer impacts of ski expansion, including new opportunities and loss of opportunities, which many scoping letters mentioned as did The Lands Council's. What are the impacts on hiking, biking, berry picking, etc from Alternative Four? What are the lost opportunities by investing in new infrastructure instead of fixing up needed lodges and existing lifts? Why is there no concessionaire plan including in the DEIS?

### **Benefits and Needs for Expansion**

The concessionaire has claimed that adding a chairlift would increase revenues to state parks of \$100,000 per year. We would like to see the assumptions that back up this claim. Our calculation, based on the Concessionaire Contract is that skier visits would have to nearly double for this to happen, which is very unlikely to happen.

The concessionaire failed to complete their part of the Masters Facility Plan, so the public has no idea whether adding a chairlift, adding new parking, etc. makes financial sense. The concessionaire, as you know, doesn't contract to run summer recreation programs. But that is something that they and The Parks Commissioners could and should talk about. Even the private ski resorts do summer activities to help them stay economically viable.

Lost opportunities such as keeping the lodge open in the summer, hosting music festivals, weddings, environmental education classes and camps and other income producing ideas are feasible. Most of the other ski areas in the region, including Lookout Pass, Silver Mountain and Schweitzer have a host of revenue producing summer events. Unfortunately State Parks and the concessionaire are narrowly focused on ski expansion.

The DEIS, Section 3, page 3, says it needs low- intermediate an intermediate level trails as one of the reasons for the PASEA, 1 Those skier s are the largest segment of the market is the reason being used to increase these types of trails. In the references there is no current material on the skiing market. Some of that was provided to State Parks in the scoping comments. The market analysis of 2007 needs to be updated before making this claim in section three.

It's also assumed in this section under purpose and need that Mt. Spokane has to keep up with the other ski areas, which are private. The DEIS needs a section that talks about this assumption. We have included several articles about the changes in skier demographics that are occurring across the United States.(See Appendix 1) This information should be used in the final EIS and Decision.

Mt. Spokane is a state park and as such, the core values, missions and goals of the State Park and Parks Commission should be clearly stated in this DEIS. The State Parks System just does not have recreation as part of its mission. It also has to preserve and protect biodiversity. Although

land use is briefly discussed in 3.7.4, it's not enough to adequately address the issue. Is an existing ski area with an intact old growth forest balanced enough? That has to be discussed.

Mt. Spokane needs to focus first, on upgrading what they have to keep visitors and not expanding. Improved and additional chairlifts plus an increased number of runs can be added in the current ski areas. Chair Four, on the north side, is underutilized. The improvements are not discussed. SE Group is clearly a pro-ski development company and has been doing work for MT. Spokane for years, first starting as Snow Engineering. Since State Parks was a part of writing this section it should be their job as balance to provide a segment in the Recreation section 3.6 to talk about improving the current ski area.

Purpose Number 2: it states there will be better long term snow accumulation and retention and the expansion in the West side of the PASEA (the direction of the PASEA is west, but is NOT noted in the DEIS). Again, where is the data? Several scoping comments asked for the data for this assumption which was also in the SE Group's Oct. 2013 report. It is not addressed. This statement has been repeated often, but is not true: *"the more northerly facing, and the more wind protected areas will have consistently better snow retention and quality."*

The PASEA is west. More documentation is needed that this will actually protect snow levels or lead to improved skiing, especially given the underutilized north side. The PASEA is a never-logged old growth forest in a state park. That is a significant factor in determining if this should even occur. It does not apparently look like it's addressed in the section three.

## **Climate Change**

Also missing is a detailed discussion of the impacts of global warming. Climate change is briefly mentioned as the reason why the PASEA should proceed. But no discussion of the problems with climate change for this ski area is even mentioned, except for the low ski year of 2004-05.

Assuming the snow levels decrease due to global warming, and visitors decline, is there any reasonable guarantee that the snow in the PASEA should it occur, will protect the ski area from global warming. It's not a well-documented assumption by any means. Have snow levels been checked there for 10 years and all around the mountain at various elevations? Nothing in the references is listed for global climate change studies and their impacts to ski areas, and no one on the project management team has expertise in it either.

