APPENDIX H:
MOUNT SPOKANE SEPA
COMBINED ENVIRONMENTAL IMPACT STATEMENT:
COMMENT SUMMARY AND
RESPONSES ON THE DRAFT EIS

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**ALTERNATIVES/PURPOSE AND NEED**

**John Gifford**

*Pacific Northwest Ski Areas Association*

*Expansion into terrain with a northern aspect will not only yield a very high quality recreational experience (i.e., better overall snow quality), it will help add resilience to the financial performance of the ski area by ensuring a longer operating season. During years of modest natural snowfall, north-facing slopes will enjoy more resilient snow packs, which will allow Mt. Spokane to open in time for the holidays and help the facility operate later in the spring.*

*Response: Comment noted. No change in document required.*

**Mike Petersen**

*The Lands Council*

*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 to not race through the beginner area, but plans to mitigate this problem are never discussed.*

**Mari Schramm, Vanessa Torjusen, Dionna Klein**

*In response to some of the concerns raised in Section 3.6: Recreation, we propose adding midways to the existing runs in order to increase access for intermediate and beginner skiers.*

**Charles Holcomb**

*Mt. Spokane Alpine Team*

*North slopes mean earlier and better training for the kids, and a more reliable means to deliver the healthy athletic pursuits of alpine skiing disciplines. Perhaps even more importantly, Mt. Spokane and SSRA competes with other areas, all of which have expanded terrain and lifts within the last 10 years. Like any business, Mt. Spokane must provide improved facilities, runs, and lifts. This can only occur and be sustained, with the additional expansion area utilized. We want to keep Spokane children of diverse economic means participating in the sport. This goal is most easily realized at close, affordable, Mt. Spokane.*

**Group Response:** The reader is referred to Section III, section 1.3 – Purpose and Need, Section III, section 2.1.1.4 – Infill Option, and Section III, section 3.6 – Recreation. Specifically, section 3.6.2 – Affected Environment details the quality of the existing lift and trail network available at Mount Spokane and the need for additional beginner to intermediate terrain not available within the existing developed ski area boundaries.

**Mike Petersen**

*The Lands Council*

*The DEIS, Section 3, page 3, says it needs low-intermediate and intermediate level trails as one of the reasons for the PASEA. Those skiers 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.*
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Response: Intermediate skiers accounted for 41 percent of visits to ski areas during the 2013/14 ski season and represented the largest portion of the skier market at 46 percent (source: NSAA National Demographic Study 2013/14) (see below).

<table>
<thead>
<tr>
<th>Percent of visits (%)</th>
<th>Percent of Participants (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>First time</td>
<td>3.8</td>
</tr>
<tr>
<td>Beginner</td>
<td>10.4</td>
</tr>
<tr>
<td>Intermediate</td>
<td>41.1</td>
</tr>
<tr>
<td>Advanced/expert</td>
<td>44.8</td>
</tr>
</tbody>
</table>

John Gifford

With a growing population, the maturing of the ‘echo boomers’ (i.e., offspring of the ‘baby boomers’), and the growth in the early retiree age cohort (i.e., 50 to 65 years of age), ski industry analysts expect unprecedented, demographic pressure to be applied to the state’s winter sports facilities, especially facilities in close proximity to population centers like Spokane and Spokane Valley. Currently:

- The health of the overall industry is strong - average annual visits for the last three years (2010/2011 through 2012/2013) at Washington ski resorts is more than 2.1 million.
- Mt. Spokane in the 2012/2013 season had record 104K visits in an average snow year, a 19.7% increase from the 2001/2003.
- Besides skiing and snowboarding, according to a 2012 report by the Outdoor Recreation Industry Foundation, at least 63% of Washington residents participate in outdoor recreation each year.
- According to the Washington State 2013 State Comprehensive Outdoor Recreation Plan, 31% of Washington residents participate in Snow & Ice Recreation Category. Participation in category activities include: Skiing 10%, Snowboarding 7%, Snowshoeing 7% and Cross Country Skiing 5%. 2.3% of the residents indicated skiing as a recreation activity which they would like to do more of in Washington. These stats illustrate that the public demand for value based, local, day-use recreational opportunities has increased, and given population growth projections will continue to increase. Land suitable for alpine skiing and snowboarding is limited; therefore it is advantageous to make optimal use of the land contiguous to existing public lands that offer developed recreation. Furthermore, the expansion area being considered was in the original vision for Mount Spokane and there was a developed skiing in that area at one time in its history therefore land classification as “Recreation Area” is appropriate.

Response: Comment noted. Where appropriate, this information may be included in the FEIS.

Mike Petersen

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.

Response: Whether or not Mount Spokane’s competition is located on private or public lands is not relevant to the stated purpose and need for additional ski terrain. As discussed in the DEIS, all of the ski
areas in Mount Spokane’s market (public and private) have witnessed increases in visitation as a result of population and economic growth in the region as well as increased demand.

Mike Petersen  
**The Lands Council**

*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.*

**Response:** Under the provisions of their existing concession agreement Mount Spokane Ski and Snowboard Park is not permitted to operate a summer recreation program (e.g., lift served mountain biking, zip-lines). Regardless, the analysis of a summer recreation program is outside the scope of the project action EIS. If at a later date, MS 2000 were to propose to operate a summer recreation program it would be reviewed under a separate SEPA analysis and considered by the Commission.

Robert Crick  
**Crick Law Firm**

*All of this is recognized too by Governor Inslee’s Blue Ribbon Task force on Recreation where it advocates the utilization of public lands to promote healthier citizens, stronger communities, and a more thriving economy. The MS2000 plan would provide all that, and more.*

**Response:** Comment noted. No change in document required.

Mike Petersen  
**The Lands Council**

*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.*

**Response:** The text of Section III, section 3.6.2.5 states that, “Although specific counts for backcountry users are unavailable it is estimated that on any given weekend or powder day approximately 200 visitors a day use the back side for backcountry skiing or other dispersed recreational activities.” Emphasis added.

William Sayre

*Glading of the trees in the proposed expansion area and improving the traverse to the base of Lift 4 will accomplish goals of expanding terrain for those who limit their exercise to sliding downhill, while improving the cache of the area for ‘side-country’ skiers and limiting environmental impact.*

**Response:** One of the existing deficiencies at Mount Spokane is the availability of low-intermediate terrain. Construction of additional ungladed terrain would increase the total acreage available for this level of user, the largest segment of the skier market (see Section III, section 3.6 – Recreation).

As discussed in Section III, section 2.1.1.2 – Connector Trail between Chair 6 and Chair 4, the connector trail was removed from consideration due to the potential presence of old growth forest or forests approaching old growth forest conditions as well as numerous streams and wetlands in the proposed trail alignment.
John Morrow

Alternative #1, the do nothing approach, is a non-starter, as it merely delays the goals of the 1999 CAMP process even further, pushing classification out of the way once again and sending mixed signals to park users as to how WSP intends to manage the PSEA. Alternative #2, the NFA approach, and Alternative #3, the Resource Recreation approach with no new chairlift, will take away any incentive for the concessionaire to manage the PSEA or promote any recreational uses therein. Alternative #2 would be a step backwards by not allowing any alpine skiing or boarding of any sort, including back country skiing, rendering the area unusable for the concessionaire or its customers. Alternative #3 would mimic the status quo by allowing back country skiing, but negates the concessionaire’s ability to create additional revenues or broaden its market appeal. Either of these two alternatives would pass additional management responsibilities and costs back to WSP from the concessionaire, as Mt. Spokane 2000 would have no financial incentive to continue backcountry patrolling and rescue operations in the PSEA.

Response: Comment noted. No change in document required.

Robert Crick

As to land classification, the appropriate course of action here is for the Commission to classify the PSEA acreage as Recreation (Land Classification Alternative 4) as proposed by MS2000. That classification would match the classification for the rest of the resort and would make for consistent management of the entire concession area.

Response: Comment noted. No change in document required.

ARCHAEOLOGICAL RESOURCES

Fayette Krause

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.

James Harrison

In any respect, this proposed archaeological survey has not yet been conducted so there is no way to effectively evaluate the impacts of the PSEA project on cultural resources, an essential step in SEPA review.

Mike Petersen

There is no disclosure that archaeological surveys have 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.

Mari Schramm, Vanessa Torjusen, Dionna Klein

According to the draft EIS, “no cultural resources surveys have been conducted in the majority of the expansion area.” However, the proposed ski area’s proximity to a cultural landscape boundary and a
number of historic buildings as well as the mountain’s cultural and historical significance for the area make such analyses vital for. An archeological survey, should be performed by professional archaeologists in the proposed ski area. Such information is The results of the survey must then be analyzed included in the final EIS. Additional attention should be given to the impact that the proposed ski area would have on the Paradise Camp/Summit Area Cultural Landscape which boarders it. This should take into account both physical impacts (increased weathering, etc.) as well as visual aesthetics.

Group Response: The following narrative language related to archaeological surveys has been added to the FEIS at Section II, section 3.7.1.1:

Although a few cultural resources surveys were completed in Mount Spokane State Park during the 1970s and 1980s, most studies have been completed since 2000. From then to the present day, 16 project-specific archaeological surveys or independent historic preservation efforts have recorded circa 25 historic sites, buildings, and structures within Mount Spokane State Park. A majority of these studies were associated with linear road, trail, or fiber optic projects. Additional surveys were undertaken for buildings or separate structural facilities, and all largely outside of the PASEA’s proposed 279-acre expansion area. Sixteen of those inventoried resources are included within the Paradise Camp/Summit Area Cultural Landscape. To date, no archaeological sites with prehistoric or pre-contact associations are identified in Mount Spokane State Park. Post-1980 Mount Spokane State Park cultural resource reports include:


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Additionally, the following documents will be added to the FEIS at Section III, Chapter 5 – References:


Jackie Corley

The Spokane Tribe is largely concerned about huckleberries and bear grass being affected due to the expansion. According to page III-43 Subalpine fir or bear grass and several species of huckleberries make up a large percentage of vegetation in the PASEA area. These plants are culturally significant to the tribe and are still collected today. The expansion would have a large effect on the plants and would eradicate a large percentage of them, and the tribe does not want to see this happen.

Response: Implementation of either of the Action Alternatives contemplated in the project EIS (e.g., Section III – Alternative 2 or Alternative 3) would result in approximately 75 acres of additional impact to vegetative communities within the 13,000-acre park. Although bear grass may be affected within the cleared ski runs it can do well in partial shade and should continue to be available within the park. Based on anecdotal information, huckleberries do well within the cleared ski runs and should continue to be abundantly available within the park.
D.R. Michel                               Upper Columbia United Tribes

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

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

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

Helen Curtis

There are questions about how adequately Cultural and Archaeological Resources were addressed.

Chris Bachman                               Sierra Club

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

James Harrison                     Spokane Tribe of Indian Archaeology and Preservation Program

Mount Spokane is a significant land form and Traditional Cultural Place (TCP) to the people of the
Spokane Tribe. The Spokane Tribe Archaeology and Preservation Program recently recorded Mount
Spokane as a TCP with the Washington State SHPOs office. Washington State Park’s own recent
discusses Mount Spokane’s potential as a Tribal TCP. Thus, the DEIS (III-116) incorrectly makes the
statement that, Under both action alternatives, there would be no effect on known historic, cultural or
archaeological resources as none are formally recorded, to date, within the expansion area.

James Harrison                     Spokane Tribe of Indian Archaeology and Preservation Program

In the few archaeological surveys that have been conducted there seems to have been a focus on small
scale ground impacts and on historic, rather than indigenous resources and land use. The
anthropological significance of the mountain to surrounding tribes is barely touched upon. The
investigators did not inquire with the Spokane Tribe; if they had Precontact cultural resources on the
mountain would have been documented earlier. The DEIS incorrectly states that the only expected
impacts to cultural resources from the PASEA project are related to historic structures on or near the
summit. These resources, while significant, are only one small and short term aspect of the mountain’s
cultural resources. The Spokane Tribe has been intimately connected to Mount Spokane for as long as
oral history recounts. For the Spokane Tribe the significance of Mount Spokane includes: the location
of a creation myth, a vision quest and prayer site, an important hunting and gathering location for first foods and medicinal plants, and a territorial marker.

James Harrison Spokane Tribe of Indian Archaeology and Preservation Program

The DEIS does not address an ethnographic TCP study as requested by the Spokane Tribe Archaeology and Preservation Program in it’s pre-DEIS scoping comments.

Jackie Corley Spokane Tribe of Indians

Mount Spokane has recently been recorded as a Traditional Cultural Property (TCP) with the Department of Archaeology and Historic Preservation (DAHP). The mountain also has many stories related to the mountain itself about creation, and traditional collection of huckleberries and bear grass. The original requests from the Spokane Tribe included the requirement of a TCP study, consideration for traditional plants that are collected by the tribe, and a full archaeological survey of the mountain. Both the TCP study and archaeological survey are yet to be conducted.

Jackie Corley Spokane Tribe of Indians

On page III-16 it is stated that the draft EIS will contain descriptions and the existing conditions of historic, cultural, and archaeological resources. The analysis is said to comply with the governor’s executive order 05-05 and consultation with interested tribes and the State Historic Preservation Officer (SHPO). The sections in the EIS are very brief when it comes to the topic of cultural resources and although the tribe was contacted many of the requests from the Spokane Tribe were not addressed.

Group Response: Development activity on Washington State Park and Recreation Commission lands is frequently subject to state and federal regulations governing the identification and evaluation of cultural resources. The primary federal regulation is Section 106 of the National Historic Preservation Act of 1996 (as amended). Projects subject to this regulation are those involving: development on federally owned land (State Parks leases many of its parks from the federal government); development requiring federal permits; or developments using federal funding. At the state level, the Governor’s Executive Order on Cultural Resources 05-05, directs state agencies using monies from the legislature for Capital developments (Capital dollars) to take into consideration their impacts to cultural resources as well as consult with interested tribal governments. Because the proposed expansion of the Mount Spokane Ski and Snowboard Area is a private undertaking, it is not be subject to Section 106 of NHPA or the Governor’s Executive Order (05-05). Instead, Mount Spokane 2000’s undertaking is subject to the State Environmental Policy Act (SEPA) and Spokane County land use regulations.

A cultural resource survey will be performed of the proposed ski expansion area. However, it will not be scheduled until funding and approvals for the development have been secured.

State Parks is concerned about the identification and protection of important cultural resources on its’ properties. This includes Mount Spokane 2000’s proposed ski area expansion on the northwest side of Mount Spokane. In reviewing the proposal for the DEIS, State Parks staff examined the archaeological database at the Department of Archaeology and Historic Preservation (DAHP) and our own park files for previously recorded archaeological sites in the park. Results of this records check indicated 25 historic
structures are recorded within the park. Sixteen of these structures are part of a cultural landscape associated with the Civilian Conservation Corps (CCC). No archaeological sites are within the boundaries of the park. Since the preparation of the DEIS, the Spokane Tribe submitted a form (August 20th, 2014) to DAHP identifying the upper reaches of Mt. Spokane as a Traditional Cultural Property (TCP). State Parks has reviewed the TCP form submitted to DAHP, due to the sensitive nature of the designation, State Parks staff will confer directly with representatives of the Spokane Tribe to address issues related to its protection.

Mike Petersen  
The Lands Council

*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.*

Mike Petersen  
The Lands Council

*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 Alternate 4 says “Construction of facilities, such as recreational trails, ski runs and lift towers, have the potential to negatively impact historic, cultural, and archaeological resources (see Section 3 3.7.1, Historic, Cultural, and Archeological Resources for a detailed analysis of the potential impact 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.*

James Harrison  
Spokane Tribe Archaeology & Preservation Program

*We see Mount Spokane is a significant and critical part of the Tribe’s cultural landscape. We recently recorded Mt. Spokane as a TCP… PASEA is not a small project, it is going to have huge impacts on the mountain and its integrity and equally large adverse view shed impacts based on its location.*

Jackie Corley  
Spokane Tribe of Indians Archaeology and Preservation Program

*I have major concerns with the lack of archaeological research that has been performed up to this point, and the EIS does not adequately address the processes that will be taken to protect cultural resources. The sections that do mention archaeology are left rather vague, and lack adequate information. Mount Spokane has recently been recorded as a Traditional Cultural Property (TCP) with the Department of Archaeology and Historic Preservation (DAHP). The mountain also has many stories related to the mountain itself about creation, and traditional collection of huckleberries and bear grass.*
Mount Spokane State Park has had a long history with Native Americans, yet the prehistory has not been fully established (II-23). Mount Spokane needs more archaeological surveys to be conducted to further explore the prehistoric importance of the area. Historically there have also been several archaeological studies that have yielded ten features that were eligible for the National Register. On page III-16 it is stated that the draft EIS will contain descriptions and the existing conditions of historic, cultural, and archaeological resources. The analysis is said to comply with the governor’s executive order 05-05 and consultation with interested tribes and the State Historic Preservation Officer (SHPO). The sections in the EIS are very brief when it comes to the topic of cultural resources and although the tribe was contacted many of the requests from the Spokane Tribe were not addressed.

Group Response: The narrative language below will be added to the FEIS at Section II, section 3.7.1.1:

Mount Spokane is generally considered by ethnographers to be within the aboriginal homeland of the Upper Spokane bands, a subgroup of the Spokane Indians, although use by nearby native groups such as the Lower and Middle Spokane, Coeur d’Alene, Kalispel, Colville, San Poil, and Nespelem peoples is also suggested by some sources. Ray (1936) goes so far as to make Mount Spokane an intersection point of Upper Spokane, Kalispel, and Coeur d’Alene territorial boundaries, thereby inferring joint use if not joint occupancy. All groups shared a dependence on resources acquired by a fishing-hunting-gathering technology.

Food and other subsistence resources were obtained via a seasonal round, whereby native groups circulated through their territories (and those of others) to pursue the changing opportunities for plants and animals. Using localized campsites or seasonal habitations, the annual round began in spring when bands and families abandoned their winter villages (Ross 1991, 1998, 2011). Uplands such as Mount Spokane were known as prime berry and game areas (Curtis 1911; Wynecoop 1969). Additional upland plant resources included beargrass, Oregongrape, kinnikinnick, flora with distinct medicinal qualities, and trees such as Western redcedar, tamarack, and cottonwood.

As the highest elevation in proximity to traditional Spokane territory, it seems reasonable that Mount Spokane was also a destination for aboriginal vision quests and additional puberty rites. Such activity often entailed the stacking of large stones to construct alignments and cairns. Prehistoric cairns in upland locales frequently command panoramic views and can signify vision quests or commemorate other important events (Cline 1938; Mandelbaum 1938; Ray 1942, Teit 1930). Although no prehistoric cairns are presently known on Mount Spokane summit, one 1895 travel account up the mountain provides evidence for this apparent aboriginal land-use. Mount Spokane also plays a role in the creation traditions of Spokane native peoples. Most recently, Spokane tribal representatives have identified Mount Spokane as a Traditional Cultural Property (TCP), as a place or location with traditional cultural significance to a living community.

For clarification, at Section III, Table EIS 2-4 Mitigation Measures and Best Management Practices Incorporated in the Project Proposal under “Cultural Resources” the following language has been added:
State Parks archaeologists or a professional State Parks designee will undertake a Phase I cultural resources survey in advance of timber removal and other project construction activities.

Identified cultural resources (i.e., artifacts, features, and sites) will be appropriately recorded with the Department of Archaeology and Historic Preservation (DAHP).

Following timber removal within formal ski runs and prior to any construction within the formal ski runs, all harvest areas will undergo a Phase II cultural resources survey by State Parks archaeologists or a State parks designee to identify additional cultural resources.

If human remains are found during project activities, interested tribes, DAHP, State Parks, and law enforcement personnel will be notified and all work in the immediate area will cease.

Results of Phase I and II survey will be compiled into a professional report of findings that complies with DAHP reporting standards. Cultural resources staff of the Spokane Tribe, Coeur d’Alene, the Kalispell Tribe, and the DAHP will have the opportunity to review and comment upon the survey report.

**CLIMATE CHANGE**

Mike Petersen  
**The Lands Council**

*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.*

Kim Thorburn

*One environmental impact to be elaborated in this DEIS, and not fully considered in the analysis, would be the potential impact on climate change by the 2 action alternatives. No action is, at a minimum, greenhouse gas-neutral and even possibly, -reducing. The action alternatives would add greenhouse gases to the atmosphere, thus contributing to the ever increasing acceleration of climate change.*

Mike Petersen  
**The Lands Council**

*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.*

Mike Petersen  
**The Lands Council**

*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. Global warming could impact profitability for the ski area.

Chris Bachman  
Sierra Club

Neglecting to address the potential impacts of global climate change is an oversight that must also be addressed. There is need to address the potential impacts of global climate change on the future viability of the ski concession. This should include the importance of intact subalpine forest over clear cutting for a few more ski runs that may be obsolete in the absence of snow at Mr. Spokane’s elevation.

**Group Response:** State Parks has used 2011 guidance used by the Washington Department of Ecology (DOE) on including greenhouse gas emissions and climate change in SEPA review. The greatest potential greenhouse gas impact from the proposal is the removal of trees. Per Department of Ecology guidance, projects that are expected to annually produce an average estimate of at least 10,000 but less than 25,000 metric tons of CO2e (carbon dioxide equivalent), should at least qualitatively disclose the GHG emissions caused by the project. In eastern Washington, 213 acres of tree removal is necessary to produce 10,000 CO2e. The most intensive alternative for ski area expansion would remove 76.1 acres trees. Using the DOE guidance no disclosure or mitigation measures related to greenhouse gas emission are proposed.  
(http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf)

See also WAC 197-11-448 and WAC 197-11-450 regarding the content of EIS’s as they relate to methods of financing and cost-benefit analysis.

**CUMULATIVE IMPACTS**

Billy Crawford-Heim

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 State Environmental Policy Act (SEPA).6 (Footnote 6 Washington State Environmental Policy Act, 43.21C RCW, et seq.) The absence of such mitigation is grounds for denial of any governmental action granting the PSEA to be converted into a developed ski area.7 (Footnote 7 RCW 43.21C.075.)

**Response:** See Section III, section 2.4 – Mitigation Measures.

Fayette Krause

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.

Response: Cumulative impacts are the effects that may result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. Generally, an impact can be considered cumulative if: a) effects of several actions occur in the same locale; b) effects on a particular resource are similar in nature; and c) effects are long-term in nature. As such, the impacts the reader describes are specifically related to the project action which have been analyzed by resource within the project EIS.

Future projects that could cumulatively impact the Study Area include implementation of the Comprehensive Trail Plan, which is part of the 2010 Master Facilities Plan. The Comprehensive Trail Plan contemplates a multi-use trail in the PASEA, depending upon the land classification adopted (see Section II).

Fayette Krause

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.

Response: The reader is correct. The text on page II-23 of the FEIS has been revised to state that the loss of hike-to, backcountry and side-country ski terrain, as well as solitude during the summer months would be a cumulative impact to recreation under Alternative 4, not Alternative 2.

EIS TEXT COMMENTS

John Roskelley

The DEIS claims that the present ski area has only 280 acres of trails, and tree and open skiing (by using Google Earth’s mapping program, the 280 acres seems underestimated by considerable acreage).

Response: Section III, section 1.1 – Introduction describes that Mount Spokane Ski and Snowboard Park, “maintains 32 ski runs, 5 chairlifts, 2 lodges (including restaurant, lounge, ski school, equipment rentals), a ski patrol building, and various administrative support structures on 1,425 acres (see Figure EIS-2).”

Douglas Dumais

I couldn’t help but notice under the heading “Purpose of the combined DEIS” the following wording “…evaluate the PROBABLE adverse environmental impacts…”. To me, that wording implies someone’s mind is already made up that the proposed development is a negative for the environment.

Response: EISs are prepared for projects that an agency (e.g., State Parks) views as having significant probable environmental impacts. Every EIS provides a discussion of significant environmental impacts and reasonable alternatives (including the No Action alternative) which would avoid or minimize adverse impacts or enhance the quality of the human environment. In many cases, both positive and negative
impacts to individual resources may occur, as is the case here and why State Parks has developed this environmental analysis.

Holly Weiler

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

**Response:** See Table EIS 3.3-2: Plant Associations Found in the Study Area for the common name, scientific name and corresponding map code for the vegetation communities found within the expansion area.

Holly Weiler

*Page II-17 lists types of skiing. The list provided on this page is straightforward and easy to understand. Page II-2 adds an additional category of “Alpine ‘backcountry’ skiing” that is nowhere defined within the document, and is misleading/confusing to the reader.*

Fayette Krause

*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 p. 3. Alternative #2 could be created permitting back-country skiing as a conditional use in the Natural Forest.*

Anne Martin

*The DEIS uses the term “off-trail cross-country skiing” and backcountry skiing, which is the same thing. The term cross-country or nordic is actually another way to describe backcountry skiing. The term “Backcountry Alpine Skiing” used in the DEIS does not exist in skiing literature. Inventing a term for the purposes of excluding a more modern, fatter, cross-country ski makes absolutely no sense. The proper term is Alpine Touring or backcountry skiing, which is not the same as alpine skiing (downhill in a resort).*

Chris Bachman

*State Parks continues to define backcountry skiing as alpine skiing. This definition is flawed. Alpine skiing, by definition is lift served. Alternative Two would prohibit the addition of a lift in the undisturbed sub alpine ecosystem in the Proposed Alpine Ski Expansion Area. With no lift, by definition, there would be no alpine skiing. Backcountry skiing on the other hand is a low impact activity that requires no alteration of the current environment. The prohibition of backcountry skiing is inconsistent with the allowance of mountain biking and equestrian use, both which impact the environment much more substantially. The prohibition of backcountry skiing can only be seen as a political maneuver attempting to shift skier support to other alternatives. Washington State Parks, as a state agency, should employ a more even handed approach.*
John Osborn

Regarding alternatives, I support Alternative Two, the Natural Forest Alternative with the following qualifier: backcountry skiing should be allowed to continue in the PASEA.

Chris Bachman

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

Greg Gordon

How will state parks be able to distinguish between off-trail cross-country skiing, which is listed as a permitted activity and backcountry skiing, which would not be permitted? Since this distinction seems rather arbitrary, we suggest that non-motorized low-impact activities (hiking, snowshoeing, skiing) be allowed as long as these activities do not interfere with the preservation of natural forest conditions.

Jeff Lambert

The DEIS incorrectly excludes backcountry skiing from the NFA land classification. Backcountry skiing is low impact and is either no more damaging or even less damaging than cross country skiing that is included as a use in NFA. The definitions of cross country skiing, backcountry skiing and alpine skiing are quite broad and nuanced. So for example, the impact of crosscountry skiing on tracked and groomed trails has a greater impact than backcountry skiing that does not require any modification to the natural forest. We request that backcountry skiing without roads, lifts or other ground disturbance be allowed in the NFA classification. The inclusion of backcountry skiing provides a place for this activity in a near Spokane location that is otherwise not available.

Jackie Corley

If such activities as snowmobiling and snow shoeing are allowed as before, why has backcountry skiing been prohibited? This needs to be further explained in the EIS, and the relationship that the removal of alpine or back country skiing has in the land classification change that would likely result in removal of the PASEA from the current MS 2000 Concessionaire Agreement.

Group Response: The skiing that is done within the PASEA is not a true backcountry skiing experience. Many skiers who utilize this terrain access the summit of Mount Spokane from the base area via Chair 1, ski through the PASEA and skate along Chair 4 Road to access Chair 4. As such, the PASEA currently functions as a round trip, lift-served ski pod, however inefficient. This is unlike a traditional backcountry skiing experience where skiers hike to terrain rather than utilizing a chairlift to facilitate access. By restricting lift-served alpine skiing from the PASEA through a NFA classification, the Commission would provide clear direction to Park staff that their intent for this area is that it be managed for preservation, restoration, and interpretation of natural forest processes.

To avoid confusion, a clarification has been made to Alternative 2 in the FEIS stating the following:

Lift-served “backcountry” or “side-country” alpine skiing that occurs on ungroomed terrain either within or outside of the ski area boundary would not be permitted under Alternative 2. Pursuant
to the Land Use and Land Classification Compatibility Matrix, any type of lift-served skiing is considered “Alpine Skiing” and is not permitted within the NFA classification.

Backcountry skiing which is not lift-served and involves human-powered hiking, snowshoeing or use of cross-country skis to reach an elevation that allows for downhill skiing is considered “Off-trail Cross-Country Skiing” which is a permitted use in the NFA classification consistent with State Park’s Land Use and Land Classification Compatibility Matrix.

This clarification acknowledges that lift-served backcountry skiing has the potential to introduce increased numbers of skiers into the NFA classification. Wildlife impacts associated with increased human presence include disturbance and habituation. Traditional backcountry skiing requiring human-powered ascent comprises a smaller user group that would have less potential to negatively impact wildlife.

ENVIRONMENTAL HEALTH

Mike Petersen The Lands Council

*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 unfragmented 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.”*

**Response:** State Parks has been in frequent consultation with WDFW during the development of the 2011 Final Supplemental Environmental Impact Statement and this 2014 Draft EIS. As such, State Parks considers the comment letter WDFW has submitted in response to this 2014 analysis as representing WDFW’s most current understanding of the actions being contemplated by State Parks and the existing environmental conditions of the project area. Additionally, the scope of the project currently under consideration has been significantly reduced in size since this 2008 letter was submitted (see DEIS Page III-6).

Grace King Gonzaga University Legal Assistance

*Parking amenities usually include an increase in impervious surface, removal of vegetation, and cause an increase in traffic, noise, pollution, and litter. These characteristics and activities often lead to compromises in biogeochemical cycling, recreational aesthetics, and ecosystem balance.*

**Response:** Under the project action alternatives, no additional parking is proposed, therefore no increase in impervious surfaces or removal of vegetation is anticipated for vehicle parking.

Section III, section 3.7.5.2 – Environmental Consequences discusses the existing parking capacity of the ski area and mitigation measures proposed to improve Average Vehicle Occupancy (AVO) and to more efficiently provide parking for ski area guests.
This section also states that the relatively low level of increased vehicular traffic associated with implementation of either of action alternatives contemplated by the project action are not anticipated to result in measureable direct or indirect impacts to local and regional air quality.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

In section 3.7.7, the DEIS states that none of the alternatives will have a negative impact on the environmental health of surrounding property, without discussing environmental health impacts for the PASEA. This is also an incredibly vague section. More detail should be provided in the FEIS as to the specific environmental health impacts of each alternative.

Response: None of the resources analyzed in section 3.7 are anticipated to be significantly impacted by the Proposed Action (see Section III, section 2.3.1). Under the State Environmental Policy Act rules (WAC 197-11-794): “Significant as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality.”

FACILITIES

Ruth Ptak University Legal Assistance

For instance, the lodges could be upgraded and/or rebuilt, the existing chairlifts could be improved, and the use of the ski lodges, trail areas, and parking lots could be expanded for year-round use. These alternatives were never addressed in the DEIS, yet they represent some of the most viable, environmentally-friendly, and cost efficient ways of increasing public use of Mt. Spokane’s facilities, trails, and environment.

Anonymous

Mt Spokane and in particular Spokane 2000 have been pushing this for 10 years now, while mostly ignoring the real issues the resort has. 1. Old worn out lift system. Band aid fixes on chairs that are breaking down, leaving skiers stuck on chairs for lengthy amounts of time. 2. Base area facilities. Lodge one is a joke, no one but SSRA uses it only open on weekends vintage 50’s bathrooms. Lodge 2 food service is a terrible layout bathrooms a joke, to small on most weekends.

John Roskelley

Obviously, the current ski area served by the built environment (lodges, chairs, trails, etc.) is underutilized. Increasing the existing ski area acreage by building new trails through the south and southeast forest stands is where the efforts of Mount Spokane should put their limited funds and resources, not installing another used, old and slow chair through the PASEA and clear-cutting seven new trails. The facility’s lodges, roads, parking, septic systems and, in general, infrastructure need a great deal of repair and long overdue maintenance before expanding into and destroying the PASEA.

Anonymous

Fixing the current facilities would have a more positive impact.
Craig Lukes

The ski area needs to address the issues inside the boundary markers instead of the backside expansion. Chairlifts parking lodge 1 brush cutting and thinning of trees you don’t have to look very far to see what is needed.

What are the lost opportunities by investing in new infrastructure instead of fixing up needed lodges and existing lifts?

Jackie Corley

The parking lot has potholes and gravel all over and the roads and the roads are very narrow. Such narrow roads with a significant increase in traffic would pose safety hazards with ice on the road for cars and people. I have experienced the parking lot at Mount Spokane during the weekends and holidays, and the roads are very unsafe in my opinion. They pose a safety hazard; there is not enough parking near the lodge so cars are parked along the road leading to the resort. On busy weekends cars are even told to park in the middle of the road with two lanes of cars on either side. This situation has been overlooked much like the condition of the lodge. I believe it would be in the mountains best interest to improve the resort to draw in customers, invest in snow makers due to the southern location of the runs, and improve the park they already have, before expanding.

Group Response: Since the beginning of the process when MS 2000 first proposed to expand into the PASEA there have been many improvements made throughout the existing ski area. Over the last ten years this has included numerous lift upgrades, installation of a new surface lift and tubing hill, expansion and numerous remodels of Lodge 2, interior and exterior improvements to Lodge 1, sewer, water, communications and point-of-sales improvements, upgrades to the night lighting system, acquisition of new snow groomers, construction of a new daycare/snowplay facility, rental shop remodel and equipment purchases, ski trail upgrades and other investments designed to improve the overall quality of the guest experience. As a non-profit concessionaire operating in the State Park system, MS 2000 makes all of its investments for the benefit of the public.

Additionally, an infill alternative was considered but eliminated (see Section III, section 2.1.1.4) as it would not address the need for consistent gradient and consistent fall-line low intermediate and intermediate level ski terrain.

David Kirkingburg

We have seen facility, terrain and chairlift expansion at Schweitzer, 49 North, Silver Mountain and Lookout Pass. Given the multitude of choices, it is inevitable that Mt. Spokane must offer similar improvements in order to remain relevant. The economic reality is that businesses must meet the demands of their customers, or face extinction. Our commentary is representative of a large number of long-term supporters of Mt. Spokane. We urge the regulatory process to find in favor of PASEA Alternative 4 and the subsequent chairlift expansion.

Response: Comment noted.
Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

The FEIS should include information about the source of Avista’s power. Many individuals in the area are concerned about clean energy, and the additional energy needs of Mt. Spokane could be significant, which in turn would lead to increased greenhouse gas emissions.

Response: As noted in Section III, section 3.7.8.2, the existing power line has sufficient capacity to provide energy for another top drive chairlift. Implementation of alternative power strategies is outside the scope of this analysis.

Mike Petersen The Lands Council

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.

Response: The DEIS contemplated an infill alternative (see Section III, section 2.1.1.4 – Infill Option). As noted in the DEIS the terrain distribution for a Chair 4 in-fill plan would result in a notable increase in expert terrain, which would not meet the Purpose and Need for additional consistent gradient and consistent fall-line low intermediate and intermediate level ski terrain. Furthermore, the addition of any new ski trails or chairlifts within the existing developed ski area would not address the need to increase the available inventory of round trip, consistent gradient, intermediate level trails within the concession area, which would allow for better circulation and more even distribution of low-intermediate and intermediate level skiers throughout the ski area.

