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1.0 Collation Summary

1.1 BACKGROUND

As per the requirements of the National Environmental Policy Act (NEPA), Section 1503.4 (a):

“An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement.”

The objectives of the response to comments are to display all of the public comments received by the U.S. Forest Service (USFS) regarding the five alternatives presented in the Summit-at-Snoqualmie MDP DEIS and to provide responses to the public comments. The public comments are then used in combination with additional research and analysis to update and finalize the FEIS and help the USFS decision makers select an alternative.

The full DEIS (hardcopy and/or compact disk) or internet download instructions were distributed to over 1,598 individuals, organizations and other agencies on December 19, 2005. The Notice of Availability of the DEIS was published in the *Federal Register* on December 23, 2005 (Volume 70, Number 246) and initiated an extended 60-day public comment period that ended on February 16, 2006. A total of 40 hardcopies and 1,550 CDs were mailed to the public and the DEIS was posted on the USFS website.

In response, during the public comment period to the DEIS, a total of 1,503 comment letters were received. Out of the 1,503 response letters, 1,137 comments were identified by the USFS as substantive comments according to guidance contained at 40 CFR 1503.4 (b). The USFS responses to the substantive comments for the Summit-at-Snoqualmie MDP DEIS can be found under Section 2.0 - Comments and Responses.

1.2 COMMENT PROCEDURE

Those receiving a copy of the Summit-at-Snoqualmie DEIS were given instructions and mail/e-mail addresses to which they could send their comments. They were advised that comments raising concerns with specific areas of the DEIS would be most useful to the process, as opposed to general comments that simply voiced opposition or support.

Consistent with NEPA, 40 CFR 1503.4(b), this volume addresses substantive comments on the DEIS. Substantive comments are those that are within the scope of the proposal, are specific to the proposal, have a direct relationship to the proposal, and include supporting reasons for the Responsible Officials to consider. Non-substantive comments are those that are outside the scope of the proposal or express opinions without supporting reasons for the Responsible Officials to consider. In an effort to address numerous public comments that were determined to be non-substantive, but for which a response

provides clarity, or for those comments that identified typographical errors or similar issues, this volume includes responses to some non-substantive comments (see Comment Code 02.0 – Non-Substantive Comments).

1.3 COMMENT TRACKING METHOD

A response to comments database was created using Microsoft Access to track and organize all of the substantive comments on the Summit-at-Snoqualmie DEIS. Using a template specifically designed for the Summit-at-Snoqualmie DEIS, each commenter’s name and demographic information (e.g., address, city, state, and zip) were entered into the database. Reference numbers were allocated to letters/e-mails based on the order in which they were received. The reference number can be used to locate individual letters/e-mails in the public record and all public responses to the Summit-at-Snoqualmie Pass DEIS, which are part of the Administrative Record for the project. On each comment letter received by the Forest Service, the letter/e-mail was reviewed and all substantive comments were identified and coded using established comment codes¹. After each comment letter had been read and its substantive comments coded, the individual substantive comments in the letter were entered into the database as separate files under the commenter’s name. Once all the comments were entered into the database, they were distributed to the Responsible Official, IDT members and resource specialists for review, responses, and identification of any revisions needed to the FEIS. Responses were incorporated into the database so that each record consisted of the demographic information of the commenter, their comment(s), and the response(s) to their comment(s).

2.0 Comments and Responses

The purpose of this volume is to display all substantive comments received from individuals, agencies, governments, tribes and groups (the community) and responses to these comments by the USFS. Full letters are reproduced in this volume for comment letters received from government agencies and Indian Tribes per Forest Service Handbook (FSH) 24.1.1(b) (refer to Section 3.0 – Letters From Indian Tribes and Government Agencies).

This section displays the individual comments and their respective responses. The substantive comments and their corresponding responses are organized by comment code category. Multiple comments that have a corresponding response are presented showing the relevant comments with a single response. All substantive comments provided by the public and their corresponding responses are provided underneath the relevant comment code.

¹ Comment Codes are used to designate the subject of specific comments (e.g., watershed resources, recreation, socio-economics).

02.0 – NON-SUBSTANTIVE COMMENTS

Bill Preston

Washington State Department of Transportation

Comment:

WSDOT employee Joe St. Charles is misidentified as Joe St. Claire in Section 3.12 (Transportation) and Chapter 5 (References).

Response:

The FEIS has been corrected to identify the WSDOT employee as Joe St. Charles.

Catherine Weatbrook

Comment:

The Summit East Mountain Top Restaurant - on page 12 of 6_Snoqualmie DEIS Chapter_1.0 Purpose and Need.pdf - there statement is made that this facility would not include restrooms - certainly you mean that this facility would share restrooms like the Alpental Mountain Top Restaurant. If not, you should.

In page 13 of 6_Snoqualmie DEIS Chapter_1.0 Purpose and Need.pdf - certainly you don't really mean 2 10 gallon propane tanks. 20 gallon tanks perhaps? Or 100 gallon?

On page 19 of 6_Snoqualmie DEIS Chapter1.0 Purpose and Need.pdf - the first sentence under Scenic Tram Rides - should read currently does not provide.

Response:

The FEIS has been updated to clarify that the ski patrol facility at the Summit East mountain-top restaurant would not include restrooms, because the adjacent restaurant would include restrooms.

Two 10-gallon propane tanks would be utilized - one at the upper terminal of the International chairlift, and another at the bump shack near the upper terminal of the existing Armstrong Express chairlift.

You are correct, the first sentence under Scenic Tram Rides in Section 1.1.2.3 - Purpose and Need was in error, and has been updated to read: "The Summit at Snoqualmie currently does not provide a formal summer recreation program, particularly for elderly or physically challenged guests, or guests with small children."

Charlie Cornish

Comment:

Section 1.1.1 Background, Page 1.2

Inaccurate statement: Summit at Snoqualmie has not offered mountain biking or scenic chair rides for the past 5 summers.

Clarification needed on statement: "Summit at Snoqualmie facilities are available for business meetings, small conferences, wedding receptions, and other special occasions throughout the summer." Is there any supporting documentation on number of participants, number days, etc. rate of growth, future plans, and potential environmental impact?

DEIS mentions that "only winter tubing being directly supported by the Summit at Snoqualmie." This statement is incorrect. The Summit at Snoqualmie does run a snow shoeing program.

Incomplete statement regarding competition: Competition for Nordic skiing and snowshoeing for Summit at Snoqualmie includes Stevens Pass, White Pass, Sno-Parks, Methow Valley, Leavenworth, Lake Chelan.

Response:

The FEIS has been updated to specify that the Summit-at-Snoqualmie currently does not offer mountain biking or scenic chair rides during the summer, and has not done so since 2002.

Section 1.1.1 - Background summarizes the existing recreation activities and opportunities available at the Summit-at-Snoqualmie. The number of participants, number of days used, and rate of growth of meeting facilities are not analyzed in the FEIS.

The FEIS has been corrected to specify that snowshoeing and winter tubing are both directly supported by the Summit-at-Snoqualmie.

The FEIS has been updated to better clarify the Summit-at-Snoqualmie's local, regional and destination market competition.

Charlie Cornish

Comment:

Section 3.1.1.1 Global Warming

Many of the references cited in Section 3.1.1.1 are not listed in Chapter 5 References.

Response:

The FEIS has been updated to include references cited in all sections of the document.

Charlie Cornish

Comment:

The Summit, Page 1-10

"The demand for shuttle service at The Summit is expected to decrease as a result of the proposed lift and trail connections between Summit East, Summit Central, and Summit West. As a result, The Summit at Snoqualmie would offer more frequent and consistent service between Alpentel and The Summit, as needed".

This statement needs to be justified. I disagree with it. The plans do not include better and easier cross over trails between Central and West. Hence most beginner and intermediate skiers cannot circulate between West and Central.

Response:

The statement has been updated to read: "The demand for shuttle service at The Summit is expected to decrease as a result of the proposed lift and trail connections between Summit East and Summit Central. As a result, the Summit-at-Snoqualmie would offer more frequent and consistent service between Alpental and The Summit, as needed."

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The discussions and tables referring to habitat and vegetation are very confusing as Mill Creek acreages are included in some and not in other cells, but are not annotated. Many of the tables include rows that are actually subsets of other rows. Explanations of numbers that are subsets or are sums are rarely provided. All the resource analyses use a study area boundary that includes the Mountaineers' property, although the FS and Booth Creek have no control over it.

Response:

The FEIS has been updated to clarify when Mill Creek is included in calculations and tables. The FEIS has also been updated to better clarify when table rows are subsets of other rows. For example, in Table 4.6.3-1C, the rows titled "Western hemlock, mature; Western hemlock, immature; Mountain hemlock, mature; Pacific silver fir, mature; Pacific silver fir, and immature and sapling" are all subsets of "Forested Habitat (acres)." As described in Section 3.0.2 – Analysis Area, the Study Area includes public (Forest Service) lands as well as private land owned by Ski Lifts, Inc. and other land holders in order to analyze the impacts to various resource areas from the Proposed Action and the alternatives.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The documents refer to both 52 and 53 acre additions to the SUP. Which is correct?

Response:

53 acres is the correct number. The difference comes from a rounding error when the building addition to the permit area came about at Grand Junction. For the FEIS, we will search out the inconsistent 52 and make the change.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The maps of all the alternatives show three buildings at Alpental, not only in the riparian reserve but right on the S Fk Snoqualmie River. These are bathrooms, ticket booth and ski schools (labeled J,K and L). Presumably, these are existing building, and presumably they are not in the river. Where, exactly are they?

Response:

The facility would be a new facility that would be located across the existing road adjacent to the existing bottom terminal of the *Armstrong Express* chairlift. The map shows 3 letters, but it would be one building. The letters on the map show the facilities that would be located there. It would not be located in the river.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Also, in section 2.3.5 (page 2-56), the description of Alternative 4 refers to "..construction and use of the proposed cross-over trails between Summit East and Summit Central, described below." But, section 2.3.5.2 states there will be no new construction of trails. Am I missing something here?

Response:

This is a copy and paste error from another alternative. With Alternative 4, there is no new development in Section 16. This mistake will be corrected in the Final EIS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The description of Alternative 2 (DEIS 2-22) says 22 lifts at the Summit (18 chairs, 4 surface) and 7 at Alpentel (5 chairs, 1 gondola, 1 magic carpet) for a total of 29 lifts. That appears to match the table on page 2-27, if the "magic carpets are included in the "surface lifts" number (which was not separated in the text for the Summit as it was for Alpentel). However, it does not match with Table S-1 in the summary (page S-8). That appears to show 31 total lifts (as there is no indication the magic carpets are included in the surface lifts number) - but at the Summit it says 3 "magic carpets" and 3 surface. Is that supposed to be 2 magic carpets and 4 surface? But if magic carpets are included in surface lifts, why is there a zero under surface lifts at Alpentel. Table S-1 also appears to include the gondola in the count of "chair lifts", despite the clear differences between a gondola and a chair lift. Since, the other proposals are based on this one, the same questions apply.

I'd appreciate an accurate, consistent and footnoted version of table S-1.

Response:

Table S-1 and Table 1.1.2-1 in the DEIS are in error in that they show an additional surface lift and an additional magic carpet under the Action Alternatives, resulting in a total of 31 lifts shown when the total should be 29 lifts. Similarly, Table 4.11-1 in the Recreation Section shows this same error, along with a typographical error – no listing of the number of Chairlifts at The Summit. No analysis in the DEIS relies on a detailed discussion of the number of surface lifts and magic carpets. Table S-2 and the information in Chapter 2 are correct in the total number of lifts provided for in the Alternatives. The FEIS will acknowledge these errors and correct them.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Speaking of colors on maps, the yellow of night skiing in the legend does not match that on the maps- it took me several looks to finally understand what areas were indicated.

Response:

There is a slight difference. After working with it so closely over the years, we didn't pick up the difference. It has been changed in the FEIS figures.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There is an error in description of section 10: "The Snoqualmie Pass Advisory Council plan foresees considerable development in this area, especially in section 10 where a golf course, residential development and community facilities are envisioned." (Wildlife Report, Appendix D, p20) This is a NF section with management designation of AMA/ST-1 (i.e, protect forest habitat, no development).

Response:

The statement regarding planned development in Section 10 was in error. The area in question is Section 15. This discussion in the Wildlife Resources Report (Appendix D) in the FEIS has been corrected.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There are numerous errors in the documents, as well as vague and unsubstantiated statements. As a result, we submitted five sets of questions to Larry Donovan via email in January. We include those messages by reference. To date we have received response to four. The portion of the SUP on Mt. Catherine (section 21 is not even included in the resource assessments and information about it is lacking on most maps. Did acreage figures for resources, impacts and uses include this parcel. If not the DEIS has failed to evaluate a part of the MDP that presumably affects all of the SUP. Not only is this very confusing and time consuming for the reviewer, it calls into question the validity of the analysis.

Response:

The portion of the SUP in Section 21 has no proposed action and has subsequently been omitted from the analysis.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

What is the intent for the island of SUP in SW quarter of section 21? If there is no proposal, why is it still in the SUP?

Response:

It never came up as a point of discussion. There are no plans to develop in it. The point never came up.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Improvements in the DEIS should include:

- Correct property ownerships, including section 3, 15,27 (NF land)
- Correct zoning and land allocations on maps
- Show SUP boundary clearly and accurately
- Show Alpine Lakes Wilderness boundary prominently on all maps
- Show all trails clearly and how they relate to the MDP proposal, including bike routes
- Show cross country skiing opportunities, both groomed and ungroomed
- Show wildlife corridors not just noting I-90 crossing points. Add one through Mountaineers forest.
- Correct errors and inconsistencies in text and tables.
- Clearly show the impacts to late-successional forest, and the proposed offset of Mill Creek by alternative (e.g., Alternative #1 should not show Mill Creek habitat as it is not part of the proposed MDP, as in Alternatives #2, #4). Clearly annotate the tables to clearly indicate when Mill Creek is included in a figure, and clearly show what cells are additive and which are not.
- Evaluate cumulative effects of proposed developments on private lands in Snoqualmie Pass area.
- Evaluate new alternative: #4 modified (see below)

Response:

The maps contained in the FEIS have been updated to include the wilderness boundary where applicable. Land Allocation and ownership have been verified using most recent USFS and County GIS data. As a result of discrepancies between USFS and County data sources, the FEIS has been updated to include a new map showing private land zoning according to King and Kittitas County data (see Figure 1.1.1-FEIS-3, Existing Private Land Ownership and Zoning) and a new figure for NFSL allocation has been included in the FEIS (see Figure 1.1.1-FEIS-2, Existing NFSL Allocation). Both groomed and non-groomed cross-country routes are shown on Figure 2.3.2-5, Nordic Trail Network. Bike routes are out of the scope of this EIS. The FEIS has been updated to include a figure showing impacts to mature and immature forest (see Figure 4.5.1-FEIS-3, Impacts to Vegetation Cover by Age Class – Alternative 2 – The Summit). Each resource area in the DEIS and FEIS includes an analysis of cumulative effects on both public and private land (e.g., Section 4.3.8 - Cumulative Effects).

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Study Area (Figure 3.0-1) did not include all of the SUP- leaving out the 150 acres of NF land in Mill Creek, Section 21.

Response:

The SUP Area in Section 21 was omitted from the Study Area due to no action being proposed there.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The text, tables and maps have numerous errors, inconsistencies and omissions, some of which we have pointed out to Forest Service staff in email messages. In fact, the maps did not even accurately show the current national forest ownership. Furthermore, the maps do not even label the Alpine Lakes Wilderness, although it is adjacent to the both SUP and ski operator ownership. Not only is this very confusing for the reviewer, it is misleading, and calls into question the validity of the analysis and thus the proposed decision. Just correcting errors in the FEIS is not sufficient. Additional information and analysis is necessary. A supplemental DEIS should be prepared.

Response:

USFS ownership is displayed using the most current GIS data available. The wilderness boundary has been added to all figures in FEIS where applicable.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Some data are inconsistent in different parts of the document. While the maps display considerable information, they have deficiencies, such as not showing the wilderness boundary and erroneous land ownership data. The map (Figure 1.1.1-2) erroneously labels several parcels as private lands: NF land in section 15, 16, 18, 27, and 33, plus state park and DOT lands in section 15, 13 and others. We question the Booth Creek ownership east of I-90 in section 9, and not showing all of it in sections 5 and 28. It also has errors in Kittitas zoning in sections 9 and 15. (see Kittitas zoning map May 30, 2005). The map shows no riparian reserves within the SUP in sections 21 and 22, although Figure 3.3.1-1 shows streams and wetland in that portion of section 21. The same errors occur on Figure 1.1.2-3.

Response:

The maps contained in the FEIS have been updated to include the wilderness boundary where applicable. Land Allocation and ownership have been verified using most recent USFS and County GIS data. As a result of discrepancies between USFS and County data sources, the FEIS has been updated to include a new map showing Private land Zoning according to King and Kittitas County data (see Figure 1.1.1-FEIS-3, Existing Private Land Ownership and Zoning) and a new figure for NFSL allocation has been included in the FEIS (see Figure 1.1.1-FEIS-2, Existing NFSL Allocation). The SUP in Section 21 has no proposed action and has been left out of the Study Area as a result. No Riparian Reserves have been created. The SUP in Section 22 has no mapped streams or wetlands and therefore has no Riparian Reserves.

Gary Westerlund

Comment:

There is a discrepancy in the description of Alternative 3. The Forest Plan Amendment #27 on page S-10 and page 2-52 would allow the proposed crossover trails. Figure 2.3.4-1 does not show the upper crossover trail being realigned.

Response:

The FEIS has been updated to clarify that Alternative 3 includes only the Summit East-Summit Central crossover trail.

Gary Westerlund

Comment:

Figure 2.3.2-5 shows the route of the Nordic Pass Trail and the ski area's nordic trail network. The map does not identify the Common Corridor which is the part of the ski area's trail network that backcountry skiers can ski without purchasing a trail pass. As part of the decision permitting the existing crossover trails the Common Corridor was established. Figure 2.3.2-5 should be revised to show the Common Corridor. The Common Corridor includes the part of the Cold Creek Road marked in yellow in Figure 2.3.2-5 and the section of the Hidden Valley Trail that goes from the Cold Creek Road up the hill to where the grade levels out.

Response:

Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to show both the Common Corridor and the Nordic Pass Routes.

Guy Spencer

Comment:

I am concerned that the Alternative 2 description of Guest Services consolidation at Summit Central apparently contradicts the master plan map. The map shows the continuity of many of the small ski schools, or at least their existing buildings, at Summit Central. The Support Facilities narrative at

section 2.3.3.5 however, states that all guest services at Summit Central will be consolidated in a new 60,000 square foot base lodge, and Table 2.3.3-6 does not list the existing ski school buildings as part of Guest Services, although they are listed in Alternative 1. Compounding this ambiguity is the introductory guest services narrative statement that the guest services would be "designed and sited to relieve base area congestion and spread guests throughout the resort." If in fact all guest services are consolidated in the new base lodge, this would create a significant increase in base area congestion compared to the current situation, where a number of small ski schools are spread across the base of Summit Central, from near the current base lodge to near the Silver Fir lodge.

Response:

The FEIS has been updated to specify that the guest services that are currently provided in the Central Base Lodge and the rental shop/learning center will be combined and consolidated into the new Summit Central Base Lodge under Alternative 2. The guest services consolidated into the new Summit Central Base Lodge, along with the improvements at the Silver Fir Base Lodge, Alpenhaus Lodge, Slide-In Lodge, Thunderbird Lodge, and the mountain-top restaurant at Summit East, would relieve base area congestion by dispersing skiers throughout the Summit-at-Snoqualmie resort.

James Chapman

Comment:

The only map even showing a wilderness boundary is Figure 1.1.1-2 and the boundary there is very lightly drawn, implying that it is no more important than another land allocation boundary. The DEIS should have clearly marked and clearly identified wilderness boundaries on all maps, so the reader could quickly see how close the restaurant would be to the wilderness.

Response:

The maps contained in the FEIS have been updated to include the wilderness boundary where applicable.

James Chapman

Comment:

(NOTE: Figure 1.1.1-2 mistakenly omitted one parcel in the southeast corner of Section 28, King County property tax records identify it as Parcel #2823119017.)

Response:

Land allocation and ownership have been verified using most recent USFS and County GIS data. As a result of discrepancies between USFS and County data sources, the FEIS has been updated to include a new map showing private land zoning according to King and Kittitas County data (see Figure 1.1.1-FEIS-3, Existing Private Land Ownership and Zoning) and a new figure for NFSL allocation has been included in the FEIS (see Figure 1.1.1-FEIS-2, Existing NFSL Allocation).

James ChapmanComment:

However, I could not see any difference in the yellow-colored areas denoting The Summit's nighttime terrain between Figures 2.3.2-3 (Alt. 1) and 2.3.3-3 (Alt. 2). There is some difference in the Alpentel maps. Please explain.

Response:

The FEIS has been updated to indicate that additional night lighting would include the Silver Fir, Easy Street, and Mill Creek pods under Alternative 2 (see Figure 2.3.3-3, Alternative 2 Proposed Night Skiing – The Summit).

James ChapmanComment:

There are several discrepancies between Tables S-1 and S-2 as to the total number of lifts (chair, surface & magic carpet) that would exist under each alternative. Both tables agree there are now 25 lifts under Alternative 1. However, Table S-1 shows 29 total lifts under Alternatives 3 & 4 while Table S-2 shows only 27 lifts. For Alternatives 2 & 5, the respective numbers are 29 and 31. (By the way, defining each type of lift in the glossary would be very helpful.)

Response:

Table S-1 in the DEIS is in error in that it shows an additional surface lift and an additional magic carpet under each of the Action Alternatives. Alternatives 3 and 4 include a total of 27 lifts (chair, surface and magic carpet), and Alternatives 2 and 5 include a total of 29 lifts. No analysis in the EIS relies on a detailed discussion of the number of surface lifts and magic carpets. Tables that were in error in the DEIS have been updated and corrected in the FEIS, and lift terms have been added to Chapter 6 - Glossary.

03.0 – OUT-OF-SCOPE COMMENTS**Harry Romberg**Comment:

There is no demographic analysis that would support a conclusion that the Hyak Creek forest corridor is not important to these species. Consequently, I urge the Forest Service to conduct just such a study. Over the ten years of this plan, information on existing and historical wildlife use, demographics of affected species, and habitat conditions and climatic trends in the vicinity would provide necessary information for the Forest Service to make an informed decision for the next planning cycle. Such a study should also evaluate the effectiveness of proposed conservation and mitigation measures in the ski area and surrounding lands (e.g., I-90 wildlife bridges), as well as impacts of increased development both in the ski area and surrounding lands.

Response:

The range of alternatives described in the DEIS and FEIS include alternatives that evaluate reduced or no development within the Hyak Creek corridor (i.e., Alternatives 3 and 4) in order to address issues associated with wildlife, habitat connectivity, as well as habitat quantity and quality. Long-term wildlife demographic analysis is outside the scope of this decision.

Toby Paterson

Comment:

Throughout the DEIS there is no comparison to other resorts in the immediate area, such as: Crystal Mountain, Mount Baker, White Pass, Stevens Pass, and further there are no comparisons to the other areas the resort operates.

Response:

NEPA does not require a comparison to other areas providing similar services to the Proposed Action, only the cumulative effects of past, present and reasonably foreseeable projects in the immediate vicinity. However, Section 1.1.1 - Background states that the Summit at Snoqualmie's local, regional and destination market competition consists primarily of Crystal Mountain, Stevens Pass, White Pass, Mission Ridge, Mt. Baker, Whistler/Blackcomb Resort, the Mount Hood ski facilities, and Mount Bachelor.

Aaron Van Lieu

Abigail Watson

Adam Wallas

Adam Wundrow

Adrienne Carmin

Ajay Ramachandran

Alexandra Jaimes

Alexandra Loeb

Alicia Kimbrel

Andrea Frangi

Andrea Khalsa

Andreas Niesen

Annalee Cobbett, JD

Anne Fox

Anne Hankins

Annette Ramos

Arran E. Thomson

Barbara Marino

Ben Kunz

Beth Vining

Betti Johnson

Bill Lober, M.D.

Bonnie Miller

Brendan Kavcard

Brendan Williams

Brett Kuchenreuther

Brian W. Sullivan

Bruce Turcott

Bryan Wyberg

Cathy Wickwire

Charles Hohing

Charles Klyn

Charles Zwick

Chris Currie

Chris Duval

Chris Gulick

Chris Hehman

Christa Carpentiere

Christie Fix

Christina Billingsley

Claudia Richey

Colby Chester

Connie Boitano

Corina Logan

Corrie Watterson

Courtney Susemihl

Dale Speicher

Daniel Gonsor

Darla Weiss

Darren Kavanagh

Dave Meyer

David H. Jones

David K. Kerlick

David Lien

David M. Westphal

David Williams

Davina L. Greive

Dean Enell

Deborah Nicely

DeeAnn Grimes

Demis Foster

Desi Caillier

Devon Musgrave

Devon Westerholm

Dinda Evans

Don Gill

Donna Patz

Donna Snow

Doug Goodall

Douglas S. Roth

Edward O. Lawler

Edward Robins

Effie Silvis

Elaine Erickson

Eldon Ball

Emily Johnson

Eric Hirst

Erik Hagstrom

Erin McKenna

Evelyn Jarosz

Gary Wallenwein

Geoff Cole

Geoffrey T. Dairiki

George W. Stone

Gordon Wood

Greg Arnold

Heather Grube

Helga Byhre

Holly Weiler

J.S. Bracher

Jack Waytz

James C. Scarborough

James Kevin O'Halloran

Janice Bernstein

Janine de Saint Giles

Jean Power

Jeanne Kinnard

Jennie Chester

Jennifer Macone

Jerlene Walberg

Jerry Liebermann

Jessica McNamara

Jessica Paige

Jessica Silva

Jim Trainer

Joanna Muench

Joanne Chapa

Joanne Polayes

Jody Stanislav

Joe Ross

Joe Sambataro

Joe Talbert

John E. Sirutis

John Gilbert

John Sutyei

Jon Jaffe

Josh Schlossberg

Joyce White

Judy Stickney

Julia N. Allen

June D. Aries

Karen Gemeinhart

Karen Johnson

Karl Huber

Kathleen Beahn

Kathleen Pierce

Kathy Jorgensen

Keith Fredrikson

Keith Reher

Keith W. Cowan

Kellee Timpson

Kenneth John Gilmour

Kenneth M. Mondal, M.D.

Kerri Haught

Kevin Farrell

Kevin Head

Kevin Spath

Kirk Francis

Kirsten Hauge

Kristen McIvor

Kristin Huff

Kristin Marshall

Kurt Wieland

Lace Thornberg

Laura Schiltz

Lauren Kramer

Lee Fellenberg

Linda Bergen

Linda Cooper

Linda Fendell

Lise Grace

Louis Poncz

Louis Richard

Louise D. Suhr

Louise D. Suhr

Luke Painter

Lyle Anderson

Marcus Engley

Margaret Brownell

Marjorie Ann Leone

Mark D. Blitzer

Mark Salamon

Mark Thompson

Martha Sands

Martha Taylor

Martina Jambrichova

Mary Alice Belov

Mary Bertrand

Michael Bernstein

Michael Lippman

Michael O'Brien

Michelle Wellington

Mike DiPietro

Mike Keary

Mike Mahanay
Washington Alpine Club

Mike Mahanay

Mike O'Shea

Mike Williams

Mindy Uber

Mr. and Mrs. Stephen Kingsford-Smith

Nancy Lill

Nathan Riensche

Nathan Shoemaker

Nelda Swiggett

Pam Engler

Pat Collier

Patricia Duke

Patricia Robert

Patricia Vadasy

Peggy Printz

Peter Rimbos

Phillip Joyner

Phrin Prickett

Rainer Kirschner

Ramona Gault

Randy Tashjian

Raymond Gill

rbramall

Rena Peterson

Rene Senos

Richard Bergner

Richard Gwozdz

Richard Rafoth

Richard Smith

Robert B. Scott

Robert Bradley

Robert E. Fuller

Ron Rundus

Ronald Ramey

Ruth A. Weber

Ruth Hanscom

Ryan Watkins

Sally Allwardt

Samara Pelley

Sandra Hazzard

Sanjeev Mehrotra

Sara Hayes

Sarah Harling

Sarah Honour

Sharon Swift

Sheri Toomey

Simon Kahan

Sonia Thompson

Stacey Glenewinkel

Stefanie Johnson

Stephanie Neely

Stephen de Blois

Stephen Rosenman

Steven Short

Sue and Jack Forker-Lee

Summerlin Larsen

Susan Marett

Susan Morgan

Suzanne Geiger

Suzanne Steel

Sydney Funsinn

Tamara Neuffer

Taylor Sekizaki

Terese Machmiller

Terradan Sagewynd

Terry Almasi

Terry Forslund

Tim Gartland

Tim Gould

Tim Kadrmas

Timothy Coleman

Tracey Williams

Tracie Hornung

Travis M. Scott

Trina

Troy Mason

Valerie Tarico

Vincent Lalonde

Vivan Gross

W.A. Bill Beck

Warren Northrop

Warren Williamson

Whitney Bosel

William Hickey

William N. Howald

Yvonne Watkins

Comment:

The developments at Alpental need to be mitigated by a donation of land at Cave Ridge, to ensure that this wild portion of the valley will be protected in the future.

Barbara Warren

Comment:

If the gondola on Denny Mr, which I'm not in favor of, is going to be constructed, I would also support a mitigation of a donation of the 140 acres near Guye Peak to protect the Alpine Lakes Wilderness area.

Brendan Williams

DeeAnn Grimes

Comment:

An additional mitigation measure includes a donation of about 140 acres of land near Guye Peak to offset impacts of development at Alpental.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Additional habitat protection should be required, such as donation of company lands on Cave Ridge.

Danny Miller

Comment:

I would also like to add that I agree with the Sierra Club's proposal to donate the land on Cave Ridge to the Alpine Lakes Wilderness. This would be a wonderful gesture, and much appreciated.

Don Marsh

Comment:

Any chosen alternative should include the land donations of both Mill Creek and Cave Ridge to offset the impacts of existing developments, proposed actions, and future growth.

Donald Parks

Alpine Lakes Protection Society

Comment:

Additional habitat protection should be required, such as donation of company lands on Cave Ridge to the Alpine Lakes Wilderness.

Eng Ron
The Mountaineers

Comment:

We strongly recommend that the final plan include the donation of the parcel the ski area owns on Cave Ridge to the Forest Service, some of which could even be added to the Alpine Lakes Wilderness. It is our understanding that this parcel has little commercial value and it should be considered as mitigation for other impact of the existing Alpental area and the expansion.

Gloria Baldi
Kittitas Audubon

Comment:

Encourage the donation of land at Cave Ridge in order to keep that end of the valley and its wildlife protected.

Harry Romberg

Comment:

The final plan should include the donation of the parcel the ski area owns on Cave Ridge to the Forest Service, some of which could even be added to the Alpine Lakes Wilderness.

Janet Bird

Comment:

Mitigation that makes more sense is a donation of about 140 acres of land near Guye Peak to offset the impact of ski development at Alpental.

Jen Watkins
Conservation Northwest

Comment:

It is important to note that there has never been adequate mitigation for original impacts of the four ski areas. An additional land donation should be considered at Cave Ridge (140 acres) with part of that being donated as an addition to the Alpine Lakes Wilderness. In addition, lands along Coal Creek (section 9, 15) should be donated to offset the impacts of the ski areas.

Joanna Bould
The Wilderness Society

Comment:

In addition to the mitigation measures in Alternative #5, we support the mitigation measures requested by Charlie Raines of The Sierra Club, including a donation of approximately 140 acres of land adjacent to the Alpine Lakes Wilderness.

Kathleen Beahn

Comment:

An additional mitigation measure includes a donation of about 140 acres of land near Guye Peak to offset impacts of development at Alpental.

Mark Lawler
Sierra Club

Comment:

We support additional mitigation through the ski area's purchase of 140 acres or more ancient forests and roadless land near Guye Peak and possibly elsewhere in the vicinity. With such mitigation, perhaps a few acres of removal of ancient forests for ski area development could be justified.

Nancy Keith
Mountains to Sound Greenway

Comment:

Considering the current and future impacts of development at Alpental, we believe that mitigation in that drainage and adjacent to the Alpine Lakes Wilderness is needed. Booth Creek Ski Holdings owns land just west of Guye Peak that is not appropriate for winter recreational use. While this land does not replace other MDP impacts, we believe donation of this land to the Forest Service for inclusion in the Alpine Lakes Wilderness is appropriate.

Patrick Spencer

Comment:

In terms of mitigation, I do think that the 140 acre Cave Ridge area and the 390 acre Mill Creek areas should be transferred to the Forest Service, regardless of Section 16 development.

Thea Levkovitz

Comment:

Any chosen alternative should include the donation of land at Mill Creek (390 acres) and Cave Ridge (140 acres) to offset the future impacts of AMA designation changes, increase in human activity, expansion of the Special Use Permit, and other actions.

William Vogel

Washington Chapter of the Wildlife Society

Comment:

We would also encourage donation of additional parcels, such as at Cave Ridge, section 5 and section 9, to compensate dependent species for the loss of habitat due to expansion of ski area facilities.

Group Response:

The FEIS has been updated to include new cumulative effects projects. One such project, the Cave Ridge Land Donation, as described in the FEIS cumulative effects sections, involves the Summit-at-Snoqualmie donating approximately 138 acres of property just west of Guye Peak, including Cave Ridge, to the Forest Service. Up to 100 acres of this donation could be added to the Alpine Lakes Wilderness, and the remainder would be managed to remain in its current unroaded condition.

Additionally, 390 acres of private land in the Mill Creek watershed would be donated for inclusion in the MBSNF, as described under Alternatives 2 and 5 in the FEIS.

Charlie Raines

Sierra Club - Cascade Chapter

Donald Parks

Alpine Lakes Protection Society

Comment:

The DEIS also fails to adequately consider the cumulative effects of multiple ski areas in the central Cascades.

Mark Lawler

Sierra Club

Comment:

We urge the Forest Service to conduct a cumulative impacts analysis of all ski area development in the Washington Cascades, and possibly including the Oregon Cascades.

Toby Paterson

Comment:

In summary there is no regional impact analysis, as an economic regional industry analysis would require.

Group Response:

USDA Forest Service correspondence dated December 3, 2001, File Code 1950/2700, states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". As summarized in the memo: "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand.....Finally, the cumulative impacts of ski area expansion cannot be appropriately addressed through a Programmatic Environmental Impact Statement (PEIS). The appropriate scale for cumulative effects analysis is dependent on the type of effects of concern associated with the proposed actions rather than the similarity of the actions and is best addressed when a specific proposal is made." The complete correspondence is available in the project record.

05.0 – GENERAL COMMENTS

Betty Ngan

Comment:

Separate areas should be created at Summit Central and Summit West for snowboarders. Mixing beginning snowboarders and skiers is dangerous for all. On my second day of beginning ski lessons, I was almost nailed by an out of control snowboarder on Summit West.

Response:

The MDP does not address separation of snowboarders and skiers (see Footnote 4 - DEIS Page 1-2, and FEIS Footnote 5).

Catherine Weatbrook

Comment:

I strongly suggest each base area have a magic carpet. Because transportation and parking are so bad, and these plans do nothing to solve that, and because crossovers aren't always reliable, a parent won't leave their child at one area to go ski at another area - I certainly didn't and East is one of my favorite areas to ski. Each area should provide a full set of options from beginner on up. Summit East needs a Magic Carpet and must have ticket sales.

Response:

The current layout and facilities provided at The Summit reflect the time when the ski areas operated independently of each other (i.e., Snoqualmie Summit, Ski Acres and Hyak). The Purpose and Need (see Section 1.1.2.3 – Purpose and Need) does not address providing a full set of options from

beginner on up at each of these ski areas. Rather, the Purpose and Need specifically addresses consolidation of the ski areas by providing better circulation between Summit West, Summit Central and Summit East. The range of alternatives presented in the EIS includes additional lifts and trails that are intended to reduce reliance on crossover trails between Summit Central and Summit East. In addition, the range of alternatives includes revised crossover trails that are intended to improve circulation between Summit Central and Summit East. As a result, no magic carpet or additional ticket sales at Summit East are proposed in the alternatives.

Charlie Cornish

Comment:

Long-term trends (past~80 years) show decreasing snow packs for Snoqualmie Pass area. Please research and include this data with graph in the DEIS.

