

Dear Mr. Klone,

Look, cutting old growth forest for one more ski run is not acceptable. With

so little native habitat left in the inland Northwest, preserving watersheds and wild life habitat is more important.

Support Alternative two, but do allow backcountry alpine skiing.



Dear Mr. Kline,

Please accept these comments into the official record for the DEIS for the Mt. Spokane PASEA Classification:

- 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.
- The seven runs and the area for the chair lift will be clear-cut. You can't mitigate old growth and native forest that has never been logged. It's not replaceable.
- Fragmentation of forests reduces habitat for rare wildlife.
- 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 (PASEA)."
- The streams near the base of the proposed chair are important for fish health downstream.
- Wetlands should have been delineated in the spring and not late summer.
- The wildlife modeling for moose, wolves and other species was not done correctly
- Cultural and Archaeological Resources were not adequately covered.
- Upgrades in parking, and lodges were not discussed. This is imperative.
- Old growth forests sequester carbon and hold soil moisture in. Global warming should be examined in the DEIS.

Send comments, due by Sept. 30, 2014, to Randy Kline, PO Box 42650, Olympia, WA 98504-2650

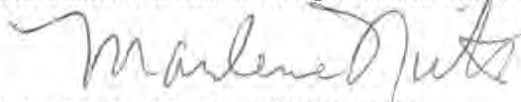
For more info [www.savemtspokane.org](http://www.savemtspokane.org)



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September 30, 2014

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

Re: Mt. Spokane State Park Draft EIS

Attn: Randy Kline, Parks staff, Washington State Parks Commission members

**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. There is no other logical conclusion that can be made based on the long-term negative consequences of Alternative's 3 & 4, which I will detail in this comment letter.**

Washington State Parks has an important dual mission to provide healthy outdoor recreation opportunities and to ensure the care and protection of a vast collection of natural, cultural and historical resources. It's not one or the other.

**Healthy outdoor recreation opportunities:**

Mount Spokane is accessible in all four seasons for a large number of recreational pursuits, including downhill skiing, snowmobiling, backcountry skiing, snowshoeing, horseback riding, mountain biking, running, birding, tourism, berry picking, and other activities. The park serves the masses at times and can be considered over-utilized for the infrastructure, especially during the winter.

The ski area presently has authorization to use 1425 acres or 10% of the park. Lift assisted groomed runs and skiable terrain take up fully 65% of the upper alpine area. This leaves only 35% of the upper mountain without roads, buildings, additional infrastructure, clear cuts, lifts and lift towers, which creates an area susceptible to fragmented habitat, stormwater erosion and weeds. The mission to provide recreation has been more than satisfied on Mount Spokane.

**The care and protection of a vast collection of natural, cultural and historical resources:**

Alternative 2 provides for the other equally important part of the dual mission – the care and protection of a very unique natural resource – an intact 800 acre alpine habitat with alpine wetlands, fragile vegetation, springs and creek headwaters, and old growth. All scientists agree that habitat loss is the number one reason species decline and disappear from their native areas. Once this block of 800 acres of alpine forest is fragmented, the area will be open to predation, erosion, weeds, and loss of water retention capabilities. The mission to provide for the care and protection of this type of unique habitat, the only one of its type in Spokane County, will only be satisfied with its protection through Alternative 2.

## 3.6 RECREATION

### 3.6.1 Affected Environment

Mount Spokane State Park, encompassing a total of approximately 14,000 acres, offers a wide range of recreation opportunities throughout the year. Existing recreational facilities include 85 picnic sites, 3 picnic shelters, a group camping area for 90 people, 8 standard camp sites, parking for approximately 1,588 vehicles, 2 horse feeding stations, 2 comfort stations, 16 vault toilets, 50 miles of hiking/equestrian trails, 50 miles of roads, 3 cabins and the historic Vista House. An existing concessionaire, Mount Spokane 2000, operates the Mount Spokane Ski and Snowboard Park within a 1,425-acre developed portion of its 2,233-acre concession area.

**The DEIS has identified critical problems associated with the facilities (chairlift, towers, operating buildings, elimination of 279 acres of forest) and other activities (construction, removal of downed trees, building of roads, recreational skiing) proposed by Mount Spokane 2000 and Alternative 4. They are at a minimum:**

- Wildlife habitat supporting populations and occurrences of resident wildlife species within the PASEA and transiting through it;
- Wildlife habitat connectivity to intra-park and regional wildlife corridors;
- Natural forest and native plant associations and communities;
- Soils and slope stability;
- Water quality;
- Introduction of non-native plant species; and
- Scenic resources including viewsheds.

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.