Mike Petersen The Lands Council

We are concerned that the concessionaire has trouble managing what they already have.

Response: Comment noted. No change in document required.

Mike Petersen The Lands Council

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.

Response: Comment noted. The comment letter from Mr. Reynolds discusses the rope tow that existed in the proposed expansion area, which is consistent with the description in the DEIS text. During the 2010 vegetation study a cable from this tow was observed in the 279-acre expansion area.

The extent of historic facilities, as they existed in the PASEA, have been considered in previous Commission meetings.

Anne Martin

We are very supportive of run and lift expansion within the existing footprint of the Mt. Spokane Ski and Snowboard Park, and we want to see resources directed away from development in the PASEA to a new lodge 2, a remodeled lodge 1, and upgrades to parking.
Response: Comment noted. No change in document required.

Holly Weiler
I did wish to take the time to comment on some of the mitigations listed within the document. Mitigation measures from section 2.5.1, numbers 6, 7, 8, 10, 13, 18, and 19 (page II-6-7); section 2.5.2, numbers 1, 8, and 9 (page II-7); and section 2.5.3, number 3 are not being followed within the alpine ski area’s current concession area. The document does not indicate how State Parks would address a failure on the part of the concession to address mitigation concerns, and I find it deeply troubling that the proposed mitigations for the expansion are not currently being followed within the existing footprint. See the pictures below, taken during the summer of 2013, for a visual of the current problems: Photo #1 taken from the chair 3 cat track and above chair 5 and Lodge #2. Yellow flowers in foreground are klamath weed (also known as common St. Johnswort); pink flowers are knapweed. No evidence of measures to control noxious weeds, nor to reestablish native vegetation. Tire tracks show failure to keep vehicle traffic to a confined area (notice off-established route tire tracks in the upper portion of the photograph heading to the lower right quadrant of the photo and off cat track). Road is overly steep and no erosion controls are in place (neither for wind nor water erosion). Photo #2 taken from the chair 3 cat track within the alpine ski concession area. Yellow flowers are klamath weed (aka, St. Johnswort), a recognized noxious weed. Just above center left of photo, note highly eroded section near chair riblet. No indication of noxious weed control or attempt to reestablish native vegetation. The DEIS mitigation measure 2.5.2 #8 states that trails must be regularly monitored to identify and eradicate all non-native and invasive species before they become established. Both photo #1 and #2 indicate a failure to do so within the current concession area, and imply a high likelihood that the concession would continue to fail to address this concern within the PASEA, where there are currently no established populations of invasive weeds, and no erosion problems. Photo # 3 depicting derelict bus and equipment left at the top of chair 3 within the alpine ski concession area. Within the DEIS, the document states the concession must enforce measures to ensure trash or refuse associated with construction is minimized. The trash from this photo may or may not be connected with construction, but it has been in place for years. No measures have been undertaken to clean the site. Photo #4 depicting derelict equipment left at the top of chair 3 within the alpine ski concession area. Under mitigation measure 2.5.4, #1 (page II-8), fall should additionally be considered under seasonality of trail use by wildlife populations. The huckleberry patches (and other wild berries) within the PASEA are of critical use to a wide variety of wildlife during the late summer/fall. It is unclear why the fall season was left off the mitigation list, but it is clear that cutting large swaths of forest for a chair lift and ski runs would have a negative impact on berry patches. The concession currently uses brush cutters to clear runs within the concession area (posting a recent photo of a ski run groomer pulling a brush hog to its Facebook page). Huckleberry bushes are slow growing, and cutting them with a brush hog would prevent berry production for several years. These berry patches are critical wildlife foraging sites in the fall season. The huckleberry patches are also considered culturally significant to the Spokane Tribe, and are therefore a cultural resource within the park (along with the bear grass that currently grows within the PASEA, another slow-growing plant that would be impacted for years should it be disturbed).
Response: Comment noted. Staff resources have impacted the ability to monitor noxious weeds in some areas of the park. As part of the 2015–2017 budget, State Parks has requested funding for a dedicated staff person to address these issues at Mount Spokane and Riverside State Parks. The mitigation measures proposed to be implemented should either of the action alternatives contemplated by the project EIS be selected would be incorporated into project level implementation documents discussed in Table EIS 2–4. These implementation documents would have contingency measures that would be enacted should they not function as planned. One example of this would be the dynamic nature of a Stormwater Pollution Prevention Plan (SWPPP), if erosion control measures are not effectively restricting the mobilization of soil during construction, additional structural Erosion and Sediment Control Plan (ESC) measures would be utilized.

The operational plans (e.g., vegetation management) that govern the existing ski area operation are outside the scope of this analysis.

As noted previously, huckleberries do well within the cleared ski runs and should continue to be abundantly available within the park.

GENERAL OPPOSITION TO THE SKI AREA EXPANSION

The individuals listed below submitted a form letter provided by The Lands Council. Due to the similarity in these comments they have been grouped together and only one response is provided. The substantive portions of this form letter have been included, by resource area, within the remainder of this Appendix. This is in no way a reflection of the level of importance placed by the agency on these individual’s comment letters.

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I support Alternative Two (2), Natural Forest Alternative (NFA) with one caveat. Back country alpine skiing should be allowed in the PASEA.

Ruth Ptak
University Legal Assistance

I believe that the Natural Forest Alternative (NFA), Alternative Two, ought to be supported. For this, however, I do have one caveat, which is that backcountry alpine skiing should be allowed in the PASEA.

Group Response: Comments noted. No change in document required. The non-project DEIS essentially contemplates this alternative already as Alternative 1 – No Action. As discussed in Section II, section 2.1,
the No Action Alternative reflects a continuation of existing management practices and activities without applying a land classification. Up to this point, staff has generally managed the area as a de facto Natural Forest Area. However, backcountry alpine skiing has been informally allowed to continue, even though this use is not otherwise permitted in Natural Forest Areas.

**Clyde Scalf**

*I ask you to do the right thing and that is to not allow clear-cutting of old growth forests for the thrill and pleasure of man for 4 months out of the year.*

**Sylvia**

*Clearcutting through the old growth on Mt. Spokane so that a limited number of people can enjoy skiing a limited number of weeks a year is not a good decision for the environment, people, and wildlife.*

**Anonymous**

*I am against constructing a new chairlift and the seven new ski trails which would require clear cutting of the old growth forest in the area. Old growth, native forests are an increasingly rare and irreplaceable resource that should be protected and enjoyed by the community intact.*

**Group Response:** Comment noted. A description of the existing forested stands within the project area is contained in Section III, section 3.3 – Vegetation.

**Bryan E. Burke**

*Support Alternative 2 but do allow backcountry alpine skiing.*

**Response:** Comment noted. No change in document required.

**Jasa Holt**  
**Washington Natural Heritage Program**

*The Washington Natural Heritage Programs strongly recommends Alternative 2 be adopted to recognize the value of the area in its natural condition.*

**Response:** Comment noted.

**Jeff Lambert**  
**Spokane Mountaineers**

*The DEIS does not fully explain the adverse effects of development that is expected under less stringent land use classifications. The development of recreation uses under the other land use classification alternatives will change the composition of flora and fauna, increase erosion and landslides and affect stream water quality.*

**Response:** Comment noted. No change in document required.

**Kyle Walters**

*Please do not allow this expansion. It is not necessary as all the terrain is already accessible. That side of Mt. Spokane being undeveloped makes the mountain unique.*

**Response:** Comment noted.
Anonymous
The back side of the mountain should be left undeveloped and left to the wild life that cohabits this area and the back country skiers in the winter.

Response: Comment noted.

Linda Bartholomew The Episcopal Church of the Resurrection
I hope you will choose to protect these valuable, irreplaceable gifts with your considered vote for a protected forest we can enjoy now and later.

Response: Comment noted. No change in document required.

Lawrence Schuchart
I know for a fact that the Moose and other wild life travel the loop from Mt. Spokane to Brown’s Mountain out to the wildlife sanctuary near Cheney. If you destroy that last stand of old growth wildlife will have no other place to go.

Response: See Section III, section 3.4 – Wildlife for a discussion of the existing wildlife and wildlife habitat as well as the expected short-term and long-term impacts of the project alternatives within the Mount Spokane Study Area.

Ann and John Klekas
The existing ski runs on Mt. Spokane are perfectly adequate for recreation and therefore there is no excuse for destroying old growth forest and wildlife habitat for amusement.

Response: Comment noted. No change in document required.

Steve Llewellyn
I am writing to express my strong support for Alternative 2, the Natural Forest Alternative (NFA) designation for the PASEA. Additionally, I also want to express my support for allowing back country skiing, which I understand will not be allowed if the decision is made to designate the PASEA as NFA.

Response: Comment noted. No change in document required.

Richard Craven
I support Alternative Two (2), Natural Forest Alternative (NFA) with one caveat. Back country alpine skiing should be allowed in the PASEA.

Response: Comment noted. No change in document required.

Liesel Lehrhaupt
I support Alternative 3: Resource recreation & natural forest area, no chairlift or trails, backcountry skiing allowed.

Response: Comment noted. No change in document required.
Lori Raney

I do NOT support the expansion of the Mt. Spokane Ski Area. I have skied at Mt. Spokane for 40 years and think it is a great ski area just as it is. New runs and a new chair lift will be detrimental to the natural environment and the wildlife that lives there. Expansion would also bring more automobile traffic.

Response: Comment noted. No change in document required.

Faye Weiler

Re: The proposed ski expansion on Mt. Spokane I again wish to express my strong opposition to this ski expansion. This would eliminate the ONLY old growth forest still remaining in all of Spokane County, the second most populous county in WA. It would benefit a very small percentage of the citizens of this state, only those who downhill ski.

Response: Comment noted. No change in document required.

Tyler Tupper

As a skier who uses lift serviced and non lift serviced areas on Mt Spokane, I support Alternative 3, allowing backcountry skiing, but no new lift. The addition of 7 new runs seems silly and unnecessary, because you can already access that area of the mountain with a 5 minute walk from the top of the chair 1 lift.

Response: Comment noted. No change in document required.

Kim Thorburn

I am writing to express my strong support for alternative 1 (no action) for the Mount Spokane PASEA DEIS for Proposed Ski Area Expansion.

Response: Comment noted. No change in document required.

Kim Thorburn

I am writing to express my strong support for alternative 2 of the Mount Spokane PASEA DEIS for Land Classification. The currently unclassified Potential Alpine Ski Area Expansion (PASEA) encompasses a special and environmentally sensitive ecosystem that calls out for the highest level of protection, i.e., natural forest area.

Response: Comment noted. No change in document required.

David Plemons The Lands Council

There are alternatives for expanding the business of the ski resort. The Land’s Council has provided you with several more sensible options. Don’t break the public trust to protect the natural beauty of the park for future generations.

Response: Comment noted. No change in document required.

Anonymous

I strongly encourage the State to deny the expansion.
Response: Comment noted. No change in document required.

Eric Armstrong

I am adamantly opposed to the ski area expansion. For one single reason: Currently, Mt. Spokane is the ONLY mountain in the Washington State were hikers, bikers, Horseback riders, snowshoers, and back country skiers can traverse from the bottom of the mountain to the top completely on singletrack/natural trails. If the expansion is allowed, this one of a kind natural experience will be lost to Washington State forever.

Response: Comment noted. No change in document required.

Eric Eikrem

My vote for alternatives offered in Section 1: - Alternative 3 - Resource Recreation and Natural Forest Area. No Chairlift or Trails. Back country skiing allowed.

Response: Comment noted. No change in document required.

Randy Krus

The expansion of the Mt. Spokane ski park area is not a necessary expansion. The market is in decline. Seem like a poor time to expand.

Response: Comment noted. No change in document required.

Kathryn Ellis

The Natural Forest Alternative is the best choice.

Response: Comment noted. No change in document required.

Laurie Jackson

This proposal will wipe out the primary recreational area on the upper north side of the mountain--several entire trail systems will be erased, huckleberry gathering areas will be denuded, historic sites affected, and old growth forest gone.

Response: Comment noted. No change in document required.

Silas McQuain

NO MT. SPOKANE SKI AREA EXPANSION! Alternative 3 - Resource Recreation and Natural Forest Area. No Chairlift or Trails. Back country skiing allowed.

Response: Comment noted. No change in document required.

Ken Frederick

There should be no chairlift or development on the northwest side of Mt. Spokane. It would drastically alter the natural setting there in a deleterious way.

Response: Comment noted. No change in document required.
William Sayres
I strongly oppose construction of a ski lift and new ski trails in the proposed expansion area. I have reviewed proposals and comments. The Mt Spokane ski concession will be better served by focusing their resources on improvement of existing facilities and dropping lift ticket prices to attract middle class skiers.

Response: Comment noted. No change in document required.

Elaine Thorne
I support the protection of the natural forest of Spokane Mountain and the preservation of habitat for wildlife of that area. The plans for ski runs and clear cut for a chair lift destroys the native forest that can not be replaced. This area is essential for wildlife and studies for the impact for destruction of the forest for recreational use of a few has not been conclusive.

Response: Comment noted. No change in document required. See Section III, section 3.3 – Vegetation and Section III, section 3.4 – Wildlife for descriptions of the existing and proposed vegetation and habitat conditions within the Mount Spokane Study Area.

Alexander Scott
I support, at minimum, Alternative Two, the Natural Forest Alternative. I also think that back country alpine skiing should be allowed in the PASEA.

Response: Comment noted. No change in document required.

James Harrison
I wanted to reach out to you as a fellow anthropologist and let you know that the Spokane Tribe is against this project.

Response: Comment noted.

Diane Burton
Do not cut any old growth except as necessary to prevent disease.

Response: Comment noted. No change in document required.

Grace King
This comment letter details why I support Alternative Two (2) and why I oppose Alternative Four (4), with particular attention to major concerns I identified in the reports, facts, and science, which formed the basis for the four alternatives listed in the DEIS.

Response: Comment noted.

Beverly Schoen
We need natural environments for wild life to remain healthy. Enough already....I thought this issue was dead and that their permit had been turned down.

Response: Comment noted.
D.R. Michel  
Upper Columbia United Tribes

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

Response: Comment noted.

Alan Shepherd

There is absolutely no need for another chairlift at Mt Spokane, I have had a season pass there for the last 30 years, there are rarely lift lines when all the current chairs are running and the terrain added would just be more of the same that was already up there. The early and late season argument is silly, you still have to ski the front side of the mountain to get back to the lodge and they always close at the same time no matter how much snow they have.

Response: The purpose and need for the project actions under consideration is detailed in Section III, section 1.3 – Purpose and Need.

Anonymous

Part 2 - Project Action - Alternative 1 - No Action. Lift and Trails are not approved at this time.

Response: Comment noted.

Anonymous

I am strongly opposed to the proposed expansion of the area. Further encroachment on the wild lands of Mount Spokane is not supported by the low number of user days seen by the ski area. I urge that the following action be taken: Part 1 - Land Classification - Alternative 3 - Resource Recreation and Natural Forest Area. No Chairlift or Trails. Back country skiing allowed.

Response: Comment noted.

Joseph Peters

The Backside Expansion proposed by Mt. Spokane 2000 is disgusting.

Response: Comment noted.

Landon Crecelius

Alternative 3 - Resource Recreation and Natural Forest Area. No Chairlift or Trails. Back country skiing allowed. I believe it is important to choose alternative 3 since this area is extremely pristine and the last area like this on the mountain.

Response: Comment noted. No change in document required.

Billy Crawford-Heim

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.

Response: Comment noted. The lands under consideration by the project and non-project EISs are administered and managed by the Washington State Parks and Recreation Commission.

John Roskelley
The DEIS for the classification of land and ski area expansion clearly indicates the PASEA should be classified as a Natural Forest Area as proposed in Alternative 2.

Response: Comment noted.

Beatrice Harrison
I strongly oppose the development of a new ski area on Mt Spokane. There are few areas in this part of the state that are more beautiful and pristine than this area of old-growth forest in our State Park.

Response: Comment noted.

Mary and Brain Jokela
We urge the Commission to adopt Alternative Two (2), Natural Forest Alternative (NFA) including back-country alpine skiing permitted in the PASEA.

Response: Comment noted. No change in document required.

Luke Bakken
I am writing to express my complete opposition to any expansion of the ski area within the boundaries of Mt. Spokane State Park. I have been a resident of Spokane for most of my life and even learned to ski at the ski area within the park. The ski area was, and still is, badly maintained when compared to other resorts in the area. The ski lifts are slow and out-of-date, the lodges are in disrepair, and concessions are third-rate. The existing ski area has sufficient capacity for current demand making expansion unnecessary. The cost involved would be better spent on improving the current facilities. The ski area is not turning away people due to a lack of acreage or lift capacity. Expansion of the ski area would necessarily involve destruction of large swaths of forest, some of which can be classified as old-growth. This forest provides wildlife habitat that would be lost forever.

Response: Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area. The proposal for additional ski terrain is in response to the purpose and need detailed in Section III, section 1.3 – Purpose and Need.

Ken Vanden Heuvel
I support Alternative Two (2), Natural Forest Alternative (NFA).

Response: Comment noted.
Lola Frederick

*We have an outstanding old growth area that begs for protection. It is simply irreplaceable. For that reason I am urging adoption of Alternative 2 of the DEIS.*

**Response:** Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area.

Laura Ackerman

*I am very much in favor of Alternative One in section three of the DEIS.*

**Response:** Comment noted.

Laura Ackerman

*I am very much in favor of Alternative Two in sections 1 and 2 of the DEIS.*

**Response:** Comment noted.

Helen Curtis

*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.*

**Response:** Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area and Section III, section 3.4 – Wildlife for a description of the existing and proposed wildlife and wildlife habitat conditions within the Mount Spokane Study Area.

Jeff Halstead

*I am writing to recommend that the Mt. Spokane PSEA be not approved.*

**Response:** Comment noted.

Larry Luton

*I support alternative 2. My major concerns are: 1. You cannot mitigate the loss of old growth forests. By definition they take too long to produce, so they are not replaceable. Therefore, any alternative that reduces the acreage of old growth forests should not be taken. 2. Considering the impacts on global climate change should be part of everything we do.*

**Response:** Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area. The FEIS has been updated to include additional potential compensatory mitigation measures to address concerns related to compensation for the loss of native forested communities (see Section II, section 2.4.2).

State Parks has used 2011 guidance used by the Washington Department of Ecology (DOE) on including greenhouse gas emissions and climate change in SEPA review. The greatest potential greenhouse gas impact from the proposal is the removal of trees. Per Department of Ecology guidance, projects that are
expected to annually produce an average estimate of at least 10,000 but less than 25,000 metric tons of CO2e (carbon dioxide equivalent), should at least qualitatively disclose the GHG emissions caused by the project. In eastern Washington, 213 acres of tree removal is necessary to produce 10,000 CO2e. The most intensive alternative for ski area expansion would remove 76.1 acres trees. Using the DOE guidance no disclosure or mitigation measures related to greenhouse gas emission are proposed. (http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf)

Lunell Haught

*Please choose Alternative 2 and if possible allow back country alpine skiing in the PASEA.*

**Response:** Comment noted. No change in document required.

Holly Weiler

*I am writing to request the Parks Commission to adopt Alternative 2, Natural Forest Area designation, for the Land Classification portion of the DEIS for Mount Spokane State PagPark’s PASEA.*

**Response:** Comment noted.

Ken Frederick

*Development of the northwest side of the mountain will ruin a scape that is beautiful in its natural state. The pristine nature would be lost forever.*

**Response:** Comment noted.

Norm McNulty

*I am opposed to any expansion that would result in cutting down old growth timber. Such timber is important for sequestration of carbon dioxide. It is also important for wildlife habitat; wildlife must be able to roam freely and not be inhibited by more paving and structures. Additional problems caused by an expansion would be increased air pollution, including carbon dioxide, from more automobiles using the area. The last thing we need in the face of climate warming (climate change) is additional destruction of plant and animal habitat.*

**Response:** Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area. No change in document required. See Section III, Chapter 3 for the impacts, both positive and negative, by resource of the action alternatives contemplated by the project EIS.

Jonathan Moo

*Please designate this area as a Natural Forest Area and allow it to go on supporting the wide range of wildlife that depends on it and providing a place human-powered exploration (which, it seems to me, includes backcountry skiing--I don’t quite understand why it would be disallowed, so long as it remains illegal to cut down trees).*

**Response:** Comment noted. The skiing that is done within the PASEA is not a true backcountry skiing experience. Many skiers who utilize this terrain access the summit of Mount Spokane out of the base area.
via Chair 1, ski through the PSEA and skate along Chair 4 Road to access Chair 4. As such, the PSEA currently functions as a round trip, lift served ski pod, however inefficient. This is unlike a traditional backcountry skiing experience (e.g., helicopter skiing or true hike-to terrain) where the user never utilizes a chairlift to facilitate access. By restricting “backcountry” skiing from the PSEA through a NFA designation, the Commission would send clear direction to Park staff that this area is for “preservation, restoration, and interpretation of natural forest processes…”

Jane Beaven

*I support Alternative Two (2), Natural Forest Alternative (NFA) but believe that back country alpine skiing should be allowed in the PSEA.*

**Response:** Comment noted. No change in document required.

Jerry King

*Please save Mt. Spokane from development. Let’s protect this natural paradise. I support Alternative Two, Natural Forest Alternative. We can’t mitigate old growth, native forests that have never been logged. Clear cutting for a chair lift and ski runs will fragment habitat for rare wildlife. The streams near the base of the proposed chair are important for fish health downstream.*

**Response:** Comment noted. The reader is referred to Section III, section 3.3.2.2 – Forested Communities for a description of the forested stands within the proposed expansion area. No change in document required.

Christy Anderson

*Please leave the west side of Mt Spokane untouched as it provides needed habitat for so many animals.*

**Response:** Comment noted. No change in document required.

Vic Hill

*I choose alternative #1 - do not make changes to the forested land. There are other means of increasing recreation using the land currently held for that purpose.*

**Response:** Comment noted. No change in document required.

Polly Kaczmarek

*Please decide on alternative 2 or 3, for maintaining a natural forest area of the land in question at Mt. Spokane. Preserving as much undisturbed land for flora and fauna should be our main goal as our city and surrounding area become increasingly developed, rather than increased recreational opportunities.*

**Response:** Comment noted. No change in document required.

Michael Price

*I prefer the “No Action” alternative on both Mt Spokane expansion proposals.*

**Response:** Comment noted. No change in document required.
Anonymous

I’m opposed to the proposed expansion at Mt Spokane State Park. Adding a lift in this pristine area of the mountain makes no sense.

Response: Comment noted.

Anonymous

The backside of the mountain is currently the best preserved terrain that we Spokane residents have to ride. It is close, accessible, and offers the beautiful, untouched powder conditions that everyone seeks after.

Response: Comment noted.

Andrew Kienast

As a season pass holder at Mt. Spokane I think it would be a terrible decision to expand the terrain. It is ridiculous to even think about destroying more habitat in an already damaged ecosystem.

Response: Comment noted.

Helen Curtis

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.

Response: Section II – Alternative 2 proposes classifying the PASEA as Natural Forest Area with the exception of the Chair 4 Road, would classify a portion of the Summit Road, and Trail #140, as Resource Recreation (see Section II, Figure II-2, and Table II-1). The classification of these existing facilities as Resource Recreation is necessary under Alternative 2 because their existence in the PASEA would not otherwise be permitted under a classification of Natural Forest Area.

A discussion of why lift-served backcountry skiing would not be allowed under Section II – Alternative 2 can be found in Section II, section 2.2 – Alternative 2 (Natural Forest Area).

Helen Curtis

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.

Response: Comment noted. No change in document required.

Warren Walker

I support Natural Forest Area (Alternative II). I ask for a land classification with minimal change that still allows low impact recreation. This gives access into the area for the public and not just Alpine Skiers.
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**Response:** Comment noted. No change in document required.

**Fayette Krause**
*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.*

**Response:** Comment noted. No change in document required.

**Alicia Malara**
*I am writing today to express my concern about the Mount Spokane PASEA. My family and I love the rugged beauty of the mountain, the breathtaking views from the summit and the abundance of wildlife we encounter there. Please do not allow any more development of this beautiful place!*

**Response:** Comment noted. No change in document required.

**Mike Vandeman**
*This is a very bad idea! We have already lost far much wildlife habitat. I vote for the no-project alternative.*

**Response:** Comment noted. No change in document required.

**Anne Martin**
*We support Alternative Two – Natural Forest Area, but backcountry skiing should be allowed.*

**Response:** Comment noted. No change in document required.

**Thomas Zysk**
*I am in favor of the Mt. Spokane chairlift construction and creation of additional ski runs. This area has historical ski usage that is reasonably being expanded upon.*

**Response:** Comment noted. No change in document required.

**Amanda Parrish**
*I support Alternative Two (2), Natural Forest Alternative (NFA) with one caveat. Back country alpine skiing should be allowed in the PASEA.*

**Response:** Comment noted. No change in document required.

**Mike Petersen**
*The Lands Council
The Lands Council strongly supports Alternative One in Section Three of the Combined Draft Environmental Impact Statement for the Aug 2014 Mt. Spokane DEIS.*

**Response:** Comment noted.
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Mike Petersen
The Lands Council

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 backcountry 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.

Response: Under Alternative 2, at Figure II-2 and Table II-1, a Resource Recreation classification has been provided for Chair 4 Road, Trail #140 and the Summit Road in order to allow for existing uses (such as mountain biking) that would not be permitted within the NFA classification. Hiking, snowshoeing, and non lift-served backcountry skiing (or “Off-trail Cross-Country Skiing”) are all permitted uses within the Natural Forest Area (NFA) classification. Backcountry lift-served skiing is considered “Alpine Skiing” as contained in State Park’s Land Use and Land Classification Compatibility Matrix and is not a permitted use in the NFA classification.

Ryan

Please don’t let them put a chair lift on the back side of Mt. Spokane it will ruin the forest. One can already access the backside and take the cat track to chair 4. There is no need for a lift back there. The added lift will only raise the price of a lift ticket which is already way to high of prices.

Response: Comment noted. No change in document required.

Barb Lee

I would not support any reduction in forest area to Mount Spokane and hope your vote will maintain the forest and wild areas.

Response: Comment noted.

Jessica Strange

I disagree with the backside expansion. It will only disrupt moose habitats and increase ticket prices.

Response: Comment noted.

Jackie Corley
Spokane Tribe of Indians Archaeology and Preservation Program

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

Response: Comment noted.

Jackie Corley
Spokane Tribe of Indians Archaeology and Preservation Program

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

Response: Comment noted.
Elaine Throne

*I support the protection of the natural forest of Spokane Mountain and the preservation of habitat for wildlife of that area. The plans for ski runs and clear cut for a chair lift destroys the native forest that cannot be replaced.*

**Response:** Comment noted.

Rand Clifford

*Old growth is forever. The seven proposed new ski runs and the corridor for the new lift will destroy forest that makes Mt. Spokane so unique.*

**Response:** Comment noted.

Nathan Hutchens

*There are natural glades spattered throughout the planned area. It would be a shame to cut ski runs into these areas. I believe that preserving these glades as well as glading several new sections is the proper route.*

**Response:** Comment noted.

Greg Gordon  Spokane Audubon

*Land Classification* Spokane Audubon agrees with the purpose and need for completing the CAMP process for Mt. Spokane Sate Park. Overall we support Alternative 2, classification of the PASEA as a Natural Forest Area.

**Response:** Comment noted.

Greg Gordon  Spokane Audubon

*Proposed Ski Area Expansion* Spokane Audubon is especially concerned with the ecological impacts that would result from the ski area expansion (PASEA). Therefore we recommend that the Washington Parks Commission choose Alternative 1, no action.

**Response:** Comment noted.

Anonymous

*After reviewing both sides of this argument I can see no reason for Mt Spokane Ski and Snowboard park to go through with the expansion. As it stands at this time, There is not enough parking or room in the lodges for the number of skiers and snowboards that use the park. As the number of snowmobilers increase there have been many near accidents with the limited space they have. To claim that this expansion would be increasing the number of trails for snowmobiles, would also be increasing the number of snowmobilers. I'm sure the hope is also to increase the number of skiers.*

**Response:** Comment noted.

Randy Abrahamson  THPO Spokane Tribe

*After additional information my choice is alternative 2, this sacred mountain does not need seven more ski runs.*
Response: Comment noted.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

The current use of the northwest “backside” area classified as the PASEA area of Mount Spokane can be categorized as low to medium recreational activities that span the four seasons typically known to the Pacific Northwest. To preserve the sustainable and healthy relationship between this natural area and the Spokane community, the most viable classification of the PASEA is Alternative 3 (section 2.3) - Resource Recreation (with Natural Forest Area below the Chair 4 Road).

Response: Comment noted.

Debra Boswell

I support Alternative Two (2), Natural Forest Alternative (NFA) with one caveat. Back country alpine skiing should be allowed in the PASEA. It already occurs there. But, inconsistently, mountain biking, snowshoeing and equestrian uses are allowed.

Response: Comment noted. No change in document required.

Ira Ford, John Stember, Kenneth Wilbur, Jacob Wood

We support Alternative 1 (No action) for Section 3.1 (Soils) and Alternative 1 (No expansion is proposed) for Section 3.2 (Watershed).

Response: Comment noted.

Bart Haggin

But I am opposed to the expansion.

Response: Comment noted.

Lindell Haggin

I support Alternative 2, classifying PASEA as a Natural Forest Area. I support Alternative 1, no action.

Response: Comment noted.

Mari Schramm, Vanessa Torjusen, Dionna Klein

Based on our assessment of the Mount Spokane Ski Area Expansion Draft EIS, we advocate the continued implementation of Alternative 1: No Action.

Response: Comment noted.

Ed Crosby

This project is a waste of money and not needed. They should focus on infrastructure, larger lodge, more parking, etc.

Response: Comment noted.
Matthew Rawlins

*Mt Spokane’s greatest asset is the relatively unspoiled back side (west side) which is currently open to backcountry skiers. Please keep it unspoiled and deny the planned expansion. The expansion would give more of the same terrain already available without lines at Mt Spokane.*

**Response:** Comment noted.

Ethan Hageman

*I am a skier. I am opposed to further expansion of the Mt Spokane ski area. Simply, the ski area has developed enough of the natural environment of Mt Spokane. The remaining natural park at this elevation is a rare feature near Spokane. It should be left for those who seek and deserve access to this area of the park without the intrusion of ski lifts and clear cut paths for ski trails.*

**Response:** Comment noted.

Samantha Mace

*I ask that the Parks Dept. protect all remaining old growth and intact forest left on Mt. Spokane and deny the ski expansion. Intact forest, intact old growth, is in short supply, esp. near Spokane. Ski hills are not in short supply. Deny any expansion of the ski area.*

**Response:** Comment noted. A description of existing vegetation communities in the 279-acre expansion area is included in Section III, section 3.3 – Vegetation.

Gary Carlson

*I am strongly against expansion of the site. Negative impacts to the environment and back country recreational opportunities would out weigh the benefit of a new chair lift and trails. We need connected and intact habitat and this project would only decrease the already small amount we have.*

**Response:** Comment noted.

Sandra Treccani

*I oppose the Mt. Spokane ski area expansion. We have more than enough areas for downhill skiing in our area. Right now, the park provides the right balance of recreational opportunities, along with protecting and preserving valuable habitat and old growth species.*

**Response:** Comment noted.

Jennifer Hall

*As a resident of Spokane and WA State tax-payer, I oppose expansion of the Mount Spokane 2000 ski area and associated addition of a chair lift and ski trails, with the pending PASEA classification. Our area already has great access to developed skiing.*

**Response:** Comment noted.
Anonymous
As a 14 year season pass holder I have seen many changes in the ski area and strongly feel this type of expansion is not the best use for this area.
Response: Comment noted.

Paul Lindholdt
I do not favor expansion of the Mt. Spokane alpine ski area. Land use option 1.
Response: Comment noted.

Nick
Bad idea. The traffic would be increased causing safety issues.
Response: Comment noted.

Ken Carmichael Inland Empire Back Country Horsemen
I am in support of OPTION 3 for the land classification which will provide for a combination of Natural Area, Resource Recreation and Recreation in the area shown as PSEA.
Response: Comment noted.

Crissy Trask
Please deny Mount Spokane’s proposal to add a chair lift and ski runs inside the Potential Alpine Ski Expansion Area (PASEA).
Response: Comment noted.

Brad Bardwell
I support Alternative Two, the Natural Forest Alternative (NFA), with the addition of allowing back-country alpine skiing in the PASEA.
Response: Comment noted.

Harvey Morrison Trout Unlimited
I strongly encourage that the classification changes described in Alternative 4, not be accepted.
Response: Comment noted.

Lynn Derby
Please do not permit the cutting of runs and construction of a lift.
Response: Comment noted.

Andrew Kolman Mt. Spokane Ski Patrol
I have not been convinced that adding a sixth chairlift will secure the future of Mt. Spokane as it simply appears to add more of the same type of terrain already available, and adds another antiquated double chairlift that other ski areas are removing from service. By contrast, adding a chairlift and...
logged ski runs will certainly destroy the excellent back country skiing in those areas, which are cherished by many skiers.

Response: Comment noted.

Jeff Lambert  
Spokane Mountaineers

*The Spokane Mountaineers position is to oppose the ski area expansion and advocate for a land use classification that prevents development of the PASEA. Consequently, the Spokane Mountaineers recommend the land classification in the PASEA be set as Natural Forest Area (Alternative 2 in the land classification portion of the DEIS).*

Response: Comment noted.

Anonymous

*If either alternative two, or three were to be selected, the detrimental effects to both areas of concern would be irreversible. Therefore, we recommend that the parks commission takes our comments and concerns into account when determining the fate of the state park.*

Response: Comment noted.

A. Walkter

*I don’t support the backside expansion.*

Response: Comment noted.

Michelle Baldwin

*Alternative 3 - Resource Recreation and Natural Forest Area. No Chairlift or Trails. Back country skiing allowed.*

Response: Comment noted.

Ken Aman

*Please, no expansion.*

Response: Comment noted.

Mellissa Young

*There is no mitigation that can be done for the removal of old growth trees. The PASEA is relatively silent concerning the carbon sequestration function of trees as well as cultural and archaeological resources. Altogether this expansion is a bad idea.*

Response: Comment noted.

James Harrison  
Spokane Tribe of Indian Archaeology and Preservation Program

*Alternative preference: EIS 1 (land classification): Alternative 2 (natural forest land classification)  
EIS 2 (ski area expansion): Alternative 1 (no action alternative).*

Response: Comment noted.
Jackie Corley  
Spokane Tribe of Indians

EIS 1 (land classification): Alternative 2 (natural forest land classification) EIS 2 (ski area expansion)  
Alternative 1 (no action alternative).

Response: Comment noted.

GENERAL SUPPORT FOR THE SKI AREA EXPANSION

Peter Fortin

I have just completed a 12 year term on the board of Mt. Spokane 2000. The board has been concerned with the lack of adequate terrain adequate for the majority of the users of the area which are intermediate skiers and boarders. Alternative 4 of the EIS would allow an increase in the type of terrain needed for the users I have described by adding one chair lift and opening seven new trails.

Response: Comment noted. The existing and proposed terrain distribution at Mount Spokane can be referenced in Section III, section 3.6 – Recreation.