Response:

The FEIS has been updated to acknowledge that snowpack in the Cascades has been declining since 1945 (see Section 3.1.1.1 - Global Warming). Section 3.1 - Climate and Snow has been updated to include additional discussion of snowpack in the Snoqualmie Pass area.

Charlie Cornish

Comment:

The MDP was prepared by Sno-Engineering in 1998. It subsequently had minor updates by Ski Lifts Planning developer, who has since left the company. Various assumptions and proposed actions are out of date.

Response:

As described in Section 2.1 - Process Used to Develop Alternatives, Ski Lifts, Inc. submitted the MDP to the Forest Service for acceptance in 1998. The Forest Service accepted the proposal and scoped it as the Proposed Action, recieved public and IDT comments, and developed four alternatives to the Proposed Action. In 2001, the proposal was re-evaluated in light of the scoping comments and the alternatives to the MDP that had been developed. Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP provides a description of the modifications to the Proposed Action.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The DEIS failed to assess a full range of reasonable alternatives. There was no consideration of significant improvements in wildlife habitat and connectivity, only how much further diminishment would be allowed. Again, other recreational uses are assumed static under all alternatives. When

allocating national forest lands to commercial uses, the Forest Service should require appropriate provisions for these other recreational uses, and consider alternatives in the EIS. We have suggested a modified version of Alternative #5 that would add to the range of alternatives and address these deficiencies. While the Forest Service has a relationship with the resort, it is not obligated to assure any particular profit margin. On the contrary, the Forest Service has a duty to deny any facilities or operations that irreparably harm other important public resources.

Response:

A range of alternatives were considered, and the most feasible alternatives (that met the Purpose and Need) were chosen for further analysis. Within all Action Alternatives, a variety of options were considered but rejected because either they were not feasible, did not meet the Purpose and Need, or both (see Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP). The DEIS follows the format established by the Council on Environmental Quality regulations for implementing NEPA (40 CFR Parts 1500-1508).

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose for the MDP is to ensure the long-term economic viability of The Summit-at-Snoqualmie and to maintain and/or enhance environmental resources and provide the public quality recreation alternatives. Notice the purpose of the MDP is not to provide "significant" improvements in wildlife habitat or connectivity, rather to "maintain or enhance" the existing condition. Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities. As a private enterprise the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

Section 1.2.4 - Particularly Applicable Goals, Standards and Guidelines describes management guidelines on the MBSNF, including "alpine ski permittees will be encouraged to integrate winter dispersed recreation into their operations if and when the opportunity and demand exists." The FEIS has been updated to include Illustration 1.1.1-FEIS-1, which displays the percentage of revenue generated by various user groups, including Nordic skiers and winter tubing at The Summit-at-Snoqualmie. Section 1.1.1 - Background describes other recreational uses at the ski area.

Section 2343 of the Forest Service Manual recognizes that operations, such as ski areas, will be operated by private parties, and that private parties generally operate for a profit. This developed winter recreation experience is currently being provided by Ski Lifts, Inc. at The Summit-at-Snoqualmie under SUP from the USFS. The SUP enables the USFS to offer public recreational experiences at the ski area that otherwise would not be possible. In order to continue to provide this

experience, the future and economic viability of the ski area, as well as the safety of the public, is of concern to the USFS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Under alternatives #3 & #5, Booth Creek would purchase 440 acres in Mill Creek, donate 390 acres to the national forest and keep 50 acres around the end of the new chair lift (the company already owns 40 acres there). What restoration measures (e.g., road obliteration, increasing tree species and age diversity) are planned and who pays for them? This may offset some of the impacts of the development (e.g., wetlands), but most of Mill Creek section is cutover, and it does not provide a wildlife corridor past the ski areas. Additional land (~50 acres) in sections 9 and 15 just north of I-90 along Coal Creek would also work to maintain this wildlife corridor and should be added to the mitigation requirement. About 30 acres of private land just west of the pass (section 5) could also be acquired and protected.

In addition, the company should donate some of their lands: 140 acres on Cave Ridge to mitigate impacts at Alpentail; plus 40 acres at Beaver Lake to offset impacts at Summit North.

Response:

As described in Sections 4.6.4.1 and 4.6.6.1 – Wildlife Habitat and Associated Species, the donation of 390 acres of land in the Mill Creek drainage would offset the impacts to forested habitat under Alternatives 3 and 5. The donated land would become part of the SPAMA and would be managed for late-successional habitat and connectivity. The FEIS acknowledges that currently this area is predominantly immature and sapling Pacific silver fir, but that it would provide long-term replacement value for loss of mature forest habitat.

As described in the cumulative effects discussions in Chapter 4 of the FEIS, the Cave Ridge Land Donation project involves the donation of 130 acres on Guye Peak to the MBSNF.

Appendix F (The Summit at Snoqualmie MDP - Implementation, Operations, Restoration and Monitoring Plan) includes a description of the restoration projects included in the MDP.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Purpose and Need Statement fails to adequately address the needs of late-successional forests and wildlife associated with those and other upper elevation habitats. The P&N statement is almost exclusively about making the commercial recreation operation more profitable. While providing

alpine skiing opportunities on national forest land is appropriate, it should not be done when it creates a significant impact on other public resources and uses.

"The existing crossover trail leading from Summit East to Summit Central does not yield suitable slope gradients for snowboarders and novice skiers to traverse from East to Central." (P&N DEIS 1-20) It does not mention a need for new crossovers from the Central to East, so why is that part of the plan?

"..with enhanced skier connectivity between The Summit ski areas, the reliance on shuttle busses for access between the areas would be reduced, allowing more efficient use of shuttle busses between The Summit and Alpental." (P&N DEIS 1-17) With more than \$40 million of upgrades proposed, it seems that an additional shuttle or two could be assigned to the Hyak/Central connection. The reduced expense to the company is the only justification offered for not providing this service. The impacts of the crossover runs to public lands and natural resources should be given greater weight in this determination.

The purpose and need statement alludes to "..maintain and/or enhance environmental resources.." but then provides no further discussion of the needs of late-successional forests and wildlife species. (DEIS 1-15)

Response:

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose for the MDP is to ensure the long-term economic viability of The Summit-at-Snoqualmie and to maintain and/or enhance environmental resources and provide the public quality recreation alternatives. Notice the purpose of the MDP is not to provide "significant improvements" in wildlife habitat or connectivity, rather to "maintain or enhance" the existing condition. Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities. As a private enterprise the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

As referenced in Section 1.1.2.3 - Purpose and Need, the DEIS and FEIS acknowledge the need to maintain the viability of Summit East by addressing skier connectivity deficiencies between Summit East and Summit Central. As described in Section 1.1.2.3 – Purpose and Need, improved crossover trails from Summit Central to Summit East are needed because "skiers must pole along the low-gradient portions of the trails and snowboarders often have to remove their equipment in order to traverse between Summit Central and Summit East" creating relative inaccessibility to Summit East. All of the Action Alternatives address these deficiencies by providing for improved skier circulation to address crowding issues, improved crossover trails between Summit East and Summit Central,

providing better dispersal of skiers, providing better skier separation by ability level, and addressing the deficit of intermediate and advanced-intermediate terrain (see Section 2.3 - Alternatives Considered in Detail).

The improvement of the shuttle bus fleet is an operational issue, and outside the scope of the EIS process, which specifically addresses facility issues.

As described in Section 1.1.2.3 – Purpose and Need, there is a need and an opportunity to restore and/or maintain the Upper South Fork Snoqualmie River and Coal Creek watersheds, consistent with the direction in the Forest Plans of MBSNF and OWNF. The purpose or objective of the Proposed Action is to maintain and/or enhance environmental resources and providing the public quality recreational opportunities in a natural outdoor setting. Section 2.3.3.11 - Restoration outlines the restoration projects that would be implemented under Alternative 2, which are further described in Appendix F - The Summit-at-Snoqualmie MDP - Implementation, Operation, Restoration and Monitoring Plan.

The range of alternatives has been developed to address issues associated with wildlife and habitat connectivity. Specifically, Alternatives 3, 4 and Modified Alternative 5 include modifications to the Proposed Action in order to address wildlife issues. These modifications include no new development in Section 16, as well as the donation of 390 acres in Mill Creek to be managed as late-successional habitat.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Draft EIS was issued December 23, 2005 with a comment deadline of February 6, 2006. The Sierra Club, ALPS and Conservation NW requested a 30 day extension by email on January 10, 2006. Subsequently, the comment deadline was extended 15 days, until February 21st. With a decision of this importance and complexity, such a short comment period makes it very difficult for the public and other reviewers to fully understand the proposal and its consequences.

Response:

Under NEPA, a minimum of 45 days are required for the comment period on a DEIS (FSH 1909.15.23.2). The Summit-at-Snoqualmie MDP Proposal DEIS was released to the public on December 23, 2005, with a comment period of 45 days, which was extended on January 27, 2006 by 15 days to February 21, 2006, for a total of 60 days.

Cliff Chatel

Comment:

Require an evaluation of the potential impact of and increase pressures on Sno-Parks in the Snoqualmie Pass/I-90 corridor for Nordic skiing and snowshoeing, should Ski Lifts, Inc. fail to

restore a quality level of service, maintain existing trail system and facilities, and make any enhancements and improvements to retain Nordic skiing and snowshoeing customers.

Response:

The Forest Service is not required to assess regional impacts of the Proposed Action. USDA Forest Service correspondence dated December 3, 2001, File Code 1950/2700, states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". As summarized in the memo: "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand... Finally, the cumulative impacts of ski area expansion cannot be appropriately addressed through a Programmatic Environmental Impact Statement (PEIS). The appropriate scale for cumulative effects analysis is dependent on the type of effects of concern associated with the proposed actions rather than the similarity of the actions and is best addressed when a specific proposal is made."

Dan Brewster
Ski Lifts, Inc.

Comment:

As the DEIS demonstrates, it IS possible to do all this and still maintain critical wildlife habitat, visual objectives, and ACS objectives. The guidelines for the Snoqualmie Pass Adaptive Management Area (SPAMA) are very clear on this subject. "Existing uses and facilities, such as recreation resorts, developed and dispersed recreation areas, and utility corridors, are considered to be consistent with the AMA objectives. In the CEAs, new developments will only be allowed if they are neutral or beneficial for late-successional forest, or if they can be mitigated. Recreation developments and expansion of existing developments will be located outside CEA's when possible." Clearly, locating outside of a CEA has not been a viable option for the Summit to meet its expansion and improvement needs. To do so, would require the development of completely separate facilities, which would be neither economically viable nor sound environmental practice, given the nature of Snoqualmie Pass development today. Therefore, the only choice available to The Summit has been to locate a substantial number its improvements and expansions within the existing CEA. As SPAMA spells out, these can and should be permitted when through mitigation or other means they are neutral or beneficial to late successional habitat. A great deal of work has been done in our proposal in order to meet this requirement. While we feel Alternative 2 could be demonstrated to meet this threshold over time, clearly Alternative 5, given the large mitigation involved, meets or surpasses this threshold.

Response:

As described in Section 1.1.2 – Purpose and Need for the Proposed Action, one purpose for the MDP proposal is to maintain and/or enhance environmental resources and provide the public quality recreational opportunities in a natural outdoor setting on NFSL, consistent with the Forest Plans for

the MBSNF and OWNF, other federal laws and regulations, other agency direction, The Summit-at-Snoqualmie SUP, and SPAMA.

The FEIS has been updated to include an analysis of the effects to late-successional habitat in Section 4.6.9 - AMA Standards and Guidelines. This analysis indicates that Alternatives 3 and 5 are "neutral" to LSH and are therefore consistent with AMA standards and guidelines.

Donald Parks
Alpine Lakes Protection Society

Comment:

Can the expansion of the Snoqualmie Pass skiing facilities be justified by demand? The data suggests that this assumption could be questionable. Maybe some other considerations are in play?

Response:

The FEIS has been updated to include an analysis of visitation relative to capacity (refer to Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2)

Eng Ron
The Mountaineers

Comment:

We submit that despite the statements in the "Purpose and Need" section of the DEIS that integration with Summit Central and Summit West is necessary for the viability of Summit East, the real problem is less about connectivity with the other areas than it is about the inability of Summit East to consistently provide a quality experience that users demand. Skiers already have connecting runs and the Draft EIS even states that a shuttle between Summit Central and East will be provided. So the stated need for the crossover runs is overstated. DEIS 4-432??

Response:

As described in Section 3.11.3 - Developed Winter Recreation, the existing Summit East-Summit Central crossover trail contains flat slopes that often require skiers to pole along the trail and snowboarders to remove their equipment and walk. Improved crossover trails are only one component of the proposed improvements at Summit East. By enhancing skier connectivity between Summit East and Summit Central, a wider spectrum of guests would be able to traverse between the resorts. Further, interconnectivity of base areas would help balance the utilization of the resort's terrain and facilities, improve operational efficiency, and would diversify the recreational experience. All the Action Alternatives contain various components to improve Summit East to address the Purpose and Need (see Section 1.1.2.3 – Purpose and Need) including new/realigned chairlifts, additional trails, a mountain-top restaurant, ski patrol stations, and guest services consolidation with Summit Central.

Greg Vansandt

Comment:

I feel that the environmental impact (viz. soil erosion, hydrographic, air quality, wildlife and vegetation) differences described between Alternative #2 and Alternative #5 are nominal, and that the proposed Master Development Plan is responsible in finding a balance between the environmental/public concerns of the USFS and the recreational/economic needs of Ski Lift Inc.

Response:

As described in Section 1.1.2.3 - Purpose and Need, the objective of the Proposed Action is to maintain and/or enhance environmental resources and provide the public quality recreational opportunities in a natural outdoor setting on NFSL, consistent with the direction in the Forest Plans of the MBSNF and OWNF.

Ian Kanair

Environmental and Natural Resources Department Snoqualmie Tribe

Comment:

There needs to be full government-to-government consultation with the Tribe to comply with federal laws and Executive Orders on this proposed project. Until such an ongoing dialog is engendered, further action within the proposed project area or activities relating to the proposed project, including development and reclassification to recreational areas, is inappropriate and without consultation would be unlawful.

At this time, the ENR Department requests that consultation be established to create a dialog and to afford an opportunity for review and discussion of issues and alternatives relating to the proposed project. The ENR Department reserves the right to comment further on this proposed project.

Response:

The FEIS highlights the consideration given to Native Indian Tribes during the analysis. Specifically, Section 1.6.1 - Tribal Government Consultation discusses the efforts of the USFS to solicit issues from potentially interested American Indian Tribes and Indian groups. No comments were received from the tribes by the USFS in response to the Notice of Intent or the scoping document. Since the publication of the DEIS, the USFS has initiated government to government consultation and informal meetings with the Snoqualmie Tribe.

James Chapman

Comment:

Why not also revegetate and close off the lower portion of Trail 49?

Response:

This portion of the existing Trail 49 is retained to provide skier access to the *Mt. Hyak* chairlift for those skiers not wishing to ride *Rampart* or *Creek Run* (see Section 4.11.2 – Impacts – Alternative 2 [Proposed Action]).

Jen Watkins
Conservation Northwest

Comment:

Two of the proposed alternatives include a land donation of Mill Creek (390 acres) to mitigate for environmental concerns. This selected parcel is not in pristine current condition, but does have value in its wetlands and a small stand of mature forest. Mill Creek is important to future wildlife connectivity across the broader landscape, but does not solve the habitat connectivity problems created by disturbance in Section 16, and should not be considered mitigation for impacts in the Hyak Creek forest corridor. Donation of this parcel should be required in the approved MDP to offset the future impacts of the other concerns listed above, AMA designation changes, and increased human activity with increased capacity.

Response:

As described in Sections 4.6.4.1 and 4.6.6.1 – Wildlife Habitat and Associated Species, the donation of 390 acres of land in the Mill Creek drainage would offset the impacts to forested habitat under Alternatives 3 and 5. The donated land would become part of the SPAMA and would be managed for late-successional habitat and connectivity. The FEIS acknowledges that currently this area is predominantly immature and sapling Pacific silver fir. According to available GIS data, the donated parcel includes approximately 45 acres of existing mature forest and 345 acres of immature forest. As the immature forested habitat in the donated parcel matures, it would increase habitat connectivity between other mature forest habitat to the west and south of the Study Area.

Jerry Lutz

Comment:

However, we believe that the USFS should consider other alternatives that permit development of more, higher skiable terrain, particularly at Alpentel. The DEIS is short-sighted in its offhand dismissal of the possible effects of climate change on skiing at the Pass. It takes so long to get anything done in the Forest Service permitting process that this is the time for the Forest Service to do what it can to increase skiable terrain, and not just for experts, above 4,000 msl.

Response:

A range of alternatives were considered, and the most feasible options (that met the Purpose and Need) were chosen for further analysis. FEIS Appendix A - Section 1.1 Alternatives Considered and

Eliminated from Further Study has been updated to include a discussion on an alternative which would have included expanded high-elevation terrain at Alpental.

The FEIS does not assume that climate change will not occur within the lifetime of the SUP, but states that "any impacts to the climate at the Summit at Snoqualmie from global warming over the next 30-40 years are outside the scope of this EIS" (Section 4.1.3.1 - Climate).

Jerry Lutz

Comment:

Probably the easiest (and least ambitious) change for the existing plan would be to install a "mid-station" for onloading on the Internationale lift at the bottom of Upper Internationale. Both Alta and Blackcomb have installed lifts that turn in mid-route - Alta's new, replacement Germania chairlift, and Blackcomb's gondola. Certainly, if the chairlift were "bent" a little bit, there would be room for an onload-download point. The "download" would be an important added feature to give intermediates the ability download if they choose. The onload would be important so that skiers would have a second option in addition to Edelweiss chair for staying above the rain most days. As proposed, there are certainly days when the bottom of the proposed Internationale chair would be in the rain, when the Upper internationale basin was receiving snow, and if global warming occurs, that will be more frequent.

A second, alternative would be to reroute of the "Pulse Gondola" to create a mid-station at the bottom of upper Internationale. Such a lift would not provide significant additional intermediate terrain, but would permit skiers to ski Upper International and provide a second way for people to "ski on top" during warmer days (when it is raining on the lower mountain). If combined with the Internationale midstation, it could open a number of terrain choices in that part of the mountain.

A third option would be to add a short chairlift that begins "above the gullies" in the backcountry, but further north of the new Internationale Chair, which would also terminate at the "first knoll" in the back country.

A final proposal, and one we believe the USFS should consider, would be for the Pulse Gondola to be rerouted to terminate at the top of the next major knoll to the north of the currently planned terminus of the Internationale chair, known colloquially as "Piss Pass," in the Alpental Backcountry, rather than at the top of Edelweiss, with a midway load/unloading station at the bottom of upper Internationale. The Internationale chairlift would also include the midstation (and perhaps the "third option chair" as well). And we would recommend another chairlift from the bottom of the first pitch in "Stokes Proper" up to the next (more northerly) ridge. From the top of that chair, people could ski back down in Stokes basin (the top part of which has open, relatively modest terrain as well as steeper pitches).

Response:

The Proposed Action and range of alternatives do not include any lifts with angle/mid stations due to the high cost associated with these stations.

The FEIS has been updated to include a discussion of a chairlift from the low backcountry traverse to the Internationale bowl (see Appendix A Section 1.1 - Alternatives Considered but Eliminated from Further Study). A lift in this alignment is not included in the range of alternatives because the terrain served by this lift would be largely expert-only terrain (i.e., double diamond), and because it would require significant impacts to riparian forested habitat, including Riparian Reserves, which have been identified as a significant issue (see Section 1.5.2.2 - Riparian Reserves).

The slope gradients in the upper Alpental backcountry would prohibit the establishment of suitable terrain other than expert (i.e., black diamond or double diamond). As described in Section 1.1.2.3 - Purpose and Need, the primary purpose of the gondola would be to address summer recreation and access to the mountain-top restaurant for all users. In this capacity, the gondola would provide little round-trip skiing, particularly for skiers below the expert ability level.

Jerry Lutz

Comment:

Edelweiss road cuts

There are several ways the Edelweiss lift could become more usable by "advanced" skiers, and even upper intermediates on most days, with modest roads. First, if a cattrack/road cut were created as low as possible across the Rollen "cliff gut", it would allow less accomplished skiers several alternatives (down the chairlift line to the top of the next knoll and then right to the bottom of "Gunmount", Gunmount, and lower Rollen). Also, if a few trees were removed, it could be possible to skiers to traverse right from below the Rollen cliff gut face to just below the bottom of Edelweiss bowl, avoiding even lower Rollen. None of these locations are shown to be within the sensitive stream corridors or other critical areas mapped in the DEIS.

In addition, with the work envisioned for the Pulse Gondola and upper mountain restaurant, it should be possible to create a relatively flat road that would traverse below the current lift termination/ski patrol hut and across the top of Edelweiss Bowl to the flatter part of the bowl "skiers' right." That would permit grooming all the way to the top of Edelweiss. Combined with the cut road through the Rollin cliffs, it would significantly open up the terrain, particularly when the conditions are favorable.

Finally, although there apparently would be "stream" issues, it would be very helpful to build a third road that meanders from the "turn" at the bottom of the Edelweiss gully (which some people refer to as "Airplane Turn" to the bottom of Edelweiss. With this year's snow, the cats have been able to establish this road, but in most years it is a place of real challenge for those of lower ability, particularly on "firm" (icy) days. It would improve accessibility of the Edelweiss terrain dramatically

if the resort were not dependant on record average snowfall to create the meandering road to the bottom.

Response:

The Proposed Action does not include additional road cuts in these areas for several reasons. First, USFS policy is to minimize road mileage within sensitive watersheds. Table 3.3.2-2 shows that all of the drainages in the Alpentel area are below the 3 mile/square mile road density threshold. The establishment of new roads in these watersheds would increase the road density, and possibly exceed the threshold. Second, the terrain in this area of Alpentel contains large talus (see Figure 3.5.1-2, Existing Vegetation Cover - Alpentel), which would make road construction very difficult.

Table 2.4-1 (Lift and Trail Construction Techniques) details that the Pulse Gondola would be constructed off-site and pieces would be flown in by helicopter and assembled on-site. As a result, no road is necessary for construction of the Pulse Gondola. FEIS Table 2.4-1 has been updated to include construction techniques for other facilities including the Alpentel mountain-top restaurant, which would be constructed using helicopter or the pulse gondola for material transport and access.

Jetta Hurst

Comment:

They just need to open all areas more often. They rarely open Summit East and only open Summit West at night and weekends. I will admit that some of the improvements seem nice. But how can they need to expand when they rarely open the runs they have? They have a lot of land to make good use of now.

Response:

The FEIS has been updated to discuss the reasons for lift closure, including staffing deficits, mechanical problems, terrain or slope issues, and redundancy of lifts (see Section 1.1.2.3 - Purpose and Need). Refer to Section 1.1.2.3 - Purpose and Need for a discussion of the need for action and purpose of the Proposed Action. The operational schedules of the Summit at Snoqualmie are outside the scope of this analysis and are addressed in an Annual Operating Plan.

John Edwards

North Cascades Conservation Council

Comment:

However Alternative 5 does entail the loss of significant old growth forest in the Hyak area. We request that the proposed new ski runs and connector trails at Summit East be eliminated and that connector trails to existing runs be re-evaluated to minimize impact in this area.

Response:

As described in Chapter 2 - Alternatives, Alternatives 3 and 4 do not include the *Creek Run* chairlift, and Alternative 4 does not include changes to Trail 71 (crossover trail).

John Watson

Comment:

I am writing to object to the way the proposed expansion of the ski areas at Snoqualmie Pass are being handled.

1. The amount of time for public comment is far too short. Just 8 days is hardly time for people to find out about what is being proposed and then comment. A minimum of at least 30 days is surely required.
2. There was no mention in the newspaper article of an Environmental Impact Statement (EIS) having been prepared for this project. Given the scope of this project an EIS is surely mandated.
3. The area under discussion contains spotted owls. A species on the endangered species list. This by itself would mandate an EIS.
4. This same area also contains old growth forest. Yet another reason for an EIS. Once these trees are cut down, that is it. The old growth trees are gone forever and can never be replaced. This fact alone mitigates against cutting these trees simply to allow skiers and snow-boarders more space. If this cut is allowed what is next? Give way here and then there with no end in sight.

Response:

The Summit-at-Snoqualmie Master Development Plan was submitted to the Forest Service in August, 1998. It was determined that an Environmental Impact Statement was required for the proposal. Public scoping comments were received, and alternatives to the Proposed Action were developed by the Forest Service. The Draft Environmental Impact Statement was released to the public on December 23, 2005, with a comment period of 45 days. On January 27, 2006, the comment period was extended by 15 days to February 21, 2006.

Kathleen Johnson

Comment:

It is such a shame that the Thunderbird Lodge has sat unused for several years. I think it would make a great "brown bag" lunch area for skiers with or without hot beverages available for sale. I have many fond memories of eating lunch with my Dad at the top of Snoqualmie Pass in the Thunderbird Lodge and hope to be able to do so again.

Response:

As described in Chapter 2 - Alternatives, under all the Action Alternatives the Thunderbird Lodge would be renovated to include approximately 70 restaurant seats.

Marcy Tobin

Comment:

Building a gondola and restaurant in this wild place would negatively impact the character of the mountain and the ski experience. The terrain is too steep and the avalanche situation is too dangerous for such a plan anyway. There is barely enough room for people to buckle their boots after they get off the chair, let alone a gondola station and restaurant. The top of the mountain would no doubt need to be altered dramatically in order to accommodate this expansion. I feel this would greatly diminish the ski experience at Alpental. I have to ask why is this improvement needed?

Response:

FEIS Alternative 3 does not include construction of the gondola and mountain-top restaurant at Alpental.

Mark A. Shillcutt

Comment:

My position and contention is that Booth Creek Ski Holdings Inc./SE Group is not interested in preserving the environment at Snoqualmie Pass, and has in fact not only a track record of environmentally irresponsible behavior, but also a history of violating the conditions section I F., of their Special Use Permit with the public, administered by the USFS. Land stewards have an obligation to preserve the land, as well as public access to the land and waters, and to take conservation efforts seriously. In the case of this most recent corporate endeavor, it would appear that you, our land managers, are managing a team of corporate players whose only goal is to increase Comfortable Carrying Capacity, in order to increase revenue, and perhaps to eventually acquire public land, with blatant disregard for the environment. It is noteworthy that the SUP fee the USFS enjoys at this area is based directly on the CCC. As this is clearly a case of SE Group grading one's own homework, and USFS public servants rubberstamping the "environmental work," in order to increase CCC, it would appear to be a huge conflict of interest.

Response:

Section 1.1.2.3 - Purpose and Need discusses the needs which include improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity. By addressing these needs, the Action Alternatives include improvements that also would increase capacity.

As described in DEIS and FEIS Section 1.2.3.1 - Applicable Land Allocations, the majority of public lands at The Summit-at-Snoqualmie ski area are allocated to a Management Area of RE1 - Developed Recreation/MA27D - Developed Site. Providing a full spectrum of recreational facilities to serve all recreational users is consistent with the MBSNF and OWNF Forest Plans. The portion of the Study Area located in the OWNF is located within the SPAMA, and must be shown to be neutral or

beneficial to LSH and connectivity (see Section 4.6.9 – Adaptive Management Area Standards and Guidelines). Table 4.6.2-1 presents a summary of the Action Alternatives in relation to the AMA/LSR Standards and Guidelines, and describes how they are neutral or beneficial to LSH and connectivity. Areas currently allocated to ST-1 are proposed to be reallocated to RE-1 to be consistent with the inclusion of the lands in the SUP area and the presence/operation of ski area facilities within them (see Section 1.1.2.3 – Purpose and Need).

The fee structure and SUP were developed by the USFS with no involvement from any outside contractor. SE GROUP (formerly Sno.engineering) prepared the MDP under a contract with Ski Lifts, Inc. Upon acceptance of the completed MDP, the Forest Service agreed to initiate a NEPA process as described in Section 1.5 - Scoping, Significant Issues and Public Participation, and Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP.

Based on their qualifications, SE GROUP subsequently was selected to act as a third-party contractor for the preparation of this NEPA document. The Council on Environmental Quality (CEQ) "40 Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" discusses third-party contracts (question 16) and disclosure statements (question 17). The response to question 17 states "when a consulting firm has been involved in developing initial data and plans for the project, but does not have any financial or other interest in the outcome of the decision, it need not be disqualified from preparing the EIS. However, a disclosure statement in the draft EIS should clearly state the scope and extent of the firm's prior involvement to expose any potential conflicts of interest that may exist." As required by NEPA, SE GROUP signed a disclosure statement which certifies that they have no direct or indirect financial or other conflicting interest in the outcome of The Summit-at-Snoqualmie MDP EIS. All work conducted by SE GROUP in this NEPA process has been under the direct supervision, and approval authority, of the USFS. This objectivity is demonstrated by the modifications to the original MDP proposal, which was accepted by the USFS in 1998 (see Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP). The MDP prepared by SE GROUP is not represented among the Action Alternatives due to these modifications which are a direct result of public scoping and issues raised by the USFS and other agencies.

Mark Fulford

Comment:

I would like to see a master plan that would include forest service and resort property set aside for police, school, and commercial development.

Response:

As described in Section 1.1.2.1 - Overview, this EIS responds to the proposal by Ski Lifts, Inc. to upgrade and expand the recreational infrastructure and associated facilities at The Summit-at-Snoqualmie. The purpose of the proposal is to update The Summit-at-Snoqualmie's MDP for long-range management and development, to ensure the long-term economic viability of The Summit-at-

Snoqualmie, maintain and/or enhance environmental resources and provide the public quality recreational opportunities in a natural outdoor setting on NFSL, consistent with the Forest Plans for the MBSNF and OOWNF, other federal laws and regulations, other agency direction, and The Summit-at-Snoqualmie SUP (see Section 1.1.2.3 - Purpose and Need). The use of NFSL for police, schools, and commercial development is outside the scope of this EIS.

Patricia Michl

Comment:

The Pass is plagued by short runs and heavy wet snow, or (worse), lack of snow. The only way to remedy this is to create new ski runs up high, higher than the top of Central Express chair and higher than the top of Mt Hyak. Abundant powdery snow can be reached only by expanding higher. I therefore suggest enlarging the ski area by accessing the areas above the Cantral Express chair and to the south east of Mr Hyak.

Response:

The area above the *Central Express* chairlift is outside the SUP area on NFSL and is therefore not included as an alternative for expansion to higher terrain. The range of alternatives presented in the EIS includes improvement at Summit East in the higher elevation Mill Creek pod. No additional ski terrain is proposed southeast of Mt. Hyak because of the low elevation of the terrain.

Patricia Michl

Comment:

Successful ski areas depend upon intermediate skiers. The proposed International chair and gondola at Alpentel do not create one inch of new terrain for intermediate back country skiers. I therefore suggest the expansion at Alpentel to occur up the valley where the back country skiers presently return into the St Bernard run. There is ample terrain in that direction. The creation of more intermediate and beginner terrain would greatly improve Alpentel.

Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to provide a convenient and quality recreation experience, including additional intermediate and advanced intermediate terrain. Alternatives 2, 3 and Modified Alternative 5 address the lack of intermediate and advanced intermediate terrain by introducing lift-served terrain in the Rampart and/or Creek Run pods. The slope gradients in the upper Alpentel backcountry would prohibit the establishment of suitable terrain other than expert (i.e., black diamond or double diamond). As described in Section 1.1.2.3 - Purpose and Need, the primary purpose of the gondola would be to address summer recreation and access to the mountain-top restaurant for all users. In this capacity, the gondola would provide little round-trip skiing, particularly for skiers below the expert ability level.

Paul Balle
I-90 Wildlife Bridges Coalition

Comment:

The DEIS does not provide sufficient information, analysis or rationale to support a decision to cut the forests in this corridor. We urge you to amend the Purpose and Need statement to include maintaining and enhancing wildlife connectivity. We ask that the Forest Service conduct an intensive study of the habitat and connectivity needs of wildlife in this zone before considering projects that would diminish or fragment the forest corridor around Hyak Creek. That study should also evaluate ongoing and proposed mitigation and conservation measures. That MDP should include additional measures to improve connectivity at Hyak Creek and Keechelus.

Response:

The DEIS and FEIS follow the format established by the Council on Environmental Quality regulations for implementing NEPA (40 CFR Parts 1500-1508).

The purpose of the MDP is not to provide improvements in wildlife habitat or connectivity, rather to meet AMA standards and guidelines to "maintain or enhance" the existing condition. Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities..." The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

As described FEIS Section 4.6.9 – Adaptive Management Area Standards and Guidelines, the USFS preferred alternative (Alternative 5) would be “neutral or beneficial” to late successional habitat (LSH) and to connectivity within the Snoqualmie Pass Adaptive Management Area. New ski trails and glading would be proposed in LSH, but the proposed 390-acre donation in Mill Creek would provide replacement habitat, reduce fragmentation and improve habitat connectivity within the Study Area. Within ski trails proposed for glading 70% overstory canopy closure would be maintained. Additional studies of wildlife and habitat connectivity in the Snoqualmie Pass area are outside the scope of this NEPA analysis.

Pete Weaver

Comment:

I would prefer a different placement of the new International chair, one that would provide loading from the low backcountry traverse to give one lift round trips to the great terrain back there.

Response:

FEIS Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP has been updated to include a discussion of a chairlift from the low backcountry traverse to the

Internationale bowl (see Appendix A Section 1.1 - Alternatives Considered but Eliminated from Further Study). A lift in this alignment is not included in the range of alternatives because the terrain served by this lift would be largely expert only terrain (i.e., double diamond), and because it would require significant impacts to riparian forested habitat, including Riparian Reserves, which have been identified as a significant issue (see Section 1.5.2.2 - Riparian Reserves).

Peter Christian

Comment:

Nothing is mentioned about more snow making equipment. Without this capability none of the other enhancements will matter (remember 2005)!

Response:

The FEIS has been updated to clarify existing snowmaking capacity at The Summit-at-Snoqualmie.

Peter Gowell

Comment:

Will want to see provisions in place to handle greater volume of folks going into great scott bowl (Denny-chair ridge). Possible a patrol hut or first aid station in even of emergency (recall: Dan Witkowski)

Response:

As described under Alternative 2 (the Proposed Action), three ski patrol facilities are proposed in addition to the one existing facility at Alpentel (refer to Figure 2.3.3-2, Alternative 2 Proposed Conditions – Alpentel). As with the current operation, chairlift signage, trail signage, and trail maps would be provided to all ski area guests. In addition, ski patrol would manage skier traffic, using portable signage and ropes. These issues would be addressed in the Annual Operating Plan.

Richard Artley

Comment:

Please understand that I oppose ANY expansion of four ski areas at Snoqualmie Pass. The Purpose and Need in your DEIS showed me no statistics that skiers are being turned away with the current facilities. Waiting in line for the ski lift has always been part of the downhill snow skiing experience. Such waits are frequently positive. I met my wife waiting for a chair lift.

Response:

As described in Section 1.1.2.3 - Purpose and Need, the purpose of the MDP proposal is to "ensure the long-term economic viability of the Summit at Snoqualmie, and to maintain and/or enhance environmental resources and provide the public quality recreational opportunities in a natural outdoor setting on NFSL." Lift lines are only one component of the need to improve circulation and dispersal of skiers and other site visitors in and out of the base area, and throughout the ski area. Other needs

include the need to maintain the viability of Summit East by consolidation with Summit Central and Summit West; balance the capacities of skier service facilities and lift/trail capacities; provide a convenient and quality recreation experience for all site visitors on a year-round basis; and amend the WNF Forest Plan to correct the SUP boundaries and allocations within the existing SUP boundary for more efficient administration.

The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2).

Richard C. Stenwell

Comment:

Has any looked into a new lift located starting at the base of mill creek up the other side of the valley?

Tom Stahl

Comment:

A better idea for Summit East would be to start at the base of the proposed new Mill Creek lift and build a new chairlift to the South and East of Mt. Hyak to get to another close-by Eastern Peak that is over 4000 feet. Then lay out some new intermediate runs back to the Mill Creek area.

Response:

The area above Mill Creek is partially outside the SUP area on NFSL and is therefore not included as an alternative.

Rick Moore

Comment:

The EIS does not adequately evaluate the feasibility of simply increasing the capacity of the existing lifts to better accommodate crowding, as opposed to building new lifts and runs. On countless occasions I have observed long lift lines at the base of the Central Express and other lifts as a direct results of too few lifts operating. It is my observation that much of the crowding can and should be better managed by having more lifts open more of the time, including access to Summit East.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

By addressing these needs, the Action Alternatives include improvements that also would increase capacity. As a day use ski area The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 –

Purpose and Need and Illustration 1.1.2-FEIS-2). The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accommodate peak visitation periods similar to sporting events and concerts.

