

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

REG: MT. Spokane PASEA.

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. This fact is well established in the scientific literature. My neighbor and I own property on the LSR in Elk, WA. Both properties have substantial spring water flows coming out of the hillsides and into the LSR. This water helps cool the river water during the summer and warms the river in the winter. This combination of different temperatures accounts for the increased biodiversity of macro invertebrates in this area. This spring water also improves the fish spawning and rearing capacity of the river. 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 also own property which borders MSSP. In the early 1970's a timber company clear-cut it's land within the official boundary of the park. An annual flowing spring at 3200 ft. elevation on my property went completely dry. The logging operation was approximately one mile above my property. I recently had a drilled well to 140ft. in this dry spring area and have a static water head at 20ft. This was recorded by a member of the WIRA 55 committee. It will be interesting to see what happens to the static head in my well if the logging occurs to expand the west side ski area. 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.

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 the 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. Mt. Spokane also does not have the vertical drop to ever become a destination ski resort. It also has to compete with the other advanced ski areas in Idaho, Montana, and Canada. Mt. Spokane has always been a beginners hill, and once they learn to alpine ski they move on to the bigger resorts. All of the previous ski concessionaires have failed and a new chairlift in a bad area will not solve their problem.

Sincerely,



September 8, 2014



Randy Kline
Environmental Program Manager
Washington State Parks Department
1111 Israel Road SW
PO Box 42650
Olympia, WA 98504-2650

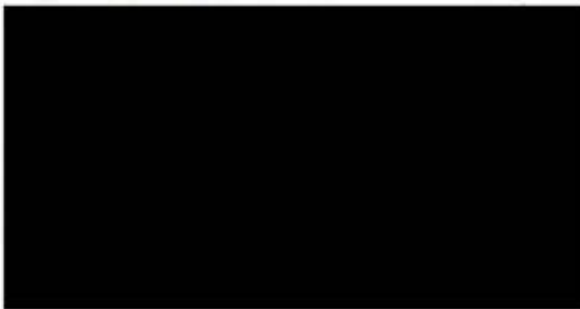
Dear Mr. Kline:

I am writing to recommend that the Mt. Spokane PASEA be not approved. My father started skiing on Mt. Spokane in the late 1940's. I have held a season pass for the last 33 years. I ski all over the mountain, including regular trips down the "back side," the area of proposed expansion. The forests are beautiful back there and very skiable in their present state. No lift is need for skiers to access this area.

I want to commend Mt. Spokane 2000 for the excellent job they have done improving the mountain's facilities and slopes. This group has been excellent stewards for the mountain and its facilities. That being said, I oppose the proposed expansion. There is plenty of thinning and glading that could take place within the current ski-area boundaries if they want more accessible terrain, especially in the chair 4 area.

Please so not approve the Mt. Spokane PASEA and the backside expansion.

Sincerely,





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

September 25, 2014

Mr. Randy Kline
Environmental Program Manager
Washington State Parks and Recreation Commission
P.O. Box 42650
Olympia, WA 98504-2650

Re: Mt. Spokane DEIS for Land Classification and Ski Area Expansion

Dear Mr. Kline:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement regarding the proposed land classification of the Mt. Spokane Ski and Snowboard Park expansion, to include an additional ski lift and several new ski trails within an approximate 279-acre area (Proponent: Washington State Parks & Recreation Commission). The Department of Ecology has reviewed the documents and submits the following comments:

Shorelands and Environmental Assistance Program-Wetlands

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 chair lift 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.

The DEIS should also overlay all intermittent and ephemeral stream crossings and include those locations in the calculation of impacts.

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. A wetland mitigation plan must be developed, approved by all appropriate agencies, and implemented for those wetland impacts that are not avoided. Contact David Moore at (509) 329-3474 or david.moore@ecy.wa.gov for more information.

Mr. Randy Kline
September 25, 2014
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Water Resources Program

Any surface water diversions will require application to the Department of Ecology for a water right permit. Contact Herm spangle at (509) 329-3488 or herm.spangle@ecy.wa.gov for more information.