Roger Bertsch

As the Vice President of the Spokane Falls Chapter of Trout Unlimited, I have been particularly interested in the wetlands assessments the potential effect of habitat for the Redband Trout in the streams below that are sourced by the waters of Mt Spokane. At this junction I fully support the Mt Spokane Ski and Snowboard Park’s proposed expansion.

Response: Comment noted. The reader is referred to Section III, section 3.2 – Watershed Resources for a discussion related to the wetlands and streams in the expansion area. The mitigation measures included in Table EIS 2-4 are intended to protect downstream water quality.

Thomas Burgess

Please allow the ski resort to open up the back side and also to allow more modern lodges to be built.

Response: Comment noted. For clarity, the project EIS does not contemplate the addition of a lodge within the 279-acre potential expansion area or anywhere within the PASEA.

Michael Roozekrans

I support the Mount Spokane Ski area full expansion project. My two sons and I ski on a regular basis at Mount Spokane. We do so because it is the closest drive. We would really like to see the north side fully expanded as it would provide a little longer season and more area to ski.

Response: Comment noted. As noted in Section III, section 1.3 – Purpose and Need, extending developed ski area infrastructure (e.g., chairlift) into the 279-acre expansion area is not intended to extend the ski season but to provide a better assurance of continued operations during periods of low snowfall.
Mike Nixon
I’m in favor of installation of a chair on the backside to expand the terrain for skiing. I also am in favor of the new mountain biking trails that have been proposed for both the ski area and the other parts of the park.

Response: Comment noted. For clarity, Mount Spokane Ski and Snowboard Park is currently not allowed under the terms of their concession agreement to operate a mountain bike program. Future projects that could increase access for mountain bikers include implementation of the Comprehensive Trail Plan, which is part of the 2010 Master Facilities Plan. The Comprehensive Trail Plan contemplates a multi-use trail in the PASEA, depending upon the land classification adopted (see Section II).

Anonymous
I am writing in hopes that the Washington State Parks and Recreation Commission will classify the land on the backside of the mountain “alternative #4 Recreation, Resource Recreation and Natural Forest Area” for recreation.

Bob and Bonnie Gregson
We definitely support Alternative 2 in the draft EIS about expanded ski runs on the west side of Mt. Spokane.

Hart Russell
My wife and I have spent some time reviewing the Combined Environmental Impact Statement regarding the land classification of the PASEA at Mt. Spokane. We were certainly impressed with the thoroughness of the study, the attention given to protecting old growth timber, and the waterways within the area. We can see no valid reason why the land classification described in Alternative 4 of the DEIS cannot be approved.

Kriss McLaughlin
My spouse and I would love to see the ski area expanded!

Anonymous
I would like to vote for Alternative 4: Recreation, Resource Recreation, and Natural Forest Area.

Makenzie Oddino
I know fully that Alternative 4 is the best option for this community.

Jeff
I would like to see Alternative 4: Recreation, Resource Recreation, and Natural Forest Area proceed. I support Alternative 4.
Andy Morsell
*Please consider Alternative 4 for the land classification for the Mt Spokane PASEA.*

Greg Wendel
*Please keep as plan 4. A recreation area.*

William McCammon
*I support alternate 4. I recreate at Mt Spokane via ski both alpine and Nordic, road bike, mt. bike, hiking, snowshoeing.*

Steven Brazil
*Alternative #4 Recreation, Resource Recreation and Natural Forest Area. I believe with this classification will allow for recreational improvements as well as maintaining the environmental areas with the upmost respect to the natural areas I believe Mt. Spokane is a vital asset to Spokane and the surrounding area.*

Bill Silverthorne
*I fully support the expansion of the Mt Spokane ski area. The expanded area is needed and will make the ski area competitive with the other area resort.*

Leamon Constant
*Please pick this choice, Alternative 4: Recreation, Resource Recreation, and Natural Forest Area.*

Charlie Wilcox
*Please choose option 4!*

Anonymous
*I support Mt Spokane Ski and Snowboard Park plan for expansion. I believe it is designed to protect the Park as well as provide the needed recreational opportunities for all the users of the Park.*

Anonymous
*I RECOMMEND ALTERNATIVE 4 FOR THE PART I LAND USE CLASSIFICATION FOR THIS PROJECT*

Terry McAleer
*I fully support Mt. Spokane’s expansion onto the backside where chair 6 is proposed.*

Patrick Bertis
*I am in support of Part 1 Land Classification - Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. I am in support of Part 2 Project Action” and either “Alternative 2 - Enhanced Recreation Alternative.*
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Karen Covelli Mt Spokane Ski Patrol and Spokane Ski Race Association
We, the Covelli-Ellison family, wholeheartedly support the proposed expansion, which will open up additional terrain for alpine skiing at Mt. Spokane State Park. We are therefore in favor of the land classification as recreational.

Gary Clarke
My family and I enjoy skiing at Mt Spokane and look forward to the expansion of the area as stated in Alternative 4. The ski area is a great recreational resource for our area and the need for additional runs for downhill skiing is important to keep the mountain viable for all ages and levels of skiers and snow boarders.

Brian Beatty Mt. Spokane Prime Time Ski Club
Please do everything in your power to support the proposed expansion of the Mt. Spokane Ski Area. It is a thoroughly researched and balanced proposal which merits adoption.

John Orden
I feel that the proposed expansion of the Mt. Spokane Ski area is in the best interest of the community.

Robert Hammett
I am in favor of the Mt. Spokane expansion plan. I hereby ask the Washington State Parks and Recreation Commission to classify the land for “Recreation” use and specifically as “Alternative #4 Recreation, Resource Recreation and Natural Forest Area”.

Richard Stacey
The distance to skiing as recreation is not just important to the Hoffmeisters and Staceys, but to hosts of people who wish to maximize time spent for fun, while leading full lives. Not just physicians, but leaders in all fields. Mt Spokane is for the recreation of the people of Spokane. It cannot hope to become Aspen, or even Schweitzer Basin. But it enhances our region. It has been 10 years trying to get another lift, while being co-operative with all other user groups. Time to approve the long standing plan!

Dawn Brewington
I support Alternative 4: Recreation, Resource Recreation, and Natural Forest Area. As a single Mom, I have biked and skied with my boys (10 and 12) up at Mt. Spokane and I would enjoy more recreational opportunities (more bike trails, more intermediate skiing slopes) to get the kids outdoors and keep them active. It is such a wonderful asset to have these types of activities be so close to Spokane.

Bruce Toillion
This letter is written in favor of “Alternative #4 Recreation, Resource Recreation and Natural Forest Area”. I support Alternative #4 at many levels, however in this letter I will address my concerns over public safety.
Sid Wurzburg

*I fully support the expansion. Many of us have been skiing that area for years with no harm to the environment.*

Kim Hatch

*Please choose Alternative 4 - Recreation, Resource Recreation and Natural Forest Area that allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Kyle Springer Evergreen East Mountain Bike Alliance

*I support Alternative 4: Recreation, Resource Recreation, and Natural Forest Area. By expanding accessible recreation in this state park I believe the park will draw more Discover Pass purchasing users and support the long term viability of the ski area. This option promotes longevity by reducing fire danger on a valuable park.*

Frank Harrill

*I urge the Commission to adopt land classification alternative 4 - Recreation, Resource Recreation and Natural Forest Area. This outcome would preserve the natural beauty and integrity of the park while maximizing affordable winter recreation opportunities for thousands of Spokane residents and do so sustainably and responsibly.*

Lisa Jangaard

*I respectfully request Washington State Parks and Recreation Commission to classify Mt. Spokane as recreation land (Alternative 4) and take project action (#2) which allows for a new chairlift, additional trails, grading and clearing.*

Rand Hatch

*I support the acceptance of Alternative # 4 of Part # 1 and Alternative # 2or # 3(preferably #2) of Part 2.*

Jonathan Price Mt. Spokane Ski Patrol

*Comment I support Alternative 4: Recreation, Resource Recreation, and Natural Forest Area.*

Matthew Gillio

*I would like the commission to approve the land use that will allow the ski concession to expand. I feel that this is a good compromise for the parties involved. This expansion will help with the fuel load in the park and make search & rescue operations safer.*

Wade Outcalt

*I support the backside expansion wholeheartedly.*

Ronald Ortiz UMC

*Please allow Mt. Spokane Ski Area to expand. I ask that you approve the following for this project: Land Classification: Alternative 4; and Project Action: Alternative 2 or 3.*
Marian Ortiz
*I believe expansion of the Mt. Spokane Ski Area would be beneficial to the region, both economically and in terms of recreational opportunities. Accordingly, I ask that you approve the following: For Part I, Alternative 4; and for Part II, Alternative 2 or 3.*

Matthew Staben
*The back side has often been the missing ingredient for great skiing on days sporting otherwise poor conditions, but unfortunately cannot be enjoyed by all.*

David Basaraba
*I support Land Classification Alternative 4 as a necessary element to the “Mt. Spokane Ski Area Expansion” project which I believe benefits all snow-sports enthusiasts throughout the Inland Northwest.*

Barb Stuebing
*I support the expansion of Mt Spokane Ski and Snowboard Park to include the proposed lift on the backside of the mountain.*

Larry Schroeder
*The expansion is needed to keep the ski area competitive with other local areas. While all other areas have expanded over the years, Mt Spokane has not been able to.*

Sharon Silverthorne
*Alternative 4 should be allowed. Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Jeff Crawford
*I am in favor of land classification alternative #4 “Recreation, Resource Recreation and Natural Forest Area.” Furthermore, I support project action for the Enhanced Recreation Alternative.*

Landry Smallfoot
*I feel strongly that expansion of the ski area to include an additional chair lift and associated runs would greatly enhance the park. Please consider alternative 4 as the best option for the public interest when enhancing plans for the park.*

Harold Preiksaitis
*My family endorses the proposal: “Recreation, Resource Recreation and Natural Forest Area.*

Bill Johnson
*I support Mt Spokane’s proposal to expand the developed ski area to the northwest side of Mt Spokane. The scaled back scope of the expansion is a good compromise between the unique attributes of Mt. Spokane and the very much needed additional inbound ski area at Mt. Spokane.*
Caren Furbeyre
I hope we can all come to an agreement that expanding opportunities for skiers within careful studies to comply with the natural beauty and adequate and reasonable protection of our God given resources that best serves the majority of the community. I urge you to support the expansion of Mt Spokane to the PASEA!

Anonymous

Dean Emanuels
I would encourage approving the installation of a new lift and trails. Mt Spokane is a great family ski resort that is close to town and affordable. It is special to see families spending time together in the state parks and we have a great resource with a nearby mountain and forest land.

Will Parks
I support the expansion of Mt Spokane Ski area. It will be a great recreation addition to a great mountain and bring more people to our Washington Parks.

Adventure Dynamics

Doug Woodford
I am in full support of the ski area expansion for the red chairlift. Skiing brings in many people to the area, providing both a boost to the local economy as well as providing increased access to the beautiful outdoors.

Troy Bockstruck
Please approve the backside terrain expansion project.

Dan Edwards
I would like to encourage the Washington State Parks Board to approve the Mt. Spokane Expansion Project. I grew up recreating at Mt. Spokane hiking, biking, camping, skiing, and other activities.

David Drinkard
Mt Spokane State Park provides many opportunities for winter outdoor recreation. I feel this expansion is in everyone’s best interest and I fully support it.

Blaine Bennett
As we take this opportunity to expand, it allows for more programs to develop at a more affordable cost. This is a recreational area that truly services all of the Spokane area as well as tourists.

Ruby Siegel
I strongly support the land classification of “Recreation, Resource Recreation and Natural Forest Area” that allows for one chairlift and seven new trails on Mt. Spokane.
Thomas Wood
*I’m voicing my support for alternative 4 on this project.*

Due Davies
*As a resident of Spokane, I think it is very important to grow the businesses in this and surrounding areas. With this said growing the recreation community will increase business and continue to allow everyone to enjoy the mountain. I enjoy the outdoors and have complete respect for it. Mt. Spokane Park’s desire to increase its hill by one chairlift and seven trails while safeguarding the natural areas is a positive thing.*

Dan Hultquist
*I am very much in favor of the chair lift expansion at Mt. Spokane.*

John Gillis
*I am 100% in favor of alternative #4.*

TJ Land

Ken Carmichael
*I am also in support of the OPTION 3 which provides for an alpine ski lift in the PASEA as proposed by the Mt Spokane 2000 group.*

BruceAnn Culbertson
*I am strongly in favor of the expansion plan for Mt. Spokane State Park. I am asking the WA State Parks and Recreation Commission to classify the land for Alternative #4 Recreation, Resource Recreation and a Natural Forest Area.*

Chris Weeks
*I support Alternative 4 to expand the ski area.*

Kit Culter
*I wish to voice my support for the new chairlift proposed on Mt. Spokane. It would be a welcome addition to the current runs on the mountain and would be a great use for the land on the mountain.*

Kevin McGlocklin
*Let the full expansion go forward.*

David Clack
*I strongly recommend and encourage you to expand the Mt. Spokane ski area that has been under review for the past 10+ years. It is time to make a positive decision in favor of expanded winter recreational opportunities on Mt. Spokane.*

Vernon Mulford
*I am in favor of this proposed expansion.*
Brenda McQuarrie
I would like to submit my support of Alternative 4 for the Land Classification of the Mt Spokane PSEA.

Mark Matthews
I am writing this note in support of the Mt Spokane PSEA.

Stacey Goranson
I support Part 1 alternative 4: Recreation, Resource Recreation and Natural Forest Area.

Jennifer Troiano
We support Alternative 4 to expand Mt. Spokane.

Karen Matthews
I believe since the beginning of the Mt Spokane PSEA, Mt Spokane 2000 has negotiated in good faith and have made concessions in the spirit of a good partnership with those who oppose. At this point I am not sure what else I can say or do to help expedite the approval of this project.

Anonymous
Please help them succeed and allow them this expansion and give family’s an opportunity to have affordable winter recreation that is on par with other local areas.

James Moore
Terrain expansion at Mount Spokane would work well with the use of the Mount Spokane Part 1 alt # 4 and Part 2 alt # 2

Steven Tesdahl
I would like to express my sincere interest, and support for part or for complete implantation of the expansion plan.

Gary Craig
I’d like to strongly support option 4-expansion of the ski area.

Steven Hansen
While preservation of virgin and old growth forest may be a honourable thing, I am completely convinced that more people will benefit from expansion than from the current policy.

Steven Stevens
I am writing to express Greater Spokane Incorporated’s support for Mt. Spokane’s expansion plan, “Alternative #4 Recreation, Resource Recreation and Natural Forest Area.” As the regional chamber of commerce and economic development council for the Spokane area, we cannot overstate the value that Mt. Spokane brings to our community.
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Candy

*Please allow for this expansion.*

Alexander Ferraro

*All of us are excited about the new Red Chair. We can’t wait to get it installed and it would certainly reduce to crowding on the front side. I am in favor of #4 classifying the back side “recreation”.*

Steven Ellison  
MT. Spokane Ski Patrol

*I am writing in support of MS2000 expansion into the PASEA, specifically Alternative 4. Since the Public Scoping process in November 2013 MS200 has addressed all of the elements of the environment that may be significantly impacted by the facilities and activities that could occur under formal land classification and as a result of the proposed ski area expansion.*

Ruth Oman  
WA State DSHS

*I am in favor of the backside expansion because Mt. Spokane Ski Area is by far the closest ski area to Spokane. In order to stay competitive with the other areas such as 49 Degrees and Silver, who are constantly expanding, Mt Spokane needs to expand, too.*

Scott Cramer

*This expansion is necessary to maintain Mt Spokane as a true player in winter recreation.*

Sheri Tresko

*We were up there for a horse event over Labor Day weekend and had a fabulous time. The rangers were very helpful and very nice. Several of our riders saw various wildlife including moose, deer and even a black bear. I am in support of Natural Forest, but believe that we can have that while allowing our citizens to enjoy the forest also. Because of these reasons, I am in support of Alternative 4: Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.*

Ronald Vierra

*I think number 3 of part 2 should be approved. Mt Spokane should be required to do more glading in the meadows area.*

Nancy

*I support the expansion of the downhill ski area*

Ruvim

*Please put up the red chair!!!!!! We need new trails!*

Heidi Reasor

*I support the expansion of Mt. Spokane ski and snowboard park.*

Russ Burright

*I believe this land should be classified in such a way that allows Mt. Spokane to expand and add a chair lift to this area; alternative 4 seems best.*
Lynn Aley
I see no solid argument for stifling the ski resort, as the environmental impact is minimal and the benefits to our community appear multifaceted.

Darrell Soyars
The proposal for a recreational land classification and alpine ski expansion should be approved by the Washington State Parks and Recreation Commission.

Anonymous
I support the park expansion at Mt Spokane. I think the addition of runs is important to continue to attract higher level skiers and keep the park viable for future use.

George Girvin
The snow conditions and terrain on the existing north slope are often superior to the east and south areas. It would seem to be more excellent addition to the ski operation to develop the northwest area.

Anonymous
I think it is important to allow the full area expansion of the ski area, I believe it is called the land classification alternative 4.

Charles Holcomb Mt. Spokane Alpine Team
SSRA’s growth will undoubtedly mirror that of the Spokane area, as well as, the skier visits of Mt. Spokane Ski and Snowboard Park. To accommodate this growth; additional parking, lodge space, lift capacity, and ski trail acreage is needed. And, for that reason, amongst others, SSRA wholeheartedly endorses the following options under consideration: Part 1 Land Classification Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Part 2 Project Action Alternative 2 - Enhanced Recreation Alternative.

J.K.
Let the ski area expand, create more jobs, become more of a regional destination!

Jennifer Holcomb
Please choose alternative 4 for land classification and alternative 2 for project action.

Snowblaze Condo Association
Please consider opening the back side for Recreation.

Anonymous
I am writing in support of Alternative Number 4 of Part 1 and Alternative Number 2 of Part 2 as it is vital that Mt Spokane be allowed to expand into the PASEA to provide for much greater public safety by decongesting ski trials, bridging the gap between beginner and expert terrain, and offering more skiing and snowboarding options on the Northwest side of the mountain that is less prone to fog.
Marjorie Lewis
The ski expansion on Mt. Spokane would be a very valuable endeavor for more people to enjoy the supreme beauty of the Pacific Northwest.

Matt Dirstine
So, aside from having the opportunities to enjoy nature the natural areas of the state in the winter, I think the expansion would really make people more aware that the rest of the mountain has neat features as well.

Russ
I am in full support for the Terrain Expansion.

Timothy Lawhead
I have often skied the terrain that is proposed for expansion. The area is currently used for alpine skiing in winter and hiking in the summer. Many more people could enjoy the area if a new lift is allowed. I believe that sensitive development such proposed would provide more diverse habitat than currently exists.

Dan Eacret
I am for exploring and supporting the additional ski area expansion proposal.

Donald Liebert
The improvement of Mt. Spokane, and the availability of better snow in expanded runs in January, would bring Whitworth back to Mt. Spokane.

Jeff Strickler
To anyone familiar with Mt. Spokane, it should be obvious that allowing this expansion of the existing ski area is the best interests of all parties, including Nature. Augmenting an existing ski area is a reasonable environmental choice, especially as it is a small number of acres given the overall size of the state park.

Matt Allen
The work has been done with the planning and environmental reviews and has been approved. Move the project forward! It is a great plan and will benefit many.

Samuel Clark
I would like to communicate my support for Alternative 4: “Recreation, Resource Recreation, and Natural Forest Area”, and I would like to see the area proposed as “recreation” be open to mountain bike users.

Susan Skaer
The ski area has grown with each decade as has the number of families who continued to utilize the area. Mt Spokane is competing with several other ski resorts in the area, it needs to be kept competitive
which only an expansion can do. Please support the expansion so more can enjoy the Spokane regions best “out your backdoor” ski area.

Sue Hallett
I support Alternatives 2 or 3

Jennifer Stone
I am in favor of classifying the whole PASEA for #4 Recreational use and allowing the Ski Area development to proceed.

Rob Rutherford
I am very much in favor of allowing development of the parcel in question for recreational downhill skiing.

Tammy Dix Jensen
Please vote in favor of alternative 4.

Lisa Pirkkala
I am endorsing Alternative 4, Recreation and Resource Recreation.

Harumi Burns
Please approve the Combined Draft Environmental Impact Statement (DEIS) Alternate Number 4 of Part 1 and Alternate Number 2 of Part 2 to make skiing at Mt Spokane safer.

Kristine Overholser
I think expanding the terrain on Mt Spokane to include a new chairlift and ski runs would benefit Spokane. I support the backside terrain expansion project.

Jody Delaney
Would love to see this happen!! One of the chairs is used by the racers so it limits the runs that the rest of us can use.

Paul Sulley
My wife, Lynn and I are in support of the expansion of Mount Spokane ski area. I believe it could be expanded with minimum impact on the environment and would be greatly appreciated and utilized by many skiers/hikers.

Leonard Allen
We share the mountain. I’m sure a lift and runs can be added that everyone can live with.

Kevin King
This is a regional resource that contributes to our area in many ways. This expansion increases public safety and provides access for rescue and emergency equipment.
Mary Jo King
We LOVE Mt. Spokane and we need your help now to keep Mt. Spokane going and offer families and citizens a great place to enjoy recreation all throughout the year. It is very important to our community, our economic viability on this side of the State and with our fragile economy, recreation is about the only boost that we have in recruiting business and employers to this area.

Mike Nixon
North Side Riders
I hope to be able to continue to use the Park as I age and hope that our access points and the types of use that are allowed will not be diminished. I think of the various plans that have been offered, Alternative 4 appears to offer the most access and is my recommendation.

Joel Lee
I am writing this comment in favor of the proposed Potential Alpine Ski Area Expansion (PASEA) at Mount Spokane.

Seth Fletcher
I am writing yet another letter to you to ask to you consider opening up the backside for skiing and recreation.

Rhys Evans
Please allow this expansion, it will be a good use of this public land.

Jeff Aden
As related to this project, please vote for part 1 alternative 4! Part 1 - land classification Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.

Ryan Fix
Personal (Local Family) - Newman Lake, WA
The mountain receives heavy usage, like a “city park” and more terrain would be a significant benefit for those local citizens who cannot afford to take their families to expensive destination resorts in Idaho and Montana. Please support Alternative 4!

Ned Fadeley
I strongly support Alternative 4, the development of Mt. Spokane in order to install another lift and seven additional ski runs.

Peter Fortin
Alternative 4 of the EIS would allow an increase in the type of terrain needed for the users I have described by adding one chair lift and opening seven new trails. This would be accomplished while safeguarding the natural areas within the boundaries of the PASEA. I urge acceptance of Alternative 4.

Jeff Aden
If not, please vote for alternative 2 under part 2! Part 2 - Project Action - Alternative 2 - Enhanced Recreation Alternative.
Kate Neitz  
*I support the Mount Spokane expansion project.*

Anonymous  
*Please expand: it would reduce gas emissions since many kids my age (in college) refuse to go to Mt Spokane simply because it is smaller than the other area ski resorts. Also, more hotel fees and restaurant fees would be paid at Mt. Spokane, in Spokane Valley, Mead or Spokane instead of Sandpoint, Keller, Wallace, etc.*

Craig Lee  
*I am strongly in favor of the installation of the new chairlift on the north side of Mt. Spokane. A new chairlift would enhance the personal safety of the people that are currently skiing this portion of the mountain in search of better snow conditions on the north side of the mountain by making it a patrolled portion of the mountain. I believe that a new chairlift would create a lot of new interest and enthusiasm for local and regional people to visit Mt. Spokane and help sustain the financial aspects of the state park.*

John Parrott  
*Please vote for Part 1, Land Classification, Alternative 4 and Part 2, Project Action, Alternative 2.*

Tony Rizzuto  
*As a life long skier on Mt Spokane I fully endorse the ski area expansion. It is my opinion that this relatively small expansion would vastly improve the area by providing more skiable acres which reduces overcrowding on the current lift and trail system.*

William Overholser  
*We need the expansion and we need ALTERNATIVE 4.*

William Overholser  
*PROJECT ACTION ALTERNATIVE 2 makes sense and will be an improvement of which we can all be proud.*

Gloria Fraser  
*Mt Spokane Prime Timers  
As a Mt Spokane skier I would be in favor of expansion.*

Louie Hill  
*I would like to add my support in favor of the land classification, alternative #4 for the Mt Spokane ski hill expansion.*

Karl Boldt  
*I strongly urge the board to allow Mt Spokane Ski Area to proceed with its planned development.*
Anonymous
The plan to open the backside of Mt. Spokane with a new chair lift is far overdue. The economic and community benefits will have a positive impact on our area without doing a damage to the natural state of the park.

Kyle Pryor
I want to express my wishes that you approve the Ski expansion as planned.

John Lindman
As regards Mt. Spokane opening up the back side of the mountain for ski area expansion I choose: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.

Steve Watts
I support the Mt. Spokane ski park expansion.

Michael Werner
Failure to expand the skiing opportunities at Mt. Spokane will only mean that more fossil fuels will be used taking skiers to other venues as they expand their ski areas. The net effect will be far more negative than managing the existing recreational facility and expanding it to better use the facilities already in place. More people using this resource means better physical health and provides an alternative activity that is wholesome for both body and mind. Please evaluate the facts of this area without emotion and choose Alternate 4 for recreational use.

Brian Johnson
In addition, I support Alternative 2 or 3 of Part 2 - Project Action.

Dan Hensley
Please vote to allow Mt. Spokane 2000 to install chair 6 at Mt. Spokane. Doing so will increase the skiing experience as well as the skiing safety on the mountain.

Todd Crowe
Please approve the Mt Spokane expansion. This will be so beneficial to our community and expand the great skiing Mt Spokane has to offer.

Mike Lorenzen
I support the expansion of ski terrain and addition of chair 6 to Mt Spokane state park.

Brian Kelley
I support the #4 alternative designation for the area, which is “recreation/resource recreation”.

Rod Pike
Please allow development of the NW side of Mt. Spokane for ski and snowboard park use. Mt. Spokane is such an important recreational area for the Spokane area.
Paul
The Mount Spokane ski park is a great use of the state park land. It has already been used before for the same purpose. This expansion is only to re-open that area for use. More people will be able to enjoy more of the mountain during the year.

Pete Thompson
I recently replied in favor of the expansion.

Michael Frasco
I am in favor of the expansion of the ski resort.

Gregg Markmann
We will continue to enjoy all of Mt Spokane in the future and would encourage the Proposed Expansion so others may also.

Patrick Dix
I urge the commission to approve Alternative 4 allowing for one chairlift and seven new trails.

Tim Foeller
I am writing to you to please consider and to allow Mt. Spokane Ski and Snowboard Park to expand the ski areas and classify those areas for Recreation.

John Jensen
The ski area expansion project at Mt. Spokane should be approved. The area where the expansion will occur has a long history of downhill skiing, and other seasonal recreation uses, with lifts and trails being used for many years. The area to be developed will introduce 80 acres of groomed trails, not a knockout blow when we consider the park is over 14,000 acres in size.

Brian Johnson
I am writing in support of Alternative 4 for Part 1 - Land Classification.

Shane Delaney Coldwell Banker
I'm writing to let you know I'm in favor of the expansion at Mt. Spokane. This project is long overdue and should be allowed to move forward soon. Hundreds of people already ski this side of the mountain and hike up to chair 4. It makes sense to add a chair to improve safety and keep people from getting lost on the backside of the mountain.

Charles Tappa Whitworth University
With that approved I would further urge approval of Alternative 2, Enhanced Recreation Alternative, to Part 2: Project Action.

Ian Lynch
The proposed Mount Spokane expansion is a vital step in ensuring Spokane’s recreation and economic growth.
Robert Brown

An expanded ski area would enable Mt. Spokane to compete favorably with other local ski areas.

Michael Metcalf MD  Mt Spokane Ski Patrol Medical Advisor

I support: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Ronald Loomis

I would like to see a chairlift installed & additional trails cleared for skiing at Mt. Spokane Ski Park.

Jim Conrad

I would like to highly encourage you to accept Mt. Spokane Ski and Snowboard Parks proposal for expansion. The proposal makes an additional section of the mountain available to more people to be able to enjoy and use in various ways while still maintaining forested sections and glades within that area. In the long run it makes a more effective use of the mountain for an expanded number of people while improving Mt. Spokane Ski and Snowboard Parks ability to serve the community.

Bob Robinson

We enjoy winter recreation at Mt. Spokane. I think expansion of the area is a very good idea. It is not only good for users of the facility, but will also provide job opportunities which are of great value in these times.

Bill Powell  Primetimers

I would like to voice my support for alternative #4 for the mountain expansion project.

Rick Penaluna

I SUPPORT the addition of another chair for many reasons. 1) Increased snow rider safety by reducing current overcrowded runs on chair 2 & 3. 2) Reduce lift lines that sometimes is up to 30-40 minutes. 3) More advanced snow riders would have legitimate patrolled runs to use rather than go out of bounds to enjoy the snow. 4) Brush cleaners for the snow sports area reduce fire potential and enable Huckleberries to grow in abundance. It would be a shame to lose OUR precious mountain to a fire.

John Parrott

Please vote for Part 1, Land Classification, Alternative 4 and Part 2, Project Action, Alternative 2.

Val Taylor

I would like to express my support of the Mt Spokane PASEA.

Charles Tappa  Whitworth University

I would like to voice my strong support of Mt Spokane PASEA and urge approval of Alternative 4 to Part 1: Land Classification.
Anonymous

*I support Land Classification: Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.*

Bette Brattebo

*I support the recreation classification that would allow installation of a new chair with 7 new runs at Mt Spokane.*

Dan Hensley

*Please vote to allow Mt. Spokane 2000 to install chair 6 at Mt. Spokane. Doing so will increase the skiing experience as well as the skiing safety on the mountain.*

Matt Jones

*I am totally for expansion of the Mt. Spokane Ski area.*

Tom Shine

*We support the Mt Spokane ski area expansion!*

Dennis Horlacher

*I support the expansion of the ski resort including a new lift in the 279 acres mentioned.*

Bart Rayniak

*I believe that Alternative #4 provides for the best public use of Mount Spokane, and will serve the overall needs of all users, while maintaining the integrity of the State Park.*

Christina Elliot

*Please consider Alternative 4 for the expansion. Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.*

Todd Lloyd

*Friend of Mt. Spokane Ski and Snowboard Park*

*I once again want to urge the Washington State Parks and Recreation Commission to classify the land in question proposed for expansion at Mt. Spokane as “Recreation”... i.e. Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.*

Tom Brattebo

*I support putting additional ski runs in at Mt. Spokane as proposed by Mt. Spokane Ski & Snowboard Park.*

Quentin Davis

*Under Part 1 if the plan item number 4 best suits the total of all.*

Rob McWilliams

*This new area will allow a longer season and spread the skiers out. Please allow this to happen. This is very important for Mt. Spokane to compete with surrounding area resorts.*
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Todd Ewert
The Mt Spokane ski area needs to be expanded. It would be helpful in recruiting top notch employees to be able to point to Mt Spokane as a great place to ski. An improved ski area would help draw new business to Spokane as well.

Michael Dix Dix Corporation
Please allow alternative number 4 and growth of the Mt. Spokane ski recreation area.

Holly Mullen
I would like to support Alternative 4 for this expansion.

Conrad Gotzian
I am fully in favor of installation of the new lift and cutting 7 new runs at Mt Spokane.

Troy McCarthy
The new expansion on the backside will provide more terrain to spread the skiers around, better quality of snow, and attract other skiers from surrounding areas.

Anonymous
Development of the Northwest side of Mt. Spokane will be good for the local economy, allowing more skiers to enjoy the mountain.

Pamela Wanja
I am also writing in support of the Washington State Parks and Recreation Commission to classify the land as “Recreation” and allow for the proposed ski lift and ski runs.

Dieter Ulrich
Please OK the back side expansion of recreational use for the Spokane 2000 Club.

Robert Winslow
I support the Proposed Action in the Mount Spokane PASEA Land Classification project currently going through SEPA.

Larry Grossman Mt. Spokane Prime Timers
I ask you to recommend: Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.

Andrew Arbini
I have skied at Mt Spokane for several years and I agree with the mountains decision to expand the area and install a new lift on the back side of the mountain.

Anonymous
I am in support of expanding Mt Spokane

Ed Byrnes
I am in support of Land Classification Alternative 4
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Jeff Gibson
I support to addition of a chairlift to the backside of Mt. Spokane and the addition of groomed runs therein.

Sean Harrigan
As a long time advocate of the environment and one who enjoys the tremendous experience of using our State Parks and trails; I would urge that the approval of our request to expand our access to Mt. Spokane be accepted.

Teri Klein
Please allocate the land for recreational use and allow the chair lift and ski runs to be built.

David Stieger
I ask you to choose alternative 4 (allow the backside of Mt Spokane to be used as an extension to the existing ski hill). I am a life long resident of Spokane and the Mountain needs this expansion to compete with other ski areas and improve the ski experience.

Anonymous
I would like to support Alternative 4 on Part 1 - Land Classification.

Anonymous
I am in favor of the Mt. Spokane chairlift construction and creation of additional ski runs. This area has historical ski usage that is reasonably being expanded upon. With proper mitigations in place, this development seems to meet the needs of public interest while meeting environment regulatory objectives and expected land usage.

Bruce Bell
The Mt. Spokane expansion project for the ski runs should continue forward as planned.

Anonymous
I support Alternate # 4 in part 1. I strongly believe that expansion of the ski resort is in the best interest of all users of Mt. Spokane State Park.

Gerald (Jerry) Canter
Mount Spokane Adventures need to expand the ski area on Mount Spokane, because skiing is a great exercise and sport for many people young and old.

Rich Kline
Opening up the park would not only make it more fun it would also make it a safer place to ski.

David Whipple
I want to provide my support to Alternative 4 of the Mt Spokane ski hill development and classification. I ski at Mt. Spokane and know the terrain under discussion, and feel that it will be a significant addition to the area that this resort adds to the local area.
Anonymous
*I do believe that the Mt Spokane state park expansion would be a great addition for the ski and snowboard community, as well as the entire Spokane community.*

Naomi Claridge
*That said, I support Alternative 4 of the Land Classification and Alternative 2 of the Recreation Classification.*

Joseph Ferraro National Ski Patrol/Mt Spokane Ski and Snowboard
*Please approve Mt Spokane PASEA Land Classification as a “Recreation” Area, Alternative 4…*

Susan Taylor
*I am in favor of expanding the current Mt. Spokane ski area to include the 800 acres adding a lift and 7 runs.*

Andre Lasalle
*I fully support the backside expansion of MT SPOKANE. I feel it will provide new terrain with a better exposure that our local ski resort needs.*

Douglas Clark
*I am writing in support of the Washington State Parks and Recreation Commission to classify the land as “Recreation” and allow for the proposed ski lift and ski runs.*

Wayne Schuh
*Please take my comments as positive and let Mt. Spokane expand.*

Diane Huckabay
*Mt Spokane Ski Area is a treasure that needs to be expanded to compete with other local ski areas. The back side will allow more varied ski terrain with minimal impact to the forested land to the north.*

Darla Kopczynski
*I would love to see the ski area expanded to add more runs for moderate difficulty.*

Kenneth Muench
*Alternative #4 is the right choice for Mt Spokane and the community…*

Joe Jensen
*The expansion will help the mountain management (a non-profit group) be more competitive with the other ski areas that made major improvements. It is the belief of many that should the expansion is not approved, the mountain will not be able to compete, and would need to give the concession back to the Parks.*
Scott Roller  
I would very much like to see an approval of another chairlift as proposed. I have been on that side of Mount Spokane and do not feel it would not impact the environment in a bad way.