Purpose Number 3: The expansion will help with search and rescue efforts, but numbers for specific backcountry users don't exist as noted in 3.6.2.5. Are there actual rescue numbers? Where are the weekly numbers for the last several years? There's nothing, not chart, for example, in the appendices or the DEIS. The members of the ski patrol could be polled, anonymously and independently, to get their opinions on rescue.

The DEIS assumes that backcountry skiers want lift-assisted services. While some of them may, the increase on the weekend use of Chair 4 could also be due to having traditional days off. Also, you need to examine that skiers like to ski in the backcountry because of the trees, and not only because of a lift service. In fact many ski the west side and then traverse over to Chair 4,

which gives the ski area a very desirable back country option. Again the use of Chair 4 needs to be reexamined. A couple of other things that could be examined would definitely be improved signage on the Chair 4 road as well as taking the PASEA out of the management of MS2000. Some very specific thinning could happen to help facilitate the need for sleds.

Transportation and Parking is not adequately mitigated. Some contingency measures are mentioned on page 123, but parking demands will also impact other concerns that will have to be addressed. There will be more noise and more potential water quality negative impacts.

We are concerned that the concessionaire has trouble managing what they already have. Taxpayer support for the ski area is never mentioned, but should be part of the discussion. The parking lot is potholed, there's trash on the top of Chair three, the lodges need more upgrades, lifts close arbitrarily in mid-afternoon, despite purchasers buying full day tickets, sewage smells sometimes emanate through the lodge, etc.

### **Conclusion**

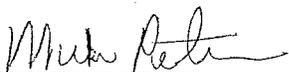
Billy Crawford-Heim, who is a Lands Council member, and whose letter we incorporate by reference as part of the Lands Council comments, says this;

*Whether the PASEA would be a great area for a ski resort or not is a moot point. Washington State law clearly identifies that Mount Spokane is worthy of preservation. The Washington State Department of Natural Resources has a legal duty to protect Mount Spokane from future ecological degradation and destruction. Accordingly, on behalf of myself and the community of Spokane request that the PASEA be designated as a natural area and preserved accordingly.*

We support Alternative Two as the only reasonable choice for the PASEA because the other alternatives clearly will harm the biological function of the PASEA and the PASEA cannot be replaced or mitigated. The PBI science and the biological expertise of WDFW and DNR also clearly support Alternative Two. The PASEA can meet the recreational mission and the preservation of biodiversity mission of the State parks by allowing back county alpine skiing. The state's recreational goal could be met by improving the current downhill lift assisted ski area.

On the whole, the DEIS does not adequately disclose the impacts of the proposed alternatives. The science is not disclosed, and ignored in many instances. The previous comments from WDFW, WADNR and Washington Ecology are clear and understandable by the general public. The public will not understand the recreational and environmental potential of the mountain if they don't have those details.

Sincerely,



Mike Petersen, Executive Director

## Appendix 1 Ski Area Demographics

<http://www.cobizmag.com/articles/sports-biz-skiing-gets-a-second-life>

### **Sports biz: Skiing gets a second life**

*Stewart Schley*

Been skiing yet this season? Then you might have already noticed something's different: There aren't as many snowboarders zooming down the slopes.

A sport that seemed to be on an unstoppable growth track now seems to be declining. Just over 30 percent of U.S. ski resort visits came from snowboarders last season, compared with 32.6 percent in the 2009-2010 season, according to an industry survey by the National Ski Areas Association. The average number of days snowboarders hit the slopes has dropped to 6.1 per season from a record of 7.6 in the sport's late 1990s heyday, NSAA says.

And – cover your ears, Shaun White – there's a generational tilt: A report by skiing industry analyst RRC Associates found the percentage of children under 14 who start on snowboards hit a low of 34 percent last season, compared with a peak of 42 percent during the 2003-04 season.

It's a trend line Mark Neel has seen firsthand, both as the father of a 15-year-old daughter and the longtime owner of an independent sporting goods shop in downtown Castle Rock, Castle Rock Bike and Ski.