The FEIS has been updated to discuss the reasons for lift closure, including staffing deficits, mechanical problems, terrain or slope issues, and redundancy of lifts (see Section 1.1.2.3 - Purpose and Need).

Roland Yamamoto

Comment:

I feel that the one group has not been adequately included. Many non-skiers visit the mountains to just play in the snow, without wanting to trek on snowshoe trails. Could there be a large free area for them? The existing snow parks are too far away from amenities, get dominated by speeding snowmobile riders, and are difficult to find for casual visitors.

Response:

As described in Section 1.1.2.3 - Purpose and Need, people of differing abilities should have the ability to enjoy the mountain recreation experience. The range of alternatives presented in the FEIS address this need. Implementation of any of the Action Alternatives would not preclude free access to the ski area for those who do not wish to use the groomed trails or lifts. However, the Action Alternatives do not specifically propose facilities for snow play.

Sandy Ruggles

Comment:

A high speed quad chair to replace the existing double chair #2 would be a big benefit and surely wouldn't be as expensive or invasive as a gondola.

Response:

As described under Modified Alternative 5 in the FEIS, the *Edelweiss* chairlift would be upgraded from a double chair to a triple chair. Alternative 4 does not include the gondola.

Steven Benesi

Comment:

On Summit West, instead of throwing the Baby Double in, I think a chair should be added in b/w Dodge and Wildside.

Response:

The Action Alternatives would realign both *Wildside* and *Dodge Ridge* to better access the terrain between the existing lifts. As a result, a new lift between *Dodge Ridge* and *Wildside* would be redundant.

Tad Sommerville

Comment:

If a summit-house is constructed it should be concave in shape and be situated on the shelf below the ski patrol lift station shack in order to best blend in with the topography. This would limit the profile visible from the north and east. Furthermore, you could build extensive decks for viewing.

Regardless, the proposed summit house should be very modest in scope and should not be anything like the Seattle Ridge Lodge at the top of Bald Mountain in Sawtooth National Forest. I think that the facility at the top of Jackson Hole in Wyoming is a good example of the necessary size - maybe just a tad larger.

Response:

As described in Section 4.15 – Visual Resources, all buildings would be designed and constructed to reflect current USFS Cascadian Architecture standards and borrow from the naturally established form and line of the surrounding natural landscape. Conceptual sketches of the Alpentel summit area are available in Volume 3 – Figures to illustrate the Cascadian-style and style/form of the proposed facilities as compared to the surrounding environment.

Todd Fiebig

Comment:

Ski Acres biggest problem is the hard walk from the parking lot to the chair lifts. It is important when adding the "Easy Street" and "Ski School" chairs that the loading station is as low as possible. This does not seem to be addressed for the "Ski School" chair and would be a grave mistake. The only logical way to address this problem is a proposal that I had heard of some time ago where the road would be re-routed to circle around behind the parking lot. At the very least the lodge should be moved to the parking lot and the "Triple" and "Holiday" chairs should start at the elevation of the parking lot. Also, the parking lot in the middle of the area on the north side of the road is under utilized. The triangle of land between this parking lot the tubing area and the proposed "Easy Street" chair on both sides of the road should be developed as privately owned residences to raise money for the improvements.

Response:

As described in Section 2.3.3.1 - Lifts, the *Ski School* chairlift would be constructed to provide out-of-base access within 250 feet of the proposed base lodge. The *Easy Street* chairlift would be replaced and realigned to provide direct out-of-base access adjacent to the Silver Fir base area facilities. In addition, as described in Section 2.3.3.5 - Support Facilities, the Central Base Lodge and rental shop/learning center would be removed and a new facility would be constructed downslope of the existing day lodge. Section 4.11 - Recreation discusses the impacts to developed winter recreation by alternative, and describes that the Action Alternatives would locate terminals closer to base area facilities in order to minimize walking distances for beginners and create more desirable learning conditions. Appendix A, Section 1.1 - Alternatives Considered and Eliminated from Further Study

has been updated to include an alternative which includes a reroute of SR-906 around the Summit Central Parking Lot 1.

Tom Stahl

Comment:

Beyond Summit Central's central express lift, there is a close-by peak to the Southwest that rises to 4200 foot. A new lift that starts where the Central Express ends at the 3800 foot level and extends to the new Southwest Peak could gain 400 feet in elevation for Summit East, Central, and West. This would provide better snow and the possibility of gaining some long intermediate runs. Ski runs could be laid out from the new Southwest peak going in all three directions back to Summit East, Summit Central, and Summit West. The new Summit East and Summit West ski runs from the new 4200 foot Southwest Peak might even be two miles long.

Response:

The area above the *Central Express* chairlift is outside the SUP area on NFSL and is therefore not included as an alternative for expansion to higher terrain. The range of alternatives presented in the EIS includes improvement at Summit East in the higher elevation Mill Creek pod.

Tom Stahl

Comment:

Instead, the proposed Gondola should be routed to the North by Northwest to reach the summit of the next closest 5000 foot peak to the North. This route would have the Gondola path travel about one and a quarter miles from the Alpental main lodge to the Northwest. Then, new beginner (green) and intermediate (blue) ski runs should be carefully laid out to provide some long mile-and-a-half or two mile ski runs from the new North Mountain back to the main Alpental lodge.

Response:

The slope gradients in the upper Alpental backcountry would prohibit the establishment of suitable terrain other than expert (i.e., black diamond or double diamond). As described in Section 1.1.2.3 - Purpose and Need, the primary purpose of the gondola would be to address summer recreation and access to the mountain-top restaurant for all users. In this capacity, the gondola would provide little round-trip skiing, particularly for skiers below the expert ability level.

Tom Warsinske

Comment:

The sessel lift modification should include the extension to the vicinity of the traverse across the trails from the top of chair one. This would provide much needed easier terrain for beginners or intermediates and to extend the ski schools along lower international. This extension or repositioning would greatly expand the width of the area already served by the lower International Bowl, and the bottom of felson and snake dance trails.

Response:

Such an extension of the *Sessel* lift would require it to cross the proposed *Internationale* lift. In addition, the terrain served by the *Sessel* lift (i.e., beginner to intermediate) would overlap with terrain served by the *Internationale* lift (i.e., expert). As described in Section 1.1.2.3 – Purpose and Need, separation between lower level terrain and more advanced terrain is currently poor. The alignments provided in the range of alternatives address this need by segregating skier ability types.

Vanessa D. Pepoy

Comment:

The USFS and Booth Creek both claim that they can reduce the impact on sensitive species by obtaining young forest nearby and calling it Late Successional Habitat which it is obviously not, not matter how cleverly labeled. The forest stands in the proposed wildlife corridor replacement route are only 25 years old. They will not provide suitable habitat for old-growth dependent species for well over a century.

Response:

As described in Sections 4.6.4.1 and 4.6.6.1 – Wildlife Habitat and Associated Species, the donation of 390 acres of land in the Mill Creek drainage would offset the impacts to forested habitat under Alternative 3 and Modified Alternative 5. The donated land would become part of the SPAMA and would be managed for LSH and connectivity. The FEIS acknowledges that currently this area is predominantly immature and sapling Pacific silver fir, but that it would increase the amount of land in the Snoqualmie Pass area that is managed for LSH.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Management Direction

The proposal fails to meet the management direction for Connectivity Emphasis Areas within the Snoqualmie Pass Adaptive Management Area. The standards only allow new recreation projects if they are neutral or beneficial to late-successional habitat and do not negatively impact connectivity or if mitigated to a condition that is neutral or beneficial to the creation and maintenance of late successional habitat at appropriate spatial and temporal scales. The cutting proposed in the Hyak Creek forest is neither neutral nor beneficial to late-successional habitat. The proposed mitigation in Mill Creek is not adequate, as it does not meet either the spatial or temporal requirements in this narrow connection of upper elevation forest type.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS quotes the SPAMA plan: "New recreation uses or facilities within the CEAs will be allowed if they are neutral or beneficial to late-successional habitat, do not negatively impact connectivity, and meet other Forest Plan standards and guidelines." (DEIS 1-27, 1-34) However, the DEIS provides no justification for how the proposed action or preferred alternative meet the neutral or beneficial standard, nor the connectivity standard. The Secretaries' memo (October 6, 2000) allows projects if "...mitigated to a condition that is neutral or beneficial to the creation and maintenance of late successional habitat at appropriate spatial and temporal scales." (DEIS 1-34 footnote)

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There can be little question that the cutting proposed in the Hyak Creek forest is neither neutral nor beneficial to late-successional habitat. The proposed mitigation via the Mill Creek donation is not adequate mitigation, and fails to meet the Secretaries' requirement. It does not meet the spatial requirements in this narrow connection of upper elevation forest type. Not only is the small amount of LSH in section 21 not contiguous with either the Hyak Creek forest or the Mt. Catherine forests, it simply is not in a location to provide the connective link that Hyak Creek does. Furthermore, any benefits of regeneration of LSH in section 21 will take at least another 70 years to achieve the character of forests to be cut, so the temporal requirement is not met.

Donald Parks
Alpine Lakes Protection Society

Comment:

Management Direction

The proposal fails to meet the management direction for Connectivity Emphasis Areas within the Snoqualmie Pass Adaptive Management Area Management. The standards only allow new recreation projects if they are neutral or beneficial to late-successional habitat and do not negatively impact connectivity. The Secretary of Agriculture's memo only allows projects if mitigated to a condition that is neutral or beneficial to the creation and maintenance of late successional habitat at appropriate spatial and temporal scales. The cutting proposed in the Hyak Creek forest is neither neutral nor beneficial to late-successional habitat, particularly in a known wildlife connectivity corridor. The proposed mitigation in Mill Creek is not adequate, as it does not meet either the spatial or temporal requirements in this narrow connection of upper elevation forest type.

Group Response:

As described in Section 4.6.9 – Adaptive Management Area Standards and Guidelines, for the proposed MDP to be consistent with the SPAMA Plan EIS, MDP components must be shown to be neutral or beneficial to LSH and connectivity. Section 4.6.9 – Adaptive Management Area Standards and Guidelines in the FEIS has been updated to include a neutral/beneficial analysis specific to the SPAMA standards and guidelines. As shown in the analysis, Alternative 3 and Modified Alternative 5 were determined to be neutral to LSH.

As described under Alternative 3 and Modified Alternative 5, the donation of the Mill Creek parcel would result in the immediate addition of 45 acres of mature forest to the Snoqualmie Pass vicinity. As only 38.32 acres of mature forest impacts would occur under Modified Alternative 5, this results in a net gain of 6.7 acres. Over the longer term, the maturation of 345 acres of immature forest would increase the additional amount of LSH in the Snoqualmie Pass area. When combined with the additional land exchanges in the area and connectivity improvements associated with I-90; this would result in an overall benefit to LSH in the Snoqualmie Pass area (see Section 4.5.7 – Cumulative Effects).

Harry Romberg

Comment:

While I support revegetation proposals near the forested are (run numbers 65,66 and 67) proposed in alternative 3, this should be done regardless of the final option.

Mark Lawler
Sierra Club

Comment:

Please provide for fully revegetating runs 65, 66, and 67 near Hyak Creek, as provided in Alternative #3. It is very unfortunate that the Forest Service allowed these developments in the past that are now no longer desired by the ski company.

Group Response:

As described in Section 1.3 - Decision Framework, the Forest Supervisors will decide which elements of each alternative would be permitted for development, and could approve all, part, or none of each element of the Action Alternatives including revegetation of closed ski trails.

Cliff Chatel

Comment:

Propose weekend transportation alternatives, such as buses from Park-and-Ride lots or public and private lots that are not in use during weekends throughout the Puget Sound region.

Don MacLaren

Comment:

My biggest concern is traffic. Even now, the place is a zoo on weekends! One has trouble and lots of frustration just trying to find any place to park. And it's only going to get worse! Parking at any ski area is a problem. For example, at Beaver Creek in Colorado, they have two parking areas. One just off I-70 that's free with a shuttle bus, and another at the base of the area where you have to pay. Stevens is already running a shuttle bus to reduce the congestion at the base of the area. You need a similar scheme for the Summit. Perhaps a shuttle service from the old air strip off I-90 across from Bandera.

Peter Gowell

Comment:

Concern about vehicle traffic. There are an increasing number of cars (especially on weekends) and would like to see a traffic plan that more effectively manages the flow, E.G. bus service at exit 34 or 38 to shuttle folks to the area.

Group Response:

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding Transportation (Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means including the ski area website. In addition employee shuttle busses will be included in the Traffic Management Plan.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

NEPA

The DEIS does not meet NEPA standards, and is an inadequate document on which to base a decision. The Purpose and Need statement is too narrow, focused primarily on the success of the commercial ski operation, though no financial details are disclosed, and no measurable standards of success are provided. The protection and restoration of wildlife habitat is only alluded to, rather than being an objective of the MDP. This contrasts with the DEIS for rebuilding & expanding I-90 east of Hyak, where wildlife connectivity is a goal of the project and dramatic improvements to wildlife connectivity are considered in the alternatives. As a federal partner, the Forest Service supported that approach for I-90, so it is a mystery why the Forest Service has taken such a narrow approach on its

own planning process. Other winter recreational activities are referenced, but there is no evaluation or even suggestion that additional non-motorized activities could be accommodated on the national forest lands. If some portion of the ski facilities are not economically (or climatically) viable, the Forest Service is not obligated to destroy other public resources and uses in an attempt to make it profitable.

Donald Parks
Alpine Lakes Protection Society

Comment:

NEPA

The DEIS does not meet NEPA standards, and is an inadequate document on which to base a decision. The Purpose and Need statement is too narrow, focused primarily on the success of the commercial ski operation, though no financial details are disclosed. The protection and restoration of wildlife habitat is only alluded to, rather than being one of the major objectives of the MDP. Other winter recreational activities are referenced, but there is no evaluation or even a suggestion that additional non-motorized activities could be accommodated on the national forest lands. This is a major oversight. If some portion of the ski facilities are not economically (or climatically) viable, the Forest Service is not obligated to destroy other public resources and uses in an attempt to make it profitable.

Group Response:

The DEIS and FEIS follow the format established by the Council on Environmental Quality regulations for implementing NEPA (40 CFR Parts 1500-1508).

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose for the MDP is to "ensure the long-term economic viability of The Summit at Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities (see Section 1.1.2.3 - Purpose and Need).

As a private enterprise, the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. However, the FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS-4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

The Purpose and Need (see Section 1.1.2.3 - Purpose and Need) does not include a need to make improvements to wildlife habitat and connectivity. Section 1.5.2.5 - Wildlife Habitat Connectivity

identifies connectivity as a significant issue and Section 1.5.2.6 - Wildlife Habitat Quantity and Quality identifies wildlife habitat as a significant issue in this analysis. These issues helped formulate the Action Alternatives. For example, Section 2.3.4 - Alternative 3 - Reduced Section 16 Development states that "Alternative 3 represents reduced development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." In addition, Section 2.3.5 - Alternative 4 - No Section 16 Development states that "Alternative 4 represents no new development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." Finally, Section 2.3.6 - Alternative 5 - Mitigated Proposed Action states that "Alternative 5 represents a reduced version of the Proposed Action and addresses concerns to late-successional habitat and wildlife connectivity..."

Adele B. Eustis

Amy Philipson

B. Ladd

Barbara Owen

Bruce Keeler

Bryn Stevens

Charlie Cornish

Chris Wendt

Cindy Hoover

Clinton Dulpys

Cynthia Hickey
Washington Alpine Club

Dan Weinstein

David Wilkinson

Deborah Dickstein

Diane Civic

Doug Gresham

Ellen Purington

Ginny Mason

Herb Bergamini

Howard P. Greenwald, Ph.D

Jacqueline Webster Patton

James M. B

James Patton

Jean E. Davis

Jean Nahan

Jera M. M

Jeri Prater

Joan Bakker

Joanne Polayes

John L. May

Jorie Wackerman

Kay Ishii

Laurie Gogic

Linda K. Minato

Maggie Allison

Michael Fagin

Patricia Ovelgunne

Paul K. Gould

Paul Kelton

Philip Barrett Molin

Robert H. Green

Robert Harn

Ron Steingold

Rune Harkestad

Russell Hamerly

Ruth Ann Stacy

Steve Meier

Suzanne Esperum

Virginia Miller

Comment:

Regarding the land donation proposed in Alternative 5, I prefer that the entire Mill Creek section be purchased outright from Plum Creek and retained in public ownership for recreational opportunities, as originally proposed by the I-90 Land Exchange/Cascade Checkerboard project.

Group Response:

As identified in FEIS footnote #25, the 390 acres of private land in the Mill Creek watershed that The Summit-at-Snoqualmie would donate for inclusion in the MBSNF was determined as acceptable lands to maintain a neutral or beneficial determination for the project within the SPAMA. Also refer to Figure 1.1.2-3, Proposed NFSL Allocation.

Cliff Chatel

Comment:

Plan improvements for accessing the upper trail system via chair lift uploading and downloading, and uphill and downhill trails that specifically address the concerns of Nordic skiers and snowshoers of all abilities.

Cliff Chatel

Comment:

Restore lighted Nordic ski trails for nighttime racing and touring, or beginner and intermediate trails near base facilities (which would remove the current need for either chair lift or strenuous expert skiing ability to access upper trail system).

Ed Rockwell

Comment:

Inclusion of Nordic Support Activities into the proposed Mt Hyak Restaurant facility. This proposed Mt. Hyak facility needs to be more than a restaurant. A Cross country activity base / training center should be incorporated into the Mt. Hyak facility. The Nordic facilities at Hyak/Summit East are currently inadequate. Trainer/Instructor facilities are non-existent. I'm a Nordic instructor for Booth

Creek, and I can attest that we simply do not have facilities to prepare for lessons, rest, store equipment. Facilities / space to train students is totally nonexistent.

Ed Rockwell

Comment:

Inclusion of Interchangeable Chairlift & Gondola at Summit East. (Prototype / Big Mountain Ski Resort, Montana). The existing facilities at Summit East do not allow for easy access and downloading from the Nordic Upper Trail System. This is where the best Nordic trails are located. Installation of an Interchangeable Chairlift & Gondola at Summit East would open up the Upper Trail System to all levels of Nordic skiers, as well as Snow Shoers. This would have a significant positive impact of Nordic Skiing for the King County and Kittitas County population.

Kathy Furtado

Comment:

Currently, a summer trail over Nordic Pass connects Ollalie Meadows with the upper area. This trail would open up the Ollalie Meadows area, and the warming hut already located there, to skiers who do not have the endurance or skill necessary to ski the current Mt. Catherine loop. To make this trail passable for cross country skiers on set tracks, a few trees might need to be culled.

Group Response:

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS Footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift

Jill and Dan Barkley

Comment:

Replacement of cross country/snowshoe alternate routs. Ski Improvements should not result in "take-away" from this existing sector of support. The Hyak and lake areas would seem to allow for increased access and connectivity for these important family activities. They provide a financial investment that should be retained, and improved upon. A circular route from Hyak, would also improve hiking during the summer months.

Kathy FurtadoComment:

The current plan adds a ski lift in the Creek Run area just to the west of the existing Keechelus lift. A new lift in this area will lead to hazardous conditions for cross country skiers descending from the upper area. Alpine skiers and snowboarders travel much faster and follow different lines than do nordic skiers. To mitigate this hazard, the plan should be modified to allow for a Nordic-skier-only descent path, winding gradually down through the terrain between Creek Run and the Silver Fir area.

Group Response:

The DEIS and FEIS acknowledge that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (see Dispersed Winter Recreation in Section 4.11.2 – Impacts – Alternative 2 [Proposed Action]). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit at Snoqualmie (see Illustration 3.11-FEIS-3), as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS Footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Charlie Raines***Sierra Club - Cascade Chapter***Comment:

Proposed new alternative - Alternative #4 modified:

The Forest Service should revise its preferred alternative to minimize the impacts to forests, habitat, wildlife corridors, wildlands, and primitive recreation. It should increase the level of mitigation and actually improve wildlife connectivity. Such an alternative could still accommodate nearly 20%

growth over the next decade, which is quite reasonable. We propose an alternative based on #4 with modifications as summarized below. We request that this alternative be evaluated in the EIS.

Key Elements in Alternative #4

- No new lifts in section 16. However, Rampart Lift could be allowed if base is moved 800' south to the #55 run.
- No new runs or crossover trails through the contiguous forest in section 16.
- No new roads in the Hyak Creek late-successional forest area
- No new night lighting on Silver Fir pod

Major Modifications to Alternative #4

- No new lifts west of existing lifts at Alpental
- No gondola at Denny Mtn.
- No restaurant on Denny Mtn.
- Donation of 390 acres in Mill Creek after decommissioning unneeded roads
- Donation of 140 acres on Cave Ridge (60 acres as wilderness addition), plus 40 acres at Beaver Lake, and 50 acres at Coal Creek section 9, 15.
- No new parking lots in riparian reserves
- Set targets for decreasing numbers of vehicles, especially at peak times
- Reduce SUP boundary on west end of Alpental
- Reduce SUP boundary East of Mt. Hyak (delete ~150 acres, section 22)
- Eliminate isolated block of SUP to SW of Mill Creek, (~140 acres, section 21)
- Do not change forest plan from ST-1 (scenic travel) to RE-1 (developed recreation) in the Hyak Creek forest area (>150 acres). Instead, change it to RE-3 unroaded, non-motorized
- Change designation for SUP on east slope of Mt. Hyak (~100 acres) and NE slope of Mt. Catherine (~150 acres) to RE-3.
- Designate the new NF lands in Mill Creek (donation) to restore unroaded, late-successional forest conditions, and appropriate non-motorized recreation.
- Redesignate other nearby national forest lands to increase protection and restoration of wildlife habitat and connectivity.
- Revegetate areas as shown in Alt #4 plus 3 runs near Hyak (#65, 66, 67) as shown in Alt #3.
- Restore Pacific Crest Trail to more natural conditions adjacent to the Summit parking lot

- Retain and improve quality Nordic skiing and snowshoe opportunities.
- Reduce consumption of water by increased conservation.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Forest Service should revise its preferred alternative to minimize the impacts to forests, habitat, wildlife corridors, wildlands, and primitive recreation. The level of mitigation must be increased. We urge the Forest Service to adopt a modified version of alternative #4 with the elements described below. This alternative could result in 20% growth over the next decade, which is quite reasonable.

- No new lifts in section 16. However, Rampart lift could be allowed if base is moved 800' south.
- No new downhill or crossover runs through contiguous forest in section 16
- No new roads in the Hyak Creek forest area
- No new night lighting on Silver Fir pod
- No development of runs or lifts west of current Alpental lifts (e.g., upper portion of proposed Internationale)
- No gondola at Denny Mtn
- No restaurant on Denny Mtn
- Reduce SUP boundary on west end of Alpental
- Reduce SUP boundary East of Mt. Hyak (delete ~150 acres, section 22)
- Eliminate SUP (~140 acres) to SW of Mill Creek, section 21
- Do not change forest plan from ST-1 (scenic travel) to RE-1 (developed recreation) in the Hyak Creek forest area (~150 acres). Instead, change it to RE-3 unroaded, non-motorized. Change designation for SUP on east slope of Mt Hyak (~100 acres) and NE slope of Mt. Catherine (~150 acres) to RE-3.
- Designate the new NF lands in Mill Creek (donation) to restore unroaded, late-successional forest conditions, and appropriate non-motorized recreation, except for the existing powerline.
- Change Forest Plan designation for adjacent unroaded lands to RE-3 (including lands in sections 3,4,5,8,10,16,17,19,20,21).
- Donation of 390 acres in Mill Creek, after decommissioning unneeded roads

- Donation of 140 acres on Cave Ridge (60 acres as wilderness addition), plus 40 acres at Beaver Lake, and 50 acres at Coal Creek sections 9, 15.
- Remove portions of parking lots in riparian reserves at Alpental.
- No new parking lots in wetland or riparian zones or reserves.
- Revegetate areas as shown in Alt #4 plus 3 runs south of powerline (#65, 66, 67) as shown in Alt #3.
- Restoration - including removal of some roads as in #4, plus additional road segments should be decommissioned
- Restoration of wetlands (as in #4 plus additional wetlands)
- Restoration in powerline corridor at Hyak Creek, with possible redesign of powerline for greater height.
- Improve habitat corridor functionality between Mt. Hyak and Gold Creek wildlife bridges.
- Improve condition of Pacific Crest Trail across ski slopes and parking lot
- Retain Nordic skiing and snowshoe opportunities (by not building Hyak lifts and runs) and improve and expand where possible.
- Identification and interpretation of Milwaukee Road railroad grade and early wagon road.
- Reduce consumption of water by conservation.
- Set targets for increased recycling.
- Scientific study of current and historic habitat usage, corridors, demographics for species associated with upper elevation forests and parklands, and effects of mitigation, conservation and development projects underway or reasonably foreseeable. This should include a worst case analysis.

Group Response:

Appendix A - Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP has been updated in the FEIS to include this suggested alternative, and the rationale for not carrying it forward in detailed analysis. The FEIS has also been updated to include the donation of 138 acres of the Cave Ridge parcel to the USFS as a cumulative effect (see, for example, Section 4.3.8 - Cumulative Effects).

FEIS Alternatives 3 and 4 do not include the Creek Run pod. FEIS Alternative 3 does not include the Pulse Gondola or mountain-top restaurant at Alpental.

Glenn Bandy
Ellensburg Cross Country Ski Club

Comment:

Why doesn't Booth Creek improve the existing facilities at Summit East? Many things could be done - an upgraded lodge, a modern lift (preferably a high-speed quad) running from the area's base to the ridge top, an aggressive brushing program to mow back encroaching forest and brush from existing runs, redevelopment of the abandoned backside, grading of the foxhole-pocked parking area. All these things would enhance the Hyak experience.

Gordon Fowlds

Comment:

The main reason the Hyak area is not used, is the parking lot is bad and some years the snow is thin down there. Fixing the Hyak parking lot should be a first priority. I would suggest Booth Creek should fix this parking lot and resurface it so it is not a mess of giant chuck holes. Upgrading the lodge facilities at Hyak may be a good idea as well. This would be a lot less expensive for them and make the Nordic users and Hyak folds much more happy and spread folks out. This would be win-win for Booth Creek.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to maintain the viability of Summit East by consolidation with Summit Central and Summit West. The Action Alternatives address this need by expanding guest service facilities at the Silver Fir base area, realigning and proposing new lifts and terrain, as well as crossover trails to provide improved connectivity between Summit East and Summit Central. Similarly, no changes to parking lots at Summit East are proposed because parking lots at Summit Central and Silver Fir are intended to provide parking for Summit East users. Under the Action Alternatives, the existing *Backside* chairlift would be replaced, realigned and renamed *Mill Creek*. Also, as described under Alternative 1 (see Section 2.3.2 - No Action Alternative, DEIS footnote 13 and FEIS footnote 17), the *Mt. Hyak* chair has been approved as a detachable quad from the Summit East base area to the top of Summit East. Brushing and mowing are operational issues, which are addressed in the Annual Operating Plan.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS failed to assess a full range of reasonable alternatives. There was no consideration of significant improvements in wildlife habitat and connectivity, only how much further diminishment would be allowed.

Donald Parks
Alpine Lakes Protection Society

Comment:

The range of alternatives is not adequate. There was no consideration of significant improvements in wildlife habitat and connectivity, only how much further diminishment would be allowed.

Group Response:

As described in Section 1.1.2.1 - Overview, this EIS responds to the proposal by Ski Lifts, Inc. to upgrade and expand the recreational infrastructure and associated facilities at The Summit-at-Snoqualmie. The purpose of the proposal is to update The Summit-at-Snoqualmie MDP for the long range (10-15 years) management and development of the ski area. The Purpose and Need (see Section 1.1.2.3 - Purpose and Need) does not include a need to make improvements to wildlife habitat and connectivity. Section 1.5.2.5 - Wildlife Habitat Connectivity identifies connectivity as a significant issue and Section 1.5.2.6 - Wildlife Habitat Quantity and Quality identifies wildlife habitat as a significant issue in this analysis. These issues helped formulate the Action Alternatives. For example, Section 2.3.4 - Alternative 3 - Reduced Section 16 Development states that "Alternative 3 represents reduced development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." In addition, Section 2.3.5 - Alternative 4 - No Section 16 Development states that "Alternative 4 represents no new development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." Finally, Section 2.3.6 - Alternative 5 - Mitigated Proposed Action states that "Alternative 5 represents a reduced version of the Proposed Action and addresses concerns to late-successional habitat and wildlife connectivity..."

10.0 – CLIMATE AND SNOW COMMENTS

Charlie Cornish

Comment:

Long-term trends (past~80 years) show decreasing snow packs for Snoqualmie Pass area. Please research and include this data with graph in the DEIS.

Response:

The FEIS has been updated to acknowledge that snowpack in the Cascades has been declining since 1945 (see Section 3.1.1.1 - Global Warming). Section 3.1 - Climate and Snow has been updated to include additional discussion of snowpack in the Snoqualmie Pass area.

Katherine Fitch

Comment:

Have any avalanche Professionals been consulted in ways to mitigate such hazards? The proposed pulse gondola at Alpentel runs right through an existing bomb tram set up to mitigate such hazards

surrounding the area. This avalanche hazard remains a concern for the second proposed lift "International" as well.

Response:

As described in Section 4.1.3.2 – Snow Conditions, avalanche control at The Summit-at-Snoqualmie would continue in the same areas and using the same methods as currently practiced. The FEIS describes that the upper lift terminal of the proposed *Internationale* chairlift is located immediately downslope of the runout zone of an existing avalanche slide path, but that the avalanche analysis in the EIS is not site-specific. The Summit-at-Snoqualmie will hire qualified avalanche zoning experts before the site location and design is finalized for all structures and facilities, as described in Other Management Provision OMP1 (see Table 2.4-2).

Becky Stanley

Comment:

Another reason for limiting the expansion to the least damage possible is because skiing as a sport in our state may have a short future because of climate change - we don't even know how many years we will be able to count on a suitable snowpack. Last year we barely got any snow at all. Our local scientists predict that this is what our future holds if weather trends hold. More info on this available at: <http://www.climatesolutions.org/pubs/inHotWaterSum.html>

Charlie Cornish

Comment:

First, as previously noted, recent studies report that global warming is happening faster than previously thought and needs to be considered. Second, the lifetime of the proposed improvements for lifts, buildings, parking lots, etc. is upwards of 50 years or more, well within the predicted 2-4 degree F warming for the Pacific Northwest; the long term impact for facilities constructed and debt servicing must therefore be included. Third, uncertainties help define error bars; the planning process must henceforth work within the bounds of the error bars. Lastly, neglecting global warming citing that it is not within the short time frame of a plan is irresponsible. Global warming is a long term, and increasingly perceived as irreversible, trend that has cumulative effects. Decisions and actions taken today will long term consequences.

Charlie Cornish

Comment:

The DEIS states: "Any impacts to the climate at the Summit at Snoqualmie from global warming over the next 30-40 years are outside the scope of this EIS." (Section 4.1.3.1 Climate). This is an invalid assumption since the recent research indicates that global warming is already occurring at a pace faster than previously thought. 2005 was the hottest year on record. Eight of the 10 warmest years since 1860 have occurred within the last decade. The MDP was prepared from the original 1998 Sno-

Engineering plan, when less was known about the rate at which climate change was and would occur. Today we know that climate change is happening faster than was known in 1998. In light of this new understanding, the DEIS needs to re-examined and rewritten for to include climate impacts and migration efforts.

Charlie Cornish

Comment:

The DEIS does not adequately address the potential impacts of global warming and climatic change. The DEIS states: "However, a gradual decrease in annual snowfall associated with global warming may result in shortening during some winters." (Section 4.1.2.1 Climate). This is statement is contradicted by findings of ski-industry funded research by the Climate Impacts Group at the University of Washington:

"Snow model simulations show that average ski conditions at Snoqualmie Pass (Washington) ski area, whose base elevation is about 3000 ft, could change dramatically by 2025. The simulations suggest that the likelihood of opening by Dec. 1 could decline by 50%, average season length could decline by 28%, and the likelihood of rain when the ski area is open could increase by 25%."

<http://www.cses.washington.edu/cig/res/hwr/hwrkeyfindings.shtml>

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Effects of global warming on the viability of Hyak (and rationale for cutting in section 16) are a major concern, as evidenced by the sporadic use over the past few years. Will the sacrifice of forest and wildlife corridor be a futile attempt to keep this lower elevation area economically viable? The base of Hyak is at 2,600' and the top at ~3,680'. The top of the Creek Run lift is only ~3,520' (DEIS 2-27, 35). If temperature warms only 2 degrees, that would raise the snow level about 600'. This would make the bottom of the Creek Run and Rampart lifts as marginal as the base at Hyak is today.

The DEIS fails to address this serious issue. It lamely states, "...global warming is not an integral part of the climate and snow analysis in the DEIS, but was considered as part of the planning process for the MDP." (DEIS 3-3) How was it considered in the planning process? Global warming will push vegetation zones higher, making it even more difficult for species associated with PSF and WH to connect across Snoqualmie Pass. Every opportunity must be maintained for those species. The DEIS fails to adequately address the ecological impacts of climate change and the relationship to the proposed facilities.

Cliff ChatelComment:

The DEIS does not adequately address the potential impacts of global warming and climatic change. It wrongly assumes that climatic changes will not occur within the next 30-40 years (Section 4.1.3.1 Climate). A ski-industry funded research by the Climate Impacts Group at the University of Washington states:

"Snow model simulations show that average ski conditions at Snoqualmie Pass (Washington) ski area, whose base elevation is about 3000 ft, could change dramatically by 2025. The simulations suggest that the likelihood of opening by Dec. 1 could decline by 50%, average season length could decline by 28%, and the likelihood of rain when the ski area is open could increase by 25%."

<http://www.cses.washington.edu/cig/res/hwr/hwrkeyfindings.shtml>

Group Response:

The FEIS has been updated to include recent studies on global warming and climate change. The FEIS does not assume that climate change will not occur within the lifetime of the SUP, but states that "any impacts to the climate at The Summit-at-Snoqualmie from global warming over the next 30-40 years are outside the scope of this EIS" (see Section 4.1.3.1 - Climate). The FEIS discusses the effects of increased temperatures and reduced snowpack, shows that the Action Alternatives would not result in a significant increase in greenhouse gas emissions (see Section 4.8 - Air Quality), and discloses that "a gradual decrease in annual snowfall associated with global warming may result in shortening of operations during some winters" (see Section 4.1.3.1 - Climate). However, the effects of climate change are outside the scope of this analysis, which evaluates the direct and indirect impacts of the installation of facilities and infrastructure over a projected ten-year period.

20.0 – WATER AND WATERSHED RESOURCES COMMENTS**Bill Preston*****Washington State Department of Transportation***Comment:

Stormwater and surface runoff generated by this project must be retained and treated on site in accordance with regulating agencies' standards, and not be allowed to flow into WSDOT rights-of-way.

Response:

The Summit-at-Snoqualmie would implement a Stormwater Management Plan under all Action Alternatives to treat stormwater, collect pollutants, and retain sediments to control stormwater and surface runoff from parking lots (see Appendix G – Conceptual Stormwater Management Plan). Additionally, project specific Stormwater Pollution Prevention Plans would be required prior to implementation of MDP components to control stormwater runoff.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS references restoration of 2 wetlands (DEIS 2-51, App F-45, et al); How large are these wetlands and what is the nature and projected success of such projects? When are they scheduled.

Response:

The exact details of the restoration would be determined when specific plans are being developed. The wetlands in question are 0.48 acre at Summit West, along the existing *Little Thunder* lift and 0.19 acre at Summit Central, along the *Central Express* lift, for a total acreage of 0.67 acre. The restoration will consist mainly of altering any existing drainage modifications to insure the viability of the wetland hydrology and revegetating the wetlands with appropriate species. Upon restoration, management of the wetlands would be modified from the current approach, which includes occasional mowing and other disturbance associated with use of the wetlands as ski terrain.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Current peak use of water at Alpental is estimated at 28,000 gpd, increasing to 34,500 gpd in year ten under Alt #5. The supply "capacity" is 620,640 from two wells, which also supply local condos, although there is no indication of that current or projected consumption. The current water consumption at Summit is 83,000 gpd, increasing to 149,126 gpd under Alt. #5. The "capacity" is listed as 465,000 gpd from Snoqualmie Pass PUD, but no indication of the source or other demands on the system. Thus, total peak daily increase of 63% under preferred alternative. (DEIS 4-454) This increased consumption, along with consumption from others could affect the natural hydrology of the area.