**Past field surveys revealed no signs of major soil erosion or landslides, primarily due to the undisturbed condition of the PASEA.**

**Mitigation is mentioned as an alternative to the destruction of the natural resource, but mitigation cannot replace vernal wetlands in an alpine setting; mitigation cannot bring back wildlife species that need connectivity to habitat; mitigation cannot replace old growth trees that have been in place for centuries; mitigation in this case can only be**

**considered as “avoiding the impact altogether by not taking a certain action or parts of an action.”**

2.5.1 through 2.5.4 are the General Mitigation Measures and Specific Measures proposed. These are regulations, procedures and activities that may limit damage short term, but they do not eliminate the overall impact and damage done to an intact and very sensitive alpine environment. We have all walked through logged areas, during and post removal of trees and land clearing. It’s never the same despite all the promises and words “mitigation” conveys.

**The recreation mission is filled; now we must protect the natural environment mission.**

**The DEIS is clear as to the advantages of Alternative 2 and disadvantages of the other alternatives:**

#### **3.1.2.2 Alternative 2 – Natural Forest Area**

- Under this alternative, there would be less opportunity for potential impacts to soil and geology resources due to the more limited range of uses that would be allowed to occur.
- This alternative would provide the least potential for soil and geology impacts and would be as described in Alternative 1 – No Action.
- This alternative would provide the least potential for stream, wetland and water quality impacts of all the action alternatives and would be similar to Alternative 1.

#### **3.1.2.4 Alternative 4 – Recreation, Resource Recreation, and Natural Forest Area**

- Under this alternative, there would be greater opportunity for potential impacts to soil and geology resources due to the expanded range of uses that would be allowed to occur in the Recreation classification.
- Construction and operation of facilities, such as recreational trails, cleared ski runs and lift towers, have the potential to negatively impact streams, wetlands and water quality

### **Cumulative Effects:**

**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.**

#### **3.1.4 Cumulative Effects**

Cumulatively, past construction on lands within and in the vicinity of the PASEA

include the construction of Chair 4 Road, the Vista House, the Summit Road, existing ski area facilities at the summit of Mount Spokane and communication towers. These existing facilities have changed sediment yield, soil compaction and impermeable surfaces between pre-development conditions and present day recreational area development. Changes in sediment yield and soil compaction are primarily temporary and associated with construction activities; however, permanent developments such as trails, roads, buildings, and structures would continue to result in an increase of impermeable surfaces over predevelopment conditions.

#### **3.2.4 Cumulative Effects**

Under Alternatives 3 and 4, future projects and construction activities occurring within wetlands and streams have the potential to alter plant communities and functional processes of the riparian zone. These processes include sediment filtration, stream bank stabilization, floodwater storage (duration and timing of flow), large woody debris (LWD) recruitment, and stream channel shading. Conversion of forest to meadow is also likely to alter hydrologic functions within the project area (e.g., evapotranspiration reduction, infiltration rates). While wetland and stream buffer widths typically encompass an area greater than the functional riparian zone, construction activities within the buffers occur in closer proximity to watershed resources. Based on this circumstance, there is a higher potential for projects occurring within wetland and stream buffers to impact watershed resources compared to projects occurring outside.

#### **3.3.4 Cumulative Effects**

Under Alternatives 3 and 4, cumulative impacts to vegetation due to potential future recreational trail and facility development include alterations in snowpack and snowmelt due to a change in vegetation communities present in portions of the PASEA and corresponding alterations on the vegetation growing season due to increased sunlight and longer snow retention in cleared areas (see Section III, section 3.3 – Vegetation for a detailed analysis of the potential impacts associated with construction and operation of alpine ski facilities).

#### **3.4.4 Cumulative Effects**

Potential cumulative effects are discussed in this section. Depending upon the degree of trail development and use patterns, new trails through forests and meadows that do not currently have trail use may result in displacement/avoidance behavior by wildlife. Many species often move away from human activity or they intentionally avoid associated human recreation sites. Animals that have been displaced by recreation are less likely to survive and reproduce where habitat is unfamiliar or inferior. In particular, during breeding, rearing, and winter and early spring foraging seasons; stress on wildlife is likely to increase susceptibility to illness, predation, and reduce individual fitness.

**The DEIS is clear that changes to the PASEA through construction and permanent elimination of the presently forested area will have an impact on water quantity and quality downstream.**



### **3.2.1 Affected Environment**

Mount Spokane is a critical component of the hydrologic cycle in the greater Spokane/Coeur d'Alene area. The mountain serves an important role of storing water that falls as snow in winter, and recharging groundwater throughout the spring and summer months.

#### **3.2.1.1 Streams**

Multiple unnamed ephemeral and perennial streams occur within the PASEA

#### **3.2.1.3 Water Quality**

No water quality monitoring stations occur within the PASEA or within Mount Spokane State Park.

#### **3.2.1.3 Water Quality**

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.

**The DEIS makes it clear that “construction and operation of recreational facilities and uses permitted” will have the potential to impact vegetative communities and forested stands within the PASEA.**

### **3.3.1 Affected Environment**

Mount Spokane State Park, including the PASEA, occupies a unique position on the landscape in Spokane County. It has the highest point in the county and has high elevation habitat that is found nowhere else in the local area.

Although land classification itself will not impact existing vegetative communities, construction and operation of recreational facilities and uses permitted consistent with the *Land Classification Compatibility Matrix for Facilities and Activities* (see Appendix 2) have the potential to impact vegetative communities and forested stands within the PASEA.

Potential impacts from trail construction, trail use or ongoing maintenance include the following:

- impacts to plants and their habitats;
- direct harm to plants providing ecosystem services;
- loss or alteration of plant habitats;
- altered ecosystem function;
- increased spread of invasive species;
- displacement of native plants by non-natives;
- increased soil disturbance favoring invasive species establishment;
- soil compaction and associated changes in hydrology and plant growth;
- human, pet and wildlife travel leading to the spread of invasive species;

**The DEIS makes it clear that wildlife will be displaced and their habitat fragmented and eliminated if Alternative 4 is selected. This is typical of the impact of recreational facilities like a ski area. A recent report published by the London Zoological Society on behalf of the World Wildlife Fund claim that the global loss of species is worse than previously thought and suggests populations have halved in 40 years. “The report shows that the biggest recorded threat to biodiversity comes from the combined impacts of habitat loss and degradation, driven by what WWF calls unsustainable human consumption”.**

<http://www.bbc.com/news/science-environment-29418983>

### **3.4.1 Affected Environment**

There are a wide variety of impacts from recreation on the twenty-one species of interest. Potential impact types by mode of recreation for the twenty-one focal wildlife species is provided in detail in *Recreation and Trail Impacts on Wildlife Species of Interest in Mount Spokane State Park*, as noted in Appendix 3.

Displacement/avoidance – Many species often move away from human activity or intentionally avoid associated sites. Sites may be avoided due to the disruption caused by human presence or habitat changes associated with the site (e.g., soil compaction, dryness of soils and vegetation along roadsides and trails). Animals displaced are less likely to survive and reproduce where habitat is unfamiliar or inferior. Displacement or avoidance is by far the most common response found in the literature related to recreation facilities and activities.

#### **3.4.2.4 Alternative 4 – Recreation, Resource Recreation, and Natural Forest Area**

Under Alternative 4, there would be greater opportunity for potential impacts to wildlife due to the expanded range of uses that would be allowed to occur in the Recreation classification.

**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). 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.**

### **3.6 RECREATION**

#### **3.6.1 Affected Environment**

Mount Spokane 2000, operates the Mount Spokane Ski and Snowboard Park within a 1,425-acre developed portion of its 2,233-acre concession area. Within the developed portion of the ski area boundary, MS 2000 currently operates five aerial chairlifts. The lift network at Mount Spokane provides access to 45 named trails on approximately 150 acres of formal ski trails and another 130 acres of tree and open skiing.

#### **Alternative 4 – Recreation, Resource Recreation, and Natural Forest Area**

Under Alternative 4, there would be greater opportunity for potential impacts to historic, cultural, and archaeological resources due to the expanded range of uses that would be allowed to occur in the Recreation classification.

To end, I believe Alternative 2 is the best solution for the park, the public, and the environment. I also feel that backcountry skiing that has been allowed through the years in the PASEA should be considered as a conditional use for the Natural Forest Area on Mt. Spokane. The DEIS did not take into consideration the long term effect of global warming. There have been numerous articles and at least one book that predict lower elevation ski areas, like Mount Spokane, will go out of business in the near future because of more rain and less snow.

I live below Mount Spokane and my property includes a wetland formed by Deadman Creek, which flows off the southwest side. I am acutely aware of the changes in water flow and subsequent wetland changes as precipitation changes on the mountain. As indicated, any clear-cutting of forested areas within the PASEA will result in changing the moisture available for summer flows to the northwest and northeast. We cannot let this happen.

The commission has shown a bias toward the ski area expansion in past decisions, which were made without the benefit of a DEIS. Parks and the commission were only stopped by a Lands Council lawsuit. This DEIS is clear that Alternative 2 is the only path to not only protecting an intact wildlife habitat and natural resource, but forcing Mount Spokane 2000 to use their limited financial resources to improve the ski area facilities presently in operation.

Sincerely,

John Roskelley

Spokane County Commissioner 1995-2004

Eastern Washington Growth Management Hearings Board 2004-2010

Board member – The Nature Conservancy for 12 years

Present board member – Washington Wildlife and Recreation Coalition