



July 14, 2010

Randy Kline, Environmental Program Manager
Washington State Parks and Recreation Commission
1111 Israel Road Southwest;
PO Box 42650
Olympia, WA 98054-2650

Mr. Kline:

This letter is comments on the June 2010 Mount Spokane State Park Master Facilities Plan Draft Environmental Impact Statement (DEIS), on behalf of The Lands Council.

The Lands Council is a conservation organization based here in Spokane, working to preserve and revitalize Inland Northwest forests, water, and wildlife through advocacy, education, effective action, and community engagement. Each year hundreds of our members visit Mount Spokane State Park to enjoy its natural beauty.

The Lands Council is therefore happy to support much of the improved management vision represented by the DEIS's action alternatives. Enhancing non-motorized recreation opportunities, minimizing impacts of existing and new facility developments, considering potential expansion of the Park boundaries, renovation of existing facilities, improving the entrance facility, designating a better-integrated trail system, improving parking and trailhead facilities, establishing an interpretive plan for the park, and improving/relocating the administrative facility are all laudable goals.

The Lands Council's main concern is the DEIS's treatment of management of the Potential Alpine Ski Expansion Area (PASEA). In discussing the PASEA, the DEIS states:

As part of its October 1999 Classification and Management Planning action for Mount Spokane State Park, the Washington State Parks and Recreation Commission (Commission) left unclassified a portion of the park covered by the current ski area concession agreement known as the Potential Alpine Ski Expansion Area (PASEA). In the Spring of 2006, Mount Spokane 2000 (MS 2000), the non-profit alpine ski area concessionaire at Mount Spokane State Park, came to the Commission with a proposal to expand skiing into about 400 acres of the 850-acre PASEA. The expansion proposal also came with preliminary support from the Mount Spokane State Park Advisory Committee,

in conjunction with that committee's work towards developing a comprehensive trails plan for the park.

In response, the agency engaged in a master facilities planning process with MS 2000 and the community, starting in autumn, 2006. Staff held three public meetings on the proposed expansion, attracting more than 100 people at each meeting. The agency web site contains all materials provided to the public at those meetings, along with comments and questions raised at the meetings and by email to staff. In addition, staff participated in numerous sessions and discussions with the Mount Spokane State Park Advisory Committee, MS 2000, natural resources agencies, community groups and other interested parties. The Commission received briefings at four work sessions providing background information and planning updates.

However, the DEIS fails to mention significant public opposition to the proposed ski area expansion, voiced perhaps most eloquently by the Save Mt. Spokane Coalition and its member groups (including The Lands Council) and individuals.

In the Table beginning on page 14 (B. MOUNT SPOKANE STATE PARK MASTER FACILITIES PLAN ALTERNATIVES) under k. Land Classification the DEIS fails to disclose the current management direction for the PASEA, which is "managed as a de-facto Natural Forest Area." (Mount Spokane State Park Management Plan, September 5, 2003, p. 15 under "Policy Direction – Land Classification.")

We fail to see the logic behind the DEIS's not including an **action alternative** that would permanently change management of the PASEA to Natural Forest Area (NFA). Further fueling our concern that State Parks may be prejudicing a future decision against such a classification, the DEIS reveals that "The Master Concession Plan is expected to be completed in 2010." It makes no sense, logically, fiscally, and perhaps legally, to proceed through an EIS review period on such a major and controversial issue for Mt. Spokane State Park twice in the same year. Many Park resources—such as water quality, recreation, and wildlife—could be markedly and adversely affected by ski area expansion into the de-facto NFA, resulting in this EIS's analysis being rendered moot when the "Master Concession Plan is ...completed in 2010."