"Five years ago, almost all of my daughter's friends were snowboarders," Neel says. "Now it's more like 50-50." Neel sees the shift reflected both in retail sales and in equipment rentals, with a rising number of younger customers now choosing skis over boards. "Snowboarding as an industry pretty much peaked in 2009," he says.

That's a stark realization for a category that seemed to almost single-handedly reinvigorate the skiing industry by attracting big numbers of what Neel calls "non-trationals" to the slopes starting 20 years ago. But it's a trend line that now has ski industry executives on watch.

"Today, there is every indication that the growth in snowboarding we took for granted has stalled, and visitation from snowboarding is headed toward a path of substantial decline," wrote Nate Fristoe of RRC Associates in a much-quoted report published last fall.

Ski industry analysts have lots of thoughts about why snowboarding may be running out of momentum, and many of them are cultural: The first generation of boarders has grown up, the sport has lost some of its rebel luster, and women in particular are abandoning boarding as they age.

Those may be valid contributors, but another big factor has to do with equipment, says Neel. Advances in ski design – especially the movement to shorter, shaped skis – have made it easier to become proficient in an activity that has a long reputation for tormenting beginners. Snowboard design and technology, Neel says, have lagged behind.

Improved skiing technology also has propelled skiing into the realm of extreme sports once associated almost exclusively with snowboarding. Some of the most jaw-dropping halfpipe stunts now happen on skis, not boards. Reflecting that, halfpipe skiing will make its international Olympics debut at next year's Olympics in Sochi, Russia. Every time a skier squeezes one more revolution out of a trick than a boarder

can muster, it brings more credibility to the thrill-seeking snowboard demographic that used to sneer at skiing's genteel reputation.

That may be good news for Colorado ski industry participants like the Broomfield-based Vail Resorts Inc., because it suggests a downturn in snowboarding may not necessarily translate to fewer paying customers. Even as boarding has declined, average skier visits have held steady at 5.5 times per season, according to national statistics. And although Vail Resorts suffered a 12.1 percent decline in total ski visits last year, the company attributes the decline to a lack of snow, not a change in the ski-snowboard mix.

The upshot here: Don't be surprised if the next time you see a 16-year-old bombing down Powder Keg at Copper Mountain, iPhone blasting and hair flying, he's got skis strapped onto his feet and a snowboard stuck up in the rafters of his parents' garage at home. After all, a dude's gotta stay hip.

*Stewart Schley writes about sports, media and technology from Denver. Read this and Schley's past columns on the Web at [cobizmag.com](http://cobizmag.com) and email him at [stewart@stewartschley.com](mailto:stewart@stewartschley.com)*

**<http://www.saminfo.com/article/guests-future>**

### **Guests of the Future**

The issue of growth in snowsports is at the top of every mountain resort's agenda. But where will that growth come from? Diversifying the participation in snowsports by being more inclusive of groups and people who are not currently participating would contribute to growth in the industry.

Growth has been the focus of NSAA president Michael Berry's presentations at national conferences and regional trade shows for years. Both the "Growth Model," developed by NSAA to help resorts understand the dynamic of the skiing and riding consumer, and the NSAA Demographic Study have helped draw a picture of the market and how it might evolve.

The key, of course, is to find new customers. What resort doesn't want to broaden its customer base? If that is to mean more than simply stealing market share, though, resorts must reach out to people who match the profile of skiers and snowboarders, but who don't currently participate. This was the focus of RRC's David Belin at the New England Summit in September. Let's take a fresh look at some of these potential customer groups that might be underrepresented at your resort.

For the past two or three decades, much of the focus of the snowsports resort industry has been on appealing to a relatively narrow group of customers, predominantly composed of white, middle- to upper-class families who generally live within proximity to ski areas. Several trends are making that strategy problematic, including a general stagnation of wages and salaries for the middle class, increasing racial diversity in the population base, and continued concentration of the U.S. population in urban areas—not to mention a decline in the percentage of two-parent households with children under 18.

Diversifying the customer base for snowsports participants can mean different things to different areas, but likely includes some combination of diversifying in terms of age, family status, gender, household income, participation frequency, and race/ethnicity.