Richard Portner  
I believe that the greater public interest is best served by reclassifying the PASEA under Alternative 4 - Recreation, Resource Recreation, and Natural Forest Area.

Jeannette Wee-Yang  
Please allow expansion on the NE side of Mt Spokane for 7 additional chairlifts! There are so many skiers at Mt Spokane on weekends that it is dangerous for younger kids and beginners.

Cliff Christiansen  
I support classifying the Mt Spokane proposed expansion area as a RECREATIONAL site.

Michael Altringer  
The expansion would allow Mt Spokane access to great terrain that would be north facing and most of the time be out of the fog. This area is already being skied by backcountry skiers and by adding a lift it would make the area safer. It would also greatly benefit wildlife, in that it would open up dense forest that is for the most part dead timber, and the runs would make great mountain meadows in the summertime.

Jason Schwab  
I would also like to endorse Alternative 2 of part 2, project action. Providing more access to this area is a benefit to the health and outdoor experience of our community.

Tom Jones  
Dear Sirs I am definitely in favor of Alternative 4

Joseph Ferraro  
Please approve Mt Spokane PASEA...Project Action as Enhance Recreation.

John Little  
The PASAE is a very limited development in scope, but will greatly enhance the alpine experience unique to Mt Spokane. Expansion will also contribute positively to the local economy and in my non-expert opinion, probably increase wildlife in the area (and no doubt huckleberry picking).

Anonymous  
I also support Alternate #3. I believe the ski resort has worked very hard to balance environmental stewardship with recreational priorities.

Robert Crick  
I believe that MS2000’s proposal should be approved and the expansion should proceed immediately with Alternative Number 2 of Part 2 (Enhanced Recreation, one chairlift and seven cleared runs).
Joan Fergin

*I am very encouraged to see that there will be an Environmental Impact Study before the group that is promoting further expansion of the ski area is given the go-ahead to proceed. I know the intent of the original group of men that bought the property was for its use to be wider than just for skiing. I am hoping that if the request is approved at all it will be scaled back to include improvements in hiking, biking and cross-country ski trails.*

Mark Pinch Black Commercial, Inc.

*I am in favor of the ski area expansion.*

Robert Robinson

*The expansion will improve the recreational quality of the ski area, and help provide jobs that are particularly valuable at this time.*

Kathy Christiansen

*I support classifying the Mt Spokane proposed expansion area as a RECREATIONAL site. This will allow for a much needed expansion of a new chair with 7 runs.*

Brook Ellingwood Elcon Construction, Inc

*I urge the Commission to adopt Alternative 4 - Recreation, Resource Recreation, and Natural Forest Area.*

John Gifford Pacific Northwest Ski Areas Association

*PNSAA supports and urges adoption of Alternative 4 - Recreation, Resource Recreation and Natural Forest Area as outline in the Draft Environmental Impact Statement.*

Quentin Davis

*Part 2 number 2 also suits the enhancement of all concerned.*

Robert Prusch Gonzaga University

*I am writing in support of the expansion of the Mt. Ski area with the addition of one new lift and opening six trails. I have skied there for over 25 years now as well as at the other ski areas in Washington and Idaho near Spokane and Mt. Spokane really needs to expand to remain competitive.*

Theresa Crowley

*I am in support of the land classification Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Terence Agnew

*I am in favor of adding additional acreage to the Mt. Spokane Snow Sports Ski and Board area.*
Ryan Grayhek
An expanded Mt. Spokane will benefit the region’s citizens through enhanced recreation for youth and families and positively impact the region’s economy. It is IMPORTANT that Alternative 4 is selected as the path forward for the vitality of the resort.

Cliff Hackney
I wish to state my support for Alternative 4 for the expansion of the Mt Spokane ski area.

David James
We fully support the initiative to expand Mt Spokane operations to the back-north side of the mountain.

Lawrence Hokanson
Even though Mt Spokane has great slope potential and ample snow, it cannot compete with any of these other resorts in its current configuration. If the proposed expansion is not approved the people of Spokane, young and old, will continue to be denied a great outdoor winter opportunity.

Kevin McGlocklin
I strongly support Part 1 Alternative 4.

Anonymous
I encourage the development of the great family park of Mt Spokane. Not only will a new chair bring more revenue to the state, it will bring more access to the mountain to the local families of Spokane.

Richard Russell
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.

Lisa Pirkkala
I am endorsing Alternative 4, Recreation and Resource Recreation. This will allow expansion, but also allow other recreation opportunities.

Eric Ewing
Today, I am making my comments in in full support of adding trails and a lift in the proposed area

Peter Thompson
I’m in favor of the expansion and feel the delay in the decision to do so has gone on far too long.

Doug Kelley
Yes to expansion. This is well thought out, impact is minimal and opens up more recreation for more users on a year round basis.
Jerry Post
*I believe that opening a new lift and runs through the PASEA plan would help thin out the crowd on the front side and make Mt. Spokane a safer, more enjoyable ski area for everyone.*

Dan Kinney
*Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Pauline Currie
*As long time pass holders to Mt. Spokane, I’m writing this letter in support of the backside terrain expansion.*

Bryce Peterson
*Please allow them to add the new lift and seven new runs. I believe it’s a sound decision both economically and environmentally for the city of Spokane.*

James Wells
*My wife and I support option 4 allowing for a new chair lift and 7 runs on Mt. Spokane.*

Oliver Lawrence
*I am writing to show my support of the Mt. Spokane expansion, more specifically the addition of a chairlift and new trails.*

Aaron Zwanzig
*I support Land Classification Alternative 4 (Recreation, Resource Recreation and Natural Forest Area)*

Aaron Zwanzig
*I support...Project Action Alternative 2 (Enhanced Recreation Alternative 2).*

Richard Portner
*I also believe the public in general would favor Project Action Alternative 2 (enhanced recreation) over the other alternatives.*

John Ray Nelson
*I strongly urge the Commission to approve the Mt. Spokane expansion project and allow development of a new lift and seven new runs on the north side of Mt. Spokane (approve Part 1, Alternative 4; and Part 2, Alternative 2).*

Gary W
*I would like to see Alternative 4 for the Mt Spokane PASEA adopted. The installation of a chairlift and the 7 runs would greatly improve the mountain for skiing.*
Louise Everett

*Please support the expansion of Mt Spokane State Park to include a new chairlift. Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Robert Bush

*Please allow the expansion of the Mt. Spokane Ski and Snowboard Park to move forward.*

Stefan Moore

*I would absolutely love to see the Mt. Spokane Ski Area continue to grow.*

Bruce Nelson

*Please make the decision to provide Spokane with additional ski options by approving section IV and allowing Mt. Spokane to set up an additional chair lift and operate 7-8 additional runs.*

Matthew Murphy

*I believe the Mt. Spokane should be able to expand the ski park. It would be beneficial for the community and help preserve the park environment.*

Jason Schwab

*I would like to submit my support for Alternative 4 of Part 1, land classification, in regard to the Mt. Spokane ski area expansion. I believe use of the Mountain as an expanded ski resort gives the best opportunity for people to enjoy the outdoors.*

Jim Wilson


Mark Burandt

*Pacific Northwest Ski Association*

*I and my family support...Alternative # 2 of part 2 to support the expansion for recreational use along with the addition of the new red chair.*

Trond Liaboe

*We therefore support the expansion of the alpine area as follows; Part 1: Alternative 4 Part 2: Alternative 3*

Brent Anyan

*I support...Alternative Number 2 of Part 2.*

Ed Byrnes

*I am in support of...Project Action Alternative 3.*
Michelle Casey-Soyars
Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Amy McConnell
I am in full support of Mt Spokane’s Recreation Classification and the proposed State Park expansion!

Brandon Rittenour
I believe an expansion of Mount Spokane Ski and Snowboard Park will have positive effects that will by far outweigh any negative effects on the environment,

Maury Nollette
I am in favor of the classification Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Ken Alexander

Ken Alexander
Part 2 - Project Action - Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing - Alternative 3 - Mitigated Alternative. Allows for the lift and seven trails but doesn’t include as much grading and clearing. This was the Alternative chosen by State Parks in the 2012 decision. I am ok with both Alternatives 2 and 3 as a project action, and totally in support of alternate 3 to get it passed.

Tom Torvik
Please allow for expansion. It will help keep Mt Spokane a fun place to both ski and hike and it will be safer.

Ken Hydzik
We are in support of Alternative 4 - Recreation, Resource Recreation, and Natural Forest Area that allows for one new chairlift and 7 new trails.

Ken Hydzik
We are also in support of the State Parks decision in 2012 that allows for Alternative 3 - Mitigated Alternative in section 2 of the Project Action.

Preston Van Doren
I am a supporter of the expansion plan proposed by Mt. Spokane ski area.
Steven Keeler  
I strongly support: Part 1, Land classification - Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Steven Keeler  

Timothy Sigafoos  
Please allow for the expansion of Mt Spokane Recreation, Allowing for one chairlift and seven new trails to solidify the long-term future of Mt. Spokane.

Anonymous  
The best way I think we can ensure Mt. Spokane’s future success is to allow the operation to grow, and allow outdoor enthusiasts greater access to the pristine area we love to play in.

Victor Frazier  
Just a quick note to say that I fully support the expansion of Mt. Spokane ski area and don’t see that expansion as an environmental danger.

Philip Sandifur  
I want to voice my support for the expansion at Mt Spokane with the addition of the new chairlift.

Remy Osso  
Please allow Mount Spokane 2000 to proceed with the installing of the new chair in the backside area of Mt. Spokane.

Richard Jeltsch  
I support the expansion of the Mt. Spokane Ski Area to the “backside” as proposed. Mt. Spokane is a vital piece of the outdoor recreation scene in the Spokane area and it is important to keep this facility competitive with other ski areas in the region.

Doug Burke  
We, as volunteers, teach people with developmental disabilities’ how to either snow board, downhill ski, cross country ski or adaptive ski. Having additional skiable terrain would make a world of difference not only to our students and coaches but to the rest of the thousands of people that use the mountain during the winter months. With the improvements to the back side, we will end up with more area to explore this great mountain by either hiking or biking.

Michael Floyd  
I urge the Washington State Parks and Recreation Commission to classify the PASEA as “Recreation” so that Mt. Spokane 2000 can proceed with its plans to improve the mountain experience for all of its visitors. On busy weekends, the mountain can get a little crowded. With a new lift on the northwest side
of the mountain and additional runs, there will be less congestion on the mountain - most notably the runs accessed by Chairs 2 and 3.

Dick Edwards
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.

Kathy Christiansen
I support classifying the Mt Spokane proposed expansion area as a RECREATIONAL site.

Daniel Ortiz
I ask that you approve the following: For Part I, Alternative 4; and for Part II, Alternative 2 or 3. Thank you.

Alexander Greer
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.

Chris White
Please give the Patrol the tools it needs to insure public safety.

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

Annette
I don’t feel that adding this additional run will cause harm to the natural area and will enhance residents’ enjoyment of the park.

Don
The best possible use for this area is a new Lift 7 runs.

Karen Akers
Regarding the Mt Spokane PASEA planning project, I support the Part 1 - Land Classification, Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Which allows for one chairlift and seven new trails, Alternative 4 safeguards natural areas and solidifies the long-term future of Mt. Spokane. It also contributes to the safety of the various outdoor enthusiasts who enjoy the area.

Michael Lewis
I'm writing in support of classifying the backside of Mt. Spokane for Recreational use (specifically “Alternative 4”) and hope you will give approval to the ski resort to move forward with a new ski lift and the seven additional trails they are proposing.
Betty White
*I am in favor of option 4 classification of the land, which is Recreation, Resource Recreation and National Forest Area. This option allows one chairlift and seven new trails.*

William Dexter
*I say you should let Mt Spokane use the land for their projects*

Gary Fiscus
*I am in favor of allowing Mt. Spokane to add an additional chairlift on the back side of the mountain & creating 7 new ski runs. As the property was given to the state for the purpose of downhill skiing, I see no reason to not allow the expansion. It’s a small area in terms of the overall wilderness managed by the State of Washington, but allows the greatest number of people to enjoins the Great Outdoors.*

Mary Crane
*Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Mary Crane
*Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing.*

Bryan Brock
*I support the expansion of the Mt. Spokane Ski backside.*

Larry Grayhek
*I support this project and object to the continual law suits by the Land Counsel.*

Rob Goranson
*I'm writing to support of land use alternative #4 which is to allow a ski lift to be installed on the backside of Mt Spokane with 7 new trails.*

Bridgette
*Hello, please make the classification for the area in question on Mt. Spokane a recreation area, and approve their expansion proposal.*

Ed Arnhold
*I am in support of the Mt Spokane ski area expansion.*

Brook Ellingwood
*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.*
Ed
*I vote for option 4. Let us expand!*

Brandon C WA state parks
*I love the idea to expand the ski area at Mount Spokane. While I am still in favor of adding more trails, the environment has a big impact on the decision for this. If the Parks system figures out a way to minimize the impact, I am in favor of this. If there are certain sections of the land that have rare plants and trees, then perhaps building near there is a bad idea.*

A discussion of the existing vegetation communities within the potential expansion area is contained in Section III, section 3.3 – Vegetation. The only facilities that are proposed at this time are the top and bottom chairlift terminals and associated lift towers.

Sue Hallett
*Please approve Part 1 -- Land Classification -- Alternative 4: Recreation, Resource Recreation and Natural Forest Area. Allow for one chairlift and seven new trails while safeguarding natural areas and solidifying the long-term future of Mt. Spokane.*

Sue Hallett
*In addition, under Project Action, please approve either Alternative 2, the Enhanced Recreation Alternative OR Alternative 3, the Mitigated Alternative.*

Anonymous
*I Support land classification alternative 4*

Cynthia Warner
*I support the approval for Mt. Spokane in Spokane, WA to be able to expand their ski park by building a new chairlift and new ski runs where they deem appropriate.*

C. King
*As an avid snowboarder and outdoor enthusiast, I implore you to consider the expansion of Mt Spokane back side with an additional chairlift as well as more runs to ride on.*

John Meekhof
*I fully support Part 1, Alternative 4; and Part 2, Alternatives 2 or 3, for further use of Mt. Spokane for skiing and related recreation.*

Gary Lewis Spokane Powderhounds
*Mt. Spokane needs to expand to keep up with demand and to compete with the other area ski resorts. Without expansion, all the other ski resorts will become more appealing and Mt. Spokane will be left behind. The economic impact would be terrible for the area.*
Jonnie Lewis  
Spokane Powderhounds

I agree, the expansion of Mt Spokane will benefit the economy for the overall Community. Not only will it bring in monies for the area it will also help attract more locals to go to Mt Spokane instead of the other mountains in the area.

Rob Goranson  
Spokane Ski Racing Association and Mt Spokane

I support Project Action alternative #3.

Al Toutant

I am in favor of expansion of the Mt. Spokane ski area, Plan # 2, for the following reasons: The expansion will allow excess for more skiers with this plan. As it is now only the hardest of hikers may ski in this area.

Ryan Waitt

Please allow the expansion of the MT Spokane winter park.

Robin Cole

I support (Part 1) Alternative 4 - Recreation, Resource Recreation and Natural Forest Area.

Robin Cole

Additionally, on Part 2, I support Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing, or, Alternative 3 - Mitigated Alternative. Allows for the lift and seven trails but doesn’t include as much grading and clearing.

Brendan Cole

I support (Part 1) Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Brendan Cole

Additionally, on Part 2, I support Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing, or, Alternative 3 - Mitigated Alternative. Allows for the lift and seven trails but doesn’t include as much grading and clearing.

Megan Cole

I support (Part 1) Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Megan Cole

Additionally, on Part 2, I support Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing, or, Alternative 3 - Mitigated Alternative. Allows for the lift and seven trails but doesn’t include as much grading and clearing.
Margaret McCoy
Spokane Powderhounds

As an instructor of the intellectually disabled for the Spokane Powderhounds I am in favor of the Mt.
Spokane Ski Area expansion.

Elizabeth Solomon

We urge the Commission to adopt the expansion plan of providing one additional chair and seven runs
within the current boundary of the ski area.

David Jolly

I fully support the expansion project at Mt. Spokane. This is truly an awesome recreational area and
should be shared with the public.

Tim Crowley

I support approval...under Part 2, Alternative -2.

Ronald Olsen

Please allow the lift and seven trails to be constructed on the back side of Mt Spokane for the long time
future of the Mt Spokane ski area. This will benefit the region’s citizens through enhanced recreation
for youth and families and positively impact the region’s economy.

Dan Lobb
Prime Timers

Please get on with the ski lift project expansion

Bill Molsberry

I would like to voice my support for the Mt Spokane ski area expansion.

Mike Allen

Please allow Mt Spokane to expand the north side of the mountain. Mt Spokane will be a good steward
to the forest. Expansion is badly needed.

Bary Leach

I believe the more ways we have for people to enjoy the outdoors will create the desire in more people
to preserve & protect the outdoors. I’m for the expansion project. It is long over do. Just think of the
amount of greenhouse gases that will be prevented by people who will start going there again because
it so close and it has more capacity.

John Romano

I am in strong favor of the proposed Mt Spokane ski area expansion with placement of a new chairlift.
This expansion will greatly enhance the ski area and allow for continued and expanded support by the
local community.

Brian Ellsworth

I am all for the development of a ski lift to open up the area in question.
Robert Salsbury
The Alternative 4 for land classification makes total sense to me and I suspect to my 4 year old granddaughter who had her first winter on skis on Mt. Spokane. I would like her and her friends in the future to still have this marvelous mountain to enjoy.

Dusty MacDonald
It’s time to help clear the way for the small amount of improvements they have been fighting for on Mt Spokane, so our local ski area can continue to grow and keep up

Paul Sulley
I am for the expansion of the Alpine Ski Area on Mount Spokane. Skiing would be improved, more jobs created and there is still enough natural forest area in the Park for solitude/habitat. I am for Alternative# 4 that allows for a chairlift to be installed.

Julie Cope
I would like to state that I am in favor of the expansion of the Mount Spokane Ski area, Option #4, part 1.

Julie Cope
I would prefer Alternate #2 if the expansion is approved.

Les Stone
I strongly recommend that you approve the Mt Spokane ski area expansion. If Mt Spokane can not stay competitive and be attractive to skiers, it will fail financially. It is now a significant source of revenue to the park system that should not be put at risk by failing to approve the expansion.

Steve Hawk
I urge the Parks Commissioners to vote yes in support of the new chairlift planned for the backside of Mt. Spokane.

Edgar Arana
I support the Mt. Spokane Expansion which includes the new chair lift. Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.

Leonard Wolf
I am writing in support of option 4, Part 1 Land Classification to allow for a ski chairlift to be added.

Richard Fairburn
Please allow Mt Spokane Ski Area to expand its recreation possibilities on the backside we really need this.

Betsy Dix
The Commission should support this land classification request for Recreational use, as the expansion will benefit the state and the region.
Bob McKinley
I am writing in support of the additional chairlift on the backside of Mt Spokane.

Sam Cozza
I believe that Alternative #4 is the best plan for the future of Mt. Spokane State Park.

Darel Maxfield
100 percent in favor of developing the back side of Mount Spokane for skiing!

Carl Guenzel
As an outdoor enthusiast using Mt Spokane for over 35 years in both the summer and the winter I am asking the Washington State Parks and Recreation Commission to approve the land classification of the back side of the mounting to Recreation.

Jan Swinton
We are residents of the City of Spokane and are writing this email in support of having the Washington State Parks and Recreation Commission approve the request of Mount Spokane 2000 for classifying land adjoining the current ski area for recreational use.

Mary Ann and Bosky
I think that the Non-profit ownership group at Mt. Spokane can expand the public skiing area without damaging the existing ecosystem.

Ray Lawton
I support the expansion of the Mt. Spokane area. This is an important part of the culture of Spokane. It is a ski area that middle income families can participate in an already expensive activity.

Dave Black
Please approve Land Classification alternative #4 Recreational- will allow for significant recreational enhancements, protect natural areas and solidify the long-term future of Mt. Spokane Mt. Spokane fills an important niche as an accessible, affordable 4-season recreation destination for citizens of this region Recreational classification will create greater access for skiers and more terrain, which also promotes better skier safety.

Mark Schafer
Please support the Mt Spokane Ski/Snowboard park expansion.

Jennifer Lehn
“Land Classification alternative 4 Recreation” will allow for significant recreational enhancements, protect natural areas and solidify the long-term future of Mt. Spokane.
Holly Bassler
Please allow recreational expansion on MT SPOKANE- We have followed the progress of the red chair and look forward to accessing the north side of MT SPOKANE recreationally. I support highest level of access available.

Marlee Griffith
I am very much in favor of the expansion plan at Mt. Spokane. It is also my understanding that a classification of #4 Recreation be established to make this happen.

Patrick DeVries
I am totally in favor of this project and support the well developed plans by Mt Spokane 2000 to expand the ski area as proposed.

Geoff Rowand
I am writing in support of the Washington State Parks & Recreation Commission to classify the Mt. Spokane PASEA as “Alternative #4 Recreation, Resource Recreation and Natural Forest Area.” Both Mt. Spokane State Park and Mt. Spokane Ski Area (MSSA) are great assets to the Inland Northwest and the proposed ski area expansion nicely balances and considers environmental stewardship.

Brent Anyan
I support Alternative Number 4 of Part 1…

James Welsh
In addition, I am in support of the Commission taking action on the project and voting to approve the Enhanced Recreation Alternative (Alternative 2).

Jason Piskel
I support Part 1 Alternative 4 of this project.

Lee Tate
I highly support the plan submitted by State Parks staff option 4 which allows the construction of a fixed grip chairlift within the PASEA including the proposed ski runs and trails. I have read the environmental mitigation language in the plans and believe them to be adequate to preserve the natural conditions that exist while allowing recreation as the original park donors planned.

Jerald Gerson
Approve the chairlift and let hundreds and hundreds of people enjoy that side of the mountain which has been tied up by people who just don’t want people to go there.

Sean Policani
Please consider in Part 1, Alternative 4 - Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.
Anonymous

*There are new chairlifts being installed every year at other local ski areas and Mt. Spokane needs to move ahead to keep competitive. So please approve this new chairlift project that has been in the planning stages for more than a decade.*

Sally Strickler

*Part 2 - Project Action Please chose: Alternative 2 - The Enhanced Recreation Alternative. This allows for the lift and seven trails. It includes more grading and clearing.*

Kayla Haas

*I support and would like to see the land classified as Recreation Area and the appropriate action taken to build an additional lift along with 7 new trails.*

Mike Howson

*In Part 1, Land Classification I support: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.*

Mike Howson


Kelli Piper

*I would like to see alternative 4 be established for Mt Spokane State Park. The park is the best and closet outdoor recreation land we have in the area, for all the seasons. With the low economy causing less money to circulate through the area it is too expensive to consider doing much outdoor recreation.*

Stephen Thew

*I would strongly support Alternative 4 for the Land Classification and Alternative 3 for the Project action.*

Jenifer Seipp

*I would really like to see the back side expansion of Mt. Spokane. They have been able to keep skiing more affordable which makes it more accessible to more people.*

Mariah McConnaughey

*Snowblaze Condo Association
The proposed expansion of the Mt Spokane Ski and Snowboard Park isn’t asking a lot, and those advocating for the expansion have been so willing to compromise the original plan to make all interested parties happy.*

Jeff Maichel

*I wholeheartedly support the notion of developing the backside of the Mt. Spokane ski area. The Mt. Spokane ski area is a jewel to those of us in Spokane County, and the enhancement of its back side is a wise use of our recreational spaces.*
Stefan Burandt

I feel that with the installation of the red chair Mt. Spokane would be able to increase revenues that could help grow the mountain and help rebuild outdated lodging and infrastructure. All of us are excited about the new Red Chair. We can’t wait to get it installed and it would certainly reduce to crowding on the front side. I am in favor of #4 classifying the back side “recreation”.

Charles McElligott

I am writing in support of the expansion plan being planned for Mt. Spokane, specifically “Alternative #4 Recreation, Resource Recreation and Natural Forest Area”.

Gloria Fletcher

It is imperative that Mt. Spokane’s existing winter sports facility be allowed to evolve and take steps forward to help accommodate the marketplace demand for skiing and snowboarding. Equally important, it is critical that Mt. Spokane be allowed to develop the components of a winter sports facility that help sustain the concession area in the highly competitive local and regional ski markets. I urge the Commission to adopt Alternative 4 and allow the Concessionaire to make these improvements.

Sally Strickler

Regarding development of ski runs In the PASEA at Mt. Spokane, For the Part 1 Land Classification (4 alternatives) Please chose: Alternative 4 - Recreation: Resource Recreation and Natural Forest Area.

Jeff Stone

I am in favor of classification for the ski area as recreation and allowing the expansion to proceed now.

Troy Peck

I feel this is a good idea as it would make it safer to ski back there as well as relieve congestion on the front side. The number of skiers has steadily increased. I totally support this plan. The Commission should support this and reclassify the land for Recreational use, the forth alternative. #4 Recreation.

Kevin Voss

Please accept my recommendation to classify the PASEA to allow an additional chairlift as proposed. It provides public safety advantages, financial advantages to the resort through increased skier visits, logistical advantages through removing congested areas, and would allow timber management resulting in a healthier forest.

Andy Porter

I believe the expansion request is a win, win situation for all.

Lee Bratcher

Please add my name, as a citizen of the State of Washington, very much in favor of the proposed expansion to the ski area at Mt. Spokane State Park.
Severyn Westbrook

Please consider opening the backside for expansion and the safety and enjoyment of our community for years to follow.

Dr Bill Molsberry

I strongly support the planned expansion of Mt Spokane ski area and the recreation designation for that area. It will benefit many groups of recreational users and still leave much of the state park untouched.

Jack Schneider

I would like to offer my support for Mt Spokane expand the skiable terrain with the proposed terrain expansion. My family and I ski and recreate at Mt Spokane year round. We enjoy the access offered and the support it provides our family.

Nancy Duncafe

Please lets allow for growth at Mt Spokane that truly enhances the area while keeping safe the natural areas. Skier or not, this benefits our area’s economy - Remember “Buy Local”. This is reference to Part 1, Alternate 4.

Leonard Selvaggio

I support the expansion of the Mt. Spokane Ski and Snowboard Park into the PASEA area. The expansion has been proposed in such a way as to minimize impact on the natural surroundings.

Anonymous

Why would we not expand this area? Come on people. Let’s do the right thing.

Mark Burandt

I and my family support part 1, #4…

Thomas Burns

I strongly urge the Washington State Parks Commission to give their approval to this much-needed civic improvement and provide our skiing community with an expanded ski area on Mt. Spokane.

James Welsh

I would like the commission to know that I am in support of the expansion of Mt. Spokane and would like to see the Commission classify the land as Recreation, Resource Recreation and Natural Forest Area (Alternative No. 4).

Sean Policani

If Part 1, Alternative 4 is chosen then please allow Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing.
Maury Nollette

I am in favor of project Action Alternative 4 - Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.

Ross Niblock

Please allow the chairlift expansion at Mt. Spokane.

Jim Harbour Washington State University

I would like to voice my support for alternative 4 under the land classification section of the document.

James Gallina

Expanding the terrain at Mt. Spokane is important as a symbol of Washington State’s commitment to balancing environmental planning and recreational use. More importantly however, is focusing on the improvement and refinement of one of Spokane’s greatest assets: proximity to nature. Please consider this my encouraging plea of support for: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.

Anonymous

Yes on alternative 4

Craig Hunt

The expansion area would be welcome. I’ve peered over the edge wanting to ski there for most of my life. I’m hoping this will soon be a reality.

Ken Kaiyala

Much of the present land in the park was donated for use as ski terrain by citizens that enjoyed skiing so close to the city. It will be a travesty if a few environmentalists are successful in blocking the proposed ski area expansion.

Mark Weishaar

I think the expansion should happen. It would revitalize the interest in the mountain and skiing for future generations.

Mike Burns Mt. Spokane Ski Patrol

My purpose of writing are to state 2 simple reasons Alternative #4 is the only solution. The first is that it supports the original mission of the private landowner who donated this land to the State of Washington originally.

Paul Arienzo Mount Spokane Ski Patrol

Please approve Alternative 4: Recreation, Resource Recreation and Natural Forest Area. In addition, a chairlift with defined trails will improve our ability to safely and quickly provide medical assistance to injured skiers and reduce the numbers of lost skiers.
Bruce Nelson

*Please pass the Alternative 4 measure of the draft, remembering that the Alternative 4 measure also safeguards natural areas of Mt. Spokane and solidifies the long term use and sustainability of Mt. Spokane for years to come.*

Maurice Ray

*I support alt. 4 of the proposed action plans. This will help meet the recreational needs of many more users while still keeping most of the state park for other users*

Anonymous

*I am in favor of Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

Duncan Gibbs

*I wish to express my desire for the land classification alternative #4…*

Duncan Gibbs

*I wish to express my desire for the...terrain expansion project alternative #2 to be implemented.*

Gary Whitcomb

*The alternative that I support is Alternative 4, which includes the installation of a new chair lift and 7-9 trails or runs. The existing Alpine area at times becomes an absolute zoo with all the families. Putting in another lift with associated runs will help to alleviate some of this crowding.*

Galen Hagen

*Please this mountain needs to be expanded it will help wild life food supply and give more terrain for the human use.*

Peter Thompson

*My preference is for Alternative # 4. It will not eliminate snow-shoeing, destroy forest lands or pollute our drinking water. It will enhance human use of our resources and make Mt. Spokane a far safer and more enjoyable experience for the thousands who ski there each year.*

Tracy Cavanagh

*I want to voice my support for Alternative 4: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.*

Doug Engle

*Please support the Mt Spokane lift expansion project. The area proposed has historically been used as a lift area and has been skied as back country for decades.*
Scott Hallett
*I am writing in support of the proposed expansion of the ski area into the north side of Mt Spokane. I am in favor of either: Alternative 2 - Enhanced Recreation Alternative. Allows for the lift and seven trails. Includes more grading and clearing Alternative 3 - Mitigated Alternative. Allows for the lift and seven trails but doesn’t include as much grading and clearing (which was the Alternative chosen by State Parks in the 2012 decision).*

Anonymous
*I would like to voice my support for the proposed expansion of the Mt. Spokane ski area.*

John Morrow
*I would urge the Commission to support only one option as presented in the DEIS, Alternative #4, as it best balances the recreational needs of the community with WSP’s mission of providing a quality winter recreational venue to the public that is safe, accessible, affordable, environmentally sustainable, and best of all, easily managed by WSP staff. Alternative #2, the NFA approach, and Alternative #3, the Resource Recreation approach with no new chairlift, will take away any incentive for the concessionaire to manage the PASEA or promote any recreational uses therein. Alternative #2 would be a step backwards by not allowing any alpine skiing or boarding of any sort, including back country skiing, rendering the area unusable for the concessionaire or its customers. Alternative #3 would mimic the status quo by allowing back country skiing, but negates the concessionaire’s ability to create additional revenues or broaden its market appeal. Either of these two alternatives would pass additional management responsibilities and costs back to WSP from the concessionaire, as Mt. Spokane 2000 would have no financial incentive to continue backcountry patrolling and rescue operations in the PASEA. I would also urge the Commission to consider that adoption of any alternative other than #4 would likely result in Mt. Spokane 2000 giving the PASEA back to WSP, as there would be no reason to continue paying concession rent or carrying liability insurance on land that cannot be managed in a manner that optimizes the safety of the concessionaire’s customers or provides no prospect of economic gain.*

Cindy Rust
*I urge you to act with faith in the intelligent design of the expansion, in conservation spirit of MS 2000, and for our young people; allow the expansion, please.*

Herb Larson
*Allow the Project Action to include Enhanced Recreation Alternative. Allow for the lift and seven trails. Include more grading and clearing.*

Herb Larson
*The proposed expansion would greatly improve the ski area. Classify the land as Recreation, Resource Recreation and Natural Forest Area.*

Richard Cadwallader
*My wife and I both think the expansion on Mt Spokane would be a good addition to the ski hill. People are already skiing the area because of the deeper snow on that side of the mountain. There is a safety*
issue due to the fact if you miss judge your line you can end up not being able to hike back to chair 4. The placement of the new chair would eliminate this problem.

Jon Selden
Please approve Part 1, Alternative 4

Jon Selden
Please approve...Part 2, Alternative 2

Ryan Perkins
I think it would be great for Mt. Spokane to be able to expand.

Will Corell, MD
I am in favor of alternative 4. I believe the addition of an extra chairlift and more ski runs for Mt. Spokane will significantly improve the quality of recreation for the greater Spokane community.

William Skaer
As a patron of Mt Spokane State Park for over 50 years I wholeheartedly encourage the commission to accept Part 1, Alternative 4...

Sam Schoesler
I am commenting to support land classification at Mt. Spokane as “recreational”, as well as for approval of all Mt. Spokane’s revised proposal.

Steve Lamberson
I vote for Alternative 4-Recreation, and am pleased to see the Washington State Parks & Recreation Commission and the ski area managers address a key deficiency in Mt. Spokane’s existing ski facility.

James Lehrman
The proposed expansion would be a natural progression to improve the outdoor experience at Mt. Spokane for the skiers and other users of the Mountain. I am very familiar with area involved and can see no negative environmental impact. Expanding the ski area would also help Mt. Spokane be more competitive with other ski areas to increase their market share of the business. All this helps Mt. Spokane remain as one of the best and most accessible recreational areas to the Spokane area.

Peter Fortinh
I am in favor of “Alternative #4, it allows for recreational enhancements, protects natural areas protects 90% of the forest in the expansion area and the recreational classification will provide greater skiable access to terrain suited for the intermediate skiing and boarding public.