Snow making is not proposed in this MDP. However the Summit website, describes the Central Park snowboarding facility: "It has Washington's most extensive park snowmaking system. Even high pressure can't stop us." And on the Superpipe page: "Expanded snowmaking.". Dan Brewster, manager of the Summit, says that is the limit of snowmaking (pers. comm.. 2-03-06), but there needs to be some explicit language in the MDP to that effect.

Response:

Section 4.13 - Utilities describes the effects of each Action Alternative on domestic water. Table 4.13.1-1 summarizes the increase in water demand at The Summit-at-Snoqualmie under each alternative. The water demand at The Summit would increase from 10 percent under Alternative 1 to 75 percent under Alternative 2 and Modified Alternative 5. At Alpental, water demand would increase from 0 percent under Alternative 1 to 23 percent under Alternatives 2, 4, and Modified

Alternative 5. The increase in peak water demand due to implementation of the MDP would not exceed the capacity of the Snoqualmie Pass Utility District (SPUD) to supply domestic water to either The Summit or Alpentel. Section 4.13.6 - Cumulative Effects analyzes the effects of the Action Alternatives coupled with past, present and reasonably foreseeable projects on utilities, such as municipal water supply, in the Snoqualmie Pass area. Any future improvements to the SPUD domestic water supply or infrastructure are out of scope of this decision, and would not necessarily be triggered by implementation of the MDP.

Expanded snowmaking is not proposed under the Action Alternatives, and so is not analyzed or further discussed in the FEIS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

In the DEIS section on Water and Watershed Resources (4.3) there are several tables that display data about affects such as impervious surface, road crossing densities and riparian buffers in non-natural condition. For each there is a column labeled "threshold". While this appears to be a standard, it is apparently just a staff generated number to find a way to differentiate between the alternatives (Larry Donovan, email 1-26-06). But these could be misleading.

For instance, the threshold for road densities in Table 4.3.6-1 is set at 3 miles per square mile, while much recent efforts on the national forests has been to get road densities below 2 miles per square mile, and preferably below that. In fact, it is the goal of SPAMA. (SPAMA FEIS 2-26) Certainly, then, the "threshold" of concern would be at 2 miles or lower.

The other major problem is that it does not assess the total watershed conditions of these sub-watersheds- as the study area excludes significant portions of these drainages. These portions have substantial amount of road miles and impervious surface. The document essentially sweeps that away saying the Yakima and Snoqualmie are both large watersheds, and this project will have negligible impact.

Response:

As described in Section 3.3.2.1, thresholds were determined from a variety of published sources applicable to the setting found in the Study Area, and from site-specific data gathered in the Study Area. For example, the SPAMA goal of 2 mi/sqmi pertains to the subwatershed scale while the DPC threshold pertains to the drainage scale. Table 3.3.1-4 documents road density for the Study Area within the Upper Yakima and South Fork Snoqualmie watersheds. The use of 3 mi/sqmi at the drainage scale is not intended to meet the SPAMA goal of 2 mi/sqmi. Rather, it is a measure of watershed health.

While the analysis of the effects resulting from the Action Alternatives takes place at the Study Area scale, the cumulative effects analysis encompasses the entire 5th field. As a result, both the site scale and watershed scale effects are considered as required by NEPA and in support of the Aquatic Conservation Strategy analysis.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

In the DEIS section on Water and Watershed Resources (4.3) there are several tables that display data about affects such as impervious surface, road crossing densities and riparian buffers in non-natural condition. For each there is a column labeled "threshold". How were those thresholds determined, by whom and what exactly do they represent? A target? A level that causes concern? A level that shows some demonstrable effect? Is this only for water or for closely related resources, such as wildlife. For road densities, the threshold is set at 3 miles per square mile, while much of our recent efforts on the national forests has been to get road densities below 2 miles per square mile, and preferably below that. Certainly, then, the "threshold" of concern would be at 2 or lower. Please explain.

Response:

Sections 3.2.2.1 and 3.3.2.1 – Process for Evaluating Drainages of Particular Concern explain the process used to establish the thresholds and what they represent. In addition, Appendix I – Physical and Biological Resource Data Tables displays additional information that was used in establishing the thresholds. USFS staff and the consultants developed these thresholds together. The thresholds were established for the soil and water related resources.

As described in Chapter 3 (see Sections 3.2.2.1 and 3.3.2.1 – Process for Evaluating Drainages of Particular Concern), the thresholds are a means of picking out the impacts among the alternatives, and comparing the degree of impact within the smaller drainages.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

We support the MDP proposal to restore some creeks, such as Beaver Lake Creek (DEIS 4-151; F-45). This program should be expanded. Outweighing the proposed restoration is new culverting of other streams. Long segments of Creek Run and Tunnel Creek would be placed in a culvert for a road and new lodge, respectively. Ditching and culverts is proposed for Mill Creek and near the Little Thunder lift (DEIS 4-70, 151). Significant grading, clearing and lift construction (including roads?) are proposed in riparian zones and wetlands adjacent to Mill Creek and tributaries at the base of Mill Creek lift. (Figure 2.3.6-1).

Response:

The FEIS discloses in Section 4.3 - Water and Watershed Resources that direct impacts to stream channels would occur during the construction/removal of stream crossings including culverts, bridges, and fords. Several Management Requirements (MR3, MR8, MR9, MR10) and Other Management Provisions (OMP9) would reduce the impacts of constructing/removing stream crossings. The restoration of Beaver Lake Creek and other restoration projects listed in Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan are considered beneficial components of the Action Alternatives.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Of the total of 72.29 acres of wetlands in the study area (including Mill Cr), 52.75 acres (73%) have already been modified. (Mill Creek is 33.9 acres with 23.7 modified). So the ski area has impacted 29.05 acres (75.6%) out of a total of 38.39 acres. The preferred alternative shows 5.88 acres of new impacts, some of which may be offset by restoration efforts at 2 degraded wetlands at Summit West and Central totaling 0.67 acres (DEIS 2-51, F-44; Larry Donovan email 2-13-06). Tables 3.3.1-5 (DEIS 3-45) and 4.3.3-3A (DEIS 4-74), 4.3.3-9 (DEIS 4-97) seem to indicate a net loss of 1.4 acres of wetlands. Normally, mitigation requires active restoration of 1 to 4 times the acreage of wetlands impacted. How can the donation of other wetlands, which would be given protection under current forest practices rules, be considered adequate mitigation?

Response:

As described in Section 4.3.6.1 – Upper Yakima River Watershed, restoration of Wetlands #207 and #142 would be performed in conjunction with tree island revegetation, and would be considered to have a beneficial direct impact because wetland functions such as the hydrologic regime, shading, and nutrient and carbon cycling would be restored to more natural conditions. The FEIS acknowledges that grading for ski runs can displace wetland area and removes all functionality of the wetland through placement of fill material or soil excavation. Clearing of vegetation can remove some of the wetland functions due to the alteration of surrounding plant communities. The use of Management Requirement MR24 and Other Management Provisions OMP7, OMP14, and OMP16 in Table 2.4-2 would minimize the potential impacts to wetland functions from clearing and grading associated with the Action Alternatives.

Donated wetlands are not considered mitigation for impacts to wetlands within the Study Area. The wetland restoration projects are not considered compensatory mitigation for wetland impacts under the Action Alternatives according to Section 404 of the Clean Water Act. Wetland mitigation under Section 404 would occur following final project designs and delineation of jurisdictional wetlands.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

As is noted the many projects will require Hydraulic Project Approval from WA Dept of Fish & Wildlife. (DEIS 1-52) However, proposals such as putting a tributary of Tunnel Creek in a culvert under a new lodge at Central (DEIS 4-70) may not meet the requirements of the state code.

Response:

As described in Section 1.7 – Permits, Approvals, and Consultations Required, The Summit-at-Snoqualmie is required by its SUP to comply with all present and future State and local laws, ordinances and regulations to the extent that they are not in conflict with Federal law or policy. The Summit-at-Snoqualmie must obtain Hydraulic Project Approval for all project components that involve development projects in State waters (i.e. culverts). According to the Governor's Office of Regulatory Assistance (www.ora.wa.gov), WDFW will issue a HPA if fish and fish habitat can be properly protected.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

SPAMA goal is 2 miles (or less) of road per square mile in each subwatershed (SPAMA FEIS 2-26); but table 4.3.6-1 shows 5.9 miles per square mile for the portion of the study area in the Coal Creek drainage; for the Hyak Creek portion (Hyak plus Creek Run) the road density is 2.5 miles per square mile. Neither of these meets the goals of the SPAMA. The proposed MDP would even add road mileage in Creek Run. Road crossing density for Hyak Creek forest (Hyak plus Creek run) is 17.05 per square mile, which is nearly 3 times the "threshold". (Table 4.3.6-1, DEIS 4-150) These argue against further construction into the Hyak Creek area.

Response:

As described in Section 3.3.2.1 – Process for Evaluating Drainages of Particular Concern, thresholds were determined from a variety of published sources applicable to the setting found in the Study Area, and from site-specific data gathered in the Study Area. The SPAMA goal of 2 miles/mile² pertains to the subwatershed scale (see SPAMA ROD page 4, and Figure 3-3 in the SPAMA FEIS) while the Drainages of Particular Concern threshold in The Summit-at-Snoqualmie EIS pertains to the drainage scale (7th field). The use of 3 miles/mile² at the drainage scale is not intended to meet the SPAMA goal of 2 miles/mile². Rather, it is a measure of watershed health.

While the analysis of the effects resulting from the Action Alternatives takes place at the Study Area scale, the cumulative effects analysis encompasses the entire 5th field. As a result, both the site scale

and watershed scale effects are considered as required by NEPA and in support of the Aquatic Conservation Strategy analysis.

Road density within the Creek Run drainage would not increase with implementation of the Action Alternatives. As shown in Tables 4.3.3-2, 4.3.4-1, 4.3.5-1, and 4.3.6-1 (as compared to Table 4.3.2-1), the road density in the Creek Run drainage would decrease from 2.52 miles/mile² to 2.24 miles/mile² under Modified Alternative 5 and 2.25 miles/mile² under Alternatives 2, 3, and 4.

The Creek Run and Hyak 7th field drainages are presented separately in Tables 4.3.2-1 (Alternative 1 – existing condition) and 4.3.6-1 (Modified Alternative 5). Under the existing condition, both of these drainages are already above the threshold for road crossing density. Under Modified Alternative 5, road crossing density would increase by 0.01 crossings/mile² in the Creek Run drainage and by 3.33 crossings/mile² in the Hyak drainage (by comparing Table 4.3.2-1 to Table 4.3.6-1).

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Support facilities, such as maintenance buildings, fuel tanks, and propane tanks, have significant impacts and risks of spills. The MDP must include locate them and include adequate measures to protect water quality and other natural resources.

Response:

As described in Table 2.4-2, Management Requirement MR14 requires The Summit-at-Snoqualmie to develop a Spill Prevention and Response Plan that must be approved by the USFS as a part of the project specific SWPPPs. In addition, petroleum products will not be discharged into drainages, no fuels will be stored within riparian zones, and all petroleum products will be secured in self-contained safety cans. Section 2.3.2.9 – Other Utilities/Infrastructure describes the existing location of utilities and infrastructure such as propane tanks and petroleum fuel.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

EPA recommends that the Record of Decision (ROD) include a condition underscoring the need for watershed restoration specifically in the 7th field drainages. The ROD should emphasize that specific design elements may be reconsidered, modified, or eliminated if necessary to meet regulatory permit requirements if information is discovered during annual monitoring or further design development during various phases of construction that indicates an individual project element is not acceptable. Including such a condition will help ensure that the need for watershed restoration in the localized drainages of the study area will be properly balanced against the socioeconomic needs for the project.

This also will provide appropriate context for subsequent evaluation of the detailed design construction plan that will occur over the next 10-15 years.

Response:

The Restoration, Implementation, Operation, and Monitoring Plan (Appendix F) has been updated to specify the 7th field drainage in which each restoration project will occur. The ROD will include specific design elements that may be reconsidered, modified or eliminated if necessary to meet regulatory permit requirements.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

In describing the proposed action (p. 4-84), the EIS indicates that several streams in the Upper Yakima Watershed exceed water quality standards for turbidity, temperature and dissolved oxygen most likely because of historic development at the Summit at Snoqualmie. Impacts from Alternative 5 are assumed in the EIS to be the same as Alternative 2 (p.4-157), and the EIS states that impacts to these water quality parameters would continue to have water quality impacts. Stream channel conditions are described as expected to undergo long-term improvements (p. 4-152 and 153), but the water quality exceedances are not fully consistent with that assessment. The EIS should discuss whether planned restoration actions will address the identified surface water quality exceedances discussed at page 4-84 and 4-147. The cumulative impacts analysis should evaluate whether the proposed action (or individual elements) are likely to exacerbate surface water quality issues at the identified streams.

Response:

The FEIS has been updated to correct the reference to The Summit-at-Snoqualmie. The historic development referred to in this statement is within the larger Snoqualmie Pass area, and includes private developments, I-90, as well as ski area facilities. Some of these existing impacts (e.g., Coal Creek along I-90) are expected to contribute to the degradation of water quality because no restoration projects in this NEPA analysis are intended to address these impacts because they are outside the analysis area, and outside the control of the proponent or USFS. The stream channel conditions referred to on DEIS pages 4-152 and 153 specifically describe conditions within the analysis area. The FEIS has been updated to better display the correlation between restoration actions and threshold exceedences in the DPC analysis. Chapter 4 – Environmental Consequences of the DEIS and FEIS includes analysis of impacts within the Study Area resulting from the range of alternatives. This analysis includes the effects of the alternatives on water quality (e.g., Section 4.3.5.2 - Water Quality). Chapter 4 – Environmental Consequences of the DEIS and FEIS also includes analysis of the effects of past, present and reasonably foreseeable actions coupled with the

Action Alternatives within the Study Area and the larger 5th field (e.g., Table 4.3.8-2 - Culvert Replacements).

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

Appendix F, Section 5 specifies restoration projects identified as part of the proposed master development plan. Projects listed in Table 5-1 of the appendix are described as having been included in the analysis for the DEIS. It is unclear from this statement whether the summary tables for Drainages of Particular Concern (e.g., Table 4.3.6-1) are assessed assuming that the restoration projects are implemented? Page 4-150 states "These restoration projects would help to address areas of concern identified in the DPC analysis", but it is not readily clear from the analysis whether the planned restoration is intended or expected to result in some measurable improvements (i.e., reducing one or more parameters below a threshold in a specific project area drainage). We recommend that the EIS/ROD include a requirement that measurable outcomes be targeted for the improvement of the undocumented impacts to local drainages.

Response:

The FEIS has been updated to clarify the effects of specific restoration projects on the DPC analysis. The ROD will include reference to measurable outcomes as described in Section 5.0 of the Restoration, Implementation, Operations and Monitoring Plan (Appendix F). The ROD will describe the entire implementation process and also includes a requirement that measurable outcomes be included for the improvement of watershed conditions at the 7th field scale.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

The EIS identified two wetlands by number (207 and 142) and describes a general location for restoration as part of the proposed action. We could not locate those wetlands on the map. We recommend that the final EIS locate on a map both the wetlands proposed for restoration and those that would be impacted by the preferred alternative.

Response:

In the DEIS Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan, Figure 10, Locations of Proposed Restoration Projects depicts the two wetland restoration areas in purple. Appendix F Figure 10 in the FEIS has been updated to more clearly display the proposed restoration projects, including a cross-reference to Tables 5-1 and 5-2.

Donald Parks
Alpine Lakes Protection Society

Comment:

The abandoned lift on the back of Hyak stands as an example of over-development with lasting consequences. The machinery has not been dismantled. The clear-cut area was never replanted. The land was simply used up, then abandoned. This is not responsible land management. Booth Creek needs to demonstrate responsibility by making concessions for what has already been lost before expecting further concessions from us, the land owners. Please revise the DEIS to address this restoration issue.

Response:

As described in Section 2.3.3.1 - Lifts, the existing *Backside* chairlift would be replaced, realigned, and renamed *Mill Creek*. Table 5-1 and Section 5.4 - Revegetation in Appendix F - The Summit-at-Snoqualmie MDP - Implementation, Operation, Restoration and Monitoring Plan lists resoration projects required under the Action Alternatives. This includes revegetation with shrub or herbaceous plant communities when existing lift terminals, lift towers and lift structures will be removed.

Eng Ron
The Mountaineers

Comment:

We DO support moving of the existing parking areas further from the South Fork Snoqualmie River where possible in order to reduce impacts to the river and the riparian corridor. We do, however, wonder if paving any more of the roadway or parking area might not serve to increase runoff due to soil impermeability and increase sedimentation or pollution from deicers and petroleum products caused by vehicles. As we assume paving would be with asphalt, petroleum-related residue from that source is also common and it should be taken into account.

Response:

As described in Section 4.3.3 – Impacts – Alternative 2 (Proposed Action), the FEIS acknowledges that increased pollutant concentrations in stormwater due to the development of impervious surfaces could result in long-term indirect impacts to water quality. The Summit-at-Snoqualmie would implement a Stormwater Management Plan under the Action Alternatives (see Appendix G – Conceptual Stormwater Management Plan). The plan would reduce the impacts to water quality by treating runoff, collecting oil and grease, and retaining sediment from newly paved surfaces, such as parking lots.

As described in Table 2.4-2, Management Requirement MR14 requires The Summit-at-Snoqualmie to develop a Spill Prevention and Response Plan that must be approved by the Forest Service as a part of

the project specific SWPPPs. Measures to prevent petroleum pollution or spills would be taken under each Action Alternative.

Eng Ron
The Mountaineers

Comment:

In addition, we urge that intensive monitoring for the length of the project be undertaken to study the effects of construction, expansion and operation of the developed ski area including the adequacy of the mitigation measures on wildlife and other recreational uses be undertaken. We believe this is a necessity if possible future expansion plans are to even be considered.

Response:

As described in Section 2.5 - Monitoring, monitoring of all construction activities will be carried out according to The Summit-at-Snoqualmie MDP - Implementation, Operation, Restoration and Monitoring Plan (Appendix F). The objectives of the plan are to monitor the implementation of mitigation, effectiveness of management practices, and validation of the impact analysis.

Kristin Ohberg

Comment:

When I hike in the Hyak area in the summer, I am dismayed at how little the ski area does to control erosion; the damaged caused by the mountain bike program several years back has never been repaired. Old signage and poles have not been cleaned up. Drainage ditches are not maintained, so roads are washed out, which is dangerous for early and late season skiing. Slopes are brushed infrequently, or not at all.

Response:

As described in Section 2.3.3.11 - Restoration and Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan, several restoration projects would be implemented under the Action Alternatives. Restoration projects include slope stabilization, road deactivation, tree islands, revegetation, and stream/riparian area restoration in order to restore disturbed areas and maintain/improve the health of aquatic and riparian ecosystems. For additional information regarding operations and restoration projects, see Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan. Ditch maintenance, brushing, and cleanup are addressed under Annual Maintenance and Operations Plans, not the proposed MDP.

Toby Paterson

Comment:

The "consultants" assert as sighted in the DEIS Section 4.3, page 4-85, that alternative 2 would decrease pollution due to oil, grease, and hydraulic fluid. The problem with this assertion is the pollution level comparison is with the resorts current level of pollution. The "consultants" have not used a zero level of pollution threshold for the gauge of analysis. Therefore, implementing any sort of plan might reduce the resorts dumping of toxic pollutants into our watersheds. The current resort level of pollution should not be the reference for possible improvement. The gauge of pollution dumping improvement should be in relation to how far above a zero level of pollution threshold the resort is dumping toxic pollutants into the watersheds.

Given the closeness to sensitive riparian zones and fresh water sources the only reasonable course of action for the resort is to bring the level of pollution as close to zero as possible.

Response:

As described in Section 2.3.2 – Alternative 1 – No Action Alternative, the No Action Alternative is included in the EIS as a benchmark against which the Action Alternatives can be compared, as required by NEPA. The impacts of each Action Alternative are compared to eachother and the No Action Alternative, which represents the current environmental condition. Under all Action Alternatives, The Summit-at-Snoqualmie would implement a Stormwater Management Plan (see Appendix G – Conceptual Stormwater Management Plan). As described in Section 2.0 – Design Objectives and Criteria of Appendix G, inclusion of the Stormwater Management Plan in the MDP is intended to serve as one method of reducing impacts of the MDP on the aquatic environment, as well as a potential means of maintaining or improving watershed conditions in the vicinity of parking areas. One component of the Stormwater Management Plan includes treating runoff, collecting oil and grease, and retaining sediment from newly paved parking lots.

Toby Paterson

Comment:

There is no mention of the negative environmental impact (caused by the resort) that has occurred at the tubing center-, which caused wetland destruction and economic cost for, clean up.

Response:

Table 3.3.1-5 displays existing wetland characteristics within The Summit-at-Snoqualmie Study Area, including natural and modified wetlands. Past impacts to the tubing center wetlands were mitigated under its own Section 404 process. Monitoring of the wetland was completed in 2004. Wetland impacts due to construction of impervious surfaces, grading, construction of water bars, or other land management activities are described and included in the existing condition discussion in Chapter 3.3 - Water and Watershed Resources.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Increased impervious surface from increased parking lots and paving parking lots results in increased runoff. This will have serious effects on water quality, especially when combined with the use of deicer.

Tracy Silves

Comment:

The statement, for example, fails to read that by placing a paved parking area where lots three and four are currently, water will inevitably run off into tributaries surrounding the lots, effecting primary water sources such as the Wenatchee and Columbia rivers.

Group Response:

As described in Section 4.3.3 – Impacts – Alternative 2 (Proposed Action), the FEIS acknowledges that increased pollutant concentrations in stormwater due to the development of impervious surfaces could result in long-term indirect impacts to water quality. The Summit-at-Snoqualmie would implement a Stormwater Management Plan under all Action Alternatives (see Appendix G – Conceptual Stormwater Management Plan). The plan would reduce the impacts to water quality by treating runoff, collecting oil and grease, and retaining sediment from newly paved surfaces, such as parking lots.

Toby Paterson

Comment:

We do not see a mention of the downstream negative agricultural impact due to water being displaced from the South Fork Snoqualmie River Watershed to the Wenatchee River Watershed due to snowmaking at Central.

Toby Paterson

Comment:

The snowmaking activities which the resort has taken part in are not mentioned in the DEIS. Of particular concern is the removal of water, via claimed water right, from the S.F. Snoqualmie and the transfer of this water into the U. Yakima watershed by snowmaking equipment at Central. This fact of snowmaking at Central was confirmed to have happened in 2004/5 from a Booth Creek employee.

The removal of water without the possibility of return from a watershed, has some probable impact on fish and wildlife downstream and negatively impacts subordinate downstream agricultural water rights.

The DEIS even sites that snowmaking is not available. However, the resort has used snowmaking equipment in the past.

DEIS: Chapter 3, Section 3.11, Page 3-207, paragraph 2:

"..the absence of substantial lift upgrades, terrain expansion, and snowmaking capability,..contributed to the lackluster performance."

The previous quote is another example of the disengenuous nature of the DEIS.

Group Response:

Current snowmaking at Summit Central utilizes municipal water provided by the Snoqualmie Pass Utility District (SPUD). The water used for snowmaking drains into the Upper Yakima River watershed, and all municipal wastewater supplied by SPUD is treated within the Upper Yakima River watershed. The FEIS has been updated to clarify existing snowmaking capacity at The Summit-at-Snoqualmie.

25.0 – VEGETATION COMMENTS

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

All the proposal maps have a green color that apparently represents forest, though it is not noted in the legend. Large areas in section 17 (Rockdale Lake) that were clearcut are shown in grey (non-forest?) but the clearcuts in section 21 (Mill Creek) are shown in green. The legend indicates much of section 21 as silver fir sapling. Is there a significant difference with the replanted clearcuts in section 17?

Response:

The vegetation in Section 17 (Rockdale Lake) is not as developed as the trees in Section 21. The difference between the two sections is the size of the trees.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The statement in the DEIS that the ski area would have to comply with the upcoming ROD on the regional management of noxious weeds is not adequate. At a minimum, the FS must identify the existing problems, and risks of further problems in MDP plan area.

Response:

Noxious weeds occurring within the Study Area are identified in Section 3.5.1.5 - Noxious Weeds. Section 4.5 - Vegetation discloses the risk of weed establishment and propogation assocaited with

each of the Action Alternatives. Management Requirement MR28 has been included in the analysis to include measures consistent with the noxious weed strategies for the MBSNF and OWNF.

Toby Paterson

Comment:

We also do not see the level of tree and foliage removal that has happened for the resort's downhill mountain bike courses.

Response:

Section 3.5 - Vegetation describes the existing conditions of the Study Area and does not necessarily differentiate mountain biking trails from other past clearing for ski area operations. As noted on page 3-110 of the DEIS, mountain biking is considered a backcountry recreation activity, which has some vegetation maintenance for these activities. However, the Summit at Snoqualmie has not supported mountain biking within the SUP since the summer of 2002.

30.0 – WILDLIFE COMMENTS

Candace Ito

Comment:

While I understand that there has already been studies at the various options available for responsible development of the area, it appears that further investigation on the impact of the wildlife corridor is necessary. Further development that will negatively impact the animals for a skiing area that is expected to have a decreasing snowfall in the couple of decades to follow seems to be an irresponsible move.

Response:

FEIS Alternatives 3 and 4 do not include the *Creek Run* lift and trails, therefore reducing potential impacts to wildlife and their associated habitat.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Suggestions that wildlife will merely travel around the east end of Mt Hyak are just that- suggestions. The DEIS provides no evidence of which species are currently or have historically used this route, nor any demographic analysis of projected use. The biological studies provided are within the proposed SUP, which includes only a small part of that area.

The suggested wildlife corridor east of Mt Hyak is crossed by two roads, a powerline and the old railroad grade that is now a state park trail. There are also two parking lots for the trail, one of which is used by hundreds of cars per day on summer and winter weekends, plus a power substation,

WSDOT maintenance facility, sewage treatment ponds and spray fields, and cabins. Furthermore, there is additional private land along the shore of Lake Keechelus in section 15 that may be developed. The DEIS provides no justification as to why this is a well functioning wildlife corridor and how it would substitute for Hyak Creek. In fact, it doesn't even describe it, and the maps are lacking in the basic information noted above.

While there are additional mitigation and other measures that could improve the functionality of the Mt Hyak/Keechelus corridor for species in this forest type, those are not even noted in the DEIS. Furthermore, any such measures will come far later than the cutting in the Hyak Creek corridor, which is expected in the first year or two. For instance, the wildlife bridges being installed on I-90 as part of a freeway rebuild and restoration of endangered bull trout habitat are five years away at the earliest. Discussions have only begun on potential restoration of some forest habitat in the upper Keechelus reservoir without diminishing storage capacity. Nor do these measures necessarily meet the needs of all the upper elevation species. None of this is can be relied upon to meet the conditions of the CEA. Before the FS suggests that this area is a viable substitute for the Hyak Creek corridor, actual data is needed and improvements to the habitat implemented.

Response:

The FEIS incorporates the larger wildlife studies that have occurred in the Snoqualmie Pass area through several excerpts from these studies and by reference. FEIS Section 3.6.1 – Summary of Existing Conditions has been updated to include relevant studies regarding wildlife in the Snoqualmie Pass area that were used in the analysis. One of the studies used for this analysis in the I-90 Snoqualmie Pass Wildlife Habitat Linkage Assessment (Singleton and Lehmkuhl 2000). The Study Area for the proposed Summit at Snoqualmie MDP EIS coincides with Section 5 - Snoqualmie Pass described in the Assessment.

As described in the DEIS (page 3-164) and FEIS and the I-90 Snoqualmie Pass Wildlife Habitat Linkage Assessment (Singleton and Lehmkuhl 2000), the Gold Creek corridor is described as a Connectivity Emphasis Area in the Snoqualmie Pass area under SPAMA. Page 3-164 of the DEIS indicates that deer, elk, bobcat, coyote and other carnivores have been documented to use this zone. The additional mitigation measures, such as the I-90 wildlife bridges, are considered in the Cumulative Effects analysis for wildlife. Furthermore, the proposed land donation in Mill Creek, approximately 390 acres, contains land ranging in elevation from 2,800 to 4,000 feet. While the donated land is currently primarily saplings, it will be managed for the promotion of late successional habitat.

The I-90 Snoqualmie Pass East (WSDOT 2005) study acknowledges that additional late-successional habitat is 50-100 years in the making with the current land management direction in the Snoqualmie Pass area. The WSDOT I-90 improvements include the construction of wildlife bridges over Gold Creek to improve wildlife connectivity. This area of improvement coincides with the high wildlife use of the area described by Singleton and Lehmkuhl (2000). While Singleton and Lehmkuhl

acknowledge that the Hyak Creek corridor provides good linkage for late successional, low mobility species, no corridor improvement projects have been proposed for this area. As such, the land donation proposed in Mill Creek has the highest potential to provide late-successional habitat for species that utilize the Gold Creek corridor. While complete development of late-successional habitat is a long-term process, the trend is towards an overall improvement in wildlife connectivity in the Snoqualmie Pass area.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Forest Zones, Habitat & Connectivity

The Snoqualmie Pass Area is a mix of Pacific Silver Fir (PSF) and Mtn. Hemlock (MH) Zones, with subalpine at upper portions of Alpental. The DEIS states that the Pacific Silver Fir zone is from 3,000-4,000', with Mountain Hemlock zone 3,400-5,400'. (DEIS 3-109) The 1997 Gap Analysis of Washington State (Cassidy et al) shows the Snoqualmie Pass area in a narrow band of the Silver Fir & Mtn Hemlock zones, with Western Hemlock and Grand Fir just to the west and east respectively. Combined with other sources, such as Franklin & Dyrness (1973, p93), this suggests the PSF Zone would be above 2,500' near Snoqualmie Pass. The only area where the elevation remains above 2,500' is between Franklin Falls and Gold Creek. Keechelus Lake constrains movements for most terrestrial species.

"The Snoqualmie Pass area has unique importance because it is the narrowest point of federally owned middle and high elevation habitat between the North and South Cascades, and the lowest elevation corridor between western and eastern Washington." "Because of this, the suitability of the area for movement and dispersal of wildlife is critical to sustaining populations of rare or sensitive species with naturally low densities and wide ranges, such as the wolverine, grizzly bear, fisher, spotted owl and wolf." (DEIS Appendix D, Wildlife Report p19)

This confirms that those species that are associated with PSF, MH, subalpine and alpine habitats have no other connection between the north and south Cascades for dispersal and genetic flow. Global warming will push these zones higher. This means the Forest Service must take extra precautions to insure that these habitat types are maintained in the Snoqualmie Pass vicinity. The proposed action is contrary to this approach.

Response:

While this comment discusses a significant issue related to wildlife habitat and connectivity (see FEIS Section 1.5 - Scoping, Significant Issues, and Public Participation), the range of alternatives developed for the Proposed Action evaluate different levels of development and subsequent impact to wildlife habitat and connectivity in the Snoqualmie Pass area. For example, the proposed action includes the development of two chairlifts and associated ski terrain in the Section 16. Alternative 3

was developed to analyze reduced Section 16 (one chairlift and associated terrain) and Alternative 4 was developed to analyze no development in Section 16.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

With additional lifts and runs pushing into relatively undisturbed habitat, and a gondola bringing many people to that wild country, where is the offsetting closure of roads or reestablishment of natural habitat in the Alpentel valley?

Response:

The reestablishment of natural habitat in the Alpentel Valley is outside the scope of the MDP for The Summit-at-Snoqualmie. FEIS Alternative 3 does not include the gondola or the mountain-top restaurant on Denny Mountain. In addition, the terrain available under the Action Alternatives is currently accessible, lift-served backcountry.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

About 16 species find their preferred habitat in PSF, MH, subalpine and alpine vegetation zones. These include lynx, pine marten, hoary marmot, water vole, pika, ptarmigan, great gray owl, three-toed woodpecker, red-breasted nuthatch, American pipit, Clark's nutcracker, pine grosbeak, white-winged crossbill, gray-headed rosy finch, Lincoln's sparrow, and cascades frog. This highlights those species most affected by the Snoqualmie Pass ski development.

For another 20 species a significant portion of their current range and habitat is in PSF and above. This includes wolf, grizzly bear, wolverine, spotted owl, black-backed woodpecker, mountain chickadee, Townsend's solitaire, gray jay, and tailed frog. Ski area development would significantly affect the habitat and/or dispersal of these species.

Of those 36 species (note a couple are probably very uncommon or visitors), about 30 are likely to find habitat in Hyak Creek, and perhaps 8 of those would be restricted to a PSF/MH forest connectivity area (essentially between Rockdale Cr and Gold Creek)- making Hyak Creek corridor a significant portion of the connectivity potential. These are pine marten, water vole, great gray owl, three-toed woodpecker, red-breasted nuthatch, pine grosbeak, Lincoln's sparrow, cascades frog. Hyak Creek would also be a significant connectivity corridor for wolverine and spotted owl. While wolf,

grizzly bear and lynx, have had their range artificially restricted in the 20th century, Hyak Creek would provide an important corridor opportunity. (GAP², WBBA³)

Response:

Comment noted. Section 3.6 - Wildlife and Appendix D - Wildlife Resources Report identify and describe the habitat requirements of pertinent wildlife species potentially occurring within the Study Area. FEIS Section 3.6.1 – Summary of Existing Conditions has been updated to include relevant studies regarding wildlife in the Snoqualmie Pass area that were used in the analysis. As described in Section 4.6 - Wildlife, impacts to wildlife species are analyzed and described for each Action Alternative.

While the Hyak Creek corridor contains late-successional habitat important for multiple species, several prominent studies in the Snoqualmie Pass area have documented connectivity problems with I-90 (WSDOT 2005, Singleton and Lehmkuhl 2000). In the vicinity of Hyak Creek, I-90 ranges from a six to eight lane highway with center jersey barriers (Singleton and Lehmkuhl 2000, WSDOT 2005). The physical structure of I-90 presents a more substantial barrier to terrestrial species (i.e., wolverine, spotted frog, bear) than to bird species as they have the ability to fly over the highway. While two box culverts under I-90 along Hyak Creek and Coal Creek can provide a connective corridor for small species, they are not utilized by species larger than a marten (Singleton and Lehmkuhl 2000). Furthermore, there are no known proposals to improve the connective corridor over or under I-90 with the Hyak Creek area.

Eng Ron
The Mountaineers

Comment:

The limited information in the Draft EIS does not even list the three dozen species whose primary habitat or range is found above 2,500 feet at Snoqualmie Pass. There is no demographic analysis that would support a conclusion that the Hyak Creek forest corridor is not important to these species.

Response:

The wildlife species addressed in the FEIS are identified in Section 3.6 - Wildlife and habitat requirements are described in detail in Appendix D - Wildlife Resources Report. It is not clear what species this comment refers to as being omitted from the DEIS. The DEIS and FEIS estimate that there are approximately 290 species potentially occurring in the each on South Fork Snoqualmie River and Upper Yakima river watersheds. Furthermore the DEIS and FEIS identify and analyze impacts to 29 special status species and over 80 migratory bird species.

² GAP = Washington Gap Analysis, 1997

³ WBBA = Washington Breeding Bird Atlas 1997

Kara Whittaker

Comment:

I would like to suggest a change to OMP 43 regarding the acceptable dates of habitat disturbing activities, specifically that the start date be extended to Sept. 1 (rather than August 1). Based on my experience monitoring breeding bird territories in this region over the last 4 years, nesting activities are not finished until mid-August. Additionally, fledgling birds need to spend at least a couple more weeks outside of the nest on their natal territories while dependent on the care of their parents for survival during this sensitive phase of life. After this time, dispersal away from the natal territory commences and juvenile birds should be well enough developed to escape from habitat disturbing activities (feathers fully grown and independence from parental feeding).

Response:

The work window dates included in OMP43 in the DEIS were based off approved work windows for Northern spotted owl and marbled murrelet. The USFS does not regulate work windows for neotropical migratory species. OMP43 was included as a measure to reduce potential impacts to nesting species.

Mark A. Shillcutt

Comment:

SE Group's DEIS Table S-3 Summary Comparison of Environmental Consequences by Alternative clearly indicates that many species, including Northern Spotted Owl, Grizzly Bear, Gray Wolf, Great Gray Owl, and Pileated Woodpecker, would be adversely affected in any scenario other than Alternative 1. This alone is superfluous reason for Alternative 1 to be the preferred and only reasonable Alternative. Additionally, the nocturnal habits of wildlife are largely unknown, so also the affects of night skiing expansion on animal such as these. Also, the DEIS failed to include such indicator species of concern as the Larch Mountain Salamander.