### **AGE DIVERSITY**

The median age of snowsports participants (the age where half are that age or younger, and half are that age or older) has risen nationally by four years over the past ten seasons. The median age was 38 in the 2012-13 season, up from 34 in 2003-04 (Graph 1). This trend signifies that the participant base is getting older by an average of half a year each season over the past decade.

Deer Park, WA 99006  
September 29, 2014

Attention: Mr. Randy Kline  
Environmental Program Manager

Washington Parks and Recreation Commission  
P.O. Box 42650  
Olympia, WA 98504-2650

Re: Mt. Spokane State Parks PASEA DEIS comments

Ladies and Gentlemen:

Please include this letter in the above-mentioned comments.

First, before the Commission begins deliberations on this matter, it would be most instructive to review the unique PASEA on-site. Please do so.

We are enthusiastic Mt. Spokane State Park users--we both alpine and cross-country ski in Mt. Spokane State Park and also hike there during non-snow months. We support Alternative Two (2), Natural Forest Alternative (NFA) including the addition of back-country alpine skiing permitted in the PASEA.

The proposed seven runs and chair lift area are within old growth native forest and will apparently be clear cut. Irreplaceable resources. And fragmented forests reduce habitat for common documented wildlife as well as for rare species. Since 2007 the Department of Natural Resources and the Washington Department of Fish and Wildlife have advocated for intact old growth. The 2010 Pacific Biodiversity Institute Biological Survey, page 58, confirmed "There are significant areas of old growth in the Biological Survey Area (PASEA)."

Please also note that streams still running in late September near the base of the proposed chair are critical components of surrounding sponge-like wetlands and for downstream aquifer supply and fish health. These wetlands should have been delineated in spring rather than in late summer.

Further, modeling for moose, wolves and other species appears inadequately analyzed for potential wildlife impact via increased human intrusion/recreational pressure.

Cultural and archaeological resources were also inadequately addressed.

Imperative parking and lodge upgrade plans were omitted.

Finally, global warming/climate change impacts must be assessed and appropriately addressed. Old growth forests sequester carbon and retain soil moisture--critical for each person in our region, for the region's health and prosperity.

Again, we urge the Commission to adopt Alternative Two (2), Natural Forest Alternative (NFA) including back-country alpine skiing permitted in the PASEA. This Alternative including alpine skiing permitted, is the sole reasoned designation consistent with the Natural Resources Mission and management objectives for Mt. Spokane State Park:

" Protecting, preserving, and interpreting key natural resources of the park, including rare, fragile and/or high quality examples of vegetative communities, associations and species; important fish and wildlife corridors and habitat areas.... and by insuring that the park use does not adversely affect water quality and/or impede natural hydrology."

Very truly yours,





September 29, 2014

Washington State Parks and Recreation Commission  
Attention: Randy Kline, Environmental Program Manager  
PO Box 42650  
Olympia, WA 98504-2650

Washington State Department of Natural Resources  
PO Box 47000  
1111 Washington Street SE  
Olympia, WA 98504-7000

Governor Jay Inslee  
Office of the Governor  
P.O. Box 40002  
Olympia, WA 98504-0002

Subject: Comment Letter: 2014 Mount Spokane Draft Environmental Impact Statement

Members of the Washington State Government:

Please consider the following comments with regard to the Mount Spokane Land Classification that will take place in the latter part of 2014 or early 2015. This comment letter addresses two specific insufficiencies of the 2014 Mount Spokane Draft Environmental Impact Statement. It also identifies the duty of the Washington State Department of Natural Resources to designate Mount Spokane as a natural area, pursuant to the powers promulgated by Washington State legislation to the DNR at 79.70 RCW and 79.71 RCW, and subsequently carried out through 332-60 WAC. Accordingly, the Department of Natural Resources should exercise its authority and designate Mount Spokane as a natural area.