Doug Dial
I strongly recommend that you approve Part 1 alternative 4...
Doug Dial
*I strongly recommend that you approve...Part 2 alternative 2.*

Anonymous
*Please consider supporting Land Classification alternative - #4 Recreation.*

Terri Horch
*We are most definitely in support of Alternative 4 of Part 1-Land Classification for the Mt Spokane PSEA - as well as in support of either Alternative 2 or 3 of the Part 2-Project Action.*

Julie Delaney
*I’m in favor of the recreational designation so the backside expansion can move forward.*

Randy Fleming
*I wish for the expansion to occur.*

Richard Gere
*As a member of this great outdoor recreation community I support the following land use alternative: Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area. Allows for one chairlift and seven new trails, safeguards natural areas and solidifies the long-term future of Mt. Spokane.*

David Basaraba
*I support Project Action Alternative 3 as a necessary element of the “Mt. Spokane Ski Area Expansion” project, which I believe will benefit all snow-sports enthusiasts throughout the Inland Northwest.*

David Basaraba
*I support the overall expansion of the Mt. Spokane Ski Area, as well as all supporting projects necessary to move this project forward.*

Matt Ewers
*Please move forward with the “backside” expansion on Mount Spokane for the good of society.*

Joyce Vierra-Larkin
*I support the expansion of Mt. Spokane ski hill.*

Jim Wilson
*Please approve the land classification for alternative 4. Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.*

Anonymous
*I support Alternative 4.*
Trond Liaboe  
*We therefore support the expansion of the alpine area as follows; Part 1: Alternative 4 Part 2: Alternative 3*

William Skaer  
*I wholeheartedly encourage the commission to accept...Part 2, Alternative 2 or 3.*

Jennifer Stone  
*I am in favor of classifying the whole PASEA for #4 Recreational use and allowing the Ski Area development to proceed.*

Anonymous  
*The Mount Spokane Expansion Project would greatly benefit the greater Spokane area as well as the ski area. This is a beloved ski hill and expanding it to allow more access would be a great benefit.*

Robert Crick  
*Crick Law Firm*  
*I believe that MS2000’s proposal should be approved and the expansion should proceed immediately with Alternative Number 4 of Part 1.*

Peter Stanton  
*Washington Trust Bank*  
*I’m writing in support of the above mentioned Recreation Classification and Mt. Spokane’s proposed expansion, and am asking the Washington State Parks and Recreation Commission to classify the land for Recreation.*

Kristine Berdan  
*I’d love to see the Mt. Spokane expansion happen!*

Orval Janssen  
*I have never understood why there has been so much opposition to something that would provide that much more opportunity for people to get out and enjoy the beauty of the mountain!*

Frank Sicilia  
*Property Owner*  
*The expansion project is a perfect idea for the area.*

Ron Oscarson  
*Mt Spokane is a great ski area and this expansion will help the area continue to be successful. The ski area adds a great deal of money to the state park. It also provides great winter recreation for Spokane area residents. A properly done expansion will add to both summer and winter recreation opportunities*

Jacob  
*I write in support of the Mt. Spokane ski area expansion plan, and ask the Washington State Parks and Recreation Commission to classify the proposed expansion area for recreational use. I proposed expansion / classification will effectuate the primary purpose of our park system - to allow enjoyment and use of our natural resources, while preserving it for future generations.*
John Campbell
I support the expansion because of the community benefit of the ski hill and my belief that the expansion can be done in a responsible way.

David Wilkinson
As a frequent summer and winter user of Mt Spokane State park, I urge you to go with Alternative #4 and allow the expansion of the alpine ski area on Mt Spokane.

John Olson
I am for the expansion of Mt. Spokane. Alternative 4 - (Preferred) Recreation, Resource Recreation and Natural Forest Area.

Chelsea Lamberson
This land classification alternative “#4 Recreation” will allow for significant recreational enhancements, protect natural areas and solidify the long term future of Mt. Spokane.

Adria McGee
Please allow the addition of another chair lift to Mt. Spokane, as many have been hoping be done for decades.

Roger Schramm
Please consider the land classification for the PASEA at Mount Spokane as Recreation. Our mountain needs this expansion to better serve our users. I am involved in a program with developmentally disabled athletes and the expansion would provide additional skiing terrain that would be very suitable for our group of over 90 participants.

Phil Dunbar
The Impact Of The Ski Area Expansion Is A Negligible Area Relative To The Size Of The Park And Surrounding Forest.

Denise Murray
Please continue on with the proposed expansion.

Dwight Carruthers
I support the expansion of the Mt Spokane ski area for a number of reasons

Brad Alfano
I am writing in support of allowing for one chairlift and seven new trails on Mt. Spokane. By allowing for improvements on Mt. Spokane, it will keep the area a solid outdoor recreation area for generations to come.

Blake McKinley
I am writing in support of the proposed new backside chairlift at Mt. Spokane.
Appendix H: Mount Spokane SEPA Combined Environmental Impact Statement
Comment Summary and Responses on the Draft EIS

Tim Crowley
*I support approval, under Part 1, of the revised proposal for Recreation (accessible)*

Shad Schoesler
*I am in favor of the Mt. Spokane expansion project. I believe this will be good for the greater Spokane community by providing additional recreation opportunities.*

The following commenters provided non-substantive supportive comments regarding the ski area expansion:

<table>
<thead>
<tr>
<th>Anonymous (4)</th>
<th>E. Ross</th>
<th>Ryan Winter</th>
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<tbody>
<tr>
<td>Cheyle Duncan</td>
<td>Lynda Garvey</td>
<td>Eric Meyer</td>
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<td>Marlene Nuits</td>
<td>Daniel Schaffer</td>
<td>Duane Crockett</td>
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<td>Bruan Duncan</td>
<td>Tomi Taylor</td>
<td>Malcolm Davidson</td>
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<td>Pam Heamerson</td>
<td>Nancy Enz Lill</td>
<td>Justin Hughes</td>
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<td>Carol Harrison</td>
<td>Natasha Hernday</td>
<td>Kathy Rogers</td>
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<td>Dolly Duncan</td>
<td>Susan Himes</td>
<td>Travis Brown</td>
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<td>Charlene Violette</td>
<td>Doraine Raichart</td>
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<td>Nancy Enz Lill</td>
<td>Susan Himes</td>
<td>Anna Twohig</td>
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<td>David Robinson</td>
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<td>Paul Christiansen</td>
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LAND USE/LAND CLASSIFICATION

Steve Pozzanghera  
*State of Washington Department of Fish and Wildlife*  
*Figure EIS-2 - PASEA boundary does not match the boundary depicted in figures for Section II. The figures need to be corrected for accuracy.*

**Response:** The reader is correct. The mapping has been updated to correctly reflect the boundary of the PASEA in Figure EIS-2 to match the boundary in Figure II-2.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens
*Alternative 3 would only allow backcountry alpine skiing as a conditional use, but the DEIS does not provide any guarantees that this statement would be enforced in the short term, or even in the long-term future. Therefore, Alternative 3 could be manipulated by private enterprises to more closely resemble Alternative 4 and the expansion of the Mount Spokane ski facilities. The DEIS needs to be reviewed and this exception within Alternative 3 needs to be further explored and backed up with legal documents.*

**Response:** Comment noted. As described in the DEIS, selection of Alternative 3 may result in the PASEA being removed from the existing MS2000 concession area. Alternative 3 would also not allow for additional lift or trail development in the PASEA. No change in document required.
MS 2000 respectfully requests the Washington State Parks Commission to classify the land for Recreation Alternative #4 Recreation, Resource Recreation and Natural Forest Area as we believe it will allow for significant enhancements, safeguard natural areas and solidify the long-term future of Mt. Spokane as a regional asset. We are confident that the expansion plan, which was revised to balance recreational opportunity with environmental stewardship, addresses forest health and land conservation concerns. As a non-profit organization, we’ve spent over a decade and nearly $1 million studying potential impacts to ensure that Mt. Spokane protects and preserves State Parks asset.

Response: Comment noted.

Elizabeth Cowles
I want to be sure the record correctly reflects my family’s support of the expansion project. Mr. Lambert is entitled to his own opinion about the expansion, but to imply that Cheney Cowles would have supported setting aside land within the PASEA as NFA is inappropriate. My family, both past and present, value Mt. Spokane as a place for all types of recreation for all types of people. Cheney Cowles, a founder of the Spokane Ski Club in 1931, embraced access to recreation and donated land within the PASEA for that purpose.

Response: Comment noted. No change in document required.

Dennis Yanuszeski
The land was donated to the State to develop into a recreational area, primarily as a ‘Ski Resort’. The people that donated this land made their fortunes in the Timber and Newspaper industries. They did not really want to be in the Ski Resort business and therefore donated it to the State for them to develop as such.

Response: Comment noted.

Joe Skokan
When feasible, new recreational areas should not be developed for only one use. For example, terrain for skiing should also be available for hiking, horseback riding and mountain biking. It may not be possible to have the land be available for all, but it shouldn’t be exclusive to just one activity that is only done a couple months of the year.

Response: Comment noted.

Jackie Corley
Spokane Tribe of Indians Archaeology and Preservation Program
Spokane County including Mount Spokane is zoned as Rural Conservation in which downhill, cross-country/ backcountry skiing, snowmobiling, and ice-skating are permitted uses(II-27). If such activities as snowmobiling and snow shoeing are allowed as before, why has backcountry skiing been prohibited?

Response: As discussed in Section II, section 3.7.4 – Land Use for purposes of park management, the State Parks Land Classification System (LCS) takes precedence over local zoning, as in this case the RCV
zoning is a general land use designation where the LCS provides detailed management direction by the agency.

Steve Pozzanghera

Washington Department of Fish and Wildlife

*Page III-54* - *The statement about the modification of wildlife habitat within the PASEA (timber harvest, wildfires, roads, ski area development) is biased and contradicts that statement that the “PASEA is largely undeveloped” (Pg II-22)*

**Response:** The text the reader refers to is, “Existing wildlife habitat conditions within the Mount Spokane Study Area have been influenced by past natural and human-caused modifications, including timber harvest, wildfires, road construction, ski area development, and other recreational activities (e.g., horseback riding, snowmobiling).”

These events and disruptions have all occurred within the 279-acre study area. Most notably a portion of the Summit Road exists within the southeastern portion of the PASEA. Other portions of the PASEA are largely undeveloped, so both statements the reader references are accurate.

Steve Pozzanghera

Washington Department of Fish and Wildlife

*Page II-4, Table II-I, Acres of recreation classification in Alternative 4 (330 acres) does not match up with the 279 acres stated throughout Section I, II, and III. This table should be corrected and figures should be added that overlay the land classifications and potential land use boundaries.***

**Response:** Table II-1 has been revised to provide consistent and accurate acreages throughout Sections I, II, and III.

**NOISE**

Fayette Krause

*The DEIS correctly notes impacts on the PASEA if Alternative #4 is selected, including: Impacts on wildlife habitat Impacts on wildlife habitat connectivity Natural Forest and native plant communities Soil and slope stability Water quality Introduction of invasive species Compromising of viewsoids 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 impacts listing. Noise will certainly be part of any construction, but it will also continue with significantly increased use by humans.*

**Response:** Comment noted. The impacts to wildlife species resulting from noise associated with the introduction of lift served alpine skiing in the PASEA are disclosed in Section III, section 3.4 – Wildlife and a discussion of the loss of solitude is contained in Section III, section 3.6 – Recreation.
PUBLIC RESOURCES/SAFETY

Severyn Westbrook
Mt Spokane Ski Patrol
As a patroller, I have witnessed countless events such as search and rescue and accidents on the back side. Some of the accidents have been life threatening. As a mountain we can place ski boundaries, ropes and “enter at your own risk signs” but people continually, annually, drop in. Opening up the back side would provide a safer environment.

Doug Dial
The area has many hazards to the skiing public and is a lighting strike away from a huge fire. The proposed plan would give the public the opportunity to enjoy the PASEA in a much safer environment. Allowing ski patrol personnel and equipment greater access to serve the public on ski runs that would be developed with the public’s safety in mind. The proposed plan would also allow for some clearing of many fire hazards that are truly needed to help protect the area from natural disaster.

Mike Burns
Mt. Spokane Ski Patrol
As a mountain ski patroller, I have spent many nights searching for people “lost on the backside” and involved in extractions of hurt skiers who venture into this unpatrolled area. It will greatly enhance safety to have mechanisms to extract people out of this area with equipment installed, and drastically clean up an area that requires skill and knowledge to safely recreate in now.

John Gifford
Pacific Northwest Ski Areas Association
It is vital that Mount Spokane have the ability to expand so the ski facility is able to ensure safe and uncongested ski trails - especially during periods of peak attendance when the majority of Mount Spokane’s guest population is comprised of individuals with limited ski and snowboard skills.

Kevin Voss
Mt. Spokane Ski Patrol
I am currently the Patrol Director and spend over 300 hours per year volunteering both on and off the mountain. As a member of the Ski Patrol, I spend a lot of time in the PASEA. We responded to over 40 lost skiers last year and most of them were located in the PASEA. Search and rescue is difficult in this area due to the poor health of the forest (windfalls, brush, tight spacing, etc.). In addition, once located the skiers are forced downhill to the snowmobile road and a lengthy traverse or we have to allocate additional patrollers to bring a snowmobile around the bottom for transport. With the additional chair lift, we would be able to simply guide the majority of lost skiers to the bottom of the lift.

Andy Porter
Mt. Spokane Ski Patrol
Last year we did a search and rescue on the back side of the mountain. The individual caught his tip on a tree, spun him around and plastered himself against another tree. His left lung was full of holes and had collapsed and he had two front ribs broken and one rear rib broken. He is alive today because of the effort and luck of many people. If we had proper access and recovery equipment to the back side this would not have been the case. We could of had the person taken care of and shipped down to the hospital within 30 to 45 minutes. I believe that by opening up the back side to a chair and open runs will make our job as patrolers a lot easier than it currently is.
Appendix H: Mount Spokane SEPA Combined Environmental Impact Statement
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Eric Ewing
Mt Spokane Ski Patrol

Last season, in February I believe, there was a guest of Mt Spokane who was seriously injured while skiing the backside of the mountain. He had several injuries including a tension pneumothorax (collapsed lung). He was in a life threatening situation. I was there that day and listened intently on the situation unfolding over the radio. While this area is technically out of our patrol area, we are the ones that are best prepared for this type of rescue. The aforementioned rescue, given trails and lift, could have had at least an hour shaved off the total rescue time. I think I have made the point about the positive impact the lift and trails would have on the patrol’s ability to do what we do.

Dave Warnica
MSSP

If any of you have actually walked the area in question you have seen the dead, diseased and downed timber. It’s a fire storm waiting to happen. Expansion of the ski area will take care of the problem and insure the health of the area. We do not want Mt Spokane to be a bald nob devastated by fire.

Dale Gill

With regards to the west side ski area expansion the EIS must look at the history of skiing on Mt. Spokane. I learned to ski on the west side in the early 1950’s. The skiing conditions were terrible due to warm moist pacific winds creating a crusty surface on the snow. At least one skier was taken off the mountain each weekend by the ski patrol due to a broken leg caused by breaking through the crust during a turn. The bad snow conditions were the reason for moving the west side skiing to the southeast side.

Bill Todd

Presently skiers already use that area. As this is out of bounds this is a dangerous practice. Opening this area would enhance public safety and allow safer access for less than expert skiers. In the public interest the only responsible decision is to allow the expansion.

Bruce Toillion

MT. Spokane Patrol is called on a weekly basis to assist and evacuate injured skiers and snowboarders and to conduct search and rescue missions for lost skier/snowboarders. Lift installation and trail development would yield many public safety and ski patrol-related benefits, among them: - no longer will skiers/riders have to use a designated snowmobile road to access a lift; - improved ski patrol response time, decrease in the number of search and rescue missions, and reduce the overall risks associated with search and rescue; - fewer patrollers will be needed to respond to calls in the PASEA, leaving more patrollers available for other calls; - decreased dependency on the high density Cat Track area; - skiers and snowboarders can safely enjoy the PASEA knowing they will have the same high level of ski patrol services they have grown to expect by skiing/riding at Mt. Spokane; - a “spreading” out of the mountain guests will reduce the number of advanced/intermediate guests using the beginner terrain, resulting in room for more beginners.

Joseph Ferraro
National Ski Patrol/Mt Spokane Ski and Snow

As a 20 year member of the Mt Spokane Ski Patrol and a Search and Rescue Board Member, we are wasting time, money, and human resources to rescue the lost and injured in this un-patrolled,
dangerous, and difficult access area. Past rescues include skiers, snowboarders, snow shoe hikers, snowmobile riders, and even members of Mt Spokane Mountaineering Club. If this area had a ski lift and better access, we could reduce these search and rescues while actually patrolling this area.

2. Developing the PASEA will make the PASEA area more skiing safe in that presently the area has much blow down timber, hanging timber, and roots which can interfere with skiing. With a chair serving the PASEA, the area will be regularly served by the Ski Patrol, which is not the case now.

Group Response: Comment noted. The number of rescues that occurred during the 2012/13 season is included in Section III, section 3.7.6 – Public Services. The reader is referred to Section III, section 1.3 – Purpose and Need #3, which describes the need for improved access by the volunteer ski patrol to the PASEA if skiing is continued to be allowed within this area.

Dan Hensley
Allowing Mt. Spokane 2000 to develop the PASEA will make the area a much healthier forest, as well as removing a great deal of fuel for forest fires. Certainly we should all be aware of the fire danger in our state.

Dave Warnica
If any of you have actually walked the area in question you have seen the dead, diseased and downed timber. It’s a fire storm waiting to happen. Expansion of the ski area will take care of the problem and insure the health of the area. We do not want Mt Spokane to be a bald nob devastated by fire.

Peter Thompson
Considering the severe forest and wild land fires we have experienced this fire season it makes sense to consider opening some areas from heavy forestation in an effort to create what might be called recreational fire breaks. The greatest environmental disaster would be to have the ski area, current or future, and the rest of Mt. Spokane State Park devastated by fire.

Richard Portner
It is worth noting that the DEIS did not mention the benefits that the proposed trails would provide with regard to forest fire containment. In the event of forest fire, each trail will provide a fire break that will significantly slow down a fire’s progress, thus allowing fire crews extra time to contain and extinguish the fire. The wider a trail is made, the more effective the firebreak.

Richard Russell
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.

Sid Wurzburg
I am also concerned about any expansion of the natural area. Summer and fall hikes and winter tree skiing have shown me how much blow down and other potential fuels have been allowed to accumulate in the Park. There is a huge potential for a fire disaster. Ski runs and access roads are fire breaks and access for fire fighters and make effective fire fighting much easier.
Frank Sicilia  

The area needs the fire breaks alone not to mention the much needed clean up in that particular part of the mountain. It's going to bring much needed safety for the entire mountain. People are not going to stop going back there. But when someone gets injured or lost, and someone every year does, the ski patrol will have a much easier time getting to them.

Group Response: It has been noted by some parties that the proposed ski area expansion will help to reduce the risk of catastrophic wildfire in the park by removing excessive dead and downed trees (fuels) in a large portion of the remaining high elevation forests in the park, and through the establishment of trails that will serve as fuel breaks across the NW face of the mountain. The unprecedented level of wildfire in eastern Washington this year highlights the need to address this issue in an aggressive and timely manner. However, the interaction of biological and environmental factors on the backside of Mount Spokane suggests limited evidence to support the notion that the proposed alpine ski expansion will reduce the risk of a catastrophic wildfire in this area. There is even the chance that it could increase the risk of one occurring.

The forests on the “backside” (northwest aspect) of Mount Spokane, especially those in the area proposed for ski area expansion, are very different from the majority of lands impacted by wildfires in Washington. With occasional exceptions, most of the latter occur in shrub-steppe, ponderosa pine, and low-mid elevation mixed conifer forests. These are dry forests and shrub communities, especially those on southern and western aspects, and typically support highly volatile shrubs like sage, bitterbrush, and ninebark. Historically these systems evolved under low intensity-high frequency fire regimes. Fire suppression efforts since the early 1900s have resulted in high accumulations of wildfire fuels and the creation of ladder fuels (continuous vegetation from the ground to the top of the canopy). What were once relatively “cool” fires burning through the understories of forests every decade or two and leaving most of the large trees unscathed, have now become stand-replacing crown fires that completely burn through all levels of the vegetation structure. By contrast, the forests in the proposed expansion area are dominated by pure or mixed stands of sub-alpine fir and western hemlock, with western larch, Douglas-fir, and western red cedar sharing portions of the canopy in the lower reaches of the project area. Their understories are characterized by relatively moist, non-volatile species like elderberry, huckleberries, and a rich diversity of native forbs. Moist soils support this vegetation throughout most of the growing season; a condition quite different from most low-elevation forests and shrub-lands where soils are often very dry in late summer and early fall, excepting along permanent water courses. The cool temperatures and high moisture levels found atop Mount Spokane have given rise to vegetation conditions that are in many ways similar to those found in much of western Washington, and which are characterized by high intensity-low frequency stand replacement fires regimes. Forests like this will burn every century or two when droughts occur (typically over multiple years), drying the forest to such an extent that a lightning strike or other ignition source will set them ablaze. There are little or no management activities that can be done to lessen this risk (in contrast to the low elevation forests where removal of excessive ladder and understory fuels can significantly slow the horizontal and vertical spread of wildfire). Hence, ski area construction in
the PSEA is likely to do little to alter the risk of catastrophic wildfires there, and could potentially exacerbate it through increases in solar radiation on the forest floor in summer (drying of vegetation and soils) and adding potential ignition sources into this landscape (those associated with the maintenance of infrastructure and trails).

Finally, concern has been raised that the undeveloped side of Mount Spokane appears to support an excess of dead trees and coarse woody debris: attributes that elevate the risk of fire ignition and spread. Much of these materials have arisen in the wake of winter storm events, or varying intensities, that appear to be relatively common atop Mount Spokane. The vast majority this wood is well over 3 to 8 inches in diameter: the diameter range associated with 1,000 hour fuels (i.e., fuels that can cause dangerous fire conditions, but which are very slow to ignite and require extended periods of drying before they will burn). Thus, the risk of the coarse wood debris and snags in the PSEA contributing significantly to the risk of a wildfire starting in the wake of a lightning strike or carelessly discarded cigarette, is low except during periods of extreme drought. On the point about the abundant coarse woody debris and snags found throughout the proposed alpine ski expansion area: these materials provide several important ecological functions as habitats, and reservoirs of nutrients and moisture that contribute to future plant and fungi growth. Their presence represents natural processes, which may look unhealthy to most humans, but serve very important roles in maintaining the health and function of the complex forest-shrub-grassland communities atop Mount Spokane.

Chris Bachman  
Sierra Club

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

Mike Petersen  
The Lands Council

_Why is there no concessionaire plan including in the DEIS?_

**Group Response:** The readers are correct, at this time no Master Concession Plan has been completed. Although discussed in the 2010 Master Facilities Plan FEIS, there is no statutory requirement that a Master Concession Plan be developed. As such, the project EIS is limited in scope to the areas within the Park defined by the Commission as having the potential to develop one new chairlift and seven alpine ski trails on 279 acres. Effectively, the current ski area expansion plan together with the lease amendment needed to implement the selected alternative would replace the Master Concession Plan.
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.” 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.

Response: The reader is referred to Section III, section 3.7.6 – Public Services. Search and rescue data from the 2012/13 ski season was included in the DEIS.

The safety of the skiing public is at stake. Many use this currently unpatrolled area. With expansion, the area will be patrolled, enhancing both safety and the skiers outdoor experience.

Response: Comment noted.

RECREATION

Giorgio Jimenez

Since I start riding my bike 3 years ago, out on the trails, my health has improved 150%. I’m 50 years old and would like to keep my health this way. Please consider the Alternative measure 4 for this new expansion project.

Karen Hensley

I support Alternative 4….. I want to see the area proposed as “Recreation” remain open to mountain bikes. Mountain biking is a sport easily adopted by a variety of people in Washington state, and had the advantage of being of great interest to both young and old.

Dan Wilson

Please consider the following in support of Alternative 4 to see the area proposed as “Recreation” remaining open to mountain bikes and hiking, we are stewards of the trail as mountain bikers our community strives to both enjoy and respect nature. As evidenced by the trail upkeep of 140, I have personally put time into maintaining these trails and the enjoyment they bring to all ages.

Shane Freeze

I support Alternative 4 because I deeply want to see the area proposed as “Recreation” remain OPEN to mountain bikes, as envisioned in the revised Trails Plan.

Will Stone

Sustainable bike trail development and maintenance is a very positive and relatively low impact way for the public to enjoy state land. Based on the options put forward, it seems option 4 is the best bet to maintain and improve bike access, so that’s my vote.
Sara Johnson
I support Mt. Spokane for recreation to keep access for bikes.

Molly Howlett
Please continue to allow for mountain biking on Mt Spokane.

Randy Fleming
I support proposal 4 for the further use of Mount Spokane as a Recreational use area to include the riding of mountain bikes.

Pat Loughery
As a hiker and mountain biker, I strongly support the Alternative 4, to allow for designation of this land for use by mountain bikes as well as other users.

Anonymous
As a mountain biker I hope you can commit to alternative 4. Mt. Spokane is the best shuttle accessible mountain biking in the area.

Marne Evergreen Mountain Bike Student League
I am writing in support of the Alternative 4 of this plan because I and my fellow mountain bike friends want to see the area proposed as “Recreation” so it remains open to mountain bikes as envisioned in the revised Trails Plan.

Angie Feser
I support Alternative 4: Recreation, Resource Recreation, and Natural Forest Area of the Mt. Spokane Draft Environmental Impact State land classification. Please consider classifying the proposed area as “Recreation” to remain open for mountain biking activities.

Dino Giurissevich
I support alternative #4 as there can never be enough mountain bike trails. Mountain biking is not only good for one’s physical and mental well-being but is a sport which consistently increases in numbers which is very good for tourism and the economy.

Jerrod Snyder
I would like to strongly voice my support for classifying the Mt Spokane area as Alternative 4. I am an avid mountain biker, and believe that Mt Spokane should continue to be open for mountain biking as well as continuing to develop mixed and single use trails that support mountain biking. I am also a nordic and alpine skier and hope that this area will embrace both summer and winter recreational opportunities afforded by the mountain.

Mike Jancola
Please keep this park open to mountain biking!
Matthew Hixson  
*I support Alternative 4 to this plan because I would like to see the recreation area open for mountain bikes.*

Ken Hoekerna  
*As an avid mountain biker, it concerns me that several of the proposed options would remove bicycles from the users who can enjoy the trails. Since alternative 4 appears to be the only option that supports continued access for bicycles, I support that option.*

Anonymous  
*I support Alternative 4 because I want to see the area proposed for Recreation, remaining open to mountain bikes.*

Dean Horstman  
*As an avid mountain biker I support alternative 4 for the project above because I want to see the recreation area remain open to mountain bikers.*

Anonymous  
*I’d like to let you know that I support Alternative 4 because I want to see the area proposed as “Recreation” remaining open to mountain bikes.*

Slim Lundeen  
*I just want to add my support for continued mountain bike use at Mt. Spokane.*

Ryan Gilbert  
*Please keep or expand Mountain Biking opportunities on Mt Spokane. Mountain biking is one of the healthiest and most popular forms of exercise these days and we need as many trails open as possible to keep our population fit.*

Sean Vergillo  
*Lacamas Trails Advocacy Group

*I’m in support of mountain bike access on Mt Spokane and surrounding areas. It can bring quite a bit of income to the area during the summer months if developed as a multiuser trail network.*

Julie Crittenden  
*I want to make sure that mountain biking is allowed. Therefore, I support Alternative 4 and the area proposed as “recreation” to remain open to mountain bikes.*

Doug Lane  
*I support Alternative 4, as it would allow for future mountain biking in the expansion area. It is important to me to continue to provide spaces for mountain biking in Washington State Parks.*

Jason Graham  
*Mt Spokane should always be open for mountain bikes and efforts should be made to increase and improve the trails. State government should work with groups who are interested in development and*
maintenance and allow them to continue work. Alternative 4 for the Mt Spokane PSEA should be pursued.

Chris Nickle

*Please Support Alternative 4. Recreation should include Mt Spokane being open to mountain bikes.*

Cody Constant

*Evergreen Mountain Bike Alliance*

*I am writing this in support of ALTERNATIVE 4. I have chosen this alternative after reading the publicly available documentation on this decision process. My decision is based on the impacts of reclassification, which would prevent mountain biking activities to take place on land that is reclassified for use as alpine-skiing recreational areas.*

Lance Cogley

*West Coast Racing*

*You should do the research, nearly every mountain resort in america is expanding into bike parks for the summer and it is profitable when done right. Dont be left in behind when there is no reason for it. Our family enjoys the beautiful trails for mountain biking. We would love to see more of them. the park is huge and has plenty of room for all to enjoy. I do believe that they need to make more trails specifically designed for biking*

Steve Pelton

*Please use the designation Alternative 4: Recreation, Resource Recreation, and Natural Forest Area. This is the only alternative that allows for Mountain Bike use which Mt. Spokane is perfect for and a very large user group.*

Justin Adams

*Please note that I support the option #4 for the Mt. Spokane proposal. A beautiful area with many resources and I believe mountain biking should be allowed.*

Greg Parker

*I support alternative 4. I mountain bike with my 10 and 7 year old boys often. Their grandparents live near Mt. Spokane state park and any of the other plans are likely to leave us without access to Mt. Spokane State Park in the form we love.*

Will Gevers

*Alternative 4 - please provide trail access for Mountain Biking*

Patrick Barnum

*I am in support of Alternative 4: Recreation, Resource Recreation, and Natural Forest Area-is the only option that allows certainty of access to this area for bikes.*

Monny Williams

*I'm for option 4 allowing mt biking.*
Eric Albers
Cold Creek Mountain Bikers

*It is important that Alternative 4 be chosen to protect access for bikes. “Cycling is a $6.1 billion dollar industry and the seventh most popular recreational activity in the U.S,” according to Jon Kennedy of Diamonback Bicycles of Kent, Washington.*

David Baty

*I support Alternative 4 of the PASEA. Especially, for the potential mountain biking opportunities it might provide.*

**Group Response:** Comments noted. For clarity, all of the non-project action alternatives (Section II) would allow for existing mountain bike trail usage within the PASEA. Mount Spokane Ski and Snowboard Park is currently not allowed under the terms of their concession agreement to operate a mountain bike program. Future projects that could increase access for mountain bikers include implementation of the Comprehensive Trail Plan, which is part of the 2010 Master Facilities Plan. The Comprehensive Trail Plan contemplates a multi-use trail in the PASEA, depending upon the land classification adopted (see Section II).

Jerry Post

*I agree with Mt. Spokane 2000 that the front side area is too crowded on many weekend days, especially the main cat track that takes skiers and riders back to the already crowded Lodge 2 area. There are hundreds of beginners in that area, and I’ve witnesses plenty of collisions and near-misses because of the density of skiers converging on the Ego Flats run.*

**Response:** Comment noted. A discussion of the existing terrain and circulation deficiencies within the developed ski area boundary is included in Section III, section 3.6 – Recreation.

Steve Busch

*Providing opportunities for the people of eastern Washington to enjoy outdoor recreation, especially during our long and sometimes dreary winter months, is vital to sustaining a healthy and vibrant community. Mt. Spokane ski operations utilize the natural landscape and have made an art form of moving snow around. Yes, ski area operations require some basic facilities and require a minimal footprint, but grooming activities, as well as the tracks left by thousands of skiers and snowboarders simply melt away every spring.*

**Response:** Comment noted.

Charles Holcomb
Mt. Spokane Alpine Team

*Kids need more terrain than is currently available at Mt. Spokane. The current intermediate terrain is congested and often dangerous. The area desperately needs more runs cut to bridge the gap between beginner and expert terrain.*

**Response:** Comment noted.
Charles Holcomb
Mt. Spokane Alpine Team

Cutting runs in the PASEA (also North/Northwest facing) provides more terrain that sees far less limited visibility conditions.

Response: Comment noted.

Mari Schramm, Vanessa Torjusen, Dionna Klein

Section 3.6: Recreation - The study was largely focused on winter activities on the mountains. Other recreational activities were acknowledged in the introduction of Section 3.6, but we would like to know more about how the types of warm-weather outdoor activities might be impacted by the ski area expansion. Hiking, Mountain biking, Wildlife viewing, Horseback riding. We would also like the EIS to expand on how the recreational opportunities of current back-country skiers would be impacted by the proposed expansion. According to the EIS, the proposed ski area has “better early and late season snow retention and quality.” However, we wondered how reducing the tree coverage on the mountain (in order to build ski runs, etc.) would affect the snow levels of the PASEA (i.e. less shade= less snow)? More specifically, would the benefits be canceled out?

In addition, please note that the current runs are eastern and northern sides of the mountain and that the proposed expansion area is on the western slope, not the northern. This would indicate that the poorer snow retention associated with “southern exposure” should not affect the current Mt. Spokane ski area.

Response: Comment noted. Impacts to both summer and winter recreationists are discussed in Section II, section 3.6 – Recreation and Section III, section 3.6 – Recreation. The FEIS includes a discussion of snow retention in Section III, section 3.6.2.1 and adds a figure illustrating the solar exposure of the proposed expansion area. Specifically, as Figure EIS-17 shows, the expansion terrain within the proposed Chair 6 area has predominantly northwest facing slopes, with some north facing and some west facing.

Steve Stevens

When Spokane was featured as “Best Town” for outdoor enthusiasts by Outside Magazine in 2013, Mt. Spokane was specifically mentioned for its contribution to our outdoor culture for residents and tourists alike. The expansion and use for recreational skiing would only add to this important aspect of our community culture. The expansion will introduce 80 acres of groomed trails, seven new runs and a chair lift within an 850-acre area designated for alpine use. Recreational classification will create greater access for skiers and more terrain, which also promotes better skier safety.

Response: Comment noted.

Laura Morgan

Please consider leaving trails open to horseback riding. I was thankful to talk with the ranger during a recent endurance ride and appreciate having such a beautiful place to ride and hike outside of ski season!

Response: Comment noted.
Marjorie Lewis

*The ski expansion would also provide additional trails through this marvelous wilderness for hikers and equestrian riders. The American Endurance Riders Association hosted an endurance ride on Mt. Spokane over Labor Day weekend and hopes to make this an annual event. Over 200 people and horses participated. Wildlife can still thrive alongside hiking / equestrian trails as hikers and horses do not create much noise disturbance.*

**Response:** Comment noted. No change in document required.

Steve Lamberson

*As currently configured, the Mt Spokane operation is mostly reliant upon south-facing slopes. In most winters, Mt Spokane’s deep snowpacks weather the highly erosive element of south-facing slopes - solar exposure and wind - without detriment to its operation. However, as the region-wide drought illustrated during the winter of 2004-2005, ski areas with south-facing aspects are especially susceptible to dramatic reductions in their operating season (e.g., Mt Spokane has a 29-day ‘fiscal year’ during the winter of 2004-2005) Expansion into terrain with a northern aspect will not only yield a very high quality recreation experience, and better, overall snow quality, it will help add resilience to the financial performance of the ski area.*

**Response:** Comment noted. No change in document required.

Dale Gill

*I learned to ski on the west side in the early 1950’s. The skiing conditions were terrible due to warm moist pacific winds creating a crusty surface on the snow. At least one skier was taken off the mountain each weekend by the ski patrol due to a broken leg caused by breaking through the crust during a turn. The bad snow conditions were the reason for moving the west side skiing to the southeast side. The use of snow packing machines will reduce the crust problem, but the conditions will usually be icy on the west side.*

**Response:** Comment noted.

Cindy Rust

*As Mt. Spokane Ski and Snowboard Park serves as a leader modeling the intentions of the 2007 Children and Nature Plan of Action signed by multiple leaders of agencies including the National Association of State Park Directors, we need to support their efforts in the fight against childhood issues brought about by lack of physical activity, by giving them the space to accommodate this role where getting out into nature especially during a high risk time to be sedentary, winter, is vital to a healthy population.*

**Response:** Comment noted.

Ken Kaiyala

*Their suggestion that a high speed lift would also improve the skiing experience is also flawed. It will only increase the number of times the runs are overcrowded in a day and the cost to purchase and*
install the lift would be far higher than installing the less costly lift that is already owned. The small amount of terrain improvement that would be required by the new northwest lift would be minimal.

**Response:** Comment noted. Section III, section 2.2 – Alternatives Considered, describes an infill alternative that was considered but eliminated, as improvements to ski terrain within the existing developed ski area boundary would not increase the amount of low-intermediate ski terrain at Mount Spokane. Additionally, there is a need for better circulation and more even distribution of low-intermediate and intermediate level skiers throughout the ski area (see Section III, section 1.3 – Purpose and Need), which could only be addressed by expanding ski area infrastructure into the PASEA (see Purpose #1).