Response:

Table S-3 is included in the Executive Summary per Council for Environmental Quality regulations. Additional information of wildlife species, occurrence, and habitat requirements can be found in Section 3.6 – Wildlife, Appendix D - Wildlife Resources Report and Appendix E- Aquatic ESA Listed Species Baseline Conditions Report. Larch mountain salamander was identified in Table 3.6.1-10 and discussed on pages 3-152-153 of the DEIS and has a current status of 'not detected' within the Study Area. Impacts to larch mountain salamander were discussed on pages 4-311 of the DEIS. The FEIS has been updated to include Table 3.6.1-FEIS1, which lists wildlife surveys that have occurred within the vicinity of Snoqualmie Pass.

Nancy Keith
Mountains to Sound Greenway

Comment:

But given the reduction of forest habitat at the summit due to historic and piecemeal development, the impacts of this project on healthy habitat and wildlife survival has to be given the highest degree of comprehensive scrutiny. How will the preferred alternative affect the "potential use" of this forest by the animals listed in the study area? If Hyak Creek is not currently a viable wildlife corridor, then where is that corridor at this elevation? What can ski resort development do to expand and protect the best corridor? To what degree will proposed gladed ski runs further fragment this forest? (It's hard to tell when these runs are shown as dotted lines on the map. Simulations of the actual forest openings would be helpful.)

Response:

The impacts of the Preferred Alternative (Modified Alternative 5) on wildlife and their habitat within the Study Area are described in Section 4.6 - Wildlife. Wildlife connectivity is discussed in FEIS Section 3.6.2 – Habitat Connectivity and the impacts on habitat connectivity are discussed under each alternative in Section 4.6 - Wildlife. Cumulative effects to wildlife habitat connectivity are discussed in Section 4.6.7 – Cumulative Effects.

As described in Section 2.3.1.3 - Construction, the glading construction technique involves selective tree removal that will retain 70% canopy coverage. If existing canopy coverage is less than 70%, no glading treatment is authorized.

Patricia A. White
Defenders of Wildlife

Comment:

The Forest Service suggests that the Hyak Creek corridor is either not fully functional due to past impacts and/or that wildlife can move around the east side of Mt. Hyak. Neither of these suggestions is substantiated or sufficient to allow the heavy forest cutting and fragmentation proposed. The Hyak Creek corridor is still functional and could improve with proper land management.

Response:

As described in the FEIS Section 4.6.9 – Adaptive Management Area Standards and Guidelines, the USFS Preferred Alternative (Modified Alternative 5) would be “neutral or beneficial” to late-successional habitat (LSH) and to connectivity within the Snoqualmie Pass Adaptive Management Area. New ski trails and glading would be proposed in LSH, but the proposed 390-acre land donation in Mill Creek would provide replacement habitat, reduce fragmentation and improve habitat connectivity within the Study Area. FEIS Alternatives 3 and 4 do not include the *Creek Run* lift and trails.

Sheri Watson

Comment:

Can you tell me where to find more information on potential impacts to wildlife connectivity in this area? Are we sure this is not perilous to the already stressed creatures? If I cannot be assured of this, I cannot support it. Habitat and connectivity are worth protecting, even at a personal cost. I also understand some trees will be cut down. While I don't like this, I trust The Summit's commitment to conservation in this area and hope that they will leave a very small footprint. Can you help me understand how many trees will be cut down and approximate age?

Response:

Additional information on wildlife connectivity can be found in the I-90 Wildlife Linkage Habitat Assessment (Singleton and Lehmkuhl 2000) and the I-90 Snoqualmie Pass East DEIS (WSDOT 2005), which are incorporated into this analysis by reference. Section 3.6.1 – Summary of Existing Conditions of the FEIS has been updated to include additional wildlife studies that were used in the analysis.

Exact number of trees, or the age of specific trees that will be cut has not been determined at this time. As described in Section 3.5 - Vegetation, tree age within the Study Area ranges from saplings to over 200 hundred years old. Tree age was classified for purposes of this analysis as mature (greater than 80 years old) and immature (less than 80 years old). As such, impacts described for each alternative are only described for these two age classifications.

In addition, FEIS Alternatives 3 and 4 do not include the *Creek Run* lift and trails to address impacts to wildlife habitat connectivity.

Toby Paterson

Comment:

We see no mention of the danger to the Puget Sound Orca, which have been recently listed as endangered.

Response:

While the Puget Sound Orca has recently been listed as endangered, it is not included on the Regional Forester's Sensitive Species list. No known habitat and its presence has not been documented within the Study Area

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Scientific Study

As noted above, the Forest Service has very weak scientific basis for decisions that have dramatic and long term consequences for wildlife. As part of the MDP, the Forest Service and the ski area should conduct an intensive study to evaluate the historic and current wildlife use in the area, demographic needs of key species and functionality of existing corridors. Such a study should also evaluate ongoing mitigation and conservation measures as well as development occurring and proposed. In that way, the Forest Service will have more substantive information on which to base decisions on future plan revisions or other proposals in the Snoqualmie Pass area. This is a ten year plan, and the elements deleted may be requested in a future round.

Donald Parks
Alpine Lakes Protection Society

Comment:

Scientific Study

As noted above, the Forest Service has very weak scientific basis for decisions that have dramatic and long-term consequences for wildlife. We strongly suggest that the Forest Service and the ski area initiate a detailed technical study to evaluate the historic and current wildlife use in the area, demographic needs of key species and corridor functionality. Such a study should also evaluate the ongoing mitigation and conservation measures as well as the development occurring and proposed. In that way, the Forest Service will have valid information on which to base decisions on future plan revisions or other proposals in the Snoqualmie Pass area.

Group Response:

As described in FEIS Section 4.6.9 – Adaptive Management Area Standards and Guidelines, the USFS Preferred Alternative (Modified Alternative 5) would be “neutral or beneficial” to late-successional habitat (LSH) and to connectivity within the Snoqualmie Pass Adaptive Management Area. New ski trails and glading would be proposed in LSH, but the proposed 390-acre donation in Mill Creek would provide replacement habitat, reduce fragmentation and improve habitat connectivity within the Study Area. Within ski trails proposed for glading 70% overstory canopy closure would be maintained.

FEIS Alternatives 3 and 4 do not include the *Creek Run* chairlift and trails to address concerns for wildlife connectivity. Additionally, monitoring of the MDP is described in FEIS Section 2.5 - Monitoring and Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan. Monitoring requires the evaluation of the required Mitigation

Measures, Management Requirements, and Other Management Provisions described in FEIS Table 2.4-2.

35.0 – FISHERIES COMMENTS

Toby Paterson

Comment:

We do not see an analysis of how many Salmon, Steelhead or other threatened fish will die from the resort's actions. We do not have an account of how the developments will impact tribal and other fisheries.

Response:

This comment appears to refer to an incidental take analysis under the Endangered Species Act. This analysis is completed by USFWS when it issues a formal Biological Opinion. The project proponent is not required to evaluate incidental take of a species in the NEPA analysis of the Proposed Action and Action Alternatives.

40.0 – RIPARIAN RESERVE COMMENTS

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Watershed conditions are seriously degraded from a century of development, including the ski areas. More than 75% of currently existing wetlands in the SUP have been degraded and numerous creeks are in ditches and culverts. Current conditions in riparian reserve is far below standard. Additional impacts in riparian reserves are expected from roads, construction, parking (see transportation), and ski runs. The proposal is deficient in protection of riparian zones and wetlands. The proposed mitigation through small restoration projects and offsite mitigation through land purchase in Mill Creek does not meet national forest standards. In fact, the proposal would involve significant grading and construction in riparian zones in Mill Creek valley.

Response:

As described in Section 3.3.1.2 - Hydrography and 3.3.1.6 - Riparian Resources, the existing condition of streams, wetlands, and riparian reserves within The Summit-at-Snoqualmie Study Area are discussed. The protection of riparian zones (see Section 3.3.1.6 - Riparian Resources) occurs in part through the designation of the Riparian Buffer width, see Table 3.3.1-11. As described "Riparian Buffers protect watershed resources through the management of vegetation adjacent to these features" (DEIS, pg 3-65). The additional impacts to streams, wetland, and Riparian Reserves resulting from the Action Alternatives are disclosed in Section 4.3 - Watershed Resources. The applicable standards

and guidelines for Riparian Reserves and the effects of each Action Alternative are described in Tables 4.3.7-1 and 4.3.7-2.

Donated wetlands are not considered mitigation for impacts to wetlands within the Study Area. The wetland restoration projects are not considered compensatory mitigation for wetland impacts under the Action Alternatives according to Section 404 of the Clean Water Act. In addition, there are no national forest standards for wetland mitigation. Wetland mitigation under Section 404 would occur following final project designs and delineation of jurisdictional wetlands.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The MDP should not expand parking lots into riparian reserves as would happen in the Tunnel and Coal Creek watersheds, such as Silver Fir lots #2 and #4. This is not consistent with the NW Forest Plan and SPAMA, especially since there is no requirement to reduce number of private vehicles at peak times.

Response:

While the construction of Silver Fir Lots 2 and 4 would occur within a riparian zone, these lots are not located on public lands (see Figure 1.1.1-FEIS-3, Existing Private Land Ownership and Zoning) and are therefore not subject to Northwest Forest Plan and SPAMA standards and guidelines.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The proposal does not meet the standards for riparian reserves. For example, in the Hyak Creek/Creek Run area, the preferred alternative would result in 26.9% riparian zones in a non-natural condition (110.74 acres), an increase of 16.5 acres. (DEIS 4-150, 58) Furthermore, at Alpentel, a major wetland complex is constrained by a road and crossed by two lifts (St. Bernard) and some runs.

Response:

The relationship of the Action Alternatives to applicable Riparian Reserve standards and guidelines are disclosed in Tables 4.3.7-1 and 4.3.7-2 for the Upper Yakima River and Upper South Fork Snoqualmie River watersheds respectively.

The table displayed on page 4-150 of the DEIS, as referenced in the comment, displays the percentage of Riparian Buffers impacted for each drainage. It is not correct to assume that the number listed in the table is the percentage of impact divided by the area of the drainage. As referenced in the comment the total area of Riparian Buffers in a non-natural condition for the Hyak Creek/Creek Run drainages is not equal to 110.74 acres. It is actually 39.06, which was not evident in the DEIS.

Therefore the FEIS has been updated to note that Area (row 2) is in relation to the entire drainage area and should not be confused with the area of Riparian Buffers. Additionally, a footnote has been added to all DPC-related tables that the numbers presented for each drainage are related to threshold metric and refers the reader to Appendix I for a complete breakdown at how the metric was calculated. Furthermore, Appendix I – Physical and Biological Resource Data Tables of the FEIS has therefore been updated to include impact areas and analysis areas specific to each drainage to clarify how the DPC analysis was completed.

As noted in Section 3.3.1.2- Hydrography, existing wetlands are divided into natural and modified conditions. Modified wetlands include "areas modified by land management" (DEIS pg 3-47). The wetland complex described in the comment fits into this category of modified. The FEIS has been updated to identify wetlands in Figure 3.3.1- 1, Hydrography – The Summit and Figure 3.3.1-2, Hydrography - Alpentel as natural and modified.

Mark A. Shillcutt

Comment:

The ski area's performance in environmental matters is lacking. For example the tubing center harmed a wetland area and required restoration. The existing maintenance shop at Alpentel is in a riparian zone, and according to employees, oil and hydraulic fluid have been dumped in its sand pit since the late 60's.

Response:

Comment noted. However, the performance of the ski area in environmental matters is outside the scope of this analysis. The referenced wetland violation at the tubing area was restored under a Nationwide 26 permit (permits numbers 2004-4-00025 and 2004-4-00024) from the Army Corps of Engineers. Activities occurring at the maintenance shop are also outside the scope of this analysis. Procedures and policies for maintenance facilities are provided in the Annual Operating Plan, which is reviewed and approved separately by the USFS.

55.0 – HERITAGE RESOURCES COMMENTS

Charlie Cornish

Comment:

The Milwaukee Road High Line railroad roadbed (FS # 06-05-05-00091) mentioned on page 3.185 was used as a XC ski trail connecting Silver Fir to Hyak, until the two bridges over Hyak and Tunnel creeks collapsed. I recommend that:

- The Roadbed between Hyak and Silver Fir be reconsidered for Heritage Protection (HRHP) designation;
- The collapsed bridges be reconstructed;

- The roadbed be developed for Nordic skiing in winter and hiking in summer.

Additionally, I propose that the roadbed be the first segment of a proposed Snoqualmie Pass Community trail that loops from Hyak to Summit West, under I-90, with spur to Alpentel, through Yellowstone Road area to Gold Creek and back to Hyak via Lake Keechelus.

Response:

The historic resources of the Milwaukee Road were described in 1992 as a basis for evaluating related properties for listing in the National Register. At that time, the Milwaukee roadbed was specifically excluded as a property potentially eligible for the NRHP within the developed context. No new information has been presented to cause the USFS to reevaluate the High Line roadbed. In Section 4.9.2 – Impacts Common to All Action Alternatives, the FEIS acknowledges that under all Action Alternatives, non-eligible heritage resources may be affected, directly or indirectly, by development activities. Currently there are no plans to include additional Nordic trails to the existing 43.15 km network (see Table 3.11.4-1).

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Pass is the center of several centuries of transportation and other human uses. For example, at the Summit parking lot you are at or near the location of wagon roads, several highway routes, a railroad, plus historic and pre-historic trails. None of these would receive any protection, identification or interpretation under the proposed plan. This is another example of the single focus of the MDP on commercial recreation, despite the fact that there are other resources and uses of this public land.

The Milwaukee Road over the pass operated from 1909-1915, and may qualify for historic designation; Would expansion of Central parking area #1 affect the old railroad grade? There is another archeological site near Hyak Creek. (DEIS 3-185)

Development at the Summit has impacted the historic route of the Cascade Crest Trail, built in the 1930s. (DEIS 3-184) The proposed MDP identifies only minor improvements on the upper ski slopes, and none where it crosses the parking lot, which is to be expanded and paved. That parking lot also affects the route of the first auto road over the Pass.

The Forest Service should provide protection to Native American cultural resources, even though some specifics cannot be revealed in the EIS.

Response:

The text describing the catalog of heritage resources in the project area is located in Section 3.9.2 – Existing Conditions. Areas eligible for the NRHP have been identified and are not expected to be impacted during implementation of the MDP. The Milwaukee Road High Line (MRHL) and Lithic isolates are described in Table 3.9.2-1 with a discussion of their NRHP eligibility. For resources

determined to be ineligible, Mitigation Measures are not required, and none are proposed. The MRHL grade has been determined to be ineligible for listing on the NRHP.

Several sections of the FEIS highlight the consideration given to areas of cultural significance during the analysis. Specifically, Section 1.6.1 – Tribal Government Consultation and Section 3.9.3 – Traditional Cultural Heritage Resources discuss the efforts of the USFS to solicit issues from potentially interested American Indian Tribes and Indian groups, and Section 4.9.2 – Impacts Common to All Action Alternatives notes that no Traditional Cultural Heritage Resources have been identified, and that no known effects will result from implementation of any of the Action Alternatives.

A discussion of the historic location of the Cascade Crest Trail (CCT) and that the Pacific Crest National Scenic Trail (PCNST) appears to be in approximately the same position as the CCT outside the developed (cleared and graded) ski area slopes and parking lots is included in Section 3.9.2 – Existing Conditions. The FEIS has been updated to include Modified Alternative 5 where the at the Summit West parking lot would be rerouted through the adjacent vegetated area, refer to Figure 2.3.6-1, Modified Alternative 5 Proposed Conditions – The Summit.

60.0 – RECREATION COMMENTS

Anita Sterling

Comment:

Having downhill and x-country skied in the area as well as having hiked and snow shoed in the adjacent back country, it would appear to me that some aspects of the various alternatives would be especially damaging to wildlife corridors and to roadless and wilderness areas adjacent to the ski areas. The Hyak Creek and Denny Mt. plans are especially worrisome.

Response:

For a detailed comparison of the effects on wildlife by alternative, refer to Section 4.6 - Wildlife

Brett A. Hertzberg

Comment:

Over the last several years (the 2004/2005 snow season excluded) have noticed that the volume of skiers and snowboarders has steadily increased each year.

With regards to the Alpental area, there is insufficient lift access to reduce congestion and bottleneaking. An average wait time at the base of Alpental on the weekend starts at 15 minutes and goes up from there. The average wait time at the chair lift to the peak of Alpental is also very long. Access to the upper peak chair is on a downward slope. There are no other significant lifts that alleviate the congestion problems at Alpental, and as such additional lifts are needed.

Response:

Under the Action Alternatives, including the Preferred Alternative, both new chairlifts and realignment of existing chairlifts are designed to alleviate congestion and increase skier circulation. Section 1.1.2.3 - Purpose and Need, as described in the DEIS and FEIS, acknowledges that skiers wishing to ski the International Bowl are required to ride two lifts and to cross through lower level terrain to access the bottom terminal of the *Armstrong Express*. As a result, the bottom of Alpental is often crowded and lift line wait times are excessive.

As discussed in FEIS Section 4.11.5 – Impacts – Modified Alternative 5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the Internationale basin. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain in the northwest portion of the SUP area, encouraging dispersal of skiers and reducing congestion at base area facilities (Section 2.3.6.1 - Lifts).

Charles Czech

Comment:

I regularly ski at Summit East (formerly Hyak) and would love to have regular access to "Hidden Valley" (labeled Mill Creek on the lift map). I have skied it only twice and had to hike out. Lift service out of this valley to the top of Mt Hyak (rather than hiking in Alpine gear) would be a great benefit to me and my family, who would love to ski this area more. The access to this area, along with the additional lifts (Rampart and Creek Run) would allow us to avoid the crowds that traditionally occur between lunchtime through mid-afternoon on the existing Keechelus chair. The new lifts will allow us to easily move to our favorite parts of the hill with less effort than today.

Response:

Under the Action Alternatives, new chairlifts and realignment of existing chairlifts at Summit East are designed to alleviate congestion, increase skier circulation, provide better access to Summit East and provide a greater diversity of terrain (see Section 1.1.2.3 - Purpose and Need).

Charlie Cornish

Comment:

Finally, I question Booth Creek/Ski Lifts, Inc. interest and commitment to Nordic skiing and snowshoeing. While the Nordic Center was always profitable at Silver Fir and its first 4 years of operation at Hyak, Boothcreek has put little effort or financial resources into building or even maintaining the nordic skiing and snowshoeing programs, while seeking elusive profits elsewhere. Boothcreek's lack of effort in the Nordic Center is well noted by the decreased emphasis in management; from a full time Nordic Center manager and season ski school director 5 years ago, to a part-time manager, to no manager and no ski school director today. As a result, the quality of trail grooming has decreased to the point where Nordic skiers are finding better grooming at Sno-Parks.

Response:

As described in Section 3.11.4 - Dispersed Winter Recreation, the Nordic facilities are located at Summit East, and comprise approximately 500 Nordic skiers during peak periods. FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS 3)

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS Footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Charlie Cornish

Comment:

Boothcreek/Ski Lifts cut out summer time activities (Mountain Biking, Chair lift rides) several years ago. How do they justify major expenditures (Pulse Gondola, Mountaintop Restaurant) when they haven't had the commitment to run summer activities for the past 5 years? Where is the business need for these?

Response:

Ski Lifts, Inc.'s commitment to operate summer activities is a business decision and is based on a wide variety of factors including demand, capital investment and return, and various other business decisions that are outside the scope of this analysis.

Charlie Cornish

Comment:

New International Chair:

What is potential impact on Backcountry skiing, where numerous skiers have been lost and died?
How will risk be minimized?

Response:

The impacts to dispersed winter recreation are discussed in Section 4.11 - Recreation. The Selected Alternative provides an additional ski patrol duty station at the terminus of the *Internationale* lift (see Section 2.3.6.6 – Ski Patrol and First Aid).

As with the current operation, chairlift signage, trail signage, and trail maps would be provided to all ski area guests. In addition, ski patrol would manage skier traffic, using portable signage and ropes. These issues would be addressed in the Annual Operating Plan.

Charlie Cornish

Comment:

Summit East, Mountaintop Restaurant

- What is the need?
- Do the benefits outweigh the costs?
- Proposed location not useable by Nordic skiers or snowshoers via their trails.

Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to balance the capacities of skier service facilities and lift/trail capacities. The mountain-top restaurant at Summit East would provide 250 restaurant seats, and encourage dispersal of skiers, reducing lunch-time congestion at base facilities.

All Action Alternatives include the Summit East mountain-top restaurant. Analysis of the impacts is included in Chapter 4 - Environmental Consequences by alternative and resource area.

Charlie Cornish

Comment:

The current First Aid lodge at Summit East is on land not owned by Ski Lifts Inc. in a building not owned by Ski Lifts Inc. How does this impact their plans?

Response:

The operation of the First Aid Lodge at Summit East is outside the scope of this analysis and is included in the Annual Operating Plan.

Charlie Cornish

Comment:

Alpental

Is a third base facility (Visitor Services Building) justified for Alpental? What are the industry standards mentioned in the DEIS? Please enumerate, describe and justify number of square feet to skier visits, peak demand, etc.

Response:

Section 1.1.2.3 - Purpose and Need includes a need to balance the capacities of skier service facilities and lift/trail capacities. The Action Alternatives include upgrades to the existing guest service facilities and construction of new guest service facilities to increase guest service capacity, and are

designed to compliment The Summit-at-Snoqualmie's overall CCC and located so they accommodate the distribution of CCC throughout the various base areas and on-mountain facilities.

As a day use ski area, The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS 2). The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accommodate peak visitation periods similar to sporting events and concerts.

Charlie Cornish

Comment:

As Ski Lifts, Inc. quality of service at the Summit Nordic Center decreases, increasing number of Nordic skiers and snowshoers are switching their recreational uses to the Sno-Parks. This places additional user pressure on the over-burden Sno-Parks in the Snoqualmie Pass corridor. The DEIS needs to consider this impact including traffic and air pollution due to longer drives as users pass Snoqualmie Pass on their way to Sno-Parks and other Nordic ski and snowshowing venues.

Response:

USDA Forest Service correspondence dated December 3, 2001, File Code 1950/2700, states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". As summarized in the memo: "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand... Finally, the cumulative impacts of ski area expansion cannot be appropriately addressed through a Programmatic Environmental Impact Statement (PEIS). The appropriate scale for cumulative effects analysis is dependent on the type of effects of concern associated with the proposed actions rather than the similarity of the actions and is best addressed when a specific proposal is made."

On this basis, an analysis of cumulative effects on Nordic skiing and snowshoeing is not necessary beyond the scope of The Summit-at-Snoqualmie analysis area. Nonetheless, the DEIS and FEIS address Nordic skiing and snowshoeing in the vicinity of Snoqualmie Pass in Section 3.11.4 - Dispersed Winter Recreation.

Charlie Cornish

Comment:

Operations of the Nordic Center at Hyak have demonstrated Hyak's viability. Why is this not included in the MDP and DEIS?

What does "consolidation" mean? Does Hyak get to retain its unique character?

Response:

As described in Section 3.11.4 - Dispersed Winter Recreation, the Nordic facilities are located at Summit East, and comprise approximately 500 Nordic skiers during peak periods. FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit at Snoqualmie (see Illustration 3.11-FEIS 3).

The consolidation of Summit East with Summit Central and Summit West is described in Section 1.1.2.3 - Purpose and Need.

Charlie Cornish

Comment:

First, the addition of new lifts and downhill runs in the Creek Run area as proposed in Alternative 2 (Ski Lifts, Inc. MDP) and Alternative 5 (Forest Service preferred alternative) will obliterate existing Nordic and snowshow trails including Snow Train, a portion of Sunrise Loop from Hyak to Grand Junction, Serpentine. Additionally, access to the Cold Creek Trail via Gary Rupta Way from the Old Milwaukee Lodge will be obliterated by the proposed Mt. Hyak lift and connecting downhill runs.

Response:

The DEIS acknowledges that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS 3), as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

As described in DEIS footnote 13 (FEIS footnote 10), the *Mt. Hyak* chairlift was approved in 2000 to replace the *Keechelus* and *Dinosaur* chairlifts. The effects of the *Mt. Hyak* lift on Nordic users are outside the scope of this analysis.

Charlie Cornish

Comment:

My research indicates that the existing Maintenance Facilities at Hyak is on land not own by Ski Lifts Inc. Does this impact their plans?

Response:

The operation of the Maintenance Facilities at Summit East is outside the scope of this analysis and is included in the Annual Operating Plan.

Charlie Cornish

Comment:

Second, the MDP as proposed is essentially the plan drafted by Sno-Engineering in 1998. At that time the Nordic Center was located at Silver Fir. When a previous version of the MDP was released for comment and withdrawn in 2000/2001, the MDP included some improvements for Nordic Skiing and snowshoeing. The proposed plan does not restore the preexisting conditions of the lighted Nordic ski trails for nighttime racing and touring, nor beginner and intermediate trails near base facilities, which existing under the original 1998 Sno-Engineering plan.

Response:

Appendix A - Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2.11 – Dispersed Recreation, describes the modifications to the Proposed Action since the submittal of the MDP to the USFS in 1998.

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Charlie Cornish

Comment:

"There is a need to provide a convenient and quality recreation experience for all site visitors on a year-round basis."

This section needs facts, market data, and statistics to support this need, especially for scenic tram rides.

Response:

The USFS objectives for The Summit-at-Snoqualmie are discussed in Section 1.2.3 - Management Direction for National Forest System Lands and Section 1.2.4 - Particularly Applicable Goals, Standards and Guidelines. As described under Forest-Wide Recreation (see Section 1.2.4), one key MBSNF Forest Plan recreation management goal/guideline is for the Forest to be "responsive to a greater diversity of Forest customers by emphasizing the needs of the very young and old, the disabled, and those of culturally and economically diverse background." Furthermore, under

Developed Recreation (see Section 1.2.4), one management guideline outlined in the MBSNF Forest Plan is to "encourage year round recreation use at winter-sports sites. Permit summer facilities that are compatible with or enhance natural resource-based recreation opportunities and in keeping with the ROS."

The need to provide a convenient and quality recreation experience for all site visitors on a year-round basis, as described in Section 1.1.2.3 - Purpose and Need, is partially based on the management goals described above. The Purpose and Need section has been updated to more clearly describe the need for quality year-round recreation at The Summit-at-Snoqualmie.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Larry, I cannot believe the Forest Service would not label the Alpine Lakes Wilderness on the maps. Not one map shows the wilderness. And the "congressionally withdrawn" labeling (on one map) has no meaning for the average reader.

Response:

The map does say Congressionally Withdrawn. However, in Chapter 1, Section 1.2.3.1, it does state the Congressionally Withdrawn allocation is the Alpine Lakes Wilderness.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The documents refer to only to "CCC" for capacity. What is the maximum capacity? What is the capacity of the 3 summit areas individually?

Response:

No maximum capacity has been defined. The CCC is what the ski area is designed for and planned for. The CCC for the 3 Summit areas was not broken out separately as the ski area is basically managing them as one area. So the numbers were not broken out.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The table describing phasing of elements (page DEIS 2-74) shows Central to West crossover trail in phase 1 of alternatives 2,3,4, and 5. But the text says that there will be no new crossovers there (either through the Mountaineers or tot the west).

Response:

You are right. For a long time, there was going to be a crossover trail from West to Central, but the ski area and the Mountaineers could not reach agreement. This is an item that had been around a while and was not changed. It will be fixed in the FEIS

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

In Table 4.11.1-2 (page DEIS 4-423) shows year 1 of alternative 1 at 490,860 visits. That is higher than current average visits. Alternative 5 shows a further increase, although there would not be time to build any of the facilities. Why are there estimates of increases in year 1? The table indicates a 25% increase in visits for alternative #5 over ten years, but the proposal is for a 39% increase in capacity. Will the proposal allow for more growth after ten years? If so, how has this been factored into the environmental analysis?

Response:

Year 1 is the first year of implementation of the EIS after it is approved. Year 1 for Alternative 1 shows more use than the current use because it assumes use would increase at a rate of 1 percent per year as a reflection of increased population growth (see Visitation under Section 4.11.1 – Impacts – Alternative 1 [No Action Alternative]). As Year 1 is in the future, the use is assumed to be greater than the current use. It is assuming some of the projects shown in Phase 1 would be implemented in the first year of implementation.

Appendix J – Assumptions used in the Recreation, Social and Economic Analysis explains the assumptions for growth.

The Proposed Action does not allow/plan for more development than what is being analyzed in the EIS. The CCC (that is, the number of people that the area can comfortably accommodate at any one time) is increased by 39 percent to reflect the need to handle days when there is a large number of visitors. The anticipated increase in visitors does not correspond mathematically to the anticipated increase in total visitation. With the increase in capacity, they could realize more visitation, but capacity does not drive visitation – the market does. Future growth or increase in capacity would need to be analyzed and approved in additional NEPA analysis.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The documents provide gross skier visits, but do not break them down by ski area. Nor do they show usage over time through the winter (i.e., use per day). Where can we look at data and graphs of usage by area and by time through the winter?

Response:

That information was not gathered for the DEIS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

On page 1-2 of the DEIS it says skier visits averaged 485,000 over the past five years, but the table 3.10.9-1 (page 3-199) gives data to suggest it was only 395,660. It appears that the first figure refers to 200-2004 (not including last year). What is correct?

Response:

The 5-year average is for the period of 2000-2004 like you said. That section was written prior to last season. When the table was made to reflect the last season the average wasn't changed. The FEIS will clearly state what 5 year period is being represented for the 5 year average.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Public Use

Without any analysis, the proposal assumes other winter activities, such as cross-country skiing and snowshoeing will remain static. At the same time the proposal seriously impacts areas suitable for those types of uses, such as Hyak Creek. Improvements for these other uses should be provided for in the MDP. The plan also needs additional restoration measures for the Pacific Crest Trail.

Response:

Section 4.11.2 – Impacts – Alternative 2 (Proposed Action), under Dispersed Recreation, describes the impacts of the Proposed Action on Nordic and snowshoe trails. FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS 3). Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a

new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Alternative 5 from the DEIS has been modified in the FEIS to include an upgrade of the Pacific Crest National Scenic Trail (PCNST) where it traverses the Summit West parking lot. The modified location would reroute the PCNST through an adjacent vegetated area, to address these and other issues. Further modifications to the PCNST are outside the scope of this analysis.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Table 2.7-2 (DEIS 2-95) shows 80,000 "Non-Alpine visits" per year. But the discussion (DEIS 4-429) anticipates 70,000 non-skiing visits to the gondola in its first year. Does the 80,000 include any non-skier visits to the other two mountain top restaurants? Or does it include the estimated growth in visits over a period of time? If so, how long? How long do you expect this growth rate? What is the capacity? What conditions at Silver Mtn, Idaho make that a good comparison? Did it achieve a 6% annual growth since constructed?

Response:

As you pointed out, the DEIS states that in its first year, the gondola would generate 70,000 visits. Appendix J (pages 2 – 3) shows that visitation would grow at 6% for the subsequent three years of phase 3, which would be approximately 83,000 visits. In order not to provide too fine a level of detail on such visitation projections, 80,000 was used as a projection of the effect of the gondola at the end of the planning period (three phases over ten years). As stated in item #3 on page 1 of Appendix J, visitation increases are projected at the end of each development phase.

Growth in the gondola use was not projected beyond the end of phase 3 because this timeframe is beyond the planning period for this MDP. As described in Table 2.3.3-1 (DEIS page 2-27), the gondola would provide a CCC of 300 people at one time.

Silver Mountain was selected as the most similar, regional gondola ride because Silver Mountain is 1 hour east of Spokane and the resort is 1/4-mile off I-90 in Kellogg, Idaho. These conditions effectively mirror those of Alpentel, which is an hour east of Seattle and 1/2 mile off of I-90. The use of a 6% growth rate for the three years was a method of showing growth in the summer gondola ridership that is approximately double the rate of skier visitation growth. The gondola is anticipated to provide a higher level of excitement than the skiing, as it would be a new offering for the Cascades/I-90 corridor. In addition, the Metropolitan Seattle area would provide a substantial population base for growth in visitation. Thus, the 6% number is not based on Silver Mountain's data. Note that Item #2

on page 1 of Appendix J indicates that any visitation projections are considered maximum levels of growth for evaluation of impacts to other resources.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Pacific Crest Trail is to be routed through the main summit parking lot for over 1,500'. I could find no information that the trail would be anything but a signed route through a paved parking lot. Is this so? And if so, how is this consistent with a national scenic trail? Will there be no effort to have a trail-like tread or any vegetation?

Response:

This is the location that has been in existence for years for the PCT. I didn't look this summer, but there have been signs up in the past directing users to connect to the PCT across the highway.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The illustration 4.11.1-1 (same page) shows a 70,000 non skier visits, presumably to the restaurants and other non-skier facilities. How is this broken out by restaurant and how is it broken out by season? Since some of the restaurant users will also be skiers, how is this factored into the tables and charts?

Response:

Chapter 8, Glossary explains the CCC. The non-skier visits that are displayed in the illustration are attributed to the up-mountain restaurant at Alpental, as only Alternatives 2, 4 and 5 are displaying non-skier visits. The bulk of this use would be in the summer and would be related to the pulse gondola.

There are non-skiers that come to the other restaurants in the winter. However, those numbers aren't separated out and they are incorporated in the overall of the CCC and visitation for the ski area. For the Summit at Snoqualmie, we have traditionally assumed 10% of the visitors are non-skiers.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

There is limited explanation supporting the rationale for the proposed action increase of Comfortable Carrying Capacity (CCC) by 39%, although important pieces of information related to CCC are provided. The relationship of the various elements are not clear. The CCC is identified as a key

element for determining the adequate capacity of individual project elements that are included in the master development plan (MDP) (e.g., parking lot capacity, utilities needs, restaurant capacity). Because the CCC is a key element of the MDP and the related resource impacts, we recommend that additional rationale be included in the EIS purpose and need section to explain the interrelationship between the CCC increase and proposed action elements.

Section 2.3.1.1 explains CCC as a concept separate from visitation, and tables (e.g., Table 2.3.3-1) show the CCC for individual project elements, both existing and proposed. The purpose and need of the project is described in terms of improving connectivity among ski areas, the need for economic viability and desired facility upgrades. It is not clear from the EIS whether the CCC is derived from the purpose and need of the project or if the level of facility expansion is based on some other analysis. We request that the EIS clarify the interrelationship between these elements. We believe this is important in order to demonstrate that those project elements that have the greatest impact on the environment are needed to fulfill the purpose and need.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year-round recreation for site visitors, and watershed restoration. Note that the Purpose and Need does not include an increase in capacity. For example, development of the Creek Run and Rampart pods would address the need for intermediate and advanced intermediate terrain, as well as the need for consolidation of Summit East with Summit West and Summit Central. By addressing these needs with new facilities, i.e. chairlifts that are not there today, the Action Alternatives result in an increase in capacity.

Section 2.3.1.1 - Capacity describes the function of CCC in ski area planning.

Dick Lazeres

Comment:

For starters it appears as if the DEIS ignores the fact that there are currently cross-country and snowshoe activities affected by the proposals. To begin with, alternative 1, does not show any of the cross country trails, nor does it show the Keechelus chair lift, the only lift currently in use at the Summit East. This does not appear to be correct and distorts the impact of all the alternatives.

Response:

DEIS and FEIS Figure 2.3.2-5, Nordic Trail Network depicts the Nordic trail network. In the FEIS, this figure has been updated to show the alpine lifts and trails under the Action Alternatives. Section 4.11.2 – Impacts – Alternative 2 (Proposed Action), under Dispersed Recreation, describes the impacts of the Proposed Action on Nordic and snowshoe trails. Section 3.11.4 - Dispersed Winter Recreation describes the current Nordic ski trails at The Summit-at-Snoqualmie. Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the

USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Don Duncan

Comment:

A portion of Figure 1-1-2-1-Proposed-Conditions-Summit showing the proposed new or relocated Central/East crossover trails. I have added the Nordic Pass Trail markers to show how the proposed crossover trail changes appear to affect the Nordic Trail. It does not look like there will be any significant problem where Route 71 intersects the Nordic Trail. As I mention in the attached "Comments", the main conflict appears to be just below Hyak Lake where the re-located Trail 49 may cut through the steep slope where the Nordic Trail switchbacks up from the power line to Hyak Lake. I made a ski trip up Hyak Creek this past Sunday to try to visualize where the re-located trail might go and it does appear that a route can be taken which will not significantly impact the Nordic Trail. As I mention in my comments, I would favor that language to this affect be included in the final MDP.