### **Mount Spokane's Old Growth Forest Must Be Preserved**

Though the definition of what "old growth" means varies nationally from jurisdiction to jurisdiction, at the core, "old growth forests" are simply defined as "the presence of large, old trees."<sup>1</sup> Washington State has defined "old-growth" as "containing trees of over ninety years and other unusual ecosystems as natural forests or natural areas, which may also be used for interpretive purposes."<sup>2</sup> Within the Mount Spokane PASEA Draft Environmental Impact Statement, "potential old growth forest or forests approaching old growth conditions" are noted and the elimination of this forest allowed as part of the alternatives for expansion."<sup>3</sup> Yet, the DEIS clearly indicates that there is in fact old growth forest throughout the PASEA, and not simply "potential old growth" forests.<sup>4</sup> The DEIS identifies that 88 percent of the trees sampled

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<sup>1</sup> United States Department of Agriculture Forest Service, Area of Old-Growth Forests in California, Oregon, and Washington, p. 7 (1993).

<sup>2</sup> (RCW § 79A.05.305(2).

<sup>3</sup> Washington State Parks and Recreation Commission, Section III. Mount Spokane State Park Proposed Ski Area Expansion Draft Environmental Impact Statement, p. III-7, § 2.1.1.2 (2014).

<sup>4</sup> *id.* at III-44-7 § 3.3.2.2.

within the PASEA “fell within the age range of 90 to 149 years, with the peak range being between 110 and 129 years (40.7 percent).” Given the unique and intact nature of the forest cover upon the west side of Mount Spokane, there is no doubt that this area is part of a larger old-growth forest.

In 1981, Washington State established the Washington Natural Heritage Program (WNHP) with the core function of identifying species and ecosystems that the Department of Natural Resources (DNR) should prioritize for conservation. The WNHP advises the Department of Natural Resources, Washington Department of Fish and Wildlife, and the Washington State Parks Department regarding implementation of the Natural Area Preserves Act. The WNHP has stated

One of the greatest values of Mount Spokane State Park is its large size and low level of fragmentation of forests within its boundaries. Those mostly unfragmented forests extend from the southern tip of the park north along the westerly slopes of Mount Spokane to forests off the park to the northeast. The northwest slope of Mount Spokane (the ski expansion area) is part of the largest, least fragmented forest habitat in the Park and connects the park forests on the south to forests on and off the park to the north.

Mount Spokane Park appears not only to be the largest, least fragmented forest landscape locally but inspection of aerial photography in Washington and Idaho reveals that similarly sized and continuous forest areas do not occur within a 20 to 30 mile radius. The aerial photograph below illustrates the size and continuity of the park’s forests in the surrounding patchwork landscape.

The forest vegetation communities composing the Blanchard Creek Natural Forest are representative of the subalpine and mid-montane forests of the Northern Rocky Mountains. Although these communities maybe relatively common, their occurrence in a continuous forest block in a natural, unmanipulated condition is an uncommon quality. The area warrants special recognition and attention so that it continues to add to the diversity of the park as an important natural destination in Washington. 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.<sup>5</sup>

There is no remaining doubt that Mount Spokane qualifies for and should be designated as a natural area. The Draft Environmental Impact Statement, even as written, confirms this fact through its discussion about the flora, fauna, aesthetics, and quality of the currently unaffected Mount Spokane west face.

### **The Washington State Environmental Policy Act Also Controls the Mount Spokane PASEA**

Within the Draft Environmental Impact Statement, there is no mention of the specific manner in which the impacts upon Mount Spokane will be mitigated, as required by the Washington

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<sup>5</sup> Washington Natural Heritage Program, February 15, 2007

State Environmental Policy Act (SEPA).<sup>6</sup> The absence of such mitigation is grounds for denial of any governmental action granting the PASEA to be converted into a developed ski area.<sup>7</sup>

### **Mount Spokane Should Be Designated A Natural Area as a Matter of Law**

The legislative intention of the Natural Area Preserves Act (NAPA), 79.70 RCW and the Natural Resource Conservation Areas Act (NRCAA), 79.71 RCW is stated within the act's respective legislative findings:

#### Chapter 79.70 RCW - NATURAL AREA PRESERVES

##### 79.70.010 - Purpose.

The purpose of this chapter is to establish a state system of natural area preserves and a means whereby the preservation of these aquatic and land areas can be accomplished.