Furthermore, the DEIS's analysis of the impacts of new trails and other developments is extremely difficult to follow because of the lack of decent maps in the body of the document itself. On page 78 the DEIS states, "The Proposed Action - Trail 180 – lies on the far western side of the park, following the major ridge line running parallel above the Spokane – Day Mountain Road for a couple of miles." Continuing on page 80:

The Proposed Action (Trail 180) traverses a late-seral stage ridgeline forest, which has exceptional quality and quantity of vegetation community characteristics that are important habitat elements for wildlife species in MSSP (Romain-Bondi et al. 2009, Table 3, pg 15 and Tables 6-9, pgs 19-25). Features include multiple canopies of gallery trees, large logs and snags, and various decay stages of large logs and snags. Twelve of the 21 focal wildlife species need a combination of these various habitat elements for some stage of their life cycle, including marten, lynx, moose, northern goshawk, boreal owl, pileated woodpecker, black-backed woodpecker, brown creeper, winter wren, pygmy shrew, and hoary and

silver-haired bat. While development and maintenance of the Proposed Action may not seem to alter the actual amount of habitat available for these species, studies show that trail and road corridors can create significant breaks in continuous forest habitat, potentially reducing habitat quality and increasing predation on interior forest species (Keller and Anderson 1992).

This indicates potentially significant impacts on old-growth habitat with the creation of Trail 180, and so the public and others reviewing the DEIS would be better informed by the DEIS revealing the exact location of this proposed trail. Unfortunately, that trail location is not shown in the DEIS. The same goes for other trails and features, including those that vary between the DEIS's three alternatives.

It required considerable trial-and-error to finally discern the location of proposed Trail 180 on "Trail Map 7" listed on the website. So why not include, in the body of the DEIS, Trail Map 7—or even just include reference or link to "Trail Map 7" in the DEIS—so reviewers can follow the analysis with reasonable effort?

Additionally, whereas this reviewer accessed the DEIS at:

<http://www.parks.wa.gov/plans/mtspokane/Stage%203%20-%2001%20Mount%20Spokane%20State%20Park%20DEIS%202010-June.pdf>, the diagrams, photos and maps are in most cases blurry, illegible, and otherwise rendered almost useless. And every map key is illegible.

We understand and support the idea of reducing costs and the consumption of paper in distributing the DEIS for review. However when portions of the document can't be read, or where cross-referencing is so difficult that the reviewing process itself becomes a barrier, the DEIS is inadequate for its stated purposes.

The location of Linders Ridge is not shown on any map in the DEIS, though based on the changes proposed, knowing its location would be vital to understand the potential environmental impacts of the alternatives.

The group camp proposed at the CCC camp location is said to need new "vehicular access" but the location of this new road is not shown on a DEIS map.

We return again to the failure of the DEIS to include the analysis of ski area expansion. As cited above from page 80, "...trail and road corridors can create significant breaks in continuous forest habitat, potentially reducing habitat quality and increasing predation on interior forest species." Even if the decisionmaker(s) for Trail 180 decide that the trade-offs are worthwhile, the **cumulative effects** of such features of the action alternatives combined with the major loss of interior forest species' habitat that would be caused by the **foreseeable** ski area expansion into the PASEA are NOT considered in this EIS. So even though our members would likely enjoy hiking, cross-country skiing, or snowshoeing along the new ridgetop Trail 180, it becomes extremely difficult for The Lands Council to support such a new trail simply because the potentially adverse **cumulative effects** on the some of the major features we enjoy about the Park—old-growth forests and wildlife—remain unanalyzed.

The Lands Council remains engaged in the process of providing public input on the management of Mount Spokane State Park. We intend our comments to be taken in the spirit of improving the management of the Park, as well as designing a public process that is truly effective.

Sincerely,

/s/

From: [REDACTED]
Sent: Thursday, June 17, 2010 5:03 PM
To: Koss, Bill (PARKS)
Cc: [REDACTED]
Subject: In support of Spokane 2000

Mr. Koss,

I just wanted to take a couple of minutes and provide a letter of support for Spokane 2000, the vision, the process, and hopefully, the expansion of recreational opportunities on the mountain. We use the mountain, year round. We hike, run, and ski. We own a condo at Snowblaze and spend as much time there as possible. Mount Spokane provides excellent value for us, our family, and our friends. However, we realize that the resort is struggling to compete with area resorts that are offering expanded terrain and upgraded facilities. Most notably, Spokane is in direct competition with 49 degrees North.