Mike Petersen The Lands Council

*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 clue 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 backcountry option.*

**Response:** The skiing that is done within the PASEA is not a true backcountry skiing experience. Many skiers who utilize this terrain access the summit of Mount Spokane from the base area via Chair 1, ski through the PASEA and skate along Chair 4 Road to access Chair 4. As such, the PASEA currently functions as a round trip, lift-served ski pod, however inefficient. This is unlike a traditional backcountry skiing experience where skiers hike to terrain rather than utilizing a chairlift to facilitate access. By restricting lift-served alpine skiing from the PASEA through a NFA classification, the Commission would provide clear direction to Park staff that their intent for this area is that it be managed for preservation, restoration, and interpretation of natural forest processes.

To avoid confusion, a clarification has been made to Alternative 2 in the Final EIS stating the following:

Lift-served “backcountry” or “side-country” alpine skiing that occurs on ungroomed terrain either within or outside of the ski area boundary would not be permitted under Alternative 2. Pursuant to the Land Use and Land Classification Compatibility Matrix, any type of lift-served skiing is considered “Alpine Skiing” and is not permitted within the NFA classification.

Backcountry skiing which is not lift-served and involves human-powered hiking, snowshoeing or use of cross-country skis to reach an elevation that allows for downhill skiing is considered “Off-trail Cross-Country Skiing” which is a permitted use in the NFA classification consistent with State Park’s Land Use and Land Classification Compatibility Matrix.

This clarification acknowledges that lift-served backcountry skiing has the potential to introduce increased numbers of skiers into the NFA classification. Traditional backcountry skiing requiring human-powered ascent comprises a smaller user group.
As noted in Section III, section 2.1.1.1, a two-chairlift concept was considered for the PASEA in 2006 which was later eliminated from consideration because it would have had an unacceptably negative impact on backcountry skiers.

Implementation of either of the action alternatives contemplated in the project EIS would retain a “side-country” tree skiing experience in the lands above Chair 4 Road between the 279-acre potential expansion area and the existing Chair 4 pod. No ski area infrastructure is proposed on these lands and should either Alternative 1, 3 or 4 be selected from the non-project EIS, skiers would continue to be able to experience a lift-served backcountry skiing, as in the existing condition.

Cris Currie

Page II-2: There is confusion here over the difference between cross-country ski trails as a permitted use and nordic track skiing as a non-permitted use. I would leave it at off-trail cross-country skiing as the permitted use so it’s clear that track skiing is not permitted. Page II-3 2.3 2nd paragraph: Off-trail snowmobiling should not be permitted in the presence of backcountry alpine skiing. Currently there are problems here and we don’t want to perpetuate them. Page II-21: State Parks frequently comes up with different amounts of mileage when it comes to Mt. Spokane’s trails. My latest calculation is 80 miles of trails, including about 20 miles of single track. Page II-22 3.6.2.2: Change “backcountry skiing” to backcountry “alpine” skiing as the non-permitted use. Backcountry nordic skiing would still be permitted. Page III-115 Alt. 2 and 3: Delete “(primarily mountain bikes).” Trail 140 is multi-use and lots of users use it. And by the time the new runs are built, we will probably have a new mountain bike trail which will decrease the use of Trail 140 for mountain biking. The document makes frequent reference to the potential for a “Round the Mountain” 5000’ trail. Do these references mean that if Alternative 4 is adopted and people want to build this trail, that another EIS would not be necessary?

Response: The reader is referred to the agency’s response to the previous comment as it relates to the definition of lift served backcountry skiing in the LCS.

Under any of the non-project land classification alternatives contemplated dispersed Nordic skiing and snowshoeing would continue to be a permitted use on any of the lands within PASEA or Mount Spokane State Park.

The Comprehensive Trail Plan would allow for consideration of a multi-use trail in the PASEA, depending upon the land classification adopted (see Section II), however construction of this trail would require additional analysis under SEPA. Once a proposal is for this trail is developed the SEPA responsible official would decide the level of environmental analysis necessary to allow or deny the construction of this or any other recreational trail (e.g., equestrian, mountain biking, hiking) within the greater PASEA.

Anonymous

Maintaining current runs or lack of. Several runs on chair 4 and 1 are unsafe during most of the season due to stumps, fallen trees and new growth except during the biggest snow years.

Response: Comment noted.
Garth Hangartner

As an avid snowshoer, I wonder when the Ski area says: “all traditional routes have been preserved.” How can a route be preserved when there are 7 runs and a lift across trail 140? I also wonder about the impact of even more skiers in the backside, and as they move further out looking for a backcountry experience...there is nothing to truly stop or prevent skiers in restricted areas.

Response: The DEIS acknowledges that either of the action alternatives contemplated in the project EIS would eliminate dispersed backcountry winter recreation opportunities within the 279-acre expansion area (see Section III, section 3.6 – Recreation).

Geoff Rowand

The MSSA provides a convenient, high quality, and affordable recreational area for the Inland Northwest but has become somewhat less competitive with other regional winter recreational offerings. Maintaining competitiveness is critical to the continued financial viability of MSSA which, in turn, benefits the community with affordable winter recreational offerings, the promotion of strong community and healthy lifestyles, providing much needed revenue for State Parks, and incremental employment opportunities. Adding the PASEA would surely attract additional skiers while lowering skier density resulting in higher revenue while lessening liability respectively.

Response: Comment noted.

Steve Pozzanghera

Page III-98 - The multi-use trail in the PASEA should be incorporated into this project since this trail will likely become a ski trail through islands in winter and vice versa ski trails will become multi-use trails in summer.

Steve Pozzanghera

Page III-87 - “No formal trails should be routed into these preferred wildlife habitat elements in tree islands.” Though no trails (formal or otherwise) in these islands would be ideal, this is not realistic for safety and other reasons, thus would prefer to see formal trails designed and built properly than informal trails (III-12) build haphazardly.

Steve Pozzanghera

Page III-12, Table 2-4 - Tree Island Retention section. “A limited number of informal skiing routes would be permitted through the tree islands.” Given the clearing proposed for these, erosion will likely be an issue and they should be formally designed. It is likely that these trails will become formal/informal off-season hiking and biking trails.

Group Response: Comment noted. An additional mitigation measure has been included in Table EIS 2-4 for Commission consideration that would amend the Tree Island Retention prescription discussed in Section III, section 2.2.5.2:

No cutting or removal of live trees or understory vegetation regardless of size is permitted, with the following exception. Removal of standing snags or other trees at high risk of failure may be considered in areas where said trees are within striking distance of developed facilities and where
people are expected to stay for extended periods of time (e.g., structures, lift terminals, lift towers and lift haul lines).

Dan Hensley
The new chair will provide an easier method for people presently finding themselves skiing in the PASEA by accident, to return to the front side of the mountain. 4. A chair lift in the PASEA will also reduce the traffic flow of skiers (beginning to advanced level) on the “Cat Track” returning to Lodge 1 and Lodge 2 from the north and northwest side of the mountain.

Response: Comment noted.

Chris Bachman
Sierra Club
Additionally, there is continuous propaganda from the concessionaire about the western slope holding snow better as well as having snow cover earlier in the season. There are several problems with this argument. First, the western aspect has early season snow and holds snow because it is protected by old growth trees. The existing ski area has little cover on it’s clear cut runs. Of course the western side of the mountain holds snow better, a fact that will be negated should it be no longer shaded by old growth. The second problem? How do you get there? Access to the western slope still comes from the same parking area and lodge. Therefore, access to the western slope will still come from the eastern slope. If there is no snow east, the only access to the west would be skier powered. This is already a recreational pursuit by many, it is called backcountry skiing.

Mike Petersen
The Lands Council
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?

Joel Lee
As has been presented in the project proposal, the PASEA is on the northwest side of the mountain and therefore will have better snow for skiing (drier) and increased snow pack which will lead to improved conditions in both the early and late seasons.

Greg Gordon
Spokane Audubon
Purpose and need. Purpose #2 is highly questionable as the proposed lift and runs would be on the southwest slopes, not the north facing slopes as stated for better snow retention. If the authors of the DEIS have such trouble with compass directions, it seriously undermines the credibility of the rest of the document. The DEIS is insufficient in that there is no analysis of the net loss of backcountry skiing opportunities. The DEIS assumes that expansion would improve the recreational opportunities, yet expansion would eliminate a unique backcountry experience and replace it with more of what is currently available. The DEIS fails to address potential upgrades to the existing facilities as alternatives. For example, the perceived need to provide for beginner and intermediate skiers could be easily met by installing midway stations on the existing lifts.
Group Response: The FEIS has been updated to include a discussion of slope aspect and the role it plays in snow quality and retention at any developed ski area (see Section III, section 3.6 and Figure EIS-17), as well as the aspect of the proposed and existing ski trails at Mount Spokane.

The expansion terrain served by the proposed Chair 6 has predominantly northwest facing slopes (see Figure EIS-17), with some north facing and some west facing aspects. From a skiing standpoint, this is an ideal addition to complement the existing terrain, as none of the existing terrain has this exposure. Having the full range of exposures allows for the best skiing options under the range of snow conditions and times of the day. The north and northwest facing aspects off of the proposed Chair 6 represent favorable exposures and should generally provide better snow quantity and quality than the snow available off Chairs 1, 2, and 3.

Lee Tate

The terrain in the PASEA is ideal for skiing because it mostly has northern exposure and because it extends to the top of the mountain, avoiding the late season melt off. It also contains ideal fall line conditions for skiing where the runs can be cut such that skiers will be able to use symmetry in motion that reduces fatigue and thereby increasing the recreation experience of park guests. From an instructional perspective, it will be a great teaching area.

Response: Comment noted.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-1 - The DEIS indicates that a significant portion of the PASEA was used for alpine downhill skiing historically “...much of it included the original site of the first lift, facilities, lodges, and improved trails to be constructed on the mountain...”. The document should provide information to support this, such as run acreage, photos, maps, etc. The cited SE Group 2007 report does not claim that a significant portion of the PASEA was used for historical downhill skiing.

Response: The FEIS text has been revised to reflect that these historic facilities occurred in or around a portion of the 279-acre potential expansion area rather than within the greater PASEA acreage. Specifically, the original ski area with rope tows, lodge and other facilities was located in the upper and southern portion of the 279-acre study area with access from the Cook’s Auto Road. There are a number of photographs and historic maps included in the public record that have been used in public presentations since State Parks began consideration of this potential project.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-4 - Relative to Purpose #3. A large portion of the PASEA (300-350 acres) will remain in Resource Recreation and used by backcountry skiers. Please clarify if further development will be needed in the 300-350 acres in the future to address safety of the skiers (i.e. safety corridors).

Response: The entire scope of development contemplated by the project EIS is limited to the 279-acre potential expansion area and described in Section III of the Combined EIS. No additional development in the PASEA is currently planned. If at a later date the concessionaire makes a proposal to increase ski
patrol access within the 300- to 350-acre area contemplated as Resource Recreation under Alternative 4 (non-project EIS) the proposal would be assessed by State Park’s staff as to the level of environmental analysis required.

Anonymous

*Creating a downhill mountain bike park type of trail is appropriately placed in ski areas as a summer use for a highly developed area (ski area) where there are lift facilities. To create the same use in this wild and natural State Park and the accompanied traffic on the Mt Constitution road is out of character and not consistent with the types of approved uses for state parks. In other words a trail which caters to bikes solely designed to go downhill is actually encouraging more mechanized vehicles in the park to transport bikes to the top.*

**Response:** Comment noted. As previously described, under the conditions of their Concession Agreement with State Parks, the concessionaire is not currently permitted to operate a mountain bike program. Therefore, use of the existing Trail #140 by mountain bikers required either a car shuttle or human power to return to the summit of Mount Spokane.

Steve Busch

**SUSTAINABILITY:** Sustainable outdoor recreation is vital for healthy people and a healthy community. Mt. Spokane Ski and Snowboard Corp needs to expand if it is going to continue providing quality outdoor recreation opportunities for the growing number of skiers and snowboarders who visit or live in our area. Like other lift served ski areas in North America, Mt. Spokane understands that serving the recreational needs of people and being good stewards of the environment are NOT mutually exclusive goals. Mt. Spokane is blessed with a lot of natural and highly variable ski terrain. Adding a few lift towers and making some relatively insignificant changes to the landscape in order to increase skier safety and public accessibility will not negatively impact the environment over the long term.

**Response:** Comment noted.

Richard Russell

*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. 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.*

**Response:** Thank you for your comment. Development of formalized, non-gladed and groomed ski trails is necessary to address the deficiencies in low-intermediate terrain currently available at Mount Spokane. However, where appropriate, final ski trail design may allow for the use of tree islands within certain trail corridors.
Bridgette

*We enjoy horseback riding on Mt. Spokane in the summer months, and we are finally seeing some equestrian events being brought back to the mountain this year, which are attracting people from all over the state & beyond, which in turn is always helpful to the economy of the Spokane area and brings revenue to the state parks. Classifying that land as NFA could potentially snuff out these events for the coming years, and ultimately hurt the community, both in what we are able to enjoy, and the potential for extra income from the people a larger ski resort & equestrian events will draw.*

**Response:** Comment noted. Alternatives 3 and 4 from Section II would allow for expanded future use of the PSEA for equestrian users.

Margaret McCoy

*More low intermediate terrain proposed in the expansion would greatly benefit the Powderhounds. Currently the easiest path down Chair 3 goes through the terrain park and eventually the cat track back to the base. Parts of that run are a bit steep. If an anxious low-level skier gets passed at close range by a zooming snow boarder either on the run or the crowded cat track, it will likely cause a setback.*

**Response:** Comment noted.

Brian Kelley

*Mt. Spokane is a very amazing and family-friendly ski hill which provides good skiing for the Spokane community at the lowest prices and closest location possible. Unfortunately over time, skiing in general has become less and less “family friendly”.....most ski hills are too far away and/or too costly for many people/families in the Spokane-area to enjoy. Mt. Spokane represents the lone ski hill that is still fairly affordable and accessible to Spokane-area residents. An expansion would continue this great service and also help the ski hill “survive” next to the other larger area ski hills, all of which have expanded over time, offered new runs and terrain, lodges, etc., and seriously increased their prices as well. The expansion would help keep our local hill family-friendly and viable as a ski hill.*

**Response:** Comment noted.

Mike Petersen

*What are the impacts on hiking, biking, berry picking, etc. from Alternative Four?*

Kim Thorburn

*Our state parks are the people’s lands, available for all types of recreation. Many recreation types available on Mt. Spokane are lower cost than alpine skiing and consequently, more accessible to all members of our community and not just the affluent. Expansion of the ski area would diminish recreational opportunities like hiking, picnicking, wildlife viewing, huckleberry picking.*

**Group Response:** The impacts to dispersed recreational activities are disclosed in Section III, section 3.6 – Recreation. It is unlikely that introduction of developed ski area infrastructure would negatively affect berry picking as huckleberries do well within the cleared ski runs and should continue to be abundantly available within the park.
Kevin Voss

The purpose of a park is to draw the public to enjoy them, and Mt. Spokane would become much more inviting to the intermediate skier with the additional lift. Currently, all skier traffic merges into one cat track that traverses across the mountain and intersects multiple downhill runs. This provides a higher concentration of collision injuries than any other part of the mountain. With the addition of the new chairlift, it would remove much of the beginner/intermediate traffic from the current learning area and chair 3 (eliminating congestion and many collision-related injuries).

Response: Comment noted. This existing ski trail congestion is described in Section III, section 3.6.2 – Affected Environment.

Jackie Corley

According to page III-108, there are inadequate runs for beginners to low intermediate. Several of the chairs are characterized as advanced slopes but some of the runs can also be characterized as intermediate through expert due to manmade terrain. Several of these runs contain either park features or moguls with significantly increase the difficulty of the run. It is not addressed on page III-109 in the description of slopes which of the runs are not only considered expert due to terrain, but it should also be stated which runs have manmade terrain on them, increasing the intensity level. The proposed runs within the PASEA would slightly increase the number of beginner through low intermediate, yet the change would be minimal. The market still far exceeds the beginner levels, which is what the PASEA argues that it needs (III-113).

Response: Skier ability levels are defined based on the slope gradient, as shown in Table EIS 2-2.

As shown in Illustration EIS 3.6-1, Mount Spokane currently has an oversupply of advanced terrain, a slight excess of intermediate and expert terrain and a deficit of beginner, novice, and low intermediate terrain, as compared to industry standards.

Steve Busch

4. PRESERVING SNOW COVER: The operations crew at Mt. Spokane treats snow as a precious commodity. No crew does a better job preparing and preserving the available snow cover than Mt. Spokane. Some ski areas have to artificially create snow, but Mt. Spokane is typically blessed with enough natural snow to offer fantastic skiing conditions. Groomed and consolidated snow tends to slow the melting process preserving the snow cover for as long as possible. This is an important consideration in regards to issues such as “climate change”, water retention, and stream flows.

Response: Comment noted.

Eric Armstrong

When mountain biking at Mt. Spokane you really do feel like you are truly out in the wilderness. The new ski trails would eliminate this aspect of the Mt. Spokane experience, as once you get halfway up the mountain you would break out onto the clearcut sections of the expanded ski area.

Response: Construction of a new chairlift and clearing/grading for seven new ski trails would result in temporary impacts to developed summer users (primarily mountain bikers) of the expansion area, as well
as a long-term addition to the developed character of the 279-acre Study Area (see Section III, section 3.6.3.3 – Developed Summer Recreation).

SEPA PROCESS

Mike Petersen  
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 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.

Response: As disclosed in Section III, section 3.7.4, WAC 352-16-020 establishes a Land Classification System (LCS) for management of State Park Lands. The LCS is a system of management zoning for park lands and waters that sets forth, in a general fashion, the basic philosophy, physical features, location, activities, and developments in a park. When assigned to a specific area within a park, each classification sets an appropriate intensity for recreational activities and facilities development. Classifications are aligned along a spectrum ranging from low to high-intensity recreational uses and developments. 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.

The Washington State Parks Commission has also provided direction regarding the management of natural resources within areas classified as “Recreation” is discussed in Commission Policy 73-04-1 Protecting Washington State Parks Natural Resources. For clarity, Subsection A(1) states that “State Parks will maintain native plants and animals (biodiversity) that occur, or seek to re-establish them where they historically occurred, within those park lands classified by the Commission as Resource Recreation Areas, Natural Areas, Natural Forest Areas, or Natural Area Preserves. When consistent with recreational use, cultural resources integrity, and other agency objectives, native plants and animals will also be preserved in lands classified as Recreation and Heritage Areas” (Emphasis added).

Nathan Smith  
MS 2000 and State Parks collaborated for over fifteen years to develop an expansion to the facility within the Potential Alpine Ski Expansion Area (“PASEA”). The Project represents the culmination of these efforts. In order to assess the environmental impacts associated with the proposed classification of the PASEA, State Parks and MS 2000 prepared the DEIS currently under review in order to have a comprehensive analysis of the potential environmental impacts that may occur after if the PASEA is classified and the expansion is approved.

Response: Comment noted. As the reader is aware, the Draft and Final EIS represent the comprehensive analysis of environmental impacts, as required by SEPA.
Mike Petersen  The Lands Council

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 in an appendix. Appendices are not likely something most of the public will read, so therefore, not accessible.

Response: The DEIS clearly states on Page II-3 that the Natural Forest Area alternative contemplated by the non-project EIS “would limit development and promote use in the PASEA for preservation, interpretation and enjoyment of natural processes.”

Including the text of Commission’s land classification system (WAC 352-16) in Section II, Appendix 2 is entirely acceptable under SEPA, as SEPA allows the combination of any and all SEPA and non-SEPA documents in order to “reduce duplication and paperwork and improve decisionmaking” (see WAC 197-11-640 – Combining Documents).

Steve Pozzanghera  State of Washington Department of Fish and Wildlife

The DEIS defers to the Spokane County Critical Areas Ordinance (CAO) requirements for a Habitat Management Plan (HMP) to identify compensatory mitigation. The analyses for both the land classification and the land use proposals are presented in one combined DEIS; theoretically for the purpose of better informing a final decision. However, as currently drafted it was difficult for us to determine if the mitigation being proposed is adequate for the level of environmental impacts.

Presentation of proposed compensatory mitigation should be prescribed within the DEIS. Without this, WDFW does not believe that the DEIS meets the intent of SEPA Rules (WAS-197-11-440(6)(2)).

Steve Pozzanghera  State of Washington Department of Fish and Wildlife

DEIS page III-17 reads that “…the overall intent of the action alternatives is to minimize the impact of providing life served alpine skiing with in the 279-acre expansion area on these resources. In addition, adjustments to the placement of alpine ski runs on the landscape allowed for some avoidance of wetland and stream habitats. While we are glad to see minimization and avoidance measures proposed throughout the document, including Table EIS 2-4 Construction Related Mitigation Measures Incorporated in the Project Proposal, no compensatory mitigation is outlines for unavoidable permanent or long-term impacts to important wildlife habitats. The document states that “implementation” of Alternatives 2 and 3 would result in impacts to “…mature forest and wildlife habitat that could not be entirely mitigated by the mitigation measures proposed” and the Draft Habitat Management Plan (HMP), included as an appendices, states that there are “unavoidable impacts to some focal wildlife species that cannot be entirely mitigated by the suite of measures presented” (pg.70). Using the mitigation measures presented on page III-16, WDFW believes that these unavoidable impacts should be compensated for by replacing, enhancing or providing substitute resources or environments.

Group Response: Thank you for your concerns about whether the Spokane County CAO HMP requirements were properly incorporated by reference into the EIS as potential compensatory mitigation measures and whether these requirements provide enough detail. We have carefully considered your concerns and will include them for the Commission’s consideration in the combined FEIS.
SEPA encourages the inclusion in EISs of existing materials relevant to impacts, alternatives, and mitigation measures through incorporation by reference. (WAC 197-11-610[4][b]; and WAC 197-11-635). Accordingly, the HMP requirements related to compensatory mitigation were incorporated by reference in compliance with these provisions. There is no requirement that such materials be repeated in the text of the EIS, in keeping with the purpose of avoiding unnecessary paperwork and duplication. Regarding your concern that the HMP requirements do not contain sufficient detail on compensatory mitigation, we refer you to the most recent court decisions on the degree of detail required for mitigation measures in EISs: Residents Opposed to Kittitas Turbines v. State Energy Facility Site Evaluation Council, 165 Wn.2d 275 (2008) and Glasser v. City of Seattle Office of Hearing Examiner, 139 Wn.App. 728 (2007). In both cases, the courts rejected arguments that the EISs were inadequate for failing to describe potential mitigation measures in sufficient detail.

SEPA also recognizes that mitigation may be built-into the proposal or the various alternatives. Under SEPA, alternatives themselves including those eliminated from further consideration are available mitigation measures. Alternatives are defined as other means of accomplishing the objectives of a proposal with less adverse environmental impacts (e.g., Alternative 3 over Alternative 2). The required no-action alternative in the project action EIS contains the ultimate mitigation measure. So available measures to mitigate adverse environmental impacts may be found throughout the EIS, including material incorporated by reference.

Steve Pozzanghera
State of Washington Department of Fish and Wildlife

The DEIS refers to State Parks Operation Plans as a project mitigation measure. WDFW suggests that these plans should also be included as part of the body of the DEIS. Their inclusion would help in the evaluation of the proposed impact avoidance and minimization techniques.

Response: The Washington Court of Appeals most recent guidance on the inclusion of mitigation measures in an EIS is Glasser v. City of Seattle Office of Hearing Examiner, 139 Wn. App. 728 (2007). In that case, Glasser opposed a proposal to construct a salmon hatchery as part of a program to compensate for loss of natural salmon-spawning habitat as a result of a diversion dam utilized by the City in its Cedar River water supply system. Glasser challenged the adequacy of a SEIS prepared for the proposed hatchery on the ground that one of the potential mitigation measures, an adaptive management plan (AMP), was not described with sufficient specificity. The Court rejected the SEIS adequacy challenge because the AMP mitigation measure was reasonable and described in sufficient detail.

As stated in the DEIS and FEIS, State Parks considers project specific operational plans (e.g., vegetation management plan, SWPPP) as available mitigation measure. The vegetation management plan would govern the control/elimination of non-native invasive plant species and provide direction for hazard tree management, coarse woody debris management, and general ongoing maintenance of vegetation in developed ski trails.
SOILS AND GEOLOGY

John Roskelley

Importantly, according to the Natural Resource Conservation Service (NRCS) Soils Resource Report most soils in the park, including the PASEA, have a severe to extreme erosion hazard. This was more than evident when in May 2008 the park experienced an extreme flood event, which washed out roads and trails throughout the park. Parks has to take into consideration that this is an alpine area up to 5800 feet and the slope gradients are steep – 40% to 60%. There is already an excellent example of run-off damage and severe erosion in the current ski area. Once the land is disturbed, it will look just like the wasteland on the opposite side of the mountain. It’s a lesson in front of our eyes.

Jackie Corley
Spokane Tribe of Indians Archaeology and Preservation Program

Soil as stated in the EIS at Mount Spokane is considered to have a severe to extreme erosion hazard (II-8). Due to the soil being composed of granitic bedrock, erosion is a very real hazard if the ski expansion takes place. Due to the undisturbed condition of the PASEA erosion has not been a problem, but with the removal of trees and soil, erosion becomes a factor.

Mike Petersen
The Lands Council

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.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

As outlined in the DEIS there is currently minimal erosion in the PASEA, because it has been undisturbed for so many years. If the expansion were to take place, the steep gradient of the landscape would be prone to erosion.

Jeff Lambert
Spokane Mountaineers

The SE Group in their 1992 report on the Mt. Spokane State Park Alpine Ski Area Study stated, “the ski area is plagued with a brush problem since the trails have not been manicured with a bulldozer and reseeded.” The analysis of Alternative 2 - Figure EIS-6 does not consider the effects of bulldozer work and reseeding. The analysis also does not consider the placement of access roads and grading necessary for drainage. We request further analysis has to include the modifications and improvements to the natural grade and vegetation within the ski runs.

Jeff Lambert
Spokane Mountaineers

There is little mention of the effects of changing the drainage and vegetation on the landslide potential even though the area is dotted with small landslides and a major slide closed the Park entry for the entire summer season. The cost of the potential for more frequent landslides should be further evaluated. The absence of the analysis of the environmental impacts of full development that is allowed under each land classification does not provide adequate information to the decision-makers.
Group Response: The readers are referred to Section III, Appendix A – Geotechnical Report. The conclusions and recommendations within this report have been incorporated into the general mitigation measures and project design for the project action alternatives.

The impacts associated with implementation of either of the action alternatives are disclosed in Section III, section 3.1 – Soils and Geology.

Mike Petersen

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?

Response: Implementation of either of the action alternatives in the project EIS will require the development of a Stormwater Pollution Prevention Plan that will detail the temporary and permanent erosion and sediment control measures intended to prevent soil mobility. This document will be reviewed and approved by Spokane County prior to the initiation of construction activities.

Mike Petersen

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? 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.” As years go by the roots will begin to decay, underbrush will change and erosion potential will grow. How will this be dealt with? 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.

Ira Ford, John Stember, Kenneth Wilbur, Jacob Wood

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. 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? What, if any, management practices will be put in place effectively to control re-vegetation? Although these soils range from moderate to high erosion potential, 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?

Group Response: Implementation of either of the action alternatives in the project EIS will require the development of a Stormwater Pollution Prevention Plan that will detail the temporary and permanent
erosion and sediment control measures intended to prevent soil mobility. The required vegetation management plan would provide direction on the long term management of revegetated areas within the expansion area, including management of non-native/invasive species.

TRANSPORTATION AND PARKING

Helen Curtis

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.

Response: The reader is referred to Section III, section 3.7.5 – Transportation and Parking which discloses “Increased visitation would also increase demand for parking at existing lots. Should demand for parking approach capacity due to the implementation of Alternative 2 or 3, Mount Spokane Ski and Snowboard Park would address the increased parking demand through a combination of improved snow management in the existing parking lots, increasing the subsidy/add additional service to the shuttle system from Spokane, and/or develop a dedicated shuttle service from the Snow Blaze Condominiums. Therefore, it is not anticipated that parking demand would exceed supply.”

Mike Petersen The Lands Council

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.

Anonymous

Nothing like slogging through 6 inches of mud to get to the base area or coming back to your car to find it covered in mud from splashing. Busy weekends parking over 1 mile away from lodge 2.

Group Response: Mitigation measures associated with transportation and parking are discussed in Section III, section 3.7.5.2.

Jackie Corley Spokane Tribe of Indians Archaeology and Preservation Program

Although there would be an increase in demand for tickets at the mountain it is not anticipated that parking would exceed the supply. I believe this situation has been entirely overlooked. Just last weekend I visited Mount Spokane, and although the roads are in good condition, there is room for improvements. The parking lot has potholes and gravel all over and the roads and the roads are very narrow. Such narrow roads with a significant increase in traffic would pose safety hazards with ice on the road for cars and people.

Response: Table EIS 2-4 requires that a contingency plan addressing closures to the main access road to the ski area due to weather and/or fallen trees will be developed in coordination with WSDOT, State Parks, and MS 2000. Additional mitigation measures associated with transportation and parking are discussed in Section III, section 3.7.5.2.
Anonymous

This mountain bike trail as I understand the proposal will be a downhill type trail with man made features (jumps, drops, berms etc). This proposal will need to be analyzed in the context of increased traffic on the road. This type of usage versus cross country mountain bike trails typically involves an individual ferrying bikes to the top via car or truck and then riding down.

Response: The parking available at Mount Spokane is anticipated to be sufficient to meet the demand associated with any future mountain bike trail improvements. The majority of visits to Mount Spokane State Park are during the winter and associated with skiers, mountain bike users make up a small percentage of the total visits to the park when compared to winter recreationists.

VEGETATION

Anonymous

The proposal is completely absent of any consequences of bringing in mechanical equipment during construction as well. The disturbance would not only allow for the spread of invasive species, but there will also be a spiral effect for the watershed. Initially, flooding will occur, followed by a lack of water retention. These depletion and excess consequences on vegetation are not mentioned within the vegetation section of the DEIS. Along with the issues listed above, the proposal also explicitly states “No studies have been performed to determine the presence and extent of non-vascular plant species (e.g., mosses) in study area” (3.3.2.3). Although the proposal attempts to deal with direct impacts, according to the writers “Many indirect impacts are also poorly understood given our knowledge and abilities to assess the impact of any project on the surrounding environment” (3.3.3). Before any action is taken, the potential indirect impacts must be evaluated in regards to surrounding and neighboring environments.

Response: The reader is referred to Section III, section 3.3.3.2 – Noxious Weeds, “Under both action alternatives, there is a potential for the spread of noxious weeds within proposed disturbed areas (i.e., new trail and chairlift clearings).”

For an analysis of the potential direct and indirect effects to watershed resources resulting from the implementation of either of the action alternatives discussed in Section III, section 3.2 – Watershed Resources.

Jasa Holt Washington Natural Heritage Program

The Blanchard Creek Natural Forest area as recommended in includes the proposed ski expansion area (PASEA). Today, the Blanchard Creek Natural Forest area retains the majority of the natural qualities as previously identified except that its forest structures are nearly 21 years older. The Natural Heritage Program still recognizes that the Blanchard Creek area is a Natural Forest Area. The possible ski area expansion would reduce the size and natural function of the current Blanchard Creek Natural Forest in half. 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 Mt. Spokane to forests off
the park to the northeast. The northwest slope of Mt. 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. Mt. 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.

Response: Comment noted.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

Another concern is the extent of forest management, particularly the clearing of downed, tipped, or damaged trees. No specific acceptable or not acceptable actions are noted, which allows for misinterpretation of the document. To avoid any confusion or abuse of the intent, following this statement should be an example of a forest management plan including the extent of clearing.

Response: Section III, section 2.2 – Alternatives Considered in Detail describes the extent (in acres) of clearing and grading that would be required if either Alternative 2 or 3 were chosen for implementation. Table EIS 2.4 details the implementation documents (e.g., vegetation management plan) that would be required if an alternative that would allow for the ski area expansion to occur were chosen.

Jeff Lambert

Having considerable knowledge of the history of Mt. Spokane, we refute the claims of previous development in the PASEA for skiing or logging. The PASEA forest is old-growth as all experts state. Moreover, it is unique and has been called by State Parks staff, the most important forest ecosystem in the State Parks system. The history of ski activities in the PASEA is limited to a crude rope tow in the pre-1950s era when skiing was limited to the existing open slopes and glades primarily on the south and east sides.

Response: Comment noted. No change in document required.

Anonymous

The proposal (SECTION III- MOUNT SPOKANE STATE PARK PROPOSED SKI AREA EXPANSION DRAFT ENVIRONMENTAL IMPACT STATEMENT 3.3 vegetation) would cover 297 acres of land which include various habitats, some of which are considered globally and nationally rare. Specifically the ‘Old Growth’ habitat, is home to multiple species that fulfill a specialized niche, and is a rare area due to the lack of fires. Aside from habitat loss, the long-term consequences of the disturbance include the expansion of invasive species. The survey of invasive species is limited to what species that have been seen by ‘volunteers’ in previous years.

Response: Comment noted. No change in document required.

Billy Crawford-Heim

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.”1 (Footnote 1 United States Department of Agriculture Forest Service, Area of Old-Growth Forests in California, Oregon, and Washington, p. 7 (1993).) 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.”2 (Footnote 2 (RCW § 79A.05.305(2).) 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.”3 (Footnote 3 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).) Yet, the DEIS clearly indicates that there is in fact old growth forest throughout the PASEA, and not simply “potential old growth” forests.4 (Footnote 4 4 id. at III-44-7 § 3.3.2.2.) The DEIS identifies that 88 percent of the trees sampled 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.

Helen Curtis

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.

Helen Curtis

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.

Mike Petersen

The Lands Council

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.

John Morrow

Mt. Spokane 2000

The studies presented in the DEIS clearly refute their allegations that the PASEA is a significant “old-growth” forest or that critical habitat for endangered or threatened species will be eliminated.
Appendix H: Mount Spokane SEPA Combined Environmental Impact Statement
Comment Summary and Responses on the Draft EIS

Grace King
Gonzaga University Legal Assistance

The DEIS fails to address possible impacts of Alternative Four on old growth forests. WAC 197-11-402 requires the drafter of the EIS to analyze “reasonable alternatives and probable adverse environmental impacts that are significant.” Section II, 3.3 Vegetation includes a discussion of the composition of forests within the PASEA, but lacks discussion of old growth and its most striking characteristic: it is impossible to replace. It is undisputed that “there are significant areas of old growth in the Biological Survey Area [PSEA]” as indicated in the Pacific Biodiversity Institute’s “Biological Surveys Conducted in the SEIS Analysis Area.”

Amanda Parrish
Since 2007 the Dept. 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 (PSEA).”

Greg Gordon
Spokane Audubon

We agree with the Washington Department of Fish and Wildlife assessment that the old growth forest habitat on the north aspect of Mount Spokane is unique and has high value for wildlife and biodiversity. Considering that 2/3 of the high elevation (above 4000 feet) of Mount Spokane State Park is dedicated to the developed ski area, preservation of the remaining high elevation forest should be the highest priority of Washington State Parks. Mt. Spokane is only one of two areas in Spokane County over 4250 feet in elevation and contains the largest expanse of old growth habitat in Spokane County. Designation of the PSEA as “Recreation” under Alternative 4 would significantly fragment this habitat type.