Response:

The trail marker locations have been added to Figure 2.3.2-5, Nordic Trail Network in the FEIS. Alternatives 1, 3 and 4 do not include the revised location for Trail 49 to address this issue.

Don Duncan

Comment:

My most enjoyable and satisfying skiing is to put skins on my backcountry skis and slog up the Nordic trail from its starting point at the road switchback, thence up along Hyak Creek and past Hyak Lake, to Nordic Pass and beyond and then ski back down by the same route, crossing a minimal number of groomed trails but never using them. There are many backcountry skiers who rely on this access corridor but choose not to pay for a Nordic ski pass since they are not using the groomed trails or Summit parking lots.

The needs and concerns of such skiers were addressed in the "Summary of Commitments and Understandings" of September 1, 1988 written by District Ranger Mike Cooley but these seem to have fallen through the crack as far as the current MDP DEIS is concerned. There is a mention of the Nordic Pass route in Section 5.7 RECREATION Background but neither here nor in later sections of the MDP DEIS is any commitment expressed to keep this free access route open to those who do not wish to use the groomed trails. Such a commitment should be a part of the Master Development Plan or this historic access route will surely be lost.

Response:

The DEIS acknowledges that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit at Snoqualmie (see Illustration 3.11-FEIS 3), as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Implementation of any of the Action Alternatives would not preclude free access to those who do not wish to use the groomed trails or other ski area facilities.

Doru Nica

Comment:

The beginner skier experience is not good either. I have friends that try to ski for the first time and they all had problems with the Little Thunder lift at Snoqualmie West (the beginner lift). At the top the terrain is too steep for them and it is common for the skier/borders to pile up (literally) when they get off the lift. Also the top part is too steep for first time skiers.

Response:

As described in Section 2.3 - Alternatives Considered in Detail, the existing *Little Thunder* chairlift would be realigned and shortened to better utilize beginner slope gradients lower on the hill. Clearing and grading is proposed around the realignment of *Little Thunder* to provide more level terrain for beginner skiers, and revegetation would occur alongside the chairlift in order to provide a buffer between beginner and intermediate terrain.

Doru Nica

Comment:

The slopes are crowded full of beginners/intermediate skiers that are bored by the beginner slopes and are coming to ski the more advanced slopes w/o the necessary skills. Collisions are common. One year a lady (that should not have been skiing at Alpental in the first place) crossed in front of on me and the best I could do to avoid her was to just cross over her skis tails. She went down because she got scared. After that she complained to the ski patrol that I caused the accident and I was put on the spot to defend myself. I never had such kind of problems with skiers on advanced or intermediate to advanced slopes before. But now days more and more beginner skiers are to be found on advanced slopes at the Summit. That was a very unpleasant experience at the Summit.

The same beginners are making the lifts go slow because they do not know how to load/unload safely and efficiently. At the Summit West it takes a minimum of 6 minutes to get to the top using the quad lift and it takes only 4 minutes to descend at a regular pace. That is a bad experience.

Similar at Alpental the advanced skiers that go to Internationale have to use the same lift as the intermediate skiers and after that take one more lift (an old double) to the top. After the descent I have to cross back to the base of the quad lift on terrain that is less than beginner difficulty; again not a great experience.

Response:

Section 1.1.2.3 - Purpose and Need acknowledges that skier circulation and out-of-base access at The Summit is poor, with ill-defined trail boundaries and routes to chairlifts/facilities. The FEIS has been updated to better display how the lack of tree islands and poorly defined trail boundaries do not provide separation between beginner areas/trails and more advanced terrain. The FEIS has also been updated to better describe poor circulation, as skiers are required to traverse across active ski trails to reach their destination at Summit Central and Summit West (see Section 1.1.2.3 – Purpose and Need and Section 3.11 - Recreation). Section 1.1.2.3 - Purpose and Need identifies that there is a need to address the lack of intermediate and advanced-intermediate terrain throughout The Summit at Snoqualmie ski areas and correct skier circulation problems caused by inefficiently aligned lifts and connector trails.

With the installation of the *Internationale* chairlift, described in the Action Alternatives, advanced level skiers would be afforded the opportunity to round-trip ski the Internationale basin without being required to access the base area and the *Armstrong Express*, thereby reducing the potential for conflicts between skiers of differing abilities.

Dre Powell

Comment:

Having experienced riding in the backcountry at Alpental and now having worked there for a year, I have witnessed many accidents that result from the dangers inherent to that area. While many skiers and boarders alike are well trained and taught to respect Alpental's steeps and deeps my fear is that the gondola will open a currently restricted area to individuals who do not have the skill or knowledge to properly navigate such terrain.

How do you plan to address the dangers inherent to the area that is planning to be open to the public? Is there a plan to regulate who will be allowed to enter this terrain? I guess my main concern is safety for the public. With so many ignorant individuals out there thinking that skiing and boarding is the trendy thing to do, how do you plan to protect them from Alpental's ever changing terrain?

Response:

The terrain available under the Action Alternatives is currently accessible, lift served backcountry.

As with the current operation, chairlift signage, trail signage, and trail maps would be provided to all ski area guests. In addition, ski patrol would manage skier traffic, using portable signage and ropes.

These issues would be addressed in the Annual Operating Plan.

Ellen McCartan

Comment:

I especially would appreciate faster chair lifts and much more separation between snow boarders and skiers - I worry about safety for me and my children the way it currently is with the snowboarders racing down crowded sloped (not to mention scraping off the best snow layer for the rest of us).

Response:

The MDP does not address separation of snowboarders and skiers (see Footnote 4 - DEIS Page 1-2, FEIS footnote 5). The range of alternatives presented in Chapter 2 includes new and upgraded high-speed chairlifts (see Section 2.3 - Alternatives Considered in Detail).

Gary Westerlund

Comment:

The DEIS does not adequately describe the benefits of the Nordic Pass Trail. In Section 5.7 on page S-37 the Nordic Pass Trail is described as a safe place to ski when the avalanche danger is high. The trail has more advantages than just low avalanche danger. The Nordic Pass Trail has the following benefits and they should be documented in the FEIS.

1. Low avalanche danger
2. No snowmobiles
3. Solitude
4. Off-road backcountry experience
5. Nive grade for off road skiing
6. Old growth forest with widely spaced trees
7. High enough elevation and close proximity to the crest for better snow
8. Winter parking available
9. Near the Seattle Metropolitan Area

Response:

Section 4.11 - Recreation has been updated to include this information.

Gary WesterlundComment:

When I objected to the current crossover trails in the past, I requested the Forest Service to identify an alternative backcountry ski destination with the same attributes as the Nordic Pass Trail. So far, the Forest Service has not identified an alternative.

As part of the Forest Service decision on the ski area MDP, I am asking the Forest Service to designate the area from Road 9070-110 north to Hyak Creek and the section of the Nordic Pass Trail from the Frog Lake area to Windy Pass, backcountry zones where the ski area can not develop nordic ski trails or snowshoe trails.

Response:

As described in DEIS Section 1.2.3.1 - Applicable Land Allocations, the public lands at The Summit-at-Snoqualmie ski area, are allocated to a Management Area of RE1 - Developed Recreation/MA27D - Developed Site. Providing a full spectrum of recreational facilities to serve all recreational users is consistent with the MBSNF and OWNF Forest Plans. Impacts to backcountry users are addressed in Section 4.11 - Recreation, which has been updated to include additional discussion on the impacts to backcountry/Nordic skiing under the Action Alternatives. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives.

Implementation of any of the Action Alternatives would not preclude free access to those who do not wish to use the groomed trails or other ski area facilities. Therefore, the USFS has elected not to designate any specific trail to any one specific use because the land use allocations mandate a full spectrum of recreation facilities.

Gary WesterlundComment:

In section 5.7, page S-37, the issue of impacts on the dispersed recreation use of Nordic Pass is mentioned but not sufficiently explored. In Section 2.11.2 on page 430 the effects of Alternative 2 on the Nordic Pass Trail are briefly mentioned. In addition in Section 2.11.7 on page 444 the irreversible effects on Nordic Pass skiers and in particular the loss of solitude is mentioned. But nowhere in the DEIS are the cumulative effects on backcountry access addressed. In a letter (attached) dated September 30, 1992, Richard Ferraro, the Deputy Regional Forester described his decision to reverse the decision that would have combined the permit boundaries of Hyak (now Summit East) and Ski Acres (not Summit Central). In his letter, Mr. Ferraro states "I am directing the Forest Supervisors to conduct additional analysis aimed at providing direction for minimizing conflicts among users, allowing for diverse uses and benefits of the National Forest, broaden the range of alternatives and examine the cumulative effects on backcountry access." To date I do not believe such a cumulative effects analysis on backcountry access has been performed. Since 1992 nothing has changed that would alleviate the need for such an analysis. Since 1992 there have been more cumulative effects to

analyze. So if this analysis were needed in 1992 before combining the permit boundaries, it is needed even more today before any decision on combining permit boundaries is made.

Response:

DEIS page 4-430 addresses the location of ski trails relative to the Nordic Pass Route. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives.

USDA Forest Service correspondence dated December 3, 2001, File Code 1950/2700, states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". As summarized in the memo: "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand... Finally, the cumulative impacts of ski area expansion cannot be appropriately addressed through a Programmatic Environmental Impact Statement (PEIS). The appropriate scale for cumulative effects analysis is dependent on the type of effects of concern associated with the proposed actions rather than the similarity of the actions and is best addressed when a specific proposal is made."

On this basis, an analysis of cumulative effects on backcountry skiing is not necessary beyond the scope of The Summit-at-Snoqualmie analysis area. Nonetheless, the DEIS and FEIS address backcountry skiing in the vicinity of Snoqualmie Pass in Section 3.11.4 - Dispersed Winter Recreation. Implementation of any of the Action Alternatives would not preclude free backcountry access to those who do not wish to use the groomed trails or other ski area facilities.

Guy Spencer

Comment:

The idea of adding some tree islands in the middle of the wide open spaces at Summit West is an excellent idea, as it will lend contrast in the foggy, flat lighting we frequently find in the winter, making day skiing easier, safer, and more fun.

Response:

The establishment of tree islands is consistent with the Purpose and Need (see Section 1.1.2.3) to improve skier circulation and skier satisfaction by creating a more natural ski area setting, skiways and separation between different skier abilities. Figure 2.3.6-1, Modified Alternative 5 Proposed Conditions – The Summit identifies the areas selected for re-vegetation and the guidelines for implementation are located in Appendix F – The Summit-at-Snoqualmie MDP – Implementation, Operations, Restoration and Monitoring Plan, Section 5.4.2 – Tree Island Revegetation.

Harry Romberg

Comment:

I am also concerned with lighting for night skiing both near the Hyak Creek corridor in section 16 and especially along the cross-over routes. Many animals are nocturnal and such lighting would

exacerbate the impacts of the runs themselves and would certainly affect their use of the area. I cannot see how this impact could be adequately mitigated and still allow for downhill skier and snowboarder use after dark and so I must further oppose a development option in the area.

Response:

The impacts to wildlife from night lighting and night skiing are discussed by alternative in Section 4.6 - Wildlife.

Jill Sherensky

Comment:

INTERNATIONALE CHAIRLIFT: This chairlift off-ramp is underneath an extremely hazardous area with cornices and high avalanche danger in the winter. The chairlift would provide very easy access to extremely dangerous backcountry terrain. The only way to ensure guest safety in this area would be to use extremely large amounts of explosives and to expand the professional patrol staffing numbers by a factor of two. Our current staffing levels are inadequate, in my view, and we do not have proper equipment (avalanche transceivers, radios, etc.) for our current patrol.

Response:

Safety programs are an operational issue not covered under the MDP, which specifically addresses facility issues. Alternative 2 (Proposed Action) provides an additional ski patrol duty station at the terminus of the *Internationale* lift (Section 2.3.3.6 – Ski Patrol and First Aid).

Joy Cordell

Comment:

We have been very concerned to see a trend toward less support for nordic skiing from the Summit-at-Snoqualmie management over the past few years. We've seen few or no resources devoted to personnel, facilities, and terrain. As far as we can see and understand, the Summit has not allocated any part of its marketing budget to advertising the Nordic Center or XC skiing this year.

And so, it is even more disturbing to see the Summit propose a plan that has such a huge impact of XC skiing at the Summit, but not mention how it will support or change nordic skiing along with these changes. It's as if XC skiing does not exist at the summit.

Response:

The DEIS acknowledges that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS 3), as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine

trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

The marketing budget of Ski Lifts, Inc. is a business decision and is outside the scope of this analysis.

Kathy Johnson

Comment:

Alternate #2 adds badly needed capacity and in both liftservice and trails. Weekend lift lines at Silver Fir (as of yesterday) were 35 minutes.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. Note that the Purpose and Need does not include an increase in capacity. For example, development of the Creek Run and Rampart pods would address the need for intermediate and advanced intermediate terrain, as well as the need for consolidation of Summit East with West and Central. By addressing these needs with new facilities, i.e. chairlifts that are not there today, the Action Alternatives result in an increase in capacity.

The FEIS has been updated to note that The Summit-at-Snoqualmie has received approval from the USFS to replace and re-align the existing *Silver Fir* chairlift with a detachable quad to increase capacity from a CCC of 710 to 930 skiers, and improve the ride time to four minutes. The approved *Silver Fir* upgrade includes moving the lower terminal closer to the parking lot to reduce uphill climbing for skiers as they access the lift. Although the *Silver Fir* chairlift has not yet been replaced, for the purposes of this FEIS analysis, replacement and alignment of the *Silver Fir* chairlift with a detachable quad is considered an existing condition, similar to the *Mt. Hyak* chairlift at Summit East.

Kevin Murphy

Comment:

I frequently hike and ski in this area because of its beauty and accessibility and I believe that any development in the area would ruin the wilderness experience of this national treasure.

Response:

As described in DEIS Section 1.2.3.1 - Applicable Land Allocations, the public lands at The Summit-at-Snoqualmie ski area are allocated to a Management Area of RE1 - Developed Recreation/MA27D - Developed Site. Providing a full spectrum of recreational facilities to serve all recreational users is consistent with the MBSNF and WNF Forest Plans and a wilderness experience is not expected in the ski area SUP boundary. Impacts to users of the Alpine Lakes Wilderness are addressed in Section 4.11 - Recreation. The FEIS has been updated to better display the wilderness boundary (see Volume 3 - Figures).

Lyn McKay

Comment:

I'm in favor of improving the Ski area, especially creating more separate areas for boarders. Even though I'm an advanced skier I've been ran into by boarders and friends have been knocked down. There is a need for more areas to ski, especially more intermediate terrain.

Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to address the lack of intermediate and advanced-intermediate terrain, and correct skier circulation problems caused by inefficiently aligned lifts and connector trails. The Action Alternatives address these needs. As discussed in Section 4.11.5 – Impacts – Modified Alternative 5, development in Section 16 would enhance the intermediate and advanced intermediate level skiing and increase the trail network at The Summit.

The MDP does not address separation of snowboarders and skiers (see footnote 4 - DEIS page 1-2, FEIS footnote 5), but does address separation of skiers by ability level (see Section 1.1.2.3 - Purpose and Need and Section 2.3 - Alternatives Considered in Detail).

Marcy Tobin

Comment:

What I have experienced lately at Alpental is difficulty in parking. There does not appear to be enough parking for busy weekends. How does the Master Plan address improved parking and timely shuttles to ferry skiers efficiently from car to lift? Having more chair lifts doesn't improve my skiing experience if I can't park and access the lift in an efficient manner. I would rather have an efficient shuttle system than more lifts.

Response:

Section 1.1.2.3 - Purpose and Need discusses the current parking and shuttle condition at The Summit. While no expansion of parking is proposed at Alpental, the guest drop-off area and stormwater management proposals (paving of lots, snow storage options and use of MgCl as a deicer, as discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities at The Summit and Alpental without expanding existing lots.

As described in Section 1.1.2.3 - Purpose and Need, by increasing skier connectivity between Summit East and Summit Central, less reliance on the shuttle system is expected, therefore allowing for more efficient shuttle service between The Summit and Alpental.

Mark A. Shillcutt

Comment:

There is certainly no need for a mountaintop restaurant and summer "nature trail" at Alpental when the food service at all the base areas is severely lacking in quality, and this construction would require more blasting, and installation of sewer lines down Denny Mt. Why not get sewer installed at the old Thunderbird lodge at Snoqualmie, and revamp something already there? There is no need for increased guest services and more buildings on public land at Alpental, as the CCC should not be increased, due to the fact that there are too many people there already. The parking requirement at Alpental is already lower than the CCC allows. All of these so-called "improvements" at Alpental would be eyesores, and this is not the kind of experience people who come to Alpental seek, nor deserve.

Response:

The mountain-top restaurant and Pulse Gondola at Alpental are not included in FEIS Alternative 3 to address this and other issues. As described in Section 2.3.5.5 - Support Facilities, the existing Thunderbird Lodge at Summit West would be renovated to include approximately 70 restaurant seats.

As described in Section 1.1.2.3 - Purpose and Need, there is a need to balance the capacities of skier service facilities and lift/trail capacities. The Action Alternatives include upgrades to the existing guest service facilities and construction of new guest service facilities to increase guest service capacity, and are designed to compliment The Summit-at-Snoqualmie's overall CCC and located so they accommodate the distribution of CCC throughout the various base area and on-mountain facilities.

Another need outlined in Section 1.1.2.3 - Purpose and Need is the need for improved circulation and dispersal. Under the Action Alternatives, both new chairlifts and realignment of existing chairlifts are designed to alleviate congestion and increase skier circulation. As discussed in FEIS Section 4.11.5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the *Internationale* basin. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain

in the northwest portion of the SUP area, encouraging dispersal of skiers and reducing congestion at base area facilities (Section 2.3.6.1 - Lifts).

The Purpose and Need does not include an increase in capacity as a need for action (see Section 1.1.2.3 - Purpose and Need). However, by addressing the need for improved circulation and dispersal and the need to balance capacities, the Action Alternatives include improvements that would increase capacity (such as the *Internationale* chairlift).

Meredith Stelling

Comment:

Over the years, we have found the crowds have increased significantly on weekends from January through mid-March. These crowds have made it difficult and sometimes impossible to find a parking place in the lots at Alpentel, Summit West and Summit Central unless you arrive 30 minutes before the lifts even open! Last weekend, my husband didn't arrive until 10:30 am and could not find parking at Alpentel, Summit West or Summit Central. In addition, lift lines at the same three ski areas have become so long that they significantly shorten the skiing day which is extremely frustrating.

Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need for balanced capacities and improved vehicular circulation, parking and shuttle services.

Under the Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action) approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpentel in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). The DEIS and FEIS acknowledge that parking at Alpentel would continue to be less than the capacity of the lift and trail network, requiring some Alpentel guests to use the shuttle to access the facilities at Alpentel.

The FEIS has been updated to better describe of the effect of insufficient parking at Alpentel on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Mike Dawson

Pacific Crest Trail Association

Comment:

In the DEIS (page 4-425), the analysis decides that "No impacts to users of the PCT would occur under Alternative 1" when actually the statement should be that no new impacts to users would occur. The fact of the matter is that the PCT users are already significantly and unnecessarily impacted by the existing ski area facilities. There exists an easy solution to the situation that would avoid both the majority of the existing impacts of the ski area development and the additional impacts of two additional lift crossings. Indeed PCTA has been involved in a USFS Optimal Trail Location Review for over 2 years without resolution because of the potential to significantly improve the PCT

experience in the study area, yet no mention of this effort or its significance as a related action has been found in the DEIS.

PCTA and the Mountaineers, who own the required property, have been advocating the relocation of the PCT from its existing route under various ski lifts with a view centered on the built infrastructure at Summit West, to a primarily natural setting across the Mountaineers tract. This would not only avoid additional impact caused by additional facility development, but would also significantly reduce the existing impact of the ski area on the PCT, resolving long term conflicts in user desired experiences without any loss of opportunity for the various recreation experiences offered by the PCT or the developed winter recreation complex.

Before this situation is completely lost in the process, we would request another meeting of the district rangers, winter recreation team, the USFS PCT Manager, PCTA, Mountaineers and Washington Trails Association (which has expressed an interest in building the relocation). We last attempted such a meeting in September 2005, but disaster relief meant that critical USFS staff were attending to needs on the Gulf Coast. We feel that it is very important that this important connected decision is completed in parallel with the surrounding ski area planning.

Response:

The FEIS has been updated to state that no new impacts to users of the PCNST would occur under Alternative 1 (see Section 4.11.1 – Impacts – Alternative 1 [No Action Alternative]). The NEPA process is utilized to analyze the impact of the MDP on the affected environment. Future relocation of the PCNST not associated with the MDP is not a connected action within the NEPA process and therefore can not be analyzed under this EIS.

The PCNST traverses a currently developed portion of The Summit-at-Snoqualmie SUP Area, which is managed under Management Area RE-1/27D Developed Recreation. The SUP area is not managed for wilderness attributes. Impacts to the PCNST are disclosed in Section 4.11.5 – Impacts – Modified Alternative 5. Modified Alternative 5 from the DEIS has been modified in the FEIS to include an upgrade of the PCNST where it traverses the Summit West parking lot. The modified location would reroute the PCNST through an adjacent vegetated area, to address these and other issues.

Refer to Section 1.2.8.3 - Pacific Crest National Scenic Trail, which states that "within Federal lands outside National Parks and Wilderness (57% of the trail) the trail must co-exist in harmony with all other resource uses and activities of the land and determined through the land management planning process....". On this basis, the occurrence of ski area facilities over and surrounding the PCNST is consistent with Section 7(a) of the *National Trails System Act* and the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail*.

Paul Carolan

Comment:

During a recent visit with my children I experienced multiple interruptions in lift service due to mechanical problems. I have witnessed mechanics beating on lift towers to return lift service. Rarely if ever do all the lifts run at the Summit. Lifts are aging and appear to lack proper maintenance. Additional lifts can only compound this problem.

Response:

The FEIS has been updated to better address the condition of the existing lift network and other facilities (see Section 1.1.2.3 - Purpose and Need, Section 3.11 - Recreation, and Section 4.11 - Recreation). The consequences of Alternative 1 (No Action Alternative) are discussed thoroughly in Section 4.11.1 – Impacts – Alternative 1 (No Action Alternative). The Summit would have a CCC of 7,920 skiers and Alpentel's CCC would be 1,880 skiers. Skier visitation projections are included in the FEIS and compared by alternative (see Table 4.11.1-2 and Illustration 4.11.1-1), and are expected to increase in all alternatives presented with regional population growth, including the No Action Alternative. As a result, simply repairing the existing chairlifts would not address the Purpose and Need for circulation and dispersal (see Section 1.1.2.3 - Purpose and Need). The Action Alternatives replace or realign aging or inefficient chairlifts, add new chairlifts and runs, and improve circulation deficiencies which would address these needs.

Paul E. Michelson

Comment:

As a former ski instructor I can also say that having a place to take a class of aspiring students out of the weather on the stormy/snowy ski days would be a huge benefit in both their own confidence, comfort, and safety. Numerous times I have gotten my classes of 8 and 9 years old to the top of a lift, weather it be at Alpentel, or Summit West, only to have a student or two have to go to the bathroom or want to go in because they were cold. Allowing the summit to carefully construct some limited facilities on the tops of their ski areas makes so much sense.

Response:

As described in Section 2.3 - Alternatives Considered in Detail, several improvements to existing facilities and construction of new guest service facilities are proposed under the Action Alternatives. The Action Alternatives include renovation of the Thunderbird Lodge at Summit West and construction of a mountain-top restaurant at Summit East, as well as expansion of the base area facilities at Summit West and the Silver Fir Base Lodge. These improvements would be designed and sited to relieve base area congestion and spread guests throughout the resort.

Peter Polson

Comment:

In particular, I think the plan to expand the lift operations at Alpentel further north would damage the beautiful backcountry that currently exists. That area is home to hikers in the summer and backcountry skiers and snowshoers in the winter. It is a wonderful place of calm and quiet. Further lift development up the valley would spoil this beautiful area and put extra load and stress on this valuable land at the edge of the Alpine Lakes area.

Response:

FEIS Alternative 3 does not include the Pulse Gondola or mountain-top restaurant at Alpentel to address this and other issues (see Section 1.5 - Scoping, Significant Issues, and Public Participation). The DEIS acknowledges that the *Internationale* lift would irretrievably commit the Internationale bowl to developed alpine recreation, thereby removing the backcountry potential of the area for the life of the MDP (see Section 4.11.7 – Irreversible and Irretrievable Effects).

Ross Smith

Comment:

I wanted to respond to an article I read about potential impact to the high alpine from summer visitors to Alpentel on the proposed gondola. I think skiers and snowboarders would be surprised that it's harder to find a parking spot at Alpentel on a sunny July day than it is in January. My kids sold lemonade to hikers and were pulling in \$150/hour from the endless stream of hikers coming from Snow Lake. Almost every single hiker used the Snow Lake trail. It was worse than 405 through Bellevue at 5 PM on a Friday. My feeling is that distributing the load around the mountain would give the vegetation a chance to recover and rejuvenate. Snow Lake is becoming a highway. It's beautiful, but there are thousands of hikers and that's by far the most popular option.

Response:

A description of summer utilization of The Summit facilities and surrounding area is included in Section 3.11.5 - Developed Summer Recreation.

Sean Moore

Comment:

I love being able to go to Snoqualmie on a weekday night and ski for a few hours after work (a very unique advantage of skiing at Snoqualmie), so increasing nighttime terrain is high on my wish list.

Response:

Table 4.11.1-1 identifies the amount of formal night skiing terrain for The Summit and Alpentel under the range of alternatives. The Action Alternatives represent an increase in formal night skiing over the existing conditions.

Thanh Truong

Comment:

The noise and visual pollution from Alpine Lakes Wilderness should be addressed. For example possible conflict between Alpentel and the Snow Lake summer trail users.

Response:

Section 4.11 - Recreation describes the impacts to summer hiking and the Alpine Lakes Wilderness by alternative, including ambient light and visibility. Section 4.15 - Visual Resources describes the impacts of proposed facilities at Alpentel on visual resources and critical viewpoints by alternative. Section 4.16 - Noise describes the operational and construction noise impacts by alternative.

Toby Paterson

Comment:

The resort already has a mountain top restaurant at West and they have failed to operate this restaurant. Using the West restaurant would decrease the environmental cost, economic cost, and make an easier access area for disabled persons. No reasonable solution for waste disposal at the planned restaurant at the top of Denny Mountain are demonstrated by the DEIS. Building the new restaurant, as apposed to updating the West restaurant, would lead to an increase in the price of a skier visit- thus leading to fewer skier visits.

Response:

As described in Section 2.3.5.5 - Support Facilities, the existing Thunderbird Lodge at Summit West would be renovated. The mountain-top restaurant at Alpentel is not included in FEIS Alternative 3 to address this and other issues. Ticket price is a business decision and is based on a wide variety of factors including demand, capital investment and return, and various other business decisions that are outside the scope of this analysis.

Toby Paterson

Comment:

The DEIS continues the mention of the "Dinosaur" chair lift at Hyak, but states that the lift has been removed. Anyone can clarify that the lift has not been removed, again proving the DEIS is, in part, based on false data.

Response:

As described in Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2.1 - Chairlifts, the *Dinosaur* chairlift was approved to be replaced under a Categorical Exclusion, although it has not physically been removed, it is not included as an "existing condition."

Footnote 13 of the DEIS on Page 2-7 (FEIS footnote 17) references the *Mt. Hyak* chairlift as a replacement for the *Keechelus* chairlift. In the FEIS, this footnote has been updated to include both the *Keechelus* and the *Dinosaur* chairs as being replaced by *Mt. Hyak*.

Tracy Silves

Comment:

The statement also fails to give in detail, the intention of logging old growth forests for expansion of an already under CCC (Comfortable Carrying Capacity) resort. There are abandoned lifts, claimed in your statement to be no longer in existence.

Response:

The FEIS has been updated to include an analysis of visitation relative to capacity (refer to Section 1.1.2.3 – Purpose and Need and Illustration 1.1.1-FEIS-2). As a day use ski area, The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accommodate peak visitation periods similar to sporting events and concerts.

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

The FEIS has been updated to better address the condition of the existing lift network and other facilities (see Section 1.1.2.3 - Purpose and Need, Section 3.11 - Recreation, and Section 4.11 - Recreation).

Tyson Peters

Comment:

Weekend after weekend, I have stood in line at Debbie's Gold and Chair 2, as noted prior, and watched the appalling line management. Frequenting many other ski areas over the years, one learns how lines flow or stall. Whether it be lack of training of the employees or lack of planning by the Summit, Alpental has a line problem that if dealt with will help improve the skiing experience of everyone by decreasing the length and chaos of the lines. On both Chair 1 and 2 there is a rope line about 30 feet long, divided into 3 or 4 sections, but the line itself goes 60 feet back; therefore it is chaotic for those just getting in line because of the lack of structure. Secondly, the lift ops are checking tickets right at the lift entrance, making the boarding process hectic and making some people miss chairs. And lastly, because of the lack of rope planning and structure, you have many chairs on both lifts not being filled to capacity; this should never happen. I suggest, before building

new facilities, the Summit focus on perfecting the current system and seeing then what changes they truly need.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. The Action Alternatives were developed in order to address these needs.

The operational schedules of The Summit-at-Snoqualmie are outside the scope of this analysis and are addressed in the Annual Operating Plan.

Wendy Kirchner

Comment:

We usually park at the Silver Fir Chairlift. This lift is the slowest one on the mountain and serves quite a few skiers. It often stops for several minutes because of maintenance problems and when it does the line at the bottom has gone from 5 minutes to 30 minutes. A newer faster lift would alleviate this problem. Having a lift to service the ski school area would be great for the skiers who have to have the lift slowed down. Many of the ski school kids come to the Silver Fir Lift and many times it has to be slowed down for them. Then it has problems getting up to speed creating long lined as a result.

Response:

Under the Action Alternatives, including the Preferred Alternative, both new chairlifts and realignment of existing chairlifts are designed to alleviate congestion and provide better support to the ski school operation. Beginner facilities would continue to be provided at Summit West and Summit Central. Chairlifts and tows would either be realigned or replaced. Terminals would be located closer to base area facilities in order to minimize walking distances for beginners (Section 4.11.5).

The FEIS has been updated to note that The Summit-at-Snoqualmie has received approval from the USFS to replace and re-align the existing *Silver Fir* chairlift with a detachable quad to increase capacity from a CCC of 710 to 930 skiers, and improve the ride time to four minutes. The approved *Silver Fir* upgrade includes moving the lower terminal closer to the parking lot to reduce uphill climbing for skiers as they access the lift. Although the *Silver Fir* chairlift has not yet been replaced, for the purposes of this FEIS analysis, replacement and alignment of the *Silver Fir* chairlift with a detachable quad is considered an existing condition, similar to the *Mt. Hyak* chairlift at Summit East.

Bernard La Fleur

Comment:

Also the improvements would make it much more convient to traverse between all the ski / board areas. I have had the unfortunate experience of having to take my board off and walk halfway through the crossover / traverse, because of the present design, (no fun at my are 67yo).

Bruce Hale

Comment:

Another point is the proposed cross ski trails between East, Central and West. I support it. I skied Snoqualmie with my children and it was long and tedious to go from one area to another - especially to Summit East. The shuttle was a long wait and interrupted the skiing to be an option. If one didn't get enough speed on the long cat tracks, or fell, it meant a long walk. Then, once you got to Summit East, you wondered why you bothered as it was primarily for beginners.

Carol Murrer

Comment:

We have waited 45 minutes twice this year for a shuttle. If we could ski between areas we could get more skiing in.

Catherine Weatbrook

Comment:

We are in favor of plan #2. The most significant reason is the vast improvement it offers for the East to Central crossover. The existing crossover is dreadful unless you use snow shoes or cross country skis. It fails to provide adequate grade to allow snow boards to make the trip in either direction - and only skiers who can skate have much of a chance. I once got to haul 4 6 to 8 year olds out of there by towing them with my ski poles - two at a time. Not terribly fun, and somewhat unsafe as I would leave two behind to pull two forward, leave those two, skate back and pull the other two. Walking that far isn't much of an option in ski boots for kids of any age. My husband has sworn off boarding the existing cross over after developing raw blisters from walking the distance in his boarding boots. The Summit East terrain, however, is some of our favorite up there. It is vastly underused, and needs to be better integrated into the offerings both to relieve some of the crowding, and for the financial viability of the resort operator.

Charles Czech

Comment:

I also endorse the trail and lift improvements because I have struggled to move between Summit East and Central several times when our children had lessons at Central. Getting back and forth between the two areas was so difficult with children, we eventually decided to drive between the two areas,

rather than walk, pole and traverse the distance between them. The trail improvements appear to eliminate the long, flat stretches that hampered our children's ability to glide.

Dennis Braunston

Comment:

The difficulty I have at Snoqualmie is the ski areas are not connected. We have our kids in ski school and we are limited where we can ski. Do it right the first time and make it easy to move to a different location.

Guy Spencer

Comment:

I also believe Trails 19 and 26 at Summit Central are an excellent idea as they would provide much needed connectivity for lower intermediate skiers between Central Express Quad chair and the revised Easy Street/Silver Fir area. These trails are especially important to the plan given the understandable plan to remove Reggie's Chair, which is prone to frequent breakdowns and is difficult for beginners to load due to its single speed operation.

Guy Spencer

Comment:

I am strongly in favor of the proposal revising the crossover trails between Summit East and Summit Central, as currently the crossover requires perfect snow conditions and dangerously high speeds to minimize walking. This is especially the case for young skiers and all snowboarders, who glide less efficiently than adult skiers.

Heidi Beck

Comment:

Hidden Valley was a beautiful run; why not bring it back? Why not spend money restoring other additional lifts and runs that would not require further cutting of forests. I think it is great that there are corridor trails between the 3 resorts - another uniqueness factor. But does there need to be a complete run between Ski Acres and Hyak? What purpose does that really serve? Easier access to the proposed new mountain top lodge?

John Sciuchetti

Comment:

The Summit East area is a great location (beautiful scenery + good terrain) but I rarely use it as there is no access to the Central Area.

Kathy Johnson

Comment:

I cannot tell you how many times we land at the top of Silver Fir and gaze East to Hyak, but don't go over there since it takes 30-40 minutes to get there and back. With the day time hours for both areas being 3:30 - and the large lift lines at silver fir, it is very difficult to utilize the hyak trails.

Paul E. Michelson

Comment:

I know from personal experience in trying to get a class of kids over from Summit Central to Summit East via the existing cat track cross over can be a difficult task, especially when there is new and often wet/heavy snow. The proposed plan to develop a better cross over with more fall line and less traversing will greatly improve both usability and also safety.

Paul Klansnic

Comment:

Improving the areas interconnect. When our kids were in beginner lessons at Summit West, we would frequently take the trail over to the more challenging terrain at Summit Central. Linking Summit East will enhance the skiers choices, and allow for more even distribution of skiers - allowing us to find the least crowded area, or terrain best suited.

Scott Cheney

Comment:

I also ski from West to Central and back but not to East because the crossover is poor. I would love to see the improvements made to make East Summit a more integrated part of the Summit ski area.

Stephen Novotny, Jr.

Comment:

I think that better designed connecting trails and lifts that allow you to circulate to different areas of the resort without having to take a shuttle is a great idea. I have had an experience where I got stuck on one of the paths because it is very flat and hard to cross, I have also had to wait for over 30 minutes for a shuttle to pick me up and take me to the other side of the mountain. If the Summit is able to build better connecting trails etc. it will help the Summit grow, and allow more people to enjoy the experience.

Tom Gibbons

Comment:

The increase in runs and chairs at Summit East/Hyak would be great for us to have more choices as we spend part of the day skiing over there. It is really a different kind of skiing and nice experience to ride through the trees.

Tom Johnson

Comment:

Effective crossovers between the different ski/snowboard areas. As a snowboarder, it is currently hard to traverse between the different areas, limiting the potential riding area. This is due to flat traverses that snowboarders have to remove their gear and walk across. This is frustrating as it gives skiers access but not the snowboarders. It is also difficult for the skiers as it requires a lot of pole work. A more hilly traverse would open up your options condiferably.