In my professional career, I have been involved with numerous projects that require environmental review, permitting, public involvement, and stakeholder engagement. The State and the resort have done a great job of providing information, allowing feedback, and for maintaining an open and fair process. But, at some point, there is a time in the life of every project where study work needs to give way to "on the ground improvements". Mount Spokane is not a wilderness area and the land-grantors never intended the mountain to be locked away as a sanctuary. Careful and thoughtful development of the north side of the mountain is certainly desirable from a user perspective, from an economic viability perspective, and will ultimately benefit the region at large.

We will continue to love the mountain whether we continue to ride 2-seater Riblets, drink beer in a lodge with a leaky roof, or enjoy the amenities of a new lodge and lift access to the north side of the mountain. We are hopeful that the latter will prevail and become a reality while we can still point our skis mostly downhill and dodge the trees.

We share the mountain with moose, deer, various bird species, marmots, and the occasional black bear (we've seen 3). Careful and thoughtful development doesn't mean trading increased human activity for wildlife habitat. The two currently co-exist nicely and I believe, will continue to do so now and into the future. Thank you for the opportunity to comment.

David James

Spokane WA

Perennial Season Ticket Holder – Go Mount Spokane



STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

2315 N Discovery Place • Spokane Valley, Washington 99216-1566 • (509) 892-1001 FAX (509) 921-2440

November 18, 2009

Washington State Parks and Recreation Commission
Attn: Bill Koss
P.O. Box 42650
Olympia, WA 98504-2650

SUBJECT: Final Environmental Impact Statement Mount Spokane Master Facilities Plan

The Washington Department of Fish and Wildlife (WDFW) reviewed the Final Environmental Impact Statement for the Mount Spokane Master Facilities Plan, November 2009. This additional information is respectfully submitted as official written testimony on behalf of the Department.

WDFW has been very active in commenting on plans for ski area expansion within Mount Spokane State Park (MSSP). Consistent with comments submitted previously to State Parks regarding the potential development of the PASEA, WDFW considers Mt. Spokane State Park a critical link to sustaining healthy wildlife populations in the Spokane region. Maintaining wildlife corridor connectivity, limiting habitat fragmentation in large blocks of habitat and maintaining diverse habitats are very important components for management within MSSP and in areas surrounding the Park.

WDFW has specific concerns about the development of Trail 180. This proposed new trail will increase habitat fragmentation on the west side of MSSP. WDFW contributed directly in the development of the Master Facilities Plan by providing technical information on wildlife to the consultant and park staff during the analysis portion of the trail development plan. WDFW concerns regarding the effects of the development of Trail 180 on the habitat and wildlife are included in the text of the Mount Spokane Master Facilities Plan.

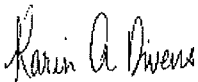
The trail is being proposed partially in a previously logged area and partially within various intact habitats. The logged area has largely re-grown with a dense shrub cover and provide

important browse habitat for ungulates. The Proposed Action traverses a late-seral stage ridgeline forest, which has exceptional quality and quantity of vegetation community characteristics that are important habitat elements for wildlife species in MSSP (Romain-Bondi et al. 2009, Table 3, pg 15 and Tables 6-9, pgs 19-25). The Proposed Trail 180 bisects the southern-most extent of concentrated elk and moose populations in MSSP (H. Ferguson, WDFW Wildlife Biologist, pers. comm.). WDFW staff also provided specific information regarding species use including: wolverines, Gray wolf, bats, and multiple bird species. The development of Trail 180 will eliminate or impact habitat elements that are important for these species. The development of this trail and the increased human use within this habitat area may affect the presence of and movement of wildlife within the west side of the Park.

WDFW respectfully recommends that the Commission consider disapproving the development of Trail 180.

Thank you for consideration of this information. If you have any questions regarding this information, please feel free to contact me at (509) 892-1001 ext. 323

Sincerely,



Karin A. Divens

PHS/GMA Biologist

KAD:kad

Cc: Mark Wachtel, Regional Habitat Program Manager
Kevin Robinette, Regional Wildlife Program Manager
Howard Ferguson, WDFW District Wildlife Biologist
Mike Atamian, WDFW Wildlife Biologist