State Environmental Policy Act (SEPA)

Ecology's comments are based upon the information submitted for review. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Sincerely,
Cindy Anderson for:

A handwritten signature in black ink, appearing to read "Terri Costello", written in a cursive style.

Terri Costello
SEPA Coordinator
Phone: (509) 329-3550
Email: temi461@ecy.wa.gov

201404336

Peter F. Stanton
Chairman and
Chief Executive Officer

September 17, 2014

Randy Kline, Environmental Program Manager
Washington State Parks & Recreation Commission
1111 Israel Road SW
PO Box 42650
Olympia, WA 98504-2650

RE: Alternative #4 Recreation, Resource Recreation and Natural Forest Area

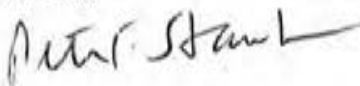
Dear Mr. Kline,

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. The current expansion plan, which was revised several times to reflect the needs and priorities of the community and environmental groups, addresses forest health and land conservation concerns as well as allowing for significant recreational enhancements.

Land Classification alternative "#4 Recreation" will allow for significant recreational enhancements, protect natural areas and solidify the long-term future of Mt. Spokane, which fills an important niche as an accessible, affordable four-season recreation destination for citizens of this region. Recreational classification will create greater access and more terrain for skiers, which also promotes better skier safety. Mt. Spokane has been a collaborator and partner, working as good stewards of this land over the past decade; and over several years of planning and extensive studies, Mt. Spokane's land classification has been adapted to preserve and protect 90% of the forest in its expansion area.

I believe that, as stated on Mr. Spokane's website, moving forward with Mt. Spokane's expansion plan will provide enhanced, safe, and accessible winter and summer recreation to Spokane and regional communities, as well as bringing additional revenue to the county, state, and State Park system while also preserving forest health and land conservation.

Sincerely,



Peter Stanton
Chairman of the Board/CEO



Post Office Box 758
La Conner, WA 98257
877.533.5520 (voice)
877.559.2847 (fax)

www.pnsaa.org

September 26, 2014

Mr. Randy Kline
Environmental Program Manager
Washington State Parks & Recreation Commission
PO Box 42650
Olympia, Washington 98504-2650

**RE: COMBINED DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
CLASSIFICATION OF LAND AND SKI AREA EXPANSION**

Dear Mr. Kline:

The Pacific Northwest Ski Areas Association (PNSAA) is a non-profit trade association representing the interests of ski and snowboard facilities in Washington, Idaho, Oregon, Montana, Northern California and Alaska. The Association's 34 member ski areas – mostly recreation providers operating on state and federally managed land – collectively host an average 5.5 million visits annually.

On behalf of the PNSAA Board of Directors, I write to provide comment on the purposes and need for formal land classification pursuant to Washington Administrative Code (WAC) 352-16 to classify approximately 800 acres of land commonly referred to as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park to potentially reclassify approximately 20 acres of land from Resource Recreation to Recreation and to potentially reclassify approximately 1 acre of land adjacent to the Vista House currently classified as Heritage to Recreation for purposes of accommodating proposed recreational facilities. Also, on a project proposal by Mount Spokane Ski and Snowboard Park to expand alpine ski facilities into a 279 acre expansion area within and adjacent to the PASEA by constructing one new chairlift and seven associated ski trails. PNSAA supports and urges adoption of Alternative 4 –Recreation, Resource Recreation and Natural Forest Area as outline in the Draft Environmental Impact Statement. This is the same classification as the existing ski area.

PNSAA believes in order for Mount Spokane Ski and Snowboard Park to catch up with guest expectations and capacity issues, the "Recreation" land classification is crucial so the operators can proceed with the proposed expansion to meet these considerable challenges by enhancing the overall functionality of the facility.