Group Response: In its scoping letter submitted to State Parks on December 19, 2013, the Washington Department of Fish and Wildlife requested that, “The EIS should clearly identify the definition being used for old growth/mature forest. WDFW is in the process of updating our definition of old growth within our old growth/mature forest priority habitat definition and currently, WDFW considers the Washington Department of Natural Resources definition of old growth forest to be best available science.”

Therefore, the discussion included in the DEIS and FEIS related to “old growth” draws on work from the independent Old Growth Definition Committee convened by the Washington Department of Natural Resources. These references are cited in the DEIS and FEIS and include:


Franklin et al. (2005) states: “Development of “old-growthedness” is a gradual process. Experience with earlier efforts to define old growth using an arbitrary set of criteria (e.g., Old Growth Definition Task Group 1986) to categorize a stand as “old growth” or “not old growth” did not work well. Many plots in old-growth stands do not display all of the features that might be used in such a definition, such as densities of large decadent trees, large snags, and large logs. Further, and perhaps most important, such a black-and-white approach does not recognize the continuum of structural or stand development.

The DEIS and FEIS focus on describing the forest conditions, rather than using a definition based on tree or stand age or tree size. Specifically, “Although eastern and western Washington share many tree species, differences in fire frequency affect the development of older forests. On the coastal Olympic Peninsula, fires may not have occurred for several thousands of years, and western red cedar over 1,000 years old are not uncommon (Van Pelt 2007). In contrast, moist forests in the Selkirk Range, which includes the Study Area, experience more frequent high severity fires, with a fire return frequency estimated between 150 and 250 years (Franklin et al. 2008). Trees older than 200 years are relatively rare, and high intensity wildfires may prevent progression to older forest conditions (Franklin et al. 2008). In the Study Area, where frequent and intense natural disturbance events involving high winds and low temperatures, punctuated by infrequent but potentially catastrophic wildfire and insect infestation events occur, the likelihood of encountering classic “old growth forest conditions” are considerably lower than those encountered in other environments.

While forests in the Study Area may not meet certain definitions of old-growth, which emphasize tree age and size, the majority of the area (and adjoining unclassified lands) supports natural processes and some of the stands contain older forest attributes (snags, coarse woody debris, multiple canopy layers) that provide habitat for a variety of wildlife species (see Table EIS 3.4-2).”

For purposes of permitting the clearing and grading associated with implementation of either of the action alternatives, Spokane County is the jurisdictional agency and regulates old growth and mature forests under its Critical Area Ordinance. See Appendix E, section 6.2 – Tree Coring for a regulatory analysis related to the forest conditions present within the Study Area.

Holly Weiler

According to its own Natural Resources documents, State Parks defines mature forests as trees 90+ years and old growth as plant communities including large old-growth trees of 150+ years, large snags, large downed logs, and large logs in streams. Some trees within the PASEA have been determined to be over 200 years old (from core samples). It is impossible to mitigate for fragmentation (via instillation of
a chair lift and ski runs) of a forest community that includes specimens of over 200 years within the mature forest community.

Response: See text from the response above. Additionally, 108 trees were cored intending to provide a general idea of the age of the forests within the Study Area, which would be impacted by the action alternatives. Trees ranging in size from stand average to stand dominant were selected from mature forest stands where clearing for ski development (e.g., clearing, grading) would occur under the action alternatives. Eleven sites were chosen for coring, distributed across upper elevation, mid elevation and lower elevation zones of the expansion area (see Appendix E, Figure 10). Of the 108 trees cored, only 7 trees out of the 108 sampled (6.5 percent) were estimated to be 150 years of age or older.

Jackie Corley  Spokane Tribe of Indians Archaeology and Preservation Program

During the surveys performed by Pacific Biodiversity Institute in 2012, it was concluded that 14 of the 92 stands in the approximately 490-acre Biological Survey Area located in the PASEA area, contained potential old growth forests (III-7). Yet the EIS contradicts itself on page III-45 where it states that in the study area frequent natural disturbances like fire damage decrease the likelihood of encountering classic old growth forest. These studies are incomplete and raise questions of how accurate the information in the EIS is if there are several pages that contradict themselves. It has been stated that Mount Spokane is one of the last examples of old growth in the Spokane area, and to clear cut a forest for ski runs would be irresponsible and would eliminate not only an amazing forest, but also a diverse habitat. Areas which contain old growth within the PASEA trail alignments have some of the largest diameter trees, as well as numerous streams and wetlands. The tribe would like to see this old growth preserved for years to come, and for the PASEA to be abandoned.

Response: The 2010 surveys analyzed an expanded acreage (i.e., 490 acres) than the proposed expansion area (i.e., 279 acres) in order to provide planning information to resource specialists. Seven of the 14 stands discussed above would not be impacted by the current proposal due to the elimination of the proposed crossover trail to Chair 4 (see Section III, section 2.1.1.2). Although the vegetation survey work conducted by Morrison et al. (2010) evaluated some of the attributes of the forest associations typically associated with old growth forest conditions the Morrision et al. study was never intended to be an old growth analysis. The ICF International surveys conducted in 2013 (see Appendix E) should be considered the best available information related to age distribution and diameter within the Study Area.

Mike Petersen  The Lands Council

There is science on the impacts of fragmentation that occurs with clearcuts. None of the scientific studies that were given to you during scoping are in the appendices.

Mike Petersen  The Lands Council

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?
Greg Gordon  Spokane Audubon

**Fragmentation and habitat loss.** The DEIS fails to adequately address the cumulative effect of the loss of habitat connectivity to the Selkirk Mountains, especially with regard to landscape level changes anticipated with increase climatic changes. The DEIS needs to address current and anticipated land use activities on private and federal lands that could increase the importance of intact subalpine forest on wildlife species.

**Group Response:** The DEIS discloses that potential impacts related to implementation of either of the action alternatives in Section III would likely result in additional forest fragmentation, changes in microclimate, and potential introduction of exotic species. And, that these impacts can extend well into the surrounding forest, causing near- and long-term changes in composition and function (see Section III, section 3.3 – Vegetation). The analysis of land activities on private and federal lands are outside the scope of this analysis.

Greg Gordon  Spokane Audubon

**Summer impacts.** With its focus on winter recreation, the DEIS is currently missing any impacts that will occur from April to November and these need to be addressed in the DEIS. These impacts include:
1. More rapid snowmelt. The loss of overstory and tree cover resulting from ski runs and lift construction will increase the rapidity of snowmelt, resulting in increased erosion and loss of soil moisture. 2. Increased soil erosion. One needs only to examine the current ski runs to see that the surface is loose soil and rock filled with tunnels. 3. Visual and recreational impacts. Off season, the current ski area is unsightly and unsuitable for hiking, biking or other recreation, as the slopes are unstable and covered in noxious weeds.

**Response:** The reader is referred to Section III, section 3.3 – Vegetation, “Potential cumulative impacts to vegetation include alterations in snowpack and snowmelt due to a change in vegetation communities present in developed ski terrain, with corresponding alterations on the vegetation growing season due to increased sunlight and longer snow retention.” Soil erosion is discussed in Section III, section 3.1 – Soils and Geology. Visual impacts are discussed in Section III, section 3.5 – Visual Resources.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

**Section 3.2 (on vegetation) of the DEIS for the reclassification of land within the PASEA has various deficiencies.** Principally, although the PASEA is currently managed as a de facto natural forest area, it still has a trail and also allows back country skiing. The implementation of Alternative 2, would require some of these activities to be regulated and restricted. The DEIS fails to address any changes that might be made by reclassifying the PASEA as all Natural Forest Area and any environmental impacts that could occur through this option. Additionally, section 3.2 lists possible impacts, but then goes on to say that “some” or “more” could be felt under each alternative. There are no specific impacts outlined for each alternative and no appendix is provided with further information. In addition, there are many other sections of the DEIS where risks are described in vague terms, without any quantifying information. The FEIS authors should make an effort to speak to these risks in more specific terms throughout the entire document.

**Response:** Comment noted. No change in document required.
Steve Pozzanghera
State of Washington Department of Fish and Wildlife

Page III-13 - This section mentions edge scalloping and feathering. Please indicate whether this is within the considered construction envelope and thus accounted for, or whether this should be considered an additional impact.

Response: Section III, section 2.2.5.2 discloses that, “Estimates on the amount of clearing that would occur for specific activities proposed in the action alternatives are shown in Table EIS 2-3 (for analysis purposes, clearing widths should be considered ‘worst-case’; actual clearing would not exceed the stated limit and may be less).”

Randy Fleming
But for the area involved to be thinned of trees only. Beyond the path that must be cut for the lift towers and emergency snowmobiles to be cut, I wish the area only to be thinned of trees so that one may ski but not remove excessive amounts of trees. The trees should be cut so that they fall down slope as to not be a danger to recreational skiers/boarders, but left for ground cover and habitat for animals.

Response: Gladed tree skiing would not provide an increase in the available low-intermediate terrain at Mount Spokane. To the extent practical after felling, downed logs would be retained on site (see Section III, section 2.2.5.2).

Brian Kelley
I have been skiing and hiking the area in question for many years, and I have seen no “unique habitats” or “special old-growth” in the area. I co-authored the government publication “Forested Plant Associations of the Colville National Forest” (USDA PNW-GTR-360, 1995), and have an extensive knowledge of the natural forests of our area. While I have not studied the area extensively, there appears to be nothing unique or special in terms of habitat or size of trees that I have seen. While the area may represent some forest types which are “rare” in Spokane County, this is very deceiving because Spokane County is largely low-elevation dry forest habitat types with few mountains over 4000-5000 ft. If one instead examines the local mountains in which Mt. Spokane is part of, the vegetation types in question are not rare, but rather ubiquitous in the surrounding mountains both to the north and east.

Response: Comment noted. No change in document required.

Steve Busch
Even first year forestry students understand that selective thinning can benefit the overall health of a forest while improving wildlife habitat. Practitioners of forest science understand that selectively thinning or removing some trees to create a ski run or a fire break, or just to utilize the timber resource, can greatly enhance forest health and reduce the chances of catastrophic wildfire.

I recently read a statement on the Land’s Council webpage that claimed the old growth forest adjacent to the expansion area on Mt. Spokane was “irreplaceable”. That is an irrational and patently absurd statement in light of what we know about forest ecology. The 370 page “Forest Health Assessment and Plan for the 2006-2007 Project Area of Mount Spokane State Park” compiled by the Pacific
Biodiversity Institute in partnership with Washington State Parks clearly demonstrates that forest succession has historically been and remains an ON GOING PROCESS on Mt. Spokane.

This study, and numerous other studies completed in other timber stands throughout our national forests clearly show that aging or overcrowded forests composed of one or a few dominant species can become increasingly susceptible to insect infestation, parasites and diseases, often leading to catastrophic wildfire. And even then, the outcome is a restart of the natural forest succession process that eventually cycles through numerous transition species to what people like to call, “old growth” forest where one or a few climax species dominate.

The proposed ski area expansion will have a negligible impact on the volume and/or distribution of any so-called “old growth” or mature timber in the proposed expansion area, and by creating a buffer, could very likely prove beneficial to the very timber stands the Lands Council claims they want to protect.

Response: Comment noted. No change in document required.

Mike Petersen
The Lands Council

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 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.

Kim Thorburn

The presence of invasive plant species in most disturbed areas of Mt. Spokane, particularly the alpine ski area, is indicative of the vegetative threats that present with alternatives 3 and 4.

Greg Gordon
Spokane Audubon

Mitigation. Mitigation measures for Alternatives 2 and 3 are inadequate with regard to preservation of old growth forest. Construction of a lift and ski runs require cutting trees and fragmentation of the forest, which essentially eliminates the structure and function of old growth as suitable wildlife habitat. Noxious weed assessment and management is inadequate, as it is practically non-existent. The DEIS needs to include a comprehensive assessment of how the spread of noxious weeds will be controlled with the removal of the overstory. Clearing ski runs will greatly increase the spread of noxious weeds, and a mitigation plan needs to be in place before approval of either Alternative 2 or 3.

Group Response: Section II and Section III provide mitigation measures intended to control the spread of noxious weeds (see Section II, section 2.5.2 and Table EIS 2-4).

Brian Ellsworth

By the looks of the forest it has gone un-managed to date. There are diseased trees and a ton of windfall or damage. If runs were developed to “mesh” nicely with the natural forest then I cannot believe it would be anything but positive for the health of the forest and the recreational area. I do not know who benefits from the selective logging but doesn’t that provide revenue as well? Cleaning up the
forest and creating runs with one chair I have to believe is minimally invasive and the possible revenue to the area would be great.

Response: Comment noted.

Chris Bachman  Sierra Club

Regardless of attempts to mitigate the impacts of fragmenting the intact forest on the remaining undisturbed on third of the mountaintop, a clear cut cannot be mitigated. The impacts to the forest are irreversible and should not be allowed. Other state agencies, the Department of Natural Resources and the Washington Department of Fish and Wildlife, have repeatedly and consistently argued for Natural Forest Area designation for the land within the PASEA. Both of these agencies see the value of preserving this area that for some reason Washington State Parks fails to see. State Parks and the concessionaire repeatedly deny the presence or old growth when the concessionaire’s own study conducted by Pacific Biodiversity Institute (Biological Survey 2010, page 58) says, “There are significant areas of old growth in the Biological Survey Area (PASEA).”

Response: Comment noted. A discussion related to the existing vegetation communities within the 279-acre study area can be found in Section III, section 3.3 – Vegetation.

Mike Petersen  The Lands Council

“There 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 an important natural destination in Washington.”

Response: The scope of the project currently under consideration has been significantly reduced in size since this 2007 letter was submitted (see DEIS Page III-6). Additionally, two detailed vegetative surveys have been conducted (see Appendix B and Appendix E) since this comment was originally submitted.

John Little

There may be a few trees that evaded the 19th century saw, but almost all if it is a second growth forest in desperate need of management - full of downed timber and overly dense stands that will be victim to a devastating wildfire. If the expansion goes through, I sure hope the state allocates some money to thin stands of trees that are not designated for the ski slope. This area is one lightning storm away from being abolished by a devastating forest fire.

Response: Comment noted.

Mike Petersen  The Lands Council

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.

Response: Comment noted. No change in document required.

VISUAL RESOURCES

Mari Schramm, Vanessa Torjusen, Dionna Klein

Analysis of Critical View Points (3.5.3.3) was limited to only 4 points 3 of which were 10-20 miles away, and only 1 of which could actually the expansion area. The EIS final draft should assess visual impact at a greater variety of distance zones (from the skiing hill itself, from Highway 2, and from Spokane especially). The EIS final draft should assess the visual impact for all 4 seasons (not just summer where foliage might obscure the view). Also, we believe that the wildlife of the area plays an important part in the scenic value of the area (seeing deer graze, or a hawk hunt). As such, we would like the final EIS to discuss the loss of wildlife as a visual issue. Specifically, how the ski expansion would affect visitor’s ability to have such scenic opportunities.

James Harrison Spokane Tribe of Indian Archaeology and Preservation Program

The DEIS seems to indicate that visual impacts are limited to a maximum distance of ten miles from the project (III-100). While this may be true for flat or undulating terrain, it does not apply to the sides of mountains. Mount Spokane is a prominent landmark, visible for many miles…Visual impacts from the PSEA project are expected to be in the range of at least 50 miles, possibly more depending on the vantage point. For example the proposed PSEA project area is clearly visible from north Spokane/Country Homes (17 miles away), downtown Spokane (21 miles away), Four Mound (24 miles away) as well as high points on the Spokane Reservation (over 40 miles away).

Jackie Corley Spokane Tribe of Indians

The clear cutting of the ski runs stated in the PSEA will be seen from miles away both inside and outside of the park. Once these runs are cleared this forest will never return to the state it is in now. Downplaying the visibility makes the runs seem like a small issue, but people who live near the state park or prairies surrounding the park will see a scarred mountain where a once intact state forest use to stand. The EIS states “It is impractical to conduct a visual analysis of the entire area as a whole”, which does not make sense.Anywhere someone can see the north face of Mount Spokane they will be able to see the effects of the clear cutting for the ski runs.

Group Response: As discussed in Section III, section 3.5 – Visual Resources, it is impractical to undertake a visual analysis of the entire area as a whole. Consequently, three viewpoints were chosen to represent visually sensitive areas within the viewshed. Furthermore, due to topography and aspect, it is evident that the development would not be visible from areas north, east or south of Mount Spokane. Fieldwork and a Google Earth analysis were used to choose the most appropriate viewpoints and to accurately evaluate the effects.

It is acknowledged in the Draft and Final EIS that the action alternatives (Section III) contain elements that have the potential to result in visual impacts, primarily through the clearing and grading necessary to
formalize ski trails and install lift terminals. These facilities will be visible by visitors accessing the Vista House on the Summit Road during the summer as additional clearing in a relatively forested landscape, although the upper terminal of the new chairlift and new trails will be screened by existing vegetation and topography from the Vista House.

The visual analysis is based on a standard set of criteria established in the Forest Service’s SMS (USDA Forest Service 1995). As noted in Section III, section 3.5.2.2, viewing distance is important in determining how change is perceived across a landscape. Modifications to the shape of the landscape may remain evident beyond 10 miles, especially if it is inconsistent with other landscape forms. Beyond 10 miles, alteration in landscape character becomes obscure.

James Harrison Spokane Tribe of Indian Archaeology and Preservation Program

The DEIS also inaccurately states (III-105) that, proposed) development within the expansion area is generally screened from view by topography in areas outside the park. As such, the (PASEA) expansion will have minimal visual impact from roads or vistas outside the park. PASEA, instead, would be visible to many thousands living in the city of Spokane and surrounding communities. However, the DEIS goes on to state (III-102) that, “It is impractical to conduct a visual analysis of the entire area as a whole.”

James Harrison Spokane Tribe of Indian Archaeology and Preservation Program

In the DEIS analysis an inadequate sample of four vantage points all within 10 miles of the PASEA project was selected based on fieldwork and a Google Earth analysis (III-102). One of the view-points, the Vista House, is uphill from the ski park thus the runs are not visible. Two of the three other select vantage points appear to be blocked from views of the mountain by nearby foot hills or vegetation, thus visual impacts are quantified at zero. Only one of the four self-selected viewpoints is at a location where the PASEA project can be seen. The DEIS goes one to confusingly and inaccurately state, Viewpoint #3 was chosen as it is one of the few locations exhibiting a rural-residential population density where the development would be visible.

Group Response: As noted in Section III, section 3.5.3.3, due to topography and aspect, it is evident that the development would not be visible from areas north, east or south of Mount Spokane. Viewpoint #3 is located in a rural area west of Mount Spokane. Due to the size of Mount Spokane State Park, few relatively well traveled areas exist proximate to the Study Area (see Illustration EIS 3.5-1). The primary viewing point within the park is at the summit of Mount Spokane located at the Vista House, this location was chosen as it receives the majority of summer visits to MSSP and is proximate to the proposed expansion area. Additional information on the visual analysis can be found in Section III, section 3.5 – Visual Resources.

Jeff Lambert Spokane Mountaineers

The proposed developments have included and should be expected to include lighted runs, lodge or huts, access roads including the potential for year-round vehicular access and glading of the areas in-between the ski runs. The lights will affect the scenic values evaluation.
Response: Neither of the action alternatives contemplated by Section III, the project EIS would permit a lodge, hut or permanent access road. As stated in Section III, section 3.4.3.2, “Night skiing is not part of the action alternatives; therefore, the only potential impact mechanism (i.e., light) would be nighttime grooming of the new trails.”

Jackie Corley  Spokane Tribe of Indians Archaeology and Preservation Program

It is stated in the EIS that hiking trails, grading, construction of lifts, roads, and buildings contribute to the developed landscape that is visible to visitors at Mount Spokane and within the park (III-105). Yet it also states that the PASEA expansion will be screened from view by topography, and you will not be able to see the expansion outside of the park. This mountain can be seen from many miles away. The clear cutting of the ski runs stated in the PASEA will be seen from miles away both inside and outside of the park. Once these runs are cleared this forest will never return to the state it is in now. The EIS states “It is impractical to conduct a visual analysis of the entire area as a whole”, which does not make sense. Any where someone can see the north face of Mount Spokane they will be able to see the effects of the clear cutting for the ski runs.

Mike Petersen  The Lands Council

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 DEIS 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.

Ruth Ptak  University Legal Assistance

Even if the enhancement of skiing capabilities were to be as great as the PASEA maintains it would be, the expansion of the ski area under Alternatives Three and Four would cause damage to the view of Mt. Spokane.

Kim Thorburn

The action alternatives would have negative aesthetic impact on Mount Spokane, an Eastern Washington natural landmark. Whether viewed from a distance or up close, the current ski area is an eyesore on the mountain summit. The bare southern slope stands out as one enjoys the mountain’s view driving into Spokane from the west.

Response: The reader is referred to Section III, section 3.5 – Visual Resources for an evaluation of the aesthetic impacts associated with implementation of either of the action alternatives. In order to analyze potential visual impacts associated with proposed development at Mount Spokane, three critical viewpoints were modeled (see Illustration 3.5-1 and Figures 8 through 13).
WATERSHED RESOURCES

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Page III-4 - Relative to purpose #2. The DEIS notes many generalities about snow retention and quality and note that the PASEA is “as a general rule” better in these categories. Please provide citations or info that supports these statements.

Response: See FEIS Figure EIS-17 and Section III, section 3.6 – Recreation. The FEIS has been updated to include a solar analysis and expanded discussion related to how slope aspect is related to snow quality and retention.

Mike Petersen The Lands Council

Development will have a great impact in water quality, the proposed chairlift base is at the headwaters of Blanchard Creek. The PASEA in an undiminished condition will continue to be a buffer for invasive plants, and protect water quality.

Response: Comment noted. No change in document required.

Bill Granger Re-Align Environmental

Under Alternative 3, there would be no grading in wetlands or buffers, and only one acre of clearing in wetlands or buffers. This is, by far, the least impactful ski area expansion that I have worked on.

Response: Comment noted.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Page II-10 - This page contains the statement “…Wetland delineations and stream identification were conducted in the 279 acre ski expansion area…” Please clarify if this included the 20 acres that will be reclassified from “Resource Recreation” to “Recreation”. If it does not, then wetland delineation should occur in these 20 acres.

Response: The study area for the wetland delineation was the 279-acre potential expansion area, which includes the 20 acres that that would be reclassified from “Resource Recreation” to “Recreation” under Alternative 4 in the non-project land classification EIS.

Terri Costello State of Washington Department of Ecology

A wetland mitigation plan must be developed, approved by all appropriate agencies, and implemented for those wetland impacts that are not avoided.

Response: The project action DEIS states on page III-39 that, “Potential impacts to wetlands and wetland buffers from clearing would be reduced through implementation of Mitigation Measures (e.g., preparation of a wetland mitigation plan) outlined in Table EIS 2-4.” Additionally, no fill is proposed to be placed within any wetland or stream found in the 279-acre potential expansion area.
Any surface water diversions will require application to the Department of Ecology for a water right permit.

Response: No surface water diversions are proposed in any of the alternatives contemplated in the Combined EIS.

The DEIS states there will be no impacts to wetlands or streams besides clearing and grading. However, it is unclear whether impacts such as placement of fill in to streams and buffers has been considered associated with installation of the proposed chairlift tower and lift operator house. In addition, fill may be inadvertently placed into wetlands or streams during grading activities. The DEIS should describe where lift towers and operator house will be installed and how impacts to streams, wetlands, and buffers will be avoided, minimized, or mitigated.

Response: For clarity, no grading and/or placement of fill in wetlands or streams is proposed by any of the alternatives contemplated by the Combined EIS.

The DEIS acknowledges the potential impact of the expansion of ski facilities into stream and wetland buffers in Section II, section 3.2.1.3 – Water Quality. Specifically, “Activities that are most likely to indirectly impact water quality within the PASEA are those that may occur within wetland or stream buffers such as any necessary clearing of riparian vegetation for recreational trails and facilities. Potential indirect impacts to water quality include the following:

- Increased sediment yield to streams and wetlands from clearing and grading,
- Increased pollutant runoff from construction equipment into streams and wetlands, and
- Increased water temperatures resulting from the removal of riparian vegetation and subsequent increases in solar radiation.”

This is also disclosed in Section III, section 3.2.1, “Direct impacts to Watershed Resources would include clearing vegetation (over 3 feet high) for ski trails that cross streams and wetlands and construction activities within streamside areas that would interrupt riparian functions.

Indirect impacts would include construction of impervious surfaces, removal of natural vegetation (affecting hydrologic function), removal or maintenance of vegetation in wetlands or streams, construction activities that result in water quality degradation in streams and wetlands, introduction of noxious weeds or other non-native species from construction activities, changes in land cover that alter flow rates and discharge timing, and windthrow impacts.”

The impacts (in square feet) to wetland and stream buffers associated with the construction of ski trails, lift towers and other associated chairlift infrastructure are further discussed in Section III, section 3.2.2 – Affected Environment.
Implementation of the Stormwater Pollution Prevention Plan (see Table EIS 2-4) is intended to eliminate any opportunity for soil to be inadvertently placed in any watershed resource (e.g., stream, wetland) during construction.

The reader is also referred to Figure EIS-15 and Figure EIS-16.

Terri Costello  
State of Washington Department of Ecology

The DEIS should also overlay all intermittent and ephemeral stream crossings and include those locations in the calculation of impacts.

Mike Petersen  
The Lands Council

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.

Ruth Ptak  
University Legal Assistance

According to the Wetland Delineation Report of March 2014, under 5.0 on page 9, “Wetland delineation fieldwork was conducted on July 29, 30, 31, and August 1, 2013…” While it is wonderful that wetland delineation work was done over multiple days, and, if the report is correct, using all of the proper methods of the Wetland Delineation Manual, there are some flaws from the approach taken. The most notable issue, which leads to subsequent problems, is the fact that delineation was conducted at an inappropriate time of year. Although the data goes into more detail, the hottest month of 2013 was July, and the longest stretch of abnormally warm weather began in early August of 2013.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-32 - Only streams that exhibited perennial flow at the time of the site visit were included in the delineation mapping.” The stream identification was performed in the late summer. This is not the recommended time of year to perform these types of assessments, particularly if streams with habitat features were not being classified if they did not contain flow at the time of survey. An NP stream may have only a PIP exhibiting flow while the rest of the channel downstream is dry. A stream channel within this project area with no flowing water could either be perennial or seasonal. July/August is not the appropriate time to conduct wetland delineations and can result in an underestimation of habitat.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page II-10 - Seasonal streams need to be included due to impacts to water quality and habitat from temporary access roads, grading, riparian habitat loss.

Helen Curtis

Associated wetlands should have been delineated in the spring and not late summer for a more accurate assessment of their location.
**Group Response:** All streams that had defined bed and bank or clearly conveyed flow during at least part of the year were delineated. In mountainous terrain seasonal drainages can form during storm events and, depending on the amount of water on the landscape, persist for a period of time. However, those features do not retain flow for a long enough period of time to influence the character of the soils or dictate the type of vegetation present, and therefore, do not delineate as wetlands or streams under the 1987 Corps of Engineers Wetland Delineation Manual (Environmental Laboratory 1987), the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (U.S. Army Corps of Engineers 2010), or the Washington State Wetlands Identification and Delineation Manual (Washington State Department of Ecology 1997). Dave Moore, a wetland specialist from the Department of Ecology’s Shorelands and Environmental Assistance Program out of their Eastern Regional Office met with the wetland delineation team on site on July 31, 2013 to walk over a portion of the site and review the delineation methods. At the time, there were no concerns about the timing of the delineation fieldwork or the methods being used.

Regardless, under the 1997 *Washington State Wetlands Identification and Delineation Manual*, wetland delineations including streams investigations, can be conducted any time of year.

**Bill Granger**

*Some individuals who wish to continue stalling this project may argue that the delineation is not acceptable to them because it was conducted during this “dry” time of the year. There are two main arguments that support the validity of the delineation. First, the current delineation protocols, identified in the wetland report (Section III, Appendix D) provide for the delineation of wetlands during drier periods. These protocols include indicators of the three parameters necessary for the determination of wetlands: hydrophytic vegetation, hydric soils, and hydrology. As noted in the datasheets attached to the delineation report, there were no instances where an area was determined not to be a wetland because of a lack of water. In fact, the data sheets show that water was present in the majority of areas where the vegetation and soils were indicative of wetlands. In addition, the delineation protocols allow for the use of secondary indicators of hydrology, if water is not present. Thus, any assertion that the wetlands were improperly delineated based on lack of hydrology is unfounded. Second, while at lower elevations July may be a dry time of the year, in a mountain environment, where snow covers the terrain for half of the year or more, July is the period immediately after snowmelt, when the ground is most saturated. As a result, the perennial initiation points of streams are typically flowing at peak levels, and the wetlands on the mountain are at their greatest saturation compared to any other time of the year. Any assertion that July is not the best time to delineate streams and wetlands on a snowy mountain is unfounded. It is the best time for this work.*

**Response:** Comment noted. See group response above.

**Mike Petersen**

*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?

Mike Petersen  
The Lands Council

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?

Ira Ford, John Stember, Kenneth Wilbur, Jacob Wood  
Gonzaga University

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**Group Response:** Mitigation measures intended to decrease or eliminate altogether the potential for increased sediment yields, runoff from construction, and increasing water temperatures are disclosed in Table EIS 2-4. The Draft and Final EIS identifies that successful implementation of the mitigation measures in Table EIS-2-4, there would be no measurable long-term indirect impacts to streams under Alternative 2 or 3 (Section III).

Harvey Morrison  
Trout Unlimited

The DEIS for the classification changes at the Mt. Spokane State Park is flawed by not assessing the impacts to the hydrology of the mountain and the tributary streams that feed Blanchard Creek, which is home to native Redband trout. Climate change is recognized as affecting the snow holding ability of the mountain and, therefore, an advantage of opening the northwest face for ski access. This same consideration should be made regarding the overall hydrology of the proposed ski area expansion. As recently as September 20, 2014, I witnessed that the streams leaving the proposed ski area were running clear, cold water at a surprising volume. This source of cold, oxygenated water is likely to be critical to the survival of the Redband trout. The DEIS notes that the hydrology will be changed by the clearing of the forest for ski runs, but does not address that impact on the native fish or offer any mitigation.
Response: Section III, section 3.4.2 notes that WDFW databases indicate that six streams within or adjacent to the boundaries of Mount Spokane State Park have trout present. The habitat surveys used for the development of Appendix B were conducted over three field sessions from June 27 to August 30, 2010. Additionally, four field surveys were performed over the summer of 2013 during the development of Appendix E. At that time, no trout were observed within the Study Area; therefore, no trout species have been included in the list of focal wildlife species for this analysis.

Section III, section 3.2.3.2 notes that potential indirect impacts to water quality include the following:

- Increased sediment yield to streams and wetlands from clearing and grading,
- Increased pollutant runoff from construction equipment into streams and wetlands, and
- Increased water temperatures resulting from the removal of riparian vegetation and subsequent increases in solar radiation.

Mitigation measures intended to decrease or eliminate altogether the potential for increased sediment yields, runoff from construction, and increasing water temperatures are disclosed in Table EIS 2-4. The Draft and Final EIS identify that successful implementation of the mitigation measures in Table EIS-2-4, there would be no measurable long-term indirect impacts to streams under Alternative 2 or 3 (Section III).

John Roskelley

The DEIS is clear that the present ski area has considerable problems with erosion, stormwater control, compaction, and the typical development conditions. This will continue in the PASEA if Alternative 4 is chosen. It also makes it clear that the cumulative effects on the environment will be devastating. Particularly disturbing is the cumulative effects of 3.3.4, which has the potential to inhibit or significantly reduce the water availability downstream for other users and to supply water for the aquifer.

Response: This is incorrect. The DEIS does not make the statement that there are existing problems with erosion, compaction or stormwater within the existing developed ski area boundaries.

Mike Petersen

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.

Anonymous

Although the DEIS attempts to take into account the impacts on vegetation, two major habitat types would be affected including Sitka alder-dominated wetlands and dry open meadows, which are both considered globally rare. The DEIS does not acknowledge the level of importance of these habitats to not only the local environment but the national environment. The proposal attempts to blow past this by saying the habitats are “locally common”. Along with this, the DEIS has a complete oversight of
classification of “old growth forest”. The area has been proven on multiple occasions to contain old growth forest and an oversight of this is detrimental to the overall impact statement and the environmental significance of the area.

Group Response: Mitigation measures intended to decrease or eliminate altogether the potential for increased sediment yields, runoff from construction, and increasing water temperatures are disclosed in Table EIS 2-4. The EIS identifies that successful implementation of the mitigation measures in Table EIS-2-4, there would be no measurable long-term indirect impacts to streams under Alternative 2 or 3 (Section III).

The DEIS and FEIS already disclose the acreage of occurrence as well as the conservation status of the plant associations found in the Study Area (see Table EIS 3.3-2).

Dale Gill

MT. Spokane is the major watershed in the north Spokane County area. The east side annual flowing creeks supply Spirit and Twin lakes, which in turn, support the Rathdrum/Spokane Prairie Aquifer. The west side annual creeks, (Deer, Deep, Little Deep, and Deadman) flow into the Little Spokane River. The WIRA 55 committee has determined that the LSR water flow is at risk and should not fall below 40cfs at the Elk Park water station. Any removal of forest cover from Mt. Spokane will reduce its watershed capacity. Any EIS must state the specific adverse impacts on our natural environmental systems that forest removal for the Mt. Spokane Ski area expansion will have. I would suggest that WSP&R record the static head of the other domestic wells on the west side of Mt. Spokane. These static heads could then be rechecked after the ski area expansion to determine if any adverse impacts had occurred and what the states liability might be.

Response: The disclosure of potential effects to watershed resources from either of the action alternatives is included in Section III, section 3.2 – Watershed Resources. This chapter identifies that the Mount Spokane Study Area encompasses the upper portions of the Water Resource Inventory Area (WRIA 57 – Middle Spokane River). Implementation of the mitigation measures listed in Table EIS 2-4 and Section II, section 2.5 – Mitigation Measures is intended to avoid completely or minimize potential impacts to watershed resources.

Mike Petersen The Lands Council

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 clear 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.

Response: The reader is referred to Section III, section 3.2 – Watershed Resources for a discussion of the existing and proposed watershed conditions within the Mount Spokane Study Area.

Mike Petersen The Lands Council

For example Section II on page 15, section it mentions alteration in snowpack and snow melt on vegetation communities in the PASEA. It is stated that there will “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.

Response: The reader is referred to Section III, section 3.3 – Vegetation, “Potential cumulative impacts to vegetation include alterations in snowpack and snowmelt due to a change in vegetation communities present in developed ski terrain, with corresponding alterations on the vegetation growing season due to increased sunlight and longer snow retention.”

Terri Costello State of Washington Department of Ecology

Regarding the DEIS alternatives, number 3 avoids most impacts to wetlands and buffers. The project can likely further avoid impacts to wetlands A and E identified in the report through trail re-design. Please describe if this avoidance to wetlands and buffer has been considered and if it is not feasible, please provide the explanation as to why.