Wade and Debra Jelcick

Comment:

Skiing to Summit Central via the crossover trails has and continues to be a problem for my children and parents. The lack of slope when traveling from Summit East to Summit Central requires much hiking and skating, both of which are difficult on alpine skis. The crossover from Summit Central to Summit East is also difficult, but for a different reason, the extreme slope at the top, and to the south of, the Silver Firs chair. The new plan alleviates both of these problems, and would allow my entire family to enjoy and utilize the entire ski area, not just Summit East.

Wendy Kirchner

Comment:

Many times we take the long crossover trail to the East area. The new plan shows crossover trails to be more of an actual ski run, which would provide more downhill making it easier for snowboarders and safer for skiers. The one now has a short steep part leading to a long flat section. You have to get speed from the steep part to get you over the flat part. Two years ago, my husband (a very accomplished skier) caught an edge at the base of the steep part and was thrown off the slope breaking his hip as a result. A couple of ski patrol went by and failed to see him (as you have to go fast and watch where you are going on the flat part). The proposed crossover appears to be safer for all levels of skiers.

Will Martin

Comment:

With the proposed crossover and additions to Summit East, I might actually use that area. I have avoided it mostly, because it is too limited and getting there is a chore.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to maintain the viability of Summit East by addressing skier connectivity deficiencies between Summit East and Summit Central. One of the principle objectives is to integrate Summit East with the rest of The Summit by installing strategically designed and placed ski pods and connector trails. Refer to Section 2.3.6.1 - Lifts and Section 2.3.6.2 - Trails for a description of the lift and trail network modifications, intended to

address skier connectivity deficiencies, under Modified Alternative 5 (The Forest Service Preferred Alternative in the FEIS).

Barbara Grove

Comment:

The lift lines have made it much less enjoyable. We often spend up to half an hour in a lift line. We strongly believe the area needs to expand & upgrade in order to keep up with the demand. Adding new terrain and chair capacity will solve this problem. This is a good use of the land.

Benjamin Dent

Comment:

I have seen many people getting plowed into because there aren't enough slopes and areas to ski and ride on. Clearing trees would reduce that danger of collisions and make it more wide spread.

Betsi Selset

Comment:

However, I feel that it is way too crowded for skiers of all abilities. With so many snowboarders on the mountain now, it is scary for my eight year old when he is on the mountain. The proposed expansion would alleviate some of this overcrowding, by spreading out more skiers and snowboarders across the 4 mountain areas.

Bill Burke

Comment:

The net effect of the Summit at Snoqualmie Master Development Plan (MDP) is to increase the skier capacity for the total area and to improve the overall skier experience. For anyone who has skied at the pass on weekends, as my family and I have since the mid 70's, this is a significant objective in that it will reduce congestion on the slopes and shorten the lift line waits.

Diana Merritt

Comment:

The problem that I currently experience is that the chair lifts that service the advanced slopes are not exclusive to advanced skiers due to the intermediate slopes serviced as well by the same chairlift. I see a benefit to the access of some of the new chairs will get the advanced skiers off the bottom slopes and the beginner skier off the advance chair lifts.

Dorothy Hart

Comment:

Currently the lift lines at the chairs have grown to a 1/2 hour wait just to get up the mountain on a Friday evening. Weekend lift lines are almost as bad.

Eric D. Crivello

Comment:

There is a very obvious lack of intermediate and advanced terrain, and the resort is currently set up to channel guests in to only a handful of the lifts and runs that are available, leaving the rest of them empty and unused.

Ericka Garcia

Comment:

I'm a beginner skier and there are a lot of times I'm skiing with my children who are also beginners, the runs at West go into one and you have intermediate advanced from Wild Thing and the beginners form the bunny lift. People have taken my children out as they come down and I think separating the lifts more would help extremely and save a lot of people from getting hurt.

Jan Day

Comment:

I have skied, lived and worked in this area for over 30 years. I use the area for both winter and summer recreation. Weekend lift lines can be very, very long. The proposed upgrades would increase skiing time by providing more runs and better access to them.

Jeremy Snowboard

Comment:

I hate waiting 15 to 20 minutes just to do a 10 minute run.

Jon Oakdale

Comment:

The Summit would GREATLY benefit for more segregation of trails and an increased number of intermediate trails which are the most heavily crowded. It would also be WONDERFUL to get all the intermediate riders off the park chair so those of us that enjoy the park don't have to worry about beginners clogging up the take-offs and landings, besides the fact that we consistently have to wait through 20-30 minute lines.

Jonathan Anderson

Comment:

As a father of two, the improvements in skier/boarder flow, especially keeping advanced skiers out of beginner areas, etc is a welcome idea. Every year there are stories worldwide of ski/board accidents involving faster, more advanced skiers/boarders and beginners, sometimes fatal. Improvements in access to trails (especially at Alpental) as well as dining facilities means an improved experience for skiers/boarders/snowshoers, etc of all levels.

Karen Murray

Comment:

The Summit at Snoqualmie serves the greater Seattle area and is not currently equipped to accommodate the sheer volume of skiers and riders that use the resort. Just this winter, I have frequently waited in lift lines that were 15 or 20 minutes long.

Loren Merriman

Comment:

I spend last Friday night on "Wild Side" the east most chair at Summit West, and moving that chair's starting point westward will improve the amount of area that is not used today except by traversing over to that chair.

M. Shuttleworth

Comment:

I often drive to Crystal or Stevens which is an extra 45 mins of 1 hour further from my home to ski challenging terrain that is not so crowded. I will be able to ski closer to home + so keep more cars from being on the road longer.

Marcy Arnold

Comment:

I am an intermediate snowboarder and this is my first year at Snoqualmie. This year I have boarded at Whistler/Blackcomb as well as Tahoe / North Star. The amount of terrain is incomparable to Snoqualmie. I absolutely love Snoqualmie, it's my home. However if you go on a weekend, which is convenient for most people, you stand in lines all day to get on one of the few lifts available, in hopes that you can get 4 or 5 runs in that day. My experience at the other resorts was different. The high speed quads and multiple lifts got the lines moving and people to the top efficiently and quickly, maximizing your riding time as well as your experience. I would love to see more lifts, and more intermediate runs. This proposal will solve these problems.

Michael Wentworth

Comment:

Some of the technology (AKA: Lifts) are outdated and need to be brought up to current technology. I believe this to be beneficial for several reasons. For one, I feel that bigger/faster lifts will decrease wait times in lines. As I have spent several weekends at Snoqualmie and a lot of time in line, I know shorter lift lines would make the day more enjoyable.

Patrick Haluptzok

Comment:

I bring my family skiing at the Summit on weekends. I am frustrated that the lines are so long and the terrain is not larger (like Crystal). I would like to see more terrain available there to spread out the skiers.

Ray Sieber

Comment:

Although it is convenient in time, the resort is extremely limited in its number of intermediate ski runs and their length. We spend so much time in line that I have resorted to night skiing, which I enjoy about as much as standing in a fifteen minutes line during the day for a five minute run - you do the math! We find the resorts as a whole limited in their current state, and the amount of people on the slopes at one time is ridiculous.

Risa Sato

Comment:

This is my 6th season @ the Summit at Snowqualmie. I am very thankful and excited with getting tons of snow this season, but not really happy about the mountain. Because, there are too many people up there! Seems like it is doubled or tripled than previous year, and the line for the chair is way too long. Everywhere we go, there are bunch of skiers and snowboarders, and one of my friends even got in a fight with another skiers. (This skier claimed that my friend got too close to his daughter on the terrain.

Tom Begley

Comment:

With all the population growth in the area and the corresponding increase in the number of skiers, expansion at the ski area is desperately needed. I have almost given up weekend skiing because of the crowds, so an increase in lift capacity would be welcome thing. The Summit at Snoqualmie has had no expansion over the years, only replacing lifts that needed replacing. Some of the replacements have helped with the overcrowding but expanding the available terrain by offering new lifts is needed to make the experience of skiing pleasurable.

Tracy Prescott

Comment:

The other runs are often packed with beginners and it can be dangerous for skiers of different abilities to mix. My wife was hit by a beginning boarder who shattered her knee. Mixing boarders and skiers is clearly a problem. Allowing The Summit to expand will help rectify these problems.

Trent Mitchell

Comment:

Most of my friends and I rarely ski Snoqualmie on weekends because it is overcrowded and also time consuming to go from one area to another. In fact, I used to ski Alpental about 20-30 times a year before I finally decided to hit Stevens or Crystal instead. Quicker access to more trails will encourage others to come back to Snoqualmie and bring life back to the ski area where most people learned how to ski.

Group Response:

Section 1.1.2.3 - Purpose and Need acknowledges that skier circulation and out-of-base access at The Summit is poor, with ill-defined trail boundaries and routes to chairlifts/facilities. The FEIS has been updated to better display how the lack of tree islands and poorly defined trail boundaries do not provide separation between beginner areas/trails and more advanced terrain. The FEIS has also been updated to better describe poor circulation, as skiers are required to traverse across active ski trails to reach their destination at Summit Central and Summit West (see Section 1.1.2.3 – Purpose and Need and Section 3.11 - Recreation). Section 1.1.2.3 – Purpose and Need identifies that there is a need to address the lack of intermediate and advanced-intermediate terrain throughout The Summit-at-Snoqualmie areas and correct skier circulation problems caused by inefficiently aligned lifts and connector trails. The current poor skier circulation, out-of-base access, skier separation and lack of intermediate and advanced-intermediate terrain create on-mountain congestion and a diminished recreation experience.

Under the range of alternatives presented in Section 2.3 - Alternatives Considered in Detail, the existing lift system would be upgraded and realigned to increase out-of-base access and skier circulation through The Summit-at-Snoqualmie. Section 4.11 - Recreation describes the effects of the various lift improvements on the recreation experience.

Benjamin Dent

Comment:

high speed quad to the crest of the back country would be a great and well worth it decision. Adding a gondola to the top would decrease the 17 minutes to get to the top by half. This would make it less crowded and people wouldn't complain as much due to the long waits and lines.

Bret Backman

Comment:

the lines on weekend just keep getting longer, resulting in less time skiing and more time waiting in line. This is particularly frustrating for those who prefer to skin the more challenging terrain at the top of Alpental, since one must wait in TWO long lines just to make a single run.

Chris Rodde

Comment:

Increasing the CCC with the Pulse Gondola and International bowl lift as proposed in Alternative # 2 would allow for more ski runs in a day, and bring Alpental closed to industry standard.

Chris Rodde

Comment:

I have limited time to ski as a parent of young kids which means I typically ski 1/2 days on Sundays or Saturdays (I am a season pass holder). The limited uphill capacity to the summit of Alpental during ski season means that I spend most of my free time standing in line versus actually skiing. On a typical Saturday or Sunday, it often takes 1 hour to make a round trip at Alpental (from top of International bowl to base to top again).

Craig Husa

Comment:

In the past, I have skied mostly at Alpental where these improvements will significantly enhance the experience. There has always been great skiable terrain there but much of it is time consuming to get to. Then, returning to the top of the mountain via two lifts takes forever (especially on busy days). These changes will allow skiers to much better enjoy the runs that already exist.

Danny Miller

Comment:

My recommendation is to update chair 2 (Edelweiss) to a high speed quad. The chair is almost 40 years old and will need replacing soon for safety reasons anyway, so why is this not covered in the 10-15 year master plan? The chair will be 50 years old before the time period of this plan expires. That will alleviate most of the congestion on the mountain without the need for an Internationale Lift.

Doug Winslow

Comment:

I am an intermediate/advanced level skier who greatly enjoys Alpental. 2 of my most major concerns with this ski area however are the lift lines/wait times to access terrain (on busy weekend days, it can take you 40-45 minutes to get from the base to the top of chair two.), and actual access to the terrain. In order to access International, you have to ride two chairlifts, and there is no way to get back down to the bottom of chair two, so you have to do this again to get back there. The proposed expansion will greatly alleviate these problems of access and timeliness of access.

Eric D. Crivello

Comment:

I also like the idea of having a gondola that leads up to a lodge at the top of alpental. I hate having to ski all the way down to the bottom of the mountain, and then having to catch two different lifts to get back up to the top. This makes the top half of the mountain underutilized, and the bottom half overcrowded. I think the new gondola will definitely help skiers and snowboarders better utilize the terrain that is already within the resort.

Erik Arthur

Comment:

I'm an advanced snowboarder and I love the upper mountain at Alpental. The main problem with the upper mountain is accessibility and the wait in the lift lines. The proposed gondola and quad chair will greatly help to get more skiers up and use this terrain more effectively.

Guy Spencer

Comment:

The new chair proposed for the Internationale area of Alpental would make it a far more accessible experience for those not in love with the tight moguls that form on Chair 2 runs. For years I have stayed away from upper Alpental because the bumps tend to be vicious due to the concentration of skiers on Internationale and through the choke points near the base of Chair 2 and the fact I have used longer skis than most people. It would be nice to have a chair into the high elevations with more options for descent.

Jake Millan

Comment:

Please, please, please do something about chair 2. Waiting in line is painful.

James Keblas

Comment:

There have been many times while exiting the top lift at Alpental I have wondered why there isn't an easier, quicker way to the top. And, as I traverse to the backside of the mountain, think to myself, why isn't there more access to this area. It's an advanced rider's dream country back there and would really serve the mountain very well if it were easier (and safer) to ride.

Kyle Bissell

Comment:

I visit Alpental most often, so I thought I'd address that area. The proposed chairlifts and gondola at Alpental would have an astronomical effect on one's experience at the ski area. Personally, I can say that I've waited in line for nearly 2 hours in the combined lines of the Edelweiss and Armstrong

Express. As my run of choice is typically International, this long wait is especially aggravating. The planned pulse gondola and International Bowl lift would greatly reduce wait times and allow for a greater amount of runs skied.

Linda Fortune

Comment:

I love skiing at Alpentel and enjoy the variety and intensity of terrain it offers. Six years ago I crushed my tibia plateau and have worked very hard to get back to my former level of skiing. Actually I am doing very well. The only route I have not come down is International because of the difficult entrance. I would love a chair that would take me up into that area and maybe open up the possibility of skiing the back country again.

Lisa Deaver-Jackson

Comment:

As a snowboarder, I love the idea of the Internat.' I chair because I wouldn't have ride two chairs (and stand in line twice), or traverse a lot (which is difficult on a snowboard) to access my favority terrain. I also like that I wouldn't have to go all the way through the crowded, flat, beginner area at the base to go back up again.

Loren Merriman

Comment:

The Alpentel's two new chairs, specifically the new chair to the top (over upper international run) and the new chair below upper international will be heavily utilized. There have been many times where the snow condition has changed for the worst as you progress down upper international, and I have wished there was a chair to take me back up to the top.. This change will solve that problem for us.

Matthew Bohan

Comment:

I typically go to Alpentel, where the parking has been full and the lift lines have been 20 to 30 minutes during weekend days most of this season. The expanded capacity of more lifts and the addition of a drop off point would be welcome changes there.

Nate Waddoups

Comment:

those of us who have been riding Alpentel for years have been waiting for years to see better access to the 'back' side of the permit area and I am sure that I speak for hundreds of people (the hundreds you'll find in the enourmous lines at the base of Chair 2 on any Saturday) when I say that a solution to this problem is long overdue and will be greatly appreciated.

Sheri Watson

Comment:

My family and I have been avid skiers at Alpental for over 5 years. My husband and I chose our home location as close as possible in order to maximize our skiing opportunities. My 2 children, now 8 and 12, both are veterans of Alpental's expert runs and ski most of the terrain considered in-boundary. Given this year's bonus snowfall, we have enjoyed the mountain as much as any family could. We have also, endured the painful wait (15 to 20 minutes on weekends) on Chair 2 to access the Edelweiss bowl and International run. As most of the families that covet this beautiful and challenging terrain, I too would enjoy the benefits of improved access to our cherished runs.

Stephen K. Festor

Comment:

I'm an expert skier who skis primarily at Alpental. The current lifts at Alpental are inadequate for transporting skiers to expert terrain because there is only one chair that accesses the terrain. This results in extremely long lift lines on the weekends (when I can ski). I understand the proposal would add an additional chair and possible gondola access to this terrain. I believe this would be a positive development because it will help lesson the lift lines on the existing chairs and allow more skiers to access the expert terrain - terrain which is already open to skiers.

Steven J. Watson

Comment:

A gondola to the top and additional chairs will help get people on the mountain and also spread people out more. I have been run over up there multiple times (one time a snow boarder hit me so hard I broke my sternum). I am all for spreading people out which will happen if more chairs and a gondola are available. You won't have everybody funneling back to the same lifts. Every time I've been hit it's been near the bottom of the Armstrong chair where the traffic is thick and some people go way too fast.

Thomas Plaster

Comment:

I have personally found that over the years the slower ski lift to the top of Alpental combined with the increased number of skiers and riders results in long lines and frustrates everyone.

Tim Whiteley

Comment:

Alpental is becoming over crowded while reaching the "chair two." This chair goes to the summit, and at times will receive lines that can take 30 minutes to get through. A two-person chair just isn't adequate for today at the mountain. It's frustrating to wait forever in a line to get the best snow.

Tom Hughes

Comment:

The proposed pulse gondola at Alpental will allow me to access the backcountry more speedily, and since that is where I mostly ski, it will be a major improvement for me.

Tom Romary

Comment:

The limited uphill capacity to the summit of Alpental during ski season means that I spend most of my free time standing in line versus actually skiing. On a typical Saturday or Sunday, it often takes 1 hour to make a round trip at Alpental (from top of Internationale bowl to base to top again).

Increasing the CCC with the Pulse Gondola and Internationale bowl lift as proposed in Alternative #2 would allow for more ski runs in a day, and bring Alpental closer to industry standard.

Tony Kahler

Comment:

The last time I went skiing I spent 1/2 hour in line at chair two to make a 5 minute ski run. This is indicative that there is a need for expansion.

Vincent DeLuca

Comment:

I am heartened to see that the owners of Alpental Ski Area are endeavoring to replace the old 2 seater chairlift that accesses the International ski run at the area. Being a long time skier with a penchant for challenging runs I would be delighted to spend more time skiing at Alpental and less time standing in 20 minute lift lines as I did this past Sunday. Alpental, as you probably know, offers great skiing for those that love the area's expert terrain. A major drawback is the bottleneck presented by the 2 seater chairlift that runs as slow as molasses.

Wendy Kirchner

Comment:

Alpental always seems to be crowded and have lines at the lifts. The waits this year have been an hour on many weekends. The added lifts along with a gondola would certainly solve the long lines. The restaurant at the base is much too small for the crowd that Alpental serves. One at the top would help with seating space plus be very scenic.

Zeke Rehn

Comment:

On weekends and holidays the Alpental ski area is so crowded it is not uncommon to take over an hour or more to ride the two separate chair lifts to the top of the mountain, allowing only several runs to be enjoyed over the course of an entire day. The problem as I see it, is that expert, advanced and

intermediate skiers must access the same chair at the bottom of the hill to get to the top. Not only does this cause a very long lift line it also creates a bottle neck at the base of the mountain where experts and beginners are all converging to access one chair.

Group Response:

FEIS Alternatives 2, 4 and Modified Alternative 5 include the Pulse Gondola, allowing direct out-of-base access to the Denny Mountain summit. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain in the northwest portion of the SUP area, allowing round-trip skiing within the Internationale bowl, encouraging dispersal of skiers and reducing congestion at base area facilities (see Section 2.3.6.1 - Lifts).

Barbara Root

Comment:

If I understand it correctly a new chair is proposed for the Hyak area. A faster chair would be great for the Nordic skiers as its hard to dress warm enough for the chairlift but light enough to exercise.

Lloyd and Patti Holman

Comment:

The changes to the lifts at Hyak provide better access to people, like ourselves, who have difficulty walking in ski boots. Currently a person must walk a great distance from the parking lot to the lower lift at Hyak in ski boots, or walk to the lodge in snow boots and then switch to ski boots and hike back up to the lower lift, which is about the same distance as walking from the parking lot. One of the proposed lifts would start closed to the lodge. We live across Keechelus Drive from the lower lot at Hyak and it is more convenient for us to drive to the Silver Fir or Central parking lots to ski because of access issues.

Mark Illing

Comment:

I strongly support the realignment and upgrade of the chair lifts at Summit West. The current situation has chair lifts that are not aligned with the fall line. When teaching various disabilities, but especially blind skiers, it is always a challenge to keep people skiing the fall line when the fall line does not bring them back to the lift. The fall line is a simple concept to teach to a blind skier, but it is not so easy when you have to also explain that we have to ski over here to ensure we can return to the chair. I would estimate that a third of the Little Thunder run is spent realigning so that you can get back to the chair. When it comes to teaching people with spinal chord injuries who use various types of sit equipment, wasting a third of the hill realigning to return to the chair is very taxing of their stamina. It is far easier for them to ski the fall line than to turn across the hill for realigning to return to the chair.

Scott Kaden
Pacific Northwest Ski Areas Association

Comment:

In research conducted by Herbert Research (Bellevue, Washington), season pass holders from a cross section of Washington state ski areas were asked what improvements would cause them to ski in Washington state more often. The most frequently mentioned items included high-speed chairlifts, the addition of new terrain, and better trail grooming.

Wendy Kirchner

Comment:

The East area has become more popular over the last years with skiers, telemarkers and cross-country skiers. One main lift is not enough to service this whole section. The additional runs would provide more diverse terrain of various abilities. My husband and son like bumps and some steep runs while my daughter and I do those, but like to cruise at times. The new runs would also allow us to ski more downhill. Presently, many of the runs funnel into a flat trail. This way we could all be satisfied all day on this part of the mountain. The new runs, the Mill Creek area and added lifts would make the East perfect for our family to spend the day there.

Group Response:

Refer to Figure 2.3.6-1, Alternative 5 Proposed Conditions – The Summit for a graphical representation of The Summit's proposed trail and lift network layout described in Section 2.3.6.1 - Lifts and Section 2.3.6.2 - Trails, under Modified Alternative 5 (The Forest Service Preferred Alternative in the FEIS). Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, balancing capacities, and providing a quality recreation experience. The Action Alternatives have been developed in order to address these needs and reduce on-mountain congestion and improve out-of-base access.

Beth Frymire

Comment:

I don't feel a restaurant at the top of Alpental is necessary. I rarely see many people enjoying the food services already provided.

Charlie Cornish

Comment:

Pulse Gondola:

- What is the need?
- Do the benefits outweigh the costs?

- ADA-accessible: this is a red-herring. Driving to Paradise or Sunrise in Mt Rainier is more ADA-accessible and a more spectacular view.
- "interpretive, scenic viewing, and dining opportunities": another red herring. Boothcreek/Ski Lifts, Inc. has not been able to run their existing chair lifts or dining areas in the summer, spring or fall, so how can they expect to run one at the top of Alpental?
- Competition for year round gondola: drives to Mr. Rainier, Mr. St. Helens, Mr. Baker, proposed tram at Crystal to Mountain Top restaurant-no contest.
- A gondola to the top of Alpental for skiing is a bad idea: there is no easy way to get down, only black diamond runs. A gondola will attract skiers of all abilities. Where is the risk analysis of beginners on a black diamond only hill?

Charlie Cornish

Comment:

As previously noted, the market demand and cost/benefit of the Pulse Gondola have not been presented in the plan. Justification of its year round use for scenic observation, photography, walking, corporate retreats/conferences and on-mountain dining is not presented in the MDP. Where are people going to walk? It is limited, rugged terrain at the top of Alpental. Also, what are the impacts of such a development so close to the Alpine Wilderness Area boundary. Such development should not occur so close to the wilderness area.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The proposed gondola on Denny Mtn. will bring substantial impacts to the high elevation landscape and the adjacent wilderness. The DEIS attempts to minimize that impact, but provides no data or cogent argument. In fact, this will be an attraction, and for many who are ill-prepared for the wild country. The temptation to scramble cross country to nearby peaks and lakes is real, and will result in numerous boot created trails through this fragile ecosystem. The DEIS offers no suggestion as to how to deal with this use and minimize impacts to the ecosystem and to comply with management direction for the wilderness.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The proposed Denny Mtn gondola/restaurant is expected to generate 70,000 non-skier visits per year at the start, increasing 6% per year. Most of use would be expected from late-June to end of September, due to weather (~14 weeks). Most of visitation can be expected on weekends, which

would result in about 2,000 people per day on the mountain. With gondola capacity at 300 per hour. (DEIS 2-27) that could go to 3,000 per day if gondola runs 10 hours.

The DEIS references the gondola at Silver Mtn., Idaho, where the federal government contributed \$6.4 million towards its construction in 1987 (Morning Star Lodge website). Will the Summit ask for public financing for this one? Without it, will it be economically feasible?

A rough sketch of the top of the gondola is shown in figure CS-4. Is this a reasonable depiction of the gondola/restaurant? At 3,500 sq ft, that would be a 70'x50' building or 35'x50' if two floors. Is the EIS a binding limit on size, or could it be expanded? What further approvals and public review would be necessary?

The DEIS states, "It is not anticipated that the gondola would provide increased access for hiking due to the rugged nature of the terrain at the summit of Alpental." (DEIS 4-430) However, providing access to rock climbers, mountain climbers, extreme sports enthusiasts, perhaps bicyclists plus thousands of other ill-equipped visitors to scramble over rocks, thin soils and meadows will cause serious impacts. Likely destinations would be Chair Peak, Melakwa Lake, Source Lake and Snow Lake. In fact, the DEIS contradicts the first statement-- "Construction of the Pulse Gondola would represent the largest contribution to additional summer and fall recreation use since it would operate on a year round basis and would increase recreational use of the area. Activity related impacts [to wildlife such as grizzly bears] would be greatest in the vicinity of the mountain top restaurant, however some gondola riders may choose to explore more remote areas along the top of Denny Mountain or to hike down from the top, thereby increasing human presence in areas that currently receive little human disturbance during summer and fall." (DEIS 4-315)

How long will the interpretive trail be? How will the Forest Service control hiker or bicyclist built trails into the wilderness? Unauthorized trails have been built near Mt. Defiance. The gondola may make this area attractive to that type of activity. The DEIS suggests no methods to prevent a myriad of trails crossing the summit of this ridge, and perhaps on down to other valley destinations.

The portion of the Alpine Lakes Wilderness adjacent to Denny Mtn. is designated Management Area 10C. "The primary goal of MA 10C is to provide outstanding opportunities for isolation and solitude, mostly free from evidence of human activities and with very infrequent encounters with others. MA 10C are generally trailless areas within wilderness, although some user-made trails may exist." (DEIS 1-25) The DEIS provides no suggestions as to how the management direction will be met, other than hoping that people will stay close to the gondola.

The DEIS (4-431) states "...the facilities would not be visible from the Wilderness.." On the contrary, they would be clearly visible from Snoqualmie Mtn and Guye Peak, and likely from Chair Peak. It may also be visible from near the Snow Lake trail where it enters the wilderness.

Crystal Raymond

Comment:

My biggest concerns are the restaurant and gondola proposed for Alpental. Both will severely hamper the rustic and remote quality that makes the Alpental terrain so desirable.

Donald Parks

Alpine Lakes Protection Society

Comment:

A plan and funding for enforcement of the Wilderness boundary is essential. It would appear, all things considered, that the Pulse Gondola ought not to be built given the nature of the readily foreseen impacts.

Donald Parks

Alpine Lakes Protection Society

Comment:

The proposed gondola on Denny Mtn. will bring substantial impacts to the high elevation landscape and the adjacent wilderness flora and fauna year-around. The DEIS attempts to minimize that impact, but provides no data or cogent argument. In fact, this will be an attraction, and for many who are unprepared for the wild country. The temptation to scramble cross-country to nearby peaks and lakes is real, and will result in numerous boot created trails through this fragile ecosystem. The DEIS offers no suggestion as to how to deal with this use and minimize impacts to the ecosystem and wilderness.

Donald Parks

Alpine Lakes Protection Society

Comment:

We would further point out that the development of a new restaurant on Denny Mtn is a highly questionable economic venture. There have been numerous restaurants that have not survived in the Snoqualmie Pass area over the past thirty years. The proposal for yet another new restaurant even farther from I-90 appears even more unlikely to survive. However, this particular idea can result in negative impacts on the natural values of the area by bringing many people into contact with very fragile places.

Eng Ron

The Mountaineers

Comment:

Though we long ago accepted the current level of lift development to the summit, the fact that the development at the top was minimal and most mechanized (i.e., lift assisted) visitation was during the

winter has allowed climbers on Denny Mountain to continue to enjoy a near-wilderness experience. A restaurant and off (ski) season visitation by gondola will pretty much eliminate the enjoyment of that experience and will likely reduce or even eliminate interest in climbing the peak.

Eng Ron
The Mountaineers

Comment:

Expanded access to the summit area during non-ski season will also have an impact to the nearby Alpine Lakes Wilderness. There is access along the ridge from Denny Mountain to The Tooth, a very popular climbing destination for the novice alpinist. Eased access along the ridge from Denny Mountain will alter the experience and the visitation to this already popular destination. Indeed, there is concern that inexperienced visitors will attempt to use the area along unofficial routes and with the associated dangers. It is likely that increased use of the Denny Mountain summit, particularly in non-winter months would result not only in loss of solitude and increased wildlife disturbance but side trails and much heavier use of existing routes.

Jim Flynn

Comment:

The EIS should demonstrate that there is sufficient area on top of this narrow ridge for the gondola, a restaurant and the existing chairlift and the increased number of skiers/snowboarders and other visitors that would be transported to this small area. With the gondola and restaurant on top of the mountain, there could easily be 100 or more people on top of the mountain on a busy day.

Joe Hoch

Comment:

Another important question is of course what effect the new lifts and restaurant will have on the area. The Alpentel Valley is something of a hidden gem with small secluded spaces, and the top of the mountain, where the new restaurant would go, has the dimensions of a basketball court. Aside from blasting rock, which undeniably would harm the environment, there is no conceivable way to get a new building in that space. Any new developments would also create new Coke bottles, candy wrappers and dirty water feeding the already car polluted Source Creek and eventually the Snoqualmie River.

Mark Lawler
Sierra Club

Comment:

A gondola is a form of intensive recreational development that is inappropriate for the Cascades, which our residents cherish for their wild, undeveloped character that is so refreshing compared to the

heavily urbanized areas along I-90. Moreover, a gondola provides little view during most of our cloudy, wet winter. Rather, its real economic value to the ski company is in the summer and fall months when the skies are mostly clear. Yet the DEIS is largely silent on the significant environmental impacts that summertime use of a gondola would create.

Matt Karaus

Comment:

Additionally, putting a restaurant at the top of Alpental is unfathomable. What happens to all the waist? How do you manage the foot traffic in what is a sensitive ecological environment in none winter months?

Nancy Keith

Mountains to Sound Greenway

Comment:

The Trust is concerned about the gondola and restaurant proposed for the summit of Denny Peak, near the boundary of the Alpine Lakes Wilderness Area. In years to come, these facilities could increase adverse impacts on the Wilderness. Summertime user-built trails emanating from the gondola end-point could easily expand into a network of unofficial routes along the ridge top to Malakwa and Source lakes and other attractive alpine destinations. Trails and shorelines in this part of the Wilderness are already over-used and damaged. Before we could support this aspect in any final alternative, we would have to see provisions for absolute containment of expanded hiking from the site. We think this development should be removed from the MDP at this time.

Phil Kazanjian

Comment:

I'm also concerned with the proposed Gondola at Alpental. Table S-3: Estimated 80,000 additional Non Alpine visits to the summit as a result of the gondola at Alpental. I assume most of these Non Alpine visits will be from June-September, about 20,000/month. With most of this occurring on the weekends, that's about 3-4,000/weekend at Alpental? This is a heavy load. Are there plans in place on how to accommodate this many visitors.

Tara Kraft

Comment:

It is the implication of this gondola that worries me most - that the top of Alpental will become a year-round city park. That kind of traffic causes too much harm to the area for questionable benefit. After all, if anyone can get there with no effort to get either up or down, will anyone really want to?

Group Response:

The Pulse Gondola and Alpental mountain-top restaurant are not included in FEIS Alternative 3 to address these and other issues.

James E. Fairchild

Comment:

A ride on Central Express takes 5 minutes 28 seconds but on Silver Fir takes 10 min 15 sec. With a moderate descent time of 2-3 minutes, a round trip on the Express takes about 8 minutes, but on Silver Fir, it takes about 13. As my main objective is to ski, not to sit on a lift, it is obvious why I use Silver Fir and Triple 60 only on occasion, to access less-skied terrain -- I get over half-again as many runs in a given time on the express. Upgrading either of these slow lifts to express would go a long ways toward spreading the crowd and achieving the "balance" they claim to seek.

John Ellis

Comment:

The Detachable Quad lift for Silver Fir, as the existing lift is too old, too slow, and the cross country skiers and snowshoe users find it scary to load a lift moving as fast as the current lift moves.

Ken and Erica Ridout

Comment:

However, the Silver Lift itself is excruciatingly slow. We are lucky if we get 3 runs in a 2 hour block of time. This is due to the long, slow chair ride and is compounded by the fact that the chair stops frequently, often for minutes at a time. The lift line builds up due to this and when you account for a 15 minute chair ride (if you are lucky and it doesn't stop too much) plus a 10-20 minute wait in line, its easy to see why we get frustrated. Changing this chair to a detachable quad would make us and a whole lot of other skiers and boarders happy. There is plenty of terrain to support the increased volume that a quad would provide.

Group Response:

The FEIS has been updated to note that The Summit-at-Snoqualmie has received approval from the USFS to replace and re-align the existing *Silver Fir* chairlift with a detachable quad to increase capacity from a CCC of 710 to 930 skiers, and improve the ride time to four minutes. The approved *Silver Fir* upgrade includes moving the lower terminal closer to the parking lot to reduce uphill climbing for skiers as they access the lift. Although the *Silver Fir* chairlift has not yet been replaced, for the purposes of this FEIS analysis, replacement and alignment of the *Silver Fir* chairlift with a detachable quad is considered an existing condition, similar to the *Mt. Hyak* chairlift at Summit East.

Refer to Section 2.3.6.1 - Lifts for a description of the modifications to the Triple 60 chairlift alignment.

C.J. Clements

Comment:

A couple of weekends ago I was forced to wait in a line that actually went up the mountain, a 45 minute wait. An instructor said it was because there were 700 kids on the mountain and the chair lifts that normally use were down. With wintersports being the fastest growing activity in the world it will only get worse. Other mountains I have been to which have numerous high speed quads, mid and top of mountain lodges, and a vast area to ride have never seen back ups like that.

Hans Lundin

Comment:

Unfortunately the numerous ski programs and close distance from Seattle results in a very congested parking lot and long lift lines. I strongly support the development plan to improve the experience for all who use this ski area.

John E. Lindsay

Comment:

By moving the lifts and improving some of the trails, skiers will have better access to the current resort.

Melissa Becker

Comment:

The Summit ski area is so crowded on weekends that we take our boys out of school in order to have a more enjoyable family experience.

Michael Wentworth

Comment:

If new bigger/faster lifts were installed, it would increase the efficiency of the skier. It would make skiing from one location to another more effective. As the majority of Snoqualmie is spread out horizontally, getting around the mountain is fairly important.

Group Response:

As described in Section 4.11.5 – Impacts - Modified Alternative 5, the USFS Preferred Alternative would realign and/or upgrade the majority of the lifts, provide additional guest service facilities, and create new chairlifts and terrain in previously underutilized portions of The Summit-at-Snoqualmie ski area. All Action Alternatives address the Purpose and Need (see Section 1.1.2.3 - Purpose and Need) to better distribute and circulate skiers on the mountain.

Frank Radella

Comment:

Why use a gondola to deliver more people to an area that is already accessible with current lifts? As it is right now the top of this run is a bottle neck for skiers entering an often rocky top of the slope. More people entering the top of "Upper International" would be dangerous to skiers/snowboarders.

Michael Snodgrass

Comment:

I do have serious concerns about the proposed gondola. My concern has to do with increasing the number of skiers and snow boarders carried to the top of the mountain. Here is why: From the top of Alpentel, skiers and boarders must pass through 3 narrow, steep and rocky passages to reach the runs below (these runs are know as 'Internationale', 'Rollen' and 'Edelweiss' Bowl'). Most of the time, these passages quickly become bottlenecks. The snow is scraped off the rocks and people then have to step, skip or jump over the exposed rocks to avoid injury or damage to their equipment. Adding more people would obviously worsen the situation.

Robert Pasko

Comment:

Chair 2 near Denny's summit is a relatively slow two seat, but still the unloading point of the chair is very crowded with off loading users because there is very limited room. In fact, there is not much flat ground suitable for any higher rate of off loading in the vicinity. Higher capacity lifts will cause large accumulations of skiers and boarders at the offload point probably creating a dangerous situation.