Marketplace Growth

The population of Washington State has experienced five decades of strong, uninterrupted growth. The 2010 U.S. Census revealed the following statistics about the period 2000-2010:

- population growth of 830,419 (a 14.1 percent increase);
- Washington becomes the 13th most populous state in the U.S. (up from 15th place), tallies a 2010 population of 6,724,540, and enables the state's Congressional delegation grows by one member;
- Washington becomes the 8th fastest growing state in the U.S. (in terms of numeric increase); and
- The population distribution between eastern Washington and western Washington remains unchanged with the same 22/78 percent split in place since 2000.

Visits to ski areas will grow as population grows. By year 2030, Washington is projected to have a population of 8.6 million. 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.

History of Ski Area Concessionaires on State Lands

The Washington State Parks and Recreation Commission is among several states that support winter sports activities through support of ski area concessions on state owned land. In the United States there are at least seven (7) states with more than 21 ski areas operating as concessionaires on state owned land. Notably: New York, where Olympic Regional Development Authority (ORDA) was given the mandate to manage and promote the sports facilities at three ski resorts, and Vermont, where the ski industry supports nearly 30 percent of Vermont's State Park budget through lease payments from seven (7) ski areas located on state lands. The other states include: Massachusetts, New Hampshire, Pennsylvania, West Virginia and Connecticut.

Safe Ski Trail Densities

With the demand for snow sports projected to grow, Washington state ski area operators must size their facilities to ensure adequate capacity for safe and comfortable skiing and snowboarding. Mount Spokane's days of peak attendance in the next decade are projected to be significantly greater than days of peak attendance witnessed in the 1980s and 1990s, largely because of sustained population growth and because a growing number of Mount Spokane's guests are choosing to focus most of their skiing and snowboarding closer to home and on weekends during the months of January and February. As a result, 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. The Option 2 land classification would provide the opportunity for much needed expansion as Mount Spokane 2000 proposed.

Long-term Economic Sustainability

The "Recreation Area" land classification that will allow expansion into terrain with a northern exposure overcomes a significant operational challenge – the Mount Spokane trail network is mostly reliant upon south-facing slopes. In most winters, Mt. Spokane's deep snowpack weathers the highly erosive elements of south-facing slopes – namely solar exposure and wind – without detriment to its operation. However, as the winter of 2004-2005 illustrates, ski facilities with south-facing aspects are especially susceptible to dramatic reductions in their operating season in winters of minimal snowfall (e.g., Mt. Spokane had just 29 operating days during the winter of 2004-2005). 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.

Recreation Potential of Appropriately Suited Terrain

There are many facets that make ski area operations unique. Topography, slope gradient requirements, solar and wind exposure, avalanche hazard, fish and wildlife habitat restrictions, cultural resources, and vehicular access are just a few of the myriad issues that help determine the suitability of lands for ski area development. Given the complex and controversial approval process associated with the

development of new ski areas (recall the Early Winters planning exercise in the 1990s), any increase in Washington state's aggregate ski area capacity likely will necessitate the expansion of the state's network of existing ski facilities. Because land suitable for alpine skiing and snowboarding is so limited, it is important to make optimal use of the land contiguous to existing ski areas. The land classification of 279 acres in the PASEA as "Recreation Area" deserves full consideration and formal environmental review – in accordance with the State Environmental Policy Act (SEPA).

Based on the purpose and needs as discussed in this letter, PNSAA urges support of Section 2.4, Alternative 4 Recreation, Resource Recreation and Natural Forest Area as outlined in the *Combined Draft Environmental Impact Statement (DEIS) for Proposed Land Classification for the Area Known as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park and Ski Area Expansion*.

If you have questions, or if I can clarify any of these comments, please do not hesitate to contact me at (877) 533-5520.

Regards,

PACIFIC NORTHWEST SKI AREAS ASSOCIATION

A handwritten signature in black ink, appearing to read "John A. Gifford". The signature is fluid and cursive, with a large initial "J" and "G".

John A. Gifford
President

cc: Brad McQuarrie