Response: The design of the ski trails in Alternatives 2 and 3 is limited by the topography available in the expansion area. As such, it is necessary to maintain consistent slope gradients, which ensure an interesting and challenging experience for the ability level for which the trail is designed. If gradients are not consistent down the trail, then that means that there will be sections that are too steep or too flat to hold the interest of the given ability level. Trail widths will vary depending upon several factors, including, but not limited to, the topography of the site, the desired trail density, the caliber of skier or snowboarder being served, and grooming requirements. The trail network should be designed to maximize fall-line conditions. Trails should also be designed to minimize cross-traffic situations, which are found at convergence zones and other bottlenecks.

Although the impact to Wetland E cannot be eliminated altogether, no grading is proposed and only limited vegetation management would be necessary to formalize the trail. Any buffer impacts will be mitigated through the requirement that Mount Spokane Ski and Snowboard Park provide a wetland mitigation plan for review and approval by Spokane County.

Mike Petersen The Lands Council

The DEIS fails to provide impartial and accurate data regarding the current wetland delineation within PASEA.

Response: Comment noted. No change in document required. The wetland delineation is included as Appendix D.

Mike Petersen The Lands Council

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.

**Response:** The wetland delineation is included as Appendix D. It is not anticipated that implementation of either of the action alternatives analyzed in Section III will have a measurable impact on the ability of Mount Spokane to recharge groundwater throughout the spring and summer months.

Kim Thorburn

_The disturbances allowed under alternatives 3 and 4 in the DEIS represent threats to an important Spokane River watershed at a time when climate change is forcing us to reconsider water management._

**Response:** An analysis of the potential impacts to watershed resources associated with implementation of either of the action alternatives contemplated in Section III can be found in section 3.2 – Watershed Resources.

Cindy Rust

_The biggest problem appears to be the fragility of the soil in the area since it is nutrient poor struggling to support vegetation. This affects all other living aspects of the area as well as water quality. However, in the expansion plan it was clearly mentioned that woody debris and cleared timber would be retained for strategic placement to hold soil in place. I am confident MS 2000 will make changes to continue to balance land use and conservation with their plans: to control erosion during preparation of the land for the chair lift and ski runs using fencing and grass/coconut fiber rolls and strategic movement of machinery; to slow runoff of melt water in the spring by reseeding and planting afterwards; to monitor summer use with trail alterations; and to continue monitoring runoff water, fauna activity, and flora distribution and density._

**Response:** Comment noted.

### WILDLIFE

Steve Pozzanghera State of Washington Department of Fish and Wildlife

_Table EIS 3.4-5 & 6 - American Pika breeding/nesting/foraging: The distance to forage is not accurate. Pika will travel much further away from rocky cover to hay. Huntly et al 1986 had 7m for haying. Also, 5000’ in elevation is likely brought in as a model parameter suitable for thermal cover, but this may be too high. Current literature shows that pika will utilize available habitat at a lower elevation._

**Response:** The model created for America pika used a distance to forage of 5 feet, as described in Romaine-Bondi et al. 2009, which is based on Roach et al. 2001 and Huntley et al. 1986 stating a distance of up to 1 meter (3.3 feet) for forage away from talus slopes. The presence of talus slopes (estimated at 2 acres) is the determinate factor in pika habitat within the PASEA, not elevation (see Table EIS 3.4-2).
Lisa Pirkkala

I would like to see the documentation and studies that reflect how a new chair and expansion of around 200 acres would negatively impact wildlife habitat.

Response: The reader is referred to Section III, section 3.4 – Wildlife for a discussion of the potential impacts on wildlife and wildlife habitat for all the alternatives considered in the project EIS.

Mari Schramm, Vanessa Torjusen, Dionna Klein

Section 3.7.3: Noise: While the noise caused by proposed ski area may not be discomforting to humans, it would detract from the overall aesthetic value of the place by overwhelming the current, “natural” soundscape (wind passing through the trees, etc.) with man-made noises (snowmobiles, human voices, etc.). We would also like the final EIS to examine the potential impact that such noise would have on local wildlife (behavior, nesting habits, etc.).

Response: The reader is referred to Section III, section 3.4 – Wildlife for a discussion of potential noise impacts to wildlife species.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

Appendix 3 was also prepared in July of 2009, and does not account for possible changes over the past 5 years in the PASEA such as effects of global climate change, trail management and possible erosion.

Response: The recreational impacts to wildlife described in Section II, Appendix 3 – Recreation and Trail Impacts on Wildlife Species of Interest in Mount Spokane State Park represents State Parks current understanding of the potential impacts on wildlife due to increased human presence in the PASEA.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Lynx winter foraging: Typically, the literature points to snowshoe densities as an indicator for lynx winter habitats, not shrub cover. In a typical snow year, snowshoe hares are more dependent on access to young conifers for forage. Snowshow hares, like lynx, are not inhibited by deep snow.

Response: Forest stands with <30 percent slope, which also contain shrub cover of >20 percent were modeled. These parameters were adopted from Stinson 2000 [draft Canada lynx recovery plan], as cited in Romaine-Bondi et al. 2009.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Page III-87 - “A generalized wildlife travel corridor links Mt Spokane State Park with the rest of the Selkirk Mountains to the north.” The wildlife corridor is mapped in Spokane County’s Comprehensive Plan Open Space Corridors. Mt. Spokane State Park is a critical link between Selkirk’s north and to Antoine Peak south and west through Deadman and Little Spokane Rivers to the Spokane River Biodiversity Area and Corridors is a PHS category. PHS mapping is not intended to be comprehensive and if habitat is not mapped it is still intended to be designed and protected by definition.

Response: The DEIS accurately discloses that the PASEA is in a wildlife corridor, but that no specific corridor through the PASEA is defined in PHS data. The statement from the DEIS includes:
No defined wildlife corridors have been mapped for the expansion area. A generalized wildlife travel corridor links Mount Spokane State Park with the rest of the Selkirk Mountains to the north. Both action alternatives would affect habitat connectivity to varying degrees.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife  

Page III-85 - Mammalian denning and young rearing life stage needs correcting. Wolves April-Sept. (WDFW 2011); Lynx kittens delivered late April to late June, with use of natal den for 21±17 days (ILBT 2013); Wolverine birthing April-June and young weaned at 7-8 weeks (NatServeExplorer); Deer peak fawn birth here is around June 9, extending 2-3 weeks on either side, followed by ~2 weeks of extremely low mobility, then another 10 weeks until weaned

Response: Text on pages III-86 and III-87 of the FEIS has been revised as follows:

Martens and coyotes, medium-sized carnivores of Mount Spokane State Park, den and raise their young during the spring months of March to June. Lynx kittens are delivered late April to late June, with use of natal den for 21 +/- 17 days. Wolverine birthing is April to June and young weaned seven to eight weeks. Wolves deliver their young April to September. Deer peak fawn birth at Mount Spokane is around June 9 extending two to three weeks on either side, followed by approximately two weeks of extremely low mobility, then another ten weeks until weaned (Pozzanghera 2014).

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife  

Table EIS 3.4-5 & 6 - Lynx Breeding/Denning: estimated at zero. The maps in Morrison & Wooten (2010, App. C) shows this habitat as present. They also state in the text that denning habitat is present: “Although adequate habitat is present, denning is not documented in Mt Spokane State Park.” Please provide references or other info to support the estimate of zero acres of Breeding/denning habitat.

Response: The presence of coarse woody debris cover in late-seral state forests is necessary to provide denning habitat for lynx. Five separate citation in the scientific literature are provide in Romaine-Bondi et al. 2009, which served as the basis for the habitat modeling in the EIS. The mature forest habitats in the PASEA lack large trees and extensive cover of large woody debris that is generally preferred by breeding lynx.

The following parameters were used to model lynx breeding/denning habitat:

Breeding/denning:

Forest stands with tree canopy closure >40 percent and coarse woody debris >15 percent.

The parameters used in the model are conservative in that 1) the analysis focused on close forest canopy of greater than 40 percent. The literature states that late seral stage forests (mature, old growth) are the best forest stand age for the species. It is expected that canopy closure would exceed 40 percent from a mature or old growth stand, therefore modeling at >40 percent was done specifically to be conservative 2) the analysis also included coarse woody debris of greater than 15 percent. The literature states that the habitat needs for this species would require >25 percent. When these parameters were viewed together the
result was no suitable breeding or denning habitat for lynx exists in the expansion area. Individually, these parameters exist in suitable amounts in some places but the analysis did not find any area where the two overlapped in a way that would provide suitable habitat for the species requirements.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Gray wolf winter foraging: the estimated habitat of zero acres is problematic. Rather than an elevation cutoff of 3,500’, critical snow depth for moose has been well documented in the literature to be 35” (see Moose for more detail). Wolves will certainly forage above 3,500’ if prey is available.

Mike Petersen  
The Lands Council

In winter animals react to snow depths, not elevation, this makes the wildlife models inaccurate.

Group Response: Winter forage for Gray Wolf is tied to prey species. While there may be variability in snow depth within the PASEA during the year and between years, generally snow is too deep for these prey species to navigate, forcing them downslope in the winter months and removing winter foraging opportunities for wolves in the PASEA.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-18, Table 2-4 - “If work between March 1 and July 15 is necessary, a qualified wildlife biologist will conduct preconstruction surveys of the weekly construction footprint for the twenty-one focal wildlife species.” The window should be through July 31.

Response: Table EIS 2-4 has been updated to require preconstruction surveys through July 31.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Moose foraging and cover: Thermal cover and aspect should be included as a parameter. These factors, as well as % forest canopy, are very important for moose during high summer temperatures and winter temperature spikes.

Response: Percent forest cover is included as a parameter for summer cover (>70 percent canopy cover). For summer/fall foraging all cover types are included to be conservative. Similarly for both summer/fall foraging and summer cover, all aspects are included in the habitat model to be conservative.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Moose Breeding and calving: The model parameters are not accurate in regards to slope and aspect. 0% does not make sense. WDFW has current collared moose data indicating calving on the NW slopes of Mt Spokane.

Response: A footnote has been added to Table EIS 3.4-5 in the FEIS that reads:

Moose is a year-round occupant of Mount Spokane State Park, which includes the breeding and calving period. The fact that no breeding/calving habitat was mapped is likely due to the scale of the model not being able to detect small microhabitat features (e.g., hills, flat ridges) that would typically be used for calving.
Kim Thorburn

*The large number of state priority wildlife species that reproduce or migrate through the PASEA are themselves alone reason for the protection that would be ensure under alternative 2.*

Response: Comment noted.

Steve Busch

1. EXPANDED WILDLIFE HABITAT, SPECIES DIVERSITY, IMPROVED WILDLIFE VIEWING OPPORTUNITIES: The best places to view wildlife are in what are called “transition areas”. Multiple species of birds, as well as large ungulates and the predators that prey on them all benefit from open brushy areas that transition to more heavily timbered areas. Having worked professionally to improve forest health, thin timber stands and replant clearcuts, I know that ungulate species such as deer, elk, and moose rely on open areas where there is an abundance of herbaceous forage plants and berry bushes on which to browse.

Response: Comment noted. No change in document required.

Greg Gordon

*Wildlife Lynx: Multiple sightings of lynx have been recorded and suitable habitat exists, ski area expansion would eliminate the upper slopes of Mt. Spokane as suitable habitat. Numerous studies suggest that ski area development is incompatible with lynx occupation. Pacific Wren: Potential breeding habitat currently exists, but with the impact of ski area expansion on wetlands and streams, this would be eliminated. Pileated woodpecker and brown creeper, both resident species, would be highly affected by the removal of snags that would accompany ski area expansion. Northern Goshawk are known year-round residents and nest on Mt. Spokane. Our members have recorded nestlings just below the PASEA. A more extensive survey of goshawk nesting sites is necessary in the PASEA as few people enter this area in the spring and summer due to heavy forest and lack of trails. Therefore few nests would have been found. Black-backed woodpeckers, which are rare in Spokane County, occur on Mt. Spokane. The DEIS needs to include a more extensive survey of this species along with the Three-toed Woodpecker which is also rare and found in the park. The DEIS makes no mention of the Three-toed Woodpecker; this needs to be addressed.*

Anonymous

*We are recommending Land Classification Alternative One, with option of back-country skiing recreation in the PASEA, from the DEIS. We prefer this alternative because the proposed ski lift would impact wildlife such as the Canadian lynx, wolverine, northern goshawk, and pygmy shrew. As with the vegetation survey, the wildlife survey is incomplete and lacks adequate information regarding impacts the ski lift would have on the twenty-one focal wildlife species listed in table II-2 of the DEIS. The DEIS itself states that the data is lacking: “Even for those species with the greatest information, however, data are often lacking on specific thresholds of disturbance (intensity of use, distance thresholds, temporal effects, etc.”*

Group Response: The reader is referred to Table EIS 3.4-3 for a summary of the known potential impacts to the twenty-one focal species under the action alternatives.
Tables EIS 3.4-5 and EIS 3.4-6 identify the effect of Alternative 2 and 3 on habitat utilized by the twenty-one focal wildlife species if either of the action alternatives contemplated by the project EIS were implemented, including effects to pileated woodpecker, lynx and goshawk habitat.

Table EIS 3.4-5 notes that an intensive search survey of potentially suitable nesting habitat in 2013 detected no evidence of goshawk nesting in or within 328 feet of the expansion area. Additionally, during 2013, two broadcast acoustical surveys were conducted for northern goshawk. The surveys encompassed the 279-acre expansion area, as well as an 800-meter buffer to the north and west of the expansion area. Two additional broadcast acoustical surveys were conducted during the summer of 2014. No visual or auditory detections of northern goshawk were recorded during any of the four broadcast acoustical surveys or the intensive search survey. No northern goshawk nest structures were observed and no accumulations of prey items or plucking posts were encountered (see Appendix E).

Anonymous

Additionally, much of the research from the DEIS is out of date, with some dated as far back as 1999. For example, surveys on wolves were conducted in 2008, leaving substantial time for the population size to increase or decrease. In the final EIS, we would like to see the parks commission provide more informative and comprehensive data on the impacts to the 21 focal wildlife species, with special consideration given to the species listed as threatened at the state level. This should include listing breeding habitat for species other than the lynx, and surveys on keystone species that would indicate the health of the old growth forest, such as the pine martin. Additionally, research should be revaluated to ensure that it is still accurate, and that no significant changes have occurred. Inclusion of data on keystone species would clear confusion about technicalities of the old growth status as well as enlighten upon the productivity of the habitat.

Response: Comment noted. The analysis contained within the DEIS and FEIS represents the best available science related to the existing condition and potential impacts to the 21 focal wildlife species studied.

James Harrison Spokane Tribe of Indian Archaeology and Preservation Program

One example of pro-project reasoning is that increasing the size of the ski park will lessen the resources needed for the ski patrol because back-country terrain on Mount Spokane will be eliminated (III-4). A second is that lynx, while known to inhabit the area, should not be affected by the conversion of their habitat, because they are nocturnal, can hide in remnant tree stands between ski trails during the day then move about freely at night when people don’t ski (III-70). The DEIS does not do an adequate job of addressing impacts from the proposed project and has several significant data gaps.

Response: Comment noted. No change in document required. As noted in Section II, section 3.7.6.2, “Alternative 2 may 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 could potentially create additional demands on public service providers.”
Lisa Pirkkala

I would like to see further study by an independent group with sound scientific background. I want to see actual data (numbers, stream surveys, edge effect studies, etc) and cited. In short, I want to see a professional draft done by professional independent contractors. To me, the last studies seem to have been done by environmentalists with emotional attachments that make up data and terminology as they go along, not looking at the benefits and the larger picture of the park users, and the resource. I need better data, please. And especially noted: there have been no studies done on the benefits of the expansion. I feel that the expansion would clear out deadfall, removing catastrophic fire conditions, improve light, improve habitat for elk, moose and deer, as well as raptors and other predators.

Response: Comment noted. No change in document required. The effects on recreational users (both summer and winter) are discussed in Section II, section 3.6 – Recreation and Section III, section 3.6 – Recreation.

Jackie Corley

Spokane Tribe of Indians

Studies on the wildlife in the area such as the gray wolf, Canadian lynx, and wolverine have little to no information on the effects of ski runs, and the direct presence of humans can cause stress and abandonment. Other animals such as the Brown Creeper bird and American martin do not have any information on the direct effect people may have on them.

Response: Table EIS 3.4-3 summarizes the known potential impacts to the twenty-one focal species under the action alternatives. This summary table was developed for the 2010 Master Facilities Plan FEIS and more detailed discussion about the habitat requirements and impact mechanisms can be found in Recreation and Trail Impacts on Wildlife Species of Interest in Mount Spokane State Park, which is included as Section I, Appendix 3.

Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

Appendix 3 of the DEIS states, “for most species in this study, effects of recreation/human disturbance are considered secondary or minor concerns compared to impacts of habitat loss and/or degradation” (page 2). Habitat loss and degradation would be felt most heavily under Alternative 4, and therefore would have the most impact on the wildlife in the area.

Response: Comment noted.

Steve Pozzanghera

State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Northern goshawk: the comments should include reference of the protocol being used and make it clear that another year of survey data is being collected in response to requirements for non-detection in 2013.

Response: The additional survey effort was described on page III-85 of the DEIS. The following change was made to Tables EIS 3.4-5 and 3.4-6:

An intensive search survey of potentially suitable nesting habitat in 2013 detected no evidence of goshawk nesting in or within 328 feet of the expansion area, nor did a follow up acoustic broadcast survey during the summer of 2014.
Appendix H: Mount Spokane SEPA Combined Environmental Impact Statement
Comment Summary and Responses on the Draft EIS

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-71 - “This concern is only relevant during the day and during the winter ski season. During the rest of the year connectivity is less of a concern because of the relative absence of human activity.”

Under the classification as Recreation, the ski area expansion, and the creation of “informal” ski trails between runs will facilitate more trails and more use by hikers, mountain bikers, etc. in the spring, summer, and fall. The DEIS includes these activities as current and continuing.

Response: No change in document required. The only project under consideration in the combined FEIS is the expansion of ski area facilities into the 279-acre potential expansion area. Therefore, the impacts associated with ski trails on lynx and lynx habitat are analyzed as they relate to the project under consideration. It is unlikely that the amount of human activity within the study area during the summer months would approach that which would be present during the winter months if the ski area expands. Regardless, the DEIS notes that Ruggiero et al. (1999) concluded “limited anecdotal observations do not support the hypotheses that snowmobiling, ski touring, or hiking (i.e., dispersed recreation) result in significant behavioral disturbances to lynx.”

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Moose winter foraging: Critical snow depth for moose is 35”, however moose are able to move through deeper snow areas if the coverage depth is variable. In addition, snow depths in the mountains obviously vary between and within seasons. Showing the estimated habitat acreage as zero acres indicates that no area of the PASEA receives less than 35” of snow. Another important factor is thermal cover in mild winters - which is what the current habitat in the PASEA is providing.

Response: Snow depth of 35 inches or greater is an impediment to moose survival, while depths of 20 to 28 inches are thought to impede moose movement (summarized in Romaine-Bondi et al. 2009).

James Bergdahl  
Conservation Biology Center

I have formally surveyed terrestrial invertebrate communities in Washington State Parks and Conservation Areas since the early 1990s, including Mt. Spokane State Parks. In particular, I requested that the Mt. Spokane EIS review the conservation status of the species Grylloblatta (Insect, Notoptera, Grylloblattidae, “ice crawlers”) that I have documented occur in the upper elevation zones on Mt. Spokane. This is the only known population of the exceptionally unique and rare flightless insect in Washington State east of the Cascades Mountains. Over the last year, under collecting permits from both the Washington State Department of Fish & Wildlife and the Washington State Parks, we have continued to survey the Mt. Spokane ice crawler population for additional information about its geographic distribution, habitat, other life history characteristics, and potential status as an undescribed species. In October 2013 I send Dr. Sean Schoville (University of Wisconsin, Madison) live specimens for study. Schoville’s DNA analysis indicates (personal email, 30 September 2014) “genetic divergence of Mt. Spokane grylloblattids, which differ by slightly more than 5% on a per nucleotide basis (at the mitochondrial COII locus) from all other populations. The most similar populations are in British Columbia. They differ by about 7% from Grylloblatta occidentalis (Mt. Baker) and 10% from G. “campodeiformis” (a southern Montana population). I would say this supports species status, relative to G. occidentalis, but perhaps they are conspecific with populations in
British Columbia.” Therefore, at this time, very recent comparative DNA analysis suggests the Mt. Spokane population may be a unique, as yet undescribed ice crawler species associated with the South Selkirk Mountains. Our current understanding of these populations are that they are probably very localized at high elevation on regional “sky islands” such as Mt. Spokane, individuals have long life spans and low reproductive potential which make their populations very vulnerable to an increase in mortality factors associated with habitat and climate change. Their extremely low power of dispersal (flightlessness) greatly confounds their ability to colonize new habitat. This exceptional, high-elevation Mt. Spokane insect species it most likely an indicator of many other plant and animal species that are highly localized on the upper elevation zones of the greater Mt. Spokane massif whose fate has not been addressed in the Draft Environmental Impact Statement concerning the proposed ski area expansion.

Response: The DEIS discloses that, “researchers from the Conservation Biology Center in Spokane have performed independent surveys near the summit of Mount Spokane, identifying a population of flightless, ice crawlers (Grylloblatta spp.). This species of insect is found at high elevations in the Rocky Mountains (from WA, ID, MT, WY, BC and AB). Grylloblattids are a poorly known group of insects restricted to cold and extreme habitats. Little is known about their life history biology, and behavior. Grylloblattids are found only in Japan, Siberia, the northwestern United States, and western Canada. There are 26 species known worldwide; the ten North American species are restricted to mountains in Montana, California, Oregon, Washington, and western Canada (http://www.entm.purdue.edu/ants/ice-crawlers.php). At this time this species is not a state or federally listed species of concern.” (Emphasis added).

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Table EIS 3.4-5 & 6 - Western Toad breeding/metamorphasis: toads will utilize snow melt seasonal pools, ponds, streams, and small lakes to breed - not tied to warm shallow ponds. Since habitat appears to be present, habitat estimates should not be zero acres.

Response: The water bodies in the PASEA do not have sufficient depth or emergent vegetation to support breeding western toads. Further, the steep topography would prevent western toads from moving up into the PASEA from suitable habitat downslope and off-site.

John Little

The biggest disruption to wildlife right now in winter is the snowmobiles the scream through the area. If the opponents are honest about their claims, they would put forth greater effort to limit snow mobile use on the access roads that circumnavigates the mountain. Additionally with regards to wildlife, any clearing that takes place for future ski runs will provide new meadow habitat for mammals - which thrive in open spaces, as access to forage is more plentiful.

Response: Comment noted.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Rocky Mountain elk summer/fall forage - The model appears to have underestimated the use of the habitat by Rocky Mountain elk
Response: Elk summer/fall forage habitat was depicted using habitat characteristics (slope, forest canopy cover, distance to roads, and distance to cover) that were consistent with those reported in the scientific literature, as summarized in Romaine-Bondi et al. 2009.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Page III-54 - “Selected habitat elements for each species, refined using additional literature searches as needed, were cross referenced with habitat data collected by Morrison and Wooten (2010) from within the potential expansion area to model and estimate the extent of suitable habitat presence for each species.” The method of mapping wildlife habitat appears to be based on the summarization of (thru zonal statistic tool in Arc) wildlife habitat parameters for each vegetation/habitat polygons created in the SEIS analysis area (Morrison & Wooten 2010) instead of just using the raster of each Wildlife Habitat parameter, created from inverse distance weighted interpolation of their 59 ecology plots. An effect of using this method is that habitats may be underestimated.

Response: The method used to map wildlife habitat was a summation of suitable habitat parameters. Zonal statistics was never used, as it is a raster based analysis, and the data used in the habitat models were vector based, as inferred by the comment. Raster data are more often used for continuous data sets (e.g., elevation). In this case more precise polygon data (vector) were available to depict the vegetation types in the PASEA providing more precise/well defined edges between vegetation types, rather than more general, raster based data. Using raster data would over simplify the vegetation types and either over estimate or under estimate habitat for species.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Northern goshawk foraging - The map is misrepresenting available forage. The downed subalpine fir areas at higher elevation are a significant source of small mammal habitat - particularly for snowshoe hares - a preferred habitat for goshawk.

Response: The criteria for open habitats only being suitable if they are less than 4 acres and interspersed with suitable forest came from Romaine-Bondi 2009.

Steve Pozzanghera  
State of Washington Department of Fish and Wildlife

Northern goshawk breeding/nesting - This map and legend appear to indicate slopes over 40% were excluded. The model parameters indicate 70%) (WDFW concours with 70%). The breeding and nesting habitat survey should also be mapped outside of the PASEA in the area surveyed.

Response: The model parameters in Table EIS 3.4-2 are incorrect. The text in the table has been modified as follows for Northern goshawk under the column “Key Habitat Elements Used to Model Suitable Habitat”:

Breeding/nesting:
- Forest stands with slopes <40 percent, tree canopy cover >70 percent, 8 largest trees/acre >19 inch dbh, and average tree height >65 feet.
The model shown on the map is correct. The impact numbers did not change. The parameters were based on those reported by Mahon et al. 2006 as cited in Romain-Bondi et al. 2009. The fact that offsite lands provide habitat attributes that are valuable, including those used by Northern goshawk, is disclosed on Page III-46 of the DEIS. Wildlife monitoring that is required on the site would be sufficient to identify and minimize potential impacts to nesting Northern goshawks during construction.

**Steve Pozzanghera**  
State of Washington Department of Fish and Wildlife

*Gray wolf summer foraging - Drawing a line at 3,500’ elevation based on foraging is not accurate. For example, moose will be available prey above 3,500’ during the summer*

**Response:** During summer the limiting factor on foraging habitat availability is a 0.25-mile buffer off of Summit Road and Kit Carson Trail, not 3,500 feet elevation. Elevation is used as a limiting factor on winter foraging habitat based on typical snow levels and prey availability.

**Steve Pozzanghera**  
State of Washington Department of Fish and Wildlife

*Lynx Winter Foraging - The entire PASEA should be considered winter foraging habitat for lynx*

**Response:** Forest stands with <30 percent slope, which also contain shrub cover of >20 percent were modeled. These parameters were adopted from Stinson 2000, as cited in Romaine-Bondi et al. 2009.

**Steve Pozzanghera**  
State of Washington Department of Fish and Wildlife

*The HMP contains species habitat maps that are modeled based on the parameters provided in the Table EIS 3.54-2. These maps should be included in the body of the DEIS rather than in the draft HMP. The maps are an important part of illustrating the impacts of the proposed land classification and proposed land use and warrant attention during the DEIS comment period.*

**Response:** There is no requirement that such materials be repeated in the text of the EIS, in keeping with the purpose of avoiding unnecessary paperwork and duplication these maps will remain within Appendix E and referenced in the main body of the EIS text.

**Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens**

*Though Appendix 3 provides a much more detailed study of possible impacts, some of this information needs to be portrayed in the principal DEIS. The DEIS merely lists some general potential impacts, and makes sweeping statements such as, “under Alternative 2, there would be less opportunity for potential impacts to vegetative communities and forested stands due to the more limited range of uses that would be allowed to occur” (3.3.2.2). But, this does not address any of the specific issues that might come up. Appendix 3 addresses possible impacts for 21 “focal species,” but none of this information is included in the DEIS itself, giving the illusion of an inadequate DEIS.*

**Response:** SEPA allows the combination of any and all SEPA and non-SEPA documents in order to “reduce duplication and paperwork and improve decisionmaking” (see WAC 197-11-640 – Combining Documents). In keeping with the purpose of avoiding unnecessary paperwork and duplication this information will remain in Appendix 3 and referenced in the main body of the EIS text.
Madeline Kern, Mollie Picha, Emily Fulp, Kathryn Martens

This lack of specificity concerning poaching and trapping needs to be addressed by the DEIS. Also, the amount of allowed snag/course woody debris removal should be addressed by the EIS under each alternative as to give a better idea of what will and will not be allowed.

Response: See Section II, section 2.5.3, “To the degree practical, retain important coarse woody debris in the form of downed logs greater than 6 inches diameter and with a length of 8 or more feet.” Poaching and trapping within MSSP are not considered to be significant and are outside the scope of this analysis.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

American Marten - Winter cover/foraging seems underestimated

Response: Marten winter cover/forage habitat was depicted using habitat characteristics (>50 percent forest canopy, presence of coarse woody debris and/or a defined number of large trees or snags/acre) that were consistent with those reported in the scientific literature, as summarized in Romaine-Bondi et al. 2009.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Western Toad - Model underestimates habitats for western toad

Response: The water bodies in the study area do not have sufficient depth or emergent vegetation to support breeding western toads.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Page II-11 thru 20 - Impacts to watershed resources, vegetation, and wildlife are fairly well identified, included permanent and cumulative effects. However, no compensatory mitigation is discussed.

Mike Petersen The Lands Council

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.

Fayette Krause

It is worth examining the applicability of the various mitigation measures listed if Alternative #4 is selected. Avoiding the impact. Not applicable. Unavoidable impacts will occur. 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. 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. Reducing or eliminating the impact over time. Not applicable. Impacts from any ski expansion will continue indefinitely. Substituting resources. Not applicable. No substitution is proposed for the 279 acre ski expansion in Alternative #4. 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.

**Group Response:** To address concerns related to compensation for the loss of native forested communities under Alternative 4 the following compensatory mitigation has been added:

Section III, section 2.4.2 – Potential Compensatory Mitigation Measures

Working with the Washington Department of Fish and Wildlife, State Parks will prioritize protection of wildlife corridors and wintering habitat within the Mount Spokane State Park long-term boundary. Where willing sellers exist, State Parks will prioritize seeking funds to acquire these properties. If fee simple acquisition is not possible, State Parks will explore the potential for conservation easements. State Parks will explore opportunities to reclassify portions of the park to increase protective land classifications.

At Section III, Table EIS 2-4 under “Vegetation” the following language has been added for clarification:

Prior to any tree cutting or construction activity related to ski area development the following must occur:

- A tree cutting plan addressing project timing, cutting methods and logistics, site access and treatment of downed trees.
- A landscape management plan for the site after construction must be developed by MS2000 and submitted for State Parks review and approval. At minimum, the finalized landscape management plan for the area must set allowed practices for modification or removal of vegetation and other landscape features (e.g., standing snags, coarse woody debris, boulders, and other terrain features), and an integrated pest management (IPM) approach for dealing with non-native vegetation.

**Steve Pozzanghera**  
State of Washington Department of Fish and Wildlife

A key tool for determining the impacts of ski area expansion is the suitable habitat estimates that were performed for the twenty-one focal species. WDFW has concerns about the parameters that were used in determining the suitable habitat and the methodology itself for the GIS modeling. In particular, we believe that suitable habitat is underestimated, resulting in less total impact being identified. This could result in inappropriate/reduced level of mitigation being proposed for the project area. Table EIS 3.4-2 presents the suitable habitat estimates.

Response: WDFW provided individual comments, by species, following this introductory text. State Parks response by species is included throughout this Response to Comments document.

**Mike Petersen**  
The Lands Council

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. 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.

**Response:** In consultation with WDFW, State Parks prioritized twenty-one focal wildlife species, which potentially occur at Mount Spokane State Park (Ferguson 2007; Table EIS 3.4-1) for inclusion in the EIS. Habitat impacts to these twenty-one focal wildlife species are listed (by alternative) in Tables EIS 3.4-5 and 3.4-6.

**Mike Petersen**

*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. Mt. Spokane hosts the only known group of pika in the County. They are being evaluated for state listing.*

**Response:** At this time, pika is not a listed species. No clearing or grading is proposed in pika habitat under either of the action alternatives considered. As noted in Section III, section 3.4, 2 acres of pika habitat exist in the talus area near the summit of Mount Spokane. Some reduction in habitat suitability may occur during winter if snow compaction from skiing and grooming degrades the subnivian zone.

**Steve Pozzanghera**

*Page II-7 - Breeding-nesting season should be from April 1 - July 31*

**Response:** This change has been made in the Final EIS.

**Steve Pozzanghera**

*Page III-42 - Snags and Logs is a priority habitat category. The DEIS repeatedly refers to areas of downed wood in the PASEA as affected by wind, snow, and insects, and in some cases statements are made about logging and development. The downed wood, clearly visible in an aerial image, is an important and unique habitat feature on Mt Spokane, one that is linked to species use. Impacts to this habitat should be clearly defined and mitigated for, rather than categorized and depicted as marginal habitat. This is wildlife habitat linked to small mammal presence, including snowshoe hare, the primary food source for foraging goshawk and lynx.*

**Response:** The section/page cited by the commenter refers to the following statement in the DEIS: “Additionally, woodlands within the central and southern portions of the Study Area have been extensively affected by wind and snow damage, often followed by bark beetle attacks, with some forest communities in this area currently supporting less than 60 live trees per acre (see Appendix B).” This is an accurate description of the Existing Conditions in the study area (the focus of this DEIS section).

Page III-86 of the DEIS under “Snag/Coarse Woody Debris Reduction” clearly refers to this habitat as “preferred habitat elements” and “critical habitat elements,” not “marginal habitat.”

**Jackie Corley**

*According to the document recreation is widely recognized and is becoming an increasingly important factor which affects wildlife and vegetation, yet information on recreational impacts is lacking (III-68).*
Studies on the wildlife in the area such as the gray wolf, Canadian lynx, and wolverine have little to no information on the effects of ski runs, and the direct presence of humans can cause stress and abandonment. Other animals such as the Brown Creeper bird and American martin do not have any information on the direct effect people may have on them. Outcomes for the forest and wildlife in the PASEA cannot be determined yet because the information just does not exist, and a project this big should not be attempted with inadequate information.

Response: Table EIS 3.4-3 summarizes the known potential impacts (from recreation) to the twenty-one focal species under the action alternatives. This summary table was developed for the 2010 Master Facilities Plan FEIS and more detailed discussion about the habitat requirements and impact mechanisms can be found in Recreation and Trail Impacts on Wildlife Species of Interest in Mount Spokane State Park, which is included as Section II, Appendix 3.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Rocky Mountain Elk cover - The PASEA provides excellent cover for elk and is part of a connected wildlife corridor. The model appears to have underestimated available cover for elk.

Response: The limiting factors in the model are distance to roads and tree canopy cover. Typically a distance of 0.5 mile from an active road system is recognized as a parameter that best defines elk cover habitat. To account for “urbanized” elk described by local wildlife officials this distance was reduced to 0.25 mile in the model. Similarly when modeling ideal forest canopy cover that provides security cover for elk, a range of 70 to 100 percent is used. The scientific literature on this topic is summarized well by Romaine-Bondi et al. 2009. Local wildlife experts (H. Ferguson, WDFW; cited in Romaine-Bondi et al. 2009) noted that 70 percent cover may be too high for elk in MSSP so a parameter of 50 percent forest cover was used. So in both forest cover and distance to roads, conservative parameters were used to define suitable elk cover habitat.

Steve Pozzanghera State of Washington Department of Fish and Wildlife

Page III-86 - Wildlife monitoring should be continued through at least the end of July (not July 15), if construction is required during the breeding, nesting/denning, and rearing period.

Response: The text has been edited to extend the period of wildlife monitoring until July 31st.

Mike Petersen The Lands Council

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-fledgling phase. This means these surveys were not done following the best science, and need to be done during the nesting phase.

Response: The DEIS notes that two additional broadcast acoustical surveys were scheduled to be conducted during the summer of 2014. The results of which are included in the FEIS.