All areas within the state, except those which are expressly dedicated by law for preservation and protection in their natural condition, are subject to alteration by human activity. Natural lands, together with the plants and animals living thereon in natural ecological systems, are valuable for the purposes of scientific research, teaching, as habitats of rare and vanishing species, as places of natural historic and natural interest and scenic beauty, and as living museums of the original heritage of the state.

It is, therefore, the public policy of the state of Washington to secure for the people of present and future generations the benefit of an enduring resource of natural areas by establishing a system of natural area preserves, and to provide for the protection of these natural areas.

#### Chapter 79.71 RCW - WASHINGTON NATURAL RESOURCES CONSERVATION AREAS

##### 79.71.010 - Legislative findings.

The legislature finds that: (1) There is an increasing and continuing need by the people of Washington for certain areas of the state to be conserved, in rural as well as urban settings, for the benefit of present and future generations; (2) such areas are worthy of conservation for their outstanding scenic and ecological values and provide opportunities for low-impact public use; (3) in certain cases acquisition of property or rights in property is necessary to protect these areas for public purposes; and (4) there is a need for a state agency to act in an effective and timely manner to acquire interests in such areas and to develop appropriate management strategies for conservation purposes.

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<sup>6</sup> Washington State Environmental Policy Act, 43.21C RCW, et seq.

<sup>7</sup> RCW 43.21C.075.

The Department of Natural Resources is tasked with the responsibility of identification and management of Washington State's valuable ecosystem. Mount Spokane has already had a Classification and Management Planning (CAMP) process conducted in anticipation of State Parks' and the DNR's natural area management planning process.<sup>8</sup> In determining what regions of Washington State are subject to conservation and may be designated as natural areas, the Department of Natural Resources must comply with RCW 79.71.020:

The Department of Natural Resources identifies its responsibility regarding conservation on its website as follows:

Natural resources conservation areas (RCW 79.71) include lands with a high priority for conservation that may be threatened with conversion to other land uses, and they include critical wildlife habitat, prime geological and scenic features, native ecological communities, or environmentally significant ecosystems. NRCAs offer opportunities for outdoor environmental education, scientific research and appropriate low-impact public uses consistent with overall conservation goals.<sup>9</sup>

Washington State legislature identified the type of land that will be considered for conservation purposes as:

79.71.020 - Characteristics of lands considered for conservation purposes.

Lands possessing the following characteristics are considered by the legislature to be worthy of consideration for conservation purposes:

- (1) Lands identified as having high priority for conservation, natural systems, wildlife, and low-impact public use values;
- (2) An area of land or water, or land and water, that has flora, fauna, geological, archaeological, scenic, or similar features of critical importance to the people of Washington and that has retained to some degree or has reestablished its natural character;
- (3) Examples of native ecological communities; and
- (4) Environmentally significant sites threatened with conversion to incompatible or ecologically irreversible uses.

Combined with years of input from the Department of Natural Resources, the Parks Department, the Department of Fish and Wildlife, the Washington Natural Heritage Program, thousands of

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<sup>8</sup> Washington State Department of Natural Resources, Natural Heritage Plan, p. 36 (2007).

<sup>9</sup> [http://www.dnr.wa.gov/ResearchScience/Topics/NaturalAreas/Pages/amp\\_na.aspx](http://www.dnr.wa.gov/ResearchScience/Topics/NaturalAreas/Pages/amp_na.aspx).

Spokane and Washington State citizens, and the Draft Environmental Impact Statement itself, Mount Spokane is primed for its natural area designation.

Whether the PASEA would be a great area for a ski resort or not is a moot point. Washington State law *clearly* identifies that Mount Spokane is worthy of preservation. The Washington State Department of Natural Resources has a legal duty to protect Mount Spokane from future ecological degradation and destruction. Accordingly, on behalf of myself and the community of Spokane request that the PASEA be designated as a natural area and preserved accordingly.

Sincerely,

A solid black rectangular redaction box covering the signature area.

By signing this Petition, you are stating that you support Mt. Spokane Ski and Snowboard Park's plans for:

Adding ski runs and lift on the "Backside".

This petition will be sent to the Washington State Parks and Recreation Commission.

538 signatures