Group Response:

The reader is correct in recognizing that density is currently high at the Denny Mountain summit at Alpentel, with a significant amount of the advanced terrain being served solely by the *Edelweiss* chairlift. The FEIS has been updated to better describe the congestion at the top of the *Edelweiss* chair. As stated in FEIS Section 4.11.5 – Impacts – Modified Alternative 5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the International basin. As a result increased alpine skiing would be expected in the Internationale basin and skier densities would be reduced at the top of *Edelweiss* (see FEIS Section 4.11.5 – Impacts – Modified Alternative 5).

The Pulse Gondola and Alpentel mountain-top restaurant are not included in FEIS Alternative 3 to address these and other issues.

Andrey Borodachyov

Comment:

There's plenty of acreage within the resort's boundaries, but some of it could be put to better use through creating better access, and making it easier to distribute the influx of skiers and riders

between the various areas of the resort. As a recent example, during the last weekends Summit Central was totally overflowing making it potentially dangerous, whereas the few people who chose to come to Summit West enjoyed the whole mountain for themselves. Better (easier) crossovers and more chairlifts to the under-used areas would alleviate this problem and add to the happier on-the-mountain experience.

Carrie McGowen

Comment:

Having additional terrain and chairlifts would encourage more people to ski this area rather than be limited to only skiing Central and Summit West. The cross over trail is a terrific way to be able to ski all areas without having to take the shuttle or move your car. I have found that my advanced students really enjoy this experience. The number one reason I have found that people do not use the cross over trail or chairs at Hyak is that it is not easy to use (confusing via the trail map) and there are not enough chair lifts. The current cross over trail has many flat spots that make it discouraging for snowboarders.

Charlie Cornish

Comment:

The DEIS repeatedly cites the need connect Summit Central and Hyak, making easier crossover access. The current Central-Hyak crossovers are adequate for skiers of all abilities. Yes, there are flat spots and slight uphill that novice skiers and snowboarders will have a greater challenge to navigate, but that comes with the terrain. Meanwhile the West-Central connector requires advanced intermediate or expert skier ability to navigate. West and Central are more heavily used and need a better connector first. Where are the plans to improve West-Central connector?

Doug McLaren

Comment:

improving all of the cross over trails improves the areas ability to offer terrain for all abilities. When having my son in Powder Pigs at Summit Central, it always took a substantial amount of time to access some of the better terrain.

Erik Arthur

Comment:

I really like the idea of adding more chairs and opening up more terrain at Summit East. I only ride at Summit East only occasionally because the existing lifts are only 2 person and very slow. Adding additional lifts and more terrain will allow more skiers/snowboarders to enjoy this area.

John Vraspin

Comment:

We took a snowboarder up the other day and it was painful to watch him come back from the top of Silver Fir to the lunch room. So yes adding new chairs and connecting trails would be very helpful - we could spend more time skiing instead of walking in our boots.

Kristi Duvall

Comment:

I purposely avoid going to The Summit ski areas because there is such a lack of variety. While guests are encouraged to take a shuttle, most of us don't want the hassle. I'd rather drive the extra 1/2 hour to Stevens so I have far more variety with less effort. I would like to see significant changes made so that the areas are more interconnected between East and Central. While not noted in the proposal, it would be interesting to consider connecting West also. Crossover trails between the areas that are accessible to a variety of terrain/skier levels would be greatly appreciated. Although different, the effort to get from the base of Discovery to the base of the Summit Quad is exhausting. Crossing over all of those trails can also be dangerous when the area is busy with skiers coming from all directions.

Lars Fisher

Comment:

I have a very difficult time skiing between the areas. The traverses are almost impossible for less than an expert skier to handle. I admit I am frequently terrified when going from Central to West, and any improvements in this area would be greatly appreciated. Given the amount of pleasure Northwest folks get out of this area, I cannot understand why the ski area cannot just span the distance between the old Hyak and what is now Summit West. What I mean is traverses between areas are inherently dangerous as they build up grooves in the path that anyone but an expert finds dangerous.

Luke Williamson

Comment:

There is a very significant need for additional ski lifts, and trails between ski areas. I have personally waited in line for up to an hour just to get onto the mountain.

Steve Savage

Coughlin Porter Lundeen

Comment:

Being a skier with many years on the slopes, getting to one area from another is not easy, but do-able, based on the existing crossover trails. Some of the trails are simple too difficult to traverse for beginner and intermediate skiers/boarders (like my wife and kids).

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, the DEIS and FEIS acknowledge the need to maintain the viability of Summit East by addressing skier connectivity deficiencies between Summit East and Summit Central and to correct the deficit in intermediate and advanced intermediate terrain at The Summit-at-Snoqualmie ski area. All Action Alternatives address these deficiencies by providing for improved skier circulation to address crowding issues, providing better dispersal of skiers, providing better skier separation by ability level, and addressing the deficit of intermediate and advanced-intermediate terrain (see Section 2.3 - Alternatives Considered in Detail).

Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.1.1 – Summit West/Central Crossover Trail provides a brief description of an alternative which would have provided for a Summit West to Summit Central crossover trail that was considered but eliminated, as well as the reason for elimination. Under the Action Alternatives, difficult access between Summit West and Summit Central would remain for beginner to intermediate level skiers due to the necessity to negotiate Trail 42 (Parachute) in order to access Summit Central from Summit West.

Dorothy Hart

Comment:

Currently the lift lines at the chairs have grown to almost a 30 minute wait on Friday evenings & Saturdays. As a Ski Instructor for the past 15 years, it is truly difficult to give a quality lesson to a class that has to spend an hour in the lift lines (which can also mean hypothermia) during a 1-1/2 hr class and only get 2 runs down the mountain.

Jay Hart

Comment:

In the past few years, it has been very frustrating trying to teach new skiers in a two hour time session, when over 1/2 of the lesson is spent waiting in the chairlift lines on beginner and intermediate chairs. I'm tired of making excuses as to why my students have not progressed further in a 6 week time period.

Robert L. Miller

Comment:

There needs to be additional lift capacity in the beginning teaching class. During ski school times the waiting in lift lines is excessive.. Instead of being able to teach the classes we spending over 1/2 the time standing in lift line. I know the addition of a lift for the ski schools at the bottom of the resort will be a great addition to Summit Central.

Group Response:

Under the Action Alternatives, both new chairlifts and realignment of existing chairlifts are designed to alleviate congestion and provide better support to the ski school operation. Beginner facilities would continue to be provided at Summit West and Summit Central. Chairlifts and tows would either be realigned or replaced. Terminals would be located closer to base area facilities in order to minimize walking distances for beginners (Section 4.11.5 – Impacts – Modified Alternative 5). For example, the proposed *Ski School* chairlift at Summit Central which would have a CCC of 680 skiers, a ride time of 4 minutes, and would be located within 250 feet of the proposed new base lodge (see Section 2.3.6 – Modified Alternative 5 – Mitigated Proposed Action).

Andre Schimmelbusch

Comment:

I mostly ski at Alpental, as most die hard pass skiers do. One of the frustrating thing is the time it takes to access some of the terrain there. It's simply not accessible 'easily'. If you want to ski lower international, you have to take the high speed quad chair, and then Edelweiss, and ski the whole mountain in one setting. The international chair would be great for just skiing that one area - which is great terrain but not easily accessible.

Lindsey Godfrey

Comment:

My husband and I are expert skiers, and we love to ski Alpental but frequently travel to Crystal Mountain instead because the lift lines are so long at Alpental compared to the amount of available skiing.

Lynn Brandli

Comment:

I won't ski at Alpental any more on the weekends. It is too crowded. Even though I know that the ski terrain is exceptional at Alpental, I don't want to put up with the insane lines - so I drive to Crystal. I live about 25 minutes from the summit, and about 90 minutes from Crystal. I feel that this proposed expansion to the Snoqualmie Summit area would greatly expand the total skiing acreage.

Mark Gibson

Comment:

At the upper chair lift at Alpental I've waited 20 to 30 min to get on. So these new lifts would help with the skiing 10 min and waiting 30.

Group Response:

Section 1.1.2.3 - Purpose and Need, as described in the DEIS and FEIS, acknowledges that skiers wishing to ski the Internationale bowl are required to ride two lifts and to cross through lower level

terrain to access the bottom terminal of the *Armstrong Express* chairlift. As a result, the bottom of Alpentel is often crowded and lift line wait times are excessive.

As discussed in FEIS Section 4.11.5 – Impacts – Modified Alternative 5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the Internationale basin. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain in the northwest portion of the SUP area, encouraging dispersal of skiers and reducing congestion at base area facilities (Section 2.3.6.1 - Lifts).

Donna C. Winters

Comment:

I realize how lucky I am to be able to ski in such a beautiful area. However over the years it has become more and more crowded. The lift line can be a 30 minute wait. It would be wonderful for Alpentel to be able to add more chairlifts to give everyone better access to the mountain top.

Gerald E. Schimke

Comment:

For the past few years I have been skiing Central Express and Silver Fir at Summit (Central) and Alpentel. Even on my short days each of these areas become boring quickly. To do both on the same day or to try to add Summit East is not convenient at present. The two chairs required to get the top of Alpentel is also a pain. Therefore, direct to the top lifts at Alpentel and improved lift and trail linkage between Summit (Central) and Summit East would be much appreciated.

Keith Dougherty

Comment:

My main issue is the slow and low volume chairlifts. I waited in line for 20+ minutes every time I finished a run. Also, it was apparent to me that every run has bumps. It would be great if there were some runs that were groomed to add some variety at Alpentel so that I would not have to go to a different area to get different terrain.

Group Response:

Under the Action Alternatives, both new chairlifts and realignment of existing chairlifts are designed to alleviate congestion and increase skier circulation. Section 1.1.2.3 - Purpose and Need, as described in the DEIS and FEIS, acknowledges that skiers wishing to ski the Internationale bowl are required to ride two lifts and to cross through lower level terrain to access the bottom terminal of the *Armstrong Express* chairlift. As a result, the bottom of Alpentel is often crowded and lift line wait times are excessive.

As discussed in FEIS Section 4.11.5 – Impacts – Modified Alternative 5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the *Internationale* basin. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain in the northwest portion of the SUP area, encouraging dispersal of skiers and reducing congestion at base area facilities (Section 2.3.6.1 - Lifts).

As described in Section 1.1.2.3 - Purpose and Need, the DEIS and FEIS acknowledge that currently, skier circulation and out-of-base access at The Summit is poor, with ill-defined trail boundaries and routes to chairlifts/facilities. The FEIS has been updated to better display that circulation is poor as skiers are required to traverse across active ski trails to reach their destination at Summit Central and Summit West (see Section 1.1.2.3 – Purpose and Need and Section 3.11 - Recreation). Section 1.1.2.3 – Purpose and Need identifies that there is a need to address the lack of intermediate and advanced-intermediate terrain throughout The Summit ski areas and correct skier circulation problems caused by inefficiently aligned lifts and connector trails.

Under the range of alternatives presented in Section 2.3-Alternatives Considered in Detail, the existing lift system would be upgraded and realigned to increase out of base access and skier circulation through The Summit-at-Snoqualmie. Section 4.11 - Recreation describes the effects of the various lift improvements on the recreation experience.

Mark A. Shillcutt

Comment:

There is no longer a Platter pull at Alpental. There has not been one for about 15 years or so. SE Group did not bother to check this out when they included it in the MDP. It would seem this could be of some advantage in trying to grandfather in more new machines.

Toby Paterson

Comment:

In the MDP a chairlift that does not exist is mentioned: the "Platter Pull" lift. This lift was never part of what Booth Creek operated. The Platter Pull lift was roughly in the same spot as the bottom 300 feet of the lift they wish to install, the International lift. This proves the DEIS, in part, is based on false data.

Group Response:

The MDP was submitted to the USFS in 1998. The DEIS is updated to reflect existing conditions, as a result the *Platter Pull* lift is not mentioned in the DEIS as an existing lift. As described in Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2.1 - Chairlifts, the *Platter Pull* surface tow no longer exists, and has been removed. The existing 20 lift (16 chair, 4 surface tow) network at The Summit-at-Snoqualmie is detailed in Table 2.3.2-1.

Chris Bader

Comment:

My mom is in a wheelchair and I'd love to take her on a gondola to the top of Alpental to have lunch while taking in the view which she would not otherwise be able to see. Just think, there is no handicap access to any mountaintop at any Washington ski resort. Green Valley at Crystal mountain has a restaurant although you would have to take a couple of lifts to get there!

Chris Burdett

Comment:

I have a number of friends that can no longer walk for great distances due to circulatory and other medical issues. The nearest facility for them to enjoy a summit is Gross Mountain in Canada. As the entry point to the Lake Wilderness area, the Summit area has enormous beauty that I can only share with other skiers and those fortunate enough to look at the many framed photos from the top of Red Mountain or Snoqualmie Mt. or the top of International on a spring day. The ability to get them to the top and enjoy this area through summer lifts and a Gondola would be a personal triumph for many of them.

Dan Hotes

Comment:

I really like the idea of the expansion at Alpental, Having a gondola go to the top and having a place to eat would definitely enhance the experience. The best part at least for me would be having the ability to take my dad, Charles Hotes up to the top to get a burger and enjoy the view together. My dad broke his leg in 17 places 6 years ago and he is unable to hike anymore.

Glen T. Peterson

Comment:

A proposed building at the "top" of Alpental will be a wonderful service to allow access for everyone to the high country.

Grazyna Krewin

Comment:

The IDEA OF A LITTLE dining palce on the top in Alpental and a lift operating in summer, couldn't be better, that would allow a lot of elderly or handicaped to enjoy the magnificent views at least in summer if they cannot get there in winter time, and it would be the first lift in the mountains so close to Seattle that would provide tourists with additional attraction.

J. Gerald and Laura Galvin

Comment:

My wife is handicapped, but if there was a gondola and a restaurant on top I could share this wonderful experience with her. I'm sure many handicapped people would love to have this experience and give thanks to you for allowing it.

Robert Ireton, MD

Comment:

The view from the top of Alpental is clearly on the magnitude of any mountain vista in the European Alps. It is currently unavailable for sightseers either winter or summer. With the installation of the Pulse Gondola, the view and alpine experience can be had by all, including my wife who is now disabled from a ski injury and cannot get to the top any more. The ski area has demonstrated already that they can build top quality structures.

Tom Romary

Comment:

I am an avid hiker and skier, and my son has physical disabilities and learning disabilities which won't allow him to hike with my family to high alpine areas around Snoqualmie Pass. I want him to experience and enjoy the wonderful views from a high alpine vista like the top of Alpental. The pulse gondola and proposed summit facility (alternative #2) would allow my son to access the summit of Alpental, and to experience the joys of being "up high" in the cascades with the rest of my family throughout the year.

Group Response:

This is consistent with Section 1.1.2.3 - Purpose and Need, that people of differing abilities should have the ability to enjoy the mountain recreation experience. The range of alternatives presented in the FEIS address this need. Ski areas on NFSL must comply with State, local and Federal regulations regarding accessibility for skiers with disabilities. The Proposed Action is designed to comply with all State, local and Federal requirements (including the American with Disabilities Act and Section 504 of the Rehabilitation Act of 1973). Project facilities will be designed using recommendations from the USFS *Accessibility Guidebook for Ski Areas on Public Lands* (USDA 2000b).

Heidi Elvestrom

Comment:

How will they manage the beginner, intermediate and even expert skiers who succumb to the human factor of "Alpental" once they are at the top of the mountain?

Jill Sherensky

Comment:

The ridgetop at Denny Mountain is extremely narrow and rocky, and is ill-suited for a trail that is destined for people with little experience in the mountains. We have seen several serious incidents in the area during my tenure as a patroller, including a death that I witnessed in which a young snowboarder leapt off the cliff. We currently have an extremely difficult time preventing extreme skiers and snowboarders from attempting to ski down the couloirs between cliff faces, and establishing a system whereby access to the area is so much easier seems contrary to common sense and safety.

Kristy Griffin

Comment:

Skiers and boards coming from East, West, and Central often have the false impression that Alpental will be a similar environment. It is not. Terrain there is much more harsh. The number of accidents, injuries, and deaths at Alpental is high enough already. Adding a lift into back country makes it too easy for inexperienced skiers and boarders to access an area that poses a threat to their safety. Plus, it kind of defeats the purpose of have a back country!

Michael and Tracy Romoser

Comment:

We are concerned, however, about a gondola from base all the way to top. While very exciting, many appropriate warnings would need to be visible informing novice skiers that there are NO easy ways down. The scenario of many more skiers and riders "stuck" trying to get started on International sounds dangerous.

Patrick Trivett

Comment:

However, due to my previous skiing/work experience, the limited terrain options of The Summit are unfortunate. Skiing is a sport where terrain obstacles enhance both the overall experience, but challenge an individual's state of mind and ability. Currently, Alpental has a large out-of-bounds area, which is subject to closure by the ski patrol and is not maintained by any standards. This limited lift-unaccessible area increases the overall danger of The Summit by creating vast areas of skiable terrain which are readily prone to avalanches and are currently unpatrolled.

Group Response:

As with the current operation, chairlift signage, trail signage, and trail maps would be provided to all ski area guests. In addition, ski patrol would manage skier traffic, using portable signage and ropes. These issues would be addressed in the Annual Operating Plan.

Glenn Bray

Comment:

I welcome the proposed enhancements to the Summit at Snoqualmie, but ask that safety is given more attention on our chairlifts than it is today, and more prominence in the master plan. In particular, for a destination that markets itself to young families as a learning center, I am surprised and disappointed that safety bars are absent on virtually all the Snoqualmie chairlifts.

As a parent of an active five year old, the prospect of putting my children - or any children for that matter 30+ feet in the air without any safety restraint seems unwise at best.

As recently as Jan 7th, a young woman fell from the chairlift. Others have fallen in the past. Please take this opportunity to prevent further accidents by installing safety bars on Snoqualmie chairlifts.

Kristin Latousek

Comment:

note: The beginning "bunny" lift at Alpental (I think it's called Bernard) does not have a safety bar across it. Young children are riding up that lift without an adult. I pulled my child out of the ski school program when I learned she was riding up that lift as a 4 year old with other 4 year old. In Aspen children must ride with an adult until 7 year old. Maybe we/WA state should adopt this safer policy?

Group Response:

The development and implementation of safety programs are an operational issue not covered under the MDP, which specifically addresses facility issues.

B.J. Armo

Comment:

Only last night my husband was wiped out in a near collision with someone not in good control of a snowboard. The proposed opportunities for separation of skill levels is such a big safety issue, and the addition of more intermediate areas will make for a far less stressful experience for those of us who aren't trying to reach bottom at breakneck speed.

Ben Draeger

Comment:

I'm an advanced snowboarder and often find that the Summit does not offer the terrain to challenge me. The few runs that are actually advanced level are in horrendous areas where there are bad lift lines.

Eddie Fugelsang

Comment:

My family and I are In the Beginning to advanced intermediate range. Also most of our Cub & Boy Scouts are in this range. We have a very difficult time finding enough intermediate terrain to accommodate everyone. The lift lines are so long, it makes it very hard to teach the younger kids to ski and board while making it an enjoyable experience.

Edward A. Conti

Comment:

There is very little intermediate terrain at the Summit and currently most of it is shared with snow boarders. Since my son and I are both skiers I am quite concerned when I see young snow boarders coming down the mountain at blazing speeds often with very little control. I have already seen two high speed impacts on the slopes in the intermediate area one of which required the ski patrol to take one party down the mountain on a sled. The proposal to add intermediate and advanced intermediate runs in the Rampart and Creek Run areas should help to solve this problem.

Gilles Guenette

Comment:

One of my biggest challenges as a ski dad is finding the most appropriate terrain for my young intermediate skiing daughter. We have a lack of of intermediate pitch runs with consisten fall line needed to develop good safe technique. Current intermediate ski runs and the most congested. The best terrain to ski with my daughter that fits her abilities is Summit East. Skiing East is difficult due to the poor arrangement of lifts and poor access to the best intermediate terrain that both 2 and 5 address with new lifts for this area.

Grant and Kelsey Bonham

Comment:

Secondly, we do not appreciate other mountain users flying by us at 100 mph while we cruise along (an obvious exaggeration but hopefully you see my point). I feel it is a safety issue. What ever version of your plans would allow for more separation of skill levels and would create more ski-able terrain would be great in our book.

John E. Lindsay

Comment:

It will also help me to teach the public to ski and snowboard by better situating the lifts to the terrain and by providing separate areas for beginners to get comfortable on the mountain while also providing improved intermediate terrain.

Jon Oakdale

Comment:

I have been skiing'boarding my entire life, and as such I have progressed through the different stages of skill and types of riding I do, and can tell you from first hand experience that there is not enough opportunity for segregation of skill at The Summit. We have beginners on the same slopes as the experts who are wizing past them.

Ken Loomis

Comment:

As advisor of the Ski Club at THS, I can personally attest to the need for improved intermediate areas. With the death of a skier last week brought about by a high-speed collision with a snowboarder, the safety that results from the separation of advanced and beginning users can not be underestimated.

Mark Illing

Comment:

Doing this will create better separation of the beginning, intermediate and advance skiers. The current configuration, while improved over the last few years, still has expert skiers cutting across the beginner hill and startling the beginner skiers. I can't count how many times my student was placed at risk by someone skiing too close and too fast to a low skill skier.

Mary Lou McMeins

Comment:

Snoqualmie is so close to my home in Carnation that I love to go up after work for a few hours of skiing or on the weekends. There isn't enough intermediate runs and it seems like there are too many beginners on the some of the runs. Adding more intermediate runs in the Rampart and Creek Run areas would solve this problem.

Mary O. Galloway

Comment:

As a parent and former ski instructor, I applaud the improvements designed to safely separate the various levels of skiers and boarders of different abilities. As a child I watched as my beginner level father was injured at what is now called West by an obviously not totally in control skier of higher ability and skiing speed. I know that while it is never possible to eliminate all such accidents, the planned re-design will encourage skiers and boarders to self-separate by ability levels.

Already the separation of Central Park from the rest of the skiers & boarders has definitely made it safer, which seems to me must also make it easier for the Ski Patrol. It certainly does make me feel safer personally to know that a high flying freeskiier or boarder isn't likely to land on me as a ski underneath.

Michael Shafer

Comment:

I have learned first hand that the mountain has very few intermediate runs. At Central, there are really only about three intermediate runs. Alpental would be a good mix, but due to the current lift configurations, the most advanced skiers speed through the beginner/intermediate runs in a rush to catch two lifts back to the top of the mountain. As a result, I won't ski there with my son, as he has almost been hit by other skiers twice. I believe the new lift configuration at Alpental, coupled with some of the trail expansion at the other sites will result in more intermediate runs and a safer and more enjoyable ski resort for all.

Mike Baxter

Comment:

I am a ski instructor at the Alpine West Ski School on Summit Central. We are on the east side next to Reggie's chair. The Easy Street and Reggie's Chair lifts provide terrain for beginners, but intermediate area access for the schools is limited due to the crowds at Silver Fir and Central Express lifts. Opening more intermediate terrain in the Rampart and Creek Run areas would alleviate crowds and open more terrain for beginners looking to advance.

Nicholas J. Paget

Comment:

Through my own personal experience, I have witnessed a number of "close calls" due to over-mixing of skill levels in a relatively small area. While I acknowledge that completely separating them is unrealistic, making a concerted effort to create an environment conducive for all skill levels, would add safety and enjoyment to all of those involved.

Noel Farmer

Comment:

I plan to spend the winters on my boards. Although I am an expert skier, my old knees and joints do not permit much time on the black diamonds. The addition of more intermediate terrain will allow me to keep skiing for many more years and do it close to home. I also believe gaining increased separation from different types of skiers improves safety issues.

Rebecca Riddell

Comment:

It would be good to have a few more blue runs (as outlined in the plan) as on weekends it is not so much fun trying to take our children down Alpine etc as there are so many people (quite a few who don't always have control). It would be good if there were a few more blue runs available as these

seem to be the runs that the majority of people want to do. The black runs always seem quite empty in comparison.

Russell Neis

Comment:

An increase in beginner intermediate skill trails would also be beneficial. My 6 year old daughter and 8 year old son are just learning to ski. It is challenging to find a decent lift/chair lift combination to meet there requitements and yet challenge them.

Scott Cheney

Comment:

As a beginner skier I found the upper part of the Summit West terrain scary for getting started. I have since progressed to a solid intermediate and find there isn't enough intermediate terrain at The Summit. I think the proposal to add intermediate and advanced intermediate runs in the Rampart and Creek Run areas will provide much needed intermediate terrain.

Scott McKinley

Comment:

I have been on the volunteer ski patrol at Hyak for almost 6 years. I have reviewed the expansion plans for all the areas at the summit and urge you to approve them. While I have obvious interest in increasing the variety of terrain at my home ski area, I also approach this from a safety perspective; a great many of the most serious accidents at my area occurred as collisions between two people in congested areas. All four of these areas are very popular and close to a major metropolitan area, and on a busy weekend, there is simply not enough open terrain to make a safe outdoor experience for everybody.

Steve Savage

Coughlin Porter Lundeen

Comment:

The proposal to realign chairs to create areas for specific levels of skier abilities is a necessity. Two weeks ago, while skiing with my son's Powder Pig class, a group of young/teen snowboarders came careening across the slope (trying to get to Silver Fir chair). It was quite dangerous; they very nearly crashed into my son and another child - their speed and size would have caused injuries for certain had I not shouted loudly to warn them of the kids.

Group Response:

Section 1.1.2.3 - Purpose and Need acknowledges that skier circulation and out-of-base access at The Summit is poor, with ill-defined trail boundaries and routes to chairlifts/facilities. The FEIS has been updated to better display how the lack of tree islands and poorly defined trail boundaries do not

provide separation between beginner areas/trails and more advanced terrain. The FEIS has also been updated to better describe poor circulation, as skiers are required to traverse across active ski trails to reach their destination at Summit Central and Summit West (see Section 1.1.2.3 – Purpose and Need and Section 3.11 - Recreation). Section 1.1.2.3 – Purpose and Need identifies that there is a need to address the lack of intermediate and advanced-intermediate terrain throughout The Summit-at-Snoqualmie areas and correct skier circulation problems caused by inefficiently aligned lifts and connector trails.

As discussed in Section 4.11.5 – Impacts – Modified Alternative 5, development in Section 16 would enhance the intermediate and advanced intermediate level skiing, and increase the trail network at The Summit.

Jayme Wiseman

Comment:

This area seems ill-equipped for transformation. Can this small and steep space accommodate such an influx of people? And how much of the terrain will be altered to accommodate skiers and riders of varying ability levels, on some of America's steepest in-bounds terrain? How will dumping a new high-speed quad into the gates of present backcountry affect the fragile terrain, ecosystem and sacredness of this area. This area currently receives a relatively low level of skiers and riders who have respect for the terrain and for nature's elements. This terrain should retain a low level of people accessing its terrain.

Siri Erickson-Brown

Comment:

Lift Location: The placement of the proposed lift into the close backcountry is a bad idea. Although this would open more terrain on the upper part of the mountain, all the proposed runs would funnel into the existing lower mountain runs, which can be very crowded on a typical weekend day, or they would have to exit into very variable/unsafe terrain that is often closed/unskiable through mid-winter due to open creekbeds/low snow cover.

Group Response:

The terrain available under the Action Alternatives is currently accessible, lift served backcountry.

A description of the *Internationale* lift and its relation to skier circulation patterns is included in FEIS - Section 4.11 - Recreation.

Ann Marie Dahl

Comment:

Separate the Alpine and Cross Country trails (except the interconnecting trails). An example is the Serpentine, an advanced Cross Country trail down from the upper system. It is often used as a

Boarding area including jumping the trail at head height which is extremely dangerous for the Cross Country skier. The Creek Run Alpine route used by Nordic skiers is also frightening to use with the Alpine skiers who travel at much faster speeds.

Max E. Limb

Comment:

It is important to minimize the number of intersection between XC skiers and lift assisted skiers for safety reasons (location relative to each other and large differences in speed). The proposed plan does not address this. Even though the State Law requires the skier below has the right-of-way there have many instances where a down hill skier has had collisions with a XC skier and very serious injuries have resulted (XC skier legally had the right-of-way, but usually sustained the major injuries).

Group Response:

The DEIS and FEIS acknowledge that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). The DEIS and FEIS Figure 2.3.2-5, Nordic Trail Network show the Nordic Pass route as it relates to the existing lifts and trails. The DEIS and FEIS acknowledge that Trail 49 and 71 would cross the Nordic Pass route.

Brett A. Hertzberg

Comment:

The additional lodges are a welcome change. Currently, I can never find a seat when I go to lunch during the rush hour around noon.

Dorothy Hart

Comment:

As ski instructors (my husband and I), we are not able to go to the lodge for lunch, because the lines are so long, we can not get through the single line, get food and eat during the 30-40 minute break we have between classes. Plus there is not enough seating to sit down even if we could get through the food line. The area has totally overgrown the small little lodge that must be about 50 or 60 yrs old. We would love to see updated, improved or new (relocated) lodges.

Greg Jensen

Comment:

As the population continues to increase in King County, the demand for additional CCC at the Summit is evident - nowhere more so than in the lack of visitor service facilities. We usually pack a lunch and eat in the car to avoid the congestion, but no one wants any Summit visitor to take measures to avoid the congestion in the restrooms.

Heidi Beck

Comment:

The Summit says that Alternative #2 is the one which can provide the best overall ski experience. How can more restaurants and parking lots improve my time on skis? It seems to me that it is really more designed to augment the numbers of visitors, skiers and non-skiers alike, rather than improve the quality of my skiing experience.

Jill Linisa Norambuena

Comment:

I feel that one of the biggest problems at Central is the lodge. The bathrooms are unacceptable - and there should be additional bathrooms on the bar level (Whiskey Petes). I think that a good "model" for restrooms would be movie theater style and more importantly, a changing area/locker room is needed and would make the dining areas of the lodge cleaner.

Lain Knowles

Comment:

There needs to be more eating areas - currently my family does not even attempt to have lunch at a lodge because they are so crowded.

Mark Glastetter

Comment:

New restaurants on mountaintops. My experience in Colorado has shown me that this type of design can be an effective method for keeping skiers spread over the mountain during meal times. It can significantly degrade the overall experience when everyone funnels into the same area at the same time, after which they all back up in lift lines to get back on the mountain. By moving some percentage of the skiers to mountaintops for meals, you reduce the lift lines at the end of meal periods and improve skier traffic flow.

Megan Lewis

Comment:

Opening more restaurants in the area will also help improve skiers experience at the mountain. I have yet to find a good restaurant up there for lunch and many times have simply quit skiing to go into town to get something to eat. Adding more restaurants will help skiers enjoy a longer day of skiing and will help the mountain with more revenue.

Scott Cheney

Comment:

On many occasions, especially in late December and all of January, there is a lot of congestion in the morning at the buildings where services are offered. At lunch it is just plain crazy busy. You can't

even find a place to sit down inside and, as a result, many times I have had to eat my lunch outside in the cold. I would really like to see improvements to the facilities, especially at Summit Central and West.

Wendy Kirchner

Comment:

The current East restaurant is pretty small for the amount of people that purchase food. One time this year, we waited 45 minutes to get out lunch! A larger one would be able to service the crowd at a faster pace and have good seating room. The main restaurant at Central lacks seating room. If the East one expands, it might draw people over from Central.

Group Response:

Section 1.1.2.3 - Purpose and Need includes a need to balance the capacities of skier service facilities and lift/trail capacities. The Action Alternatives include upgrades to the existing guest service facilities and construction of new guest service facilities to increase guest service capacity, and are designed to compliment The Summit-at-Snoqualmie's overall CCC and located so they accommodate the distribution of CCC throughout the various base areas and on-mountain facilities.

Charlie Cornish

Comment:

Section 1.1.2.1 Overview, Page 1-2

Purpose of improvements in the MDP

1. Increase skier connectivity between Summit East and Summit Central

Comment: Connectivity between Summit West and Summit Central is worse-requiring expert (black diamond) or intermediate (blue) run skills, but there are no plans to improve it. There is more demand to connect West and Central, since they are open more hours and serve more skiers. Why is this issue explored and resolved?

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

There are only two narrow and difficult crossover trails between Central and North, yet there is no proposal to improve that situation. It seems that there is a double standard.

Group Response:

Appendix A – Alternatives Considered and Modifications to the MDP, Section 1.1.1 – Summit West/Central Crossover Trail provides a brief description of alternatives which would have provided for a Summit West to Summit Central crossover trail that were considered but eliminated, as well as

the reason for elimination. Under the Action Alternatives, difficult access between Summit West and Summit Central would remain for beginner to intermediate level skiers due to the necessity to negotiate Trail 42 (Parachute) in order to access Summit Central from Summit West.

Carrie McGowen

Comment:

Adding the gondola and restaurant and additional chair lifts at Alpental will allow riders more convenience (eating lunch at the top rather than going all the way down the mountain), more terrain and will reduce the horrendous weekend and holiday lift lines. It will also allow non-riders to enjoy the mountain experience.

Grant and Kelsey Bonham

Comment:

Finally, the incredible views and unique mountain top ecosystems that attract so many are only able to be enjoyed by those physically fit enough to ski in the winter or hike in the summer. I am unable to share the experience with my family and friends who are not disabled, but not able-bodied enough to hike to the top or ski.

Tom Gibbons

Comment:

I know you can't do anything about the weather but adding the gondola to the top of the mountain would give my father a few more days up there in the winter and would allow me and my kids to enjoy more, nicer weather days on top of the mountain in the summer time.

Tom Johnson

Comment:

The restaurant at the top of Alpental is a cool idea. It is a majestic view and the gondola would let everybody come see. My parents are older and less mobile. It would be great if they could check out some of the terrain that I enjoy so much in the winter.

Walter Kelley

Comment:

The plan at alpental would be especially nice for my family (non riders) they could ride the gondola to the top and see the beautiful winter scenes I see when I ride. If you have ever fought the crowds at the base trying to eat lunch you know that a restaurant at the top would be simply marvelous.

Group Response:

This is consistent with the Purpose and Need (Section 1.1.2.3) that people of differing abilities should have the ability to enjoy the mountain recreation experience. The range of alternatives presented in the DEIS and FEIS addresses this need.

Brett A. Hertzberg

Comment:

With regards to the Summit West area, the grading on the slope that extends from the top of the current easy rider lift to the dodge ridge lift is terrible. Every time I wind up on the "wildside" / "easy rider" lift areas, and desire to get over to the pacific crest chair, I have to traverse across several (around 5) runs in one fell swoop. Since the grading is bad, snowboarders especially need to hang on to one edge of their boards and try to "hold a high line" to get between the areas. Frankly, it is one of the reasons I don't ski the area more frequently.

Everett Tsang

Comment:

I see one glaring omission in all the different proposals, and due to the stated goals seems to be an obvious addition. The former Thunderbird chair was pulled out after being broken down, and decided against fixing. This is the one chair that could get from the base area, to the top of the Thunderbird peak. Now in order to get up there, you have to first go up Pacific Crest mainly, since Dodge Ridge is hardly ever running, then a long traverse to Wildside. This forces you to take a slow chair, which is constantly being slowed down, just to get high enough to traverse across to Wildside, which is the only chair running to the peak.

Due to Wildside being the only chair running to that peak, it also cuts off the run abruptly if you want to go back up to the peak. Thunderbird is a chair that NEEDS to be put back into the area, preferably with a high-speed quad.

Group Response:

Under the Action Alternatives, the lift network at Summit West, excluding the current *Pacific Crest* chair, would be replaced or realigned to take advantage of the fall line and to enhance skier circulation, including access from the base area and parking lot.

The FEIS has been updated to include evaluation of an alternative that includes a high-speed lift to replace the old *Thunderbird* lift. This alternative was considered but eliminated from detailed study (see Appendix A - Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP).

Gary Westerlund

Comment:

An analysis of the data in Table S-1 of the summary indicates not much benefit from improved crossover trails. Per Table S-1, Alternative 5 has a night skiing CCC of 9870 for The Summit. Alternative 5 has a daytime CCC of 10710 for The Summit. So day use CCC is 8.5% greater than night use (10710 vs. 9870). Per the same table total ski terrain for Alternative 5 is 593 acres and for night skiing 545 acres. Thus day acreage is 8.8% greater than night acreage. So the increase in day use CCC is directly related to the increase in ski terrain. The 9870 night skiers will not use the unlit crossover trails. So the crossover trails are only needed to satisfy the additional 840 skiers (10710 less 9870) that use the ski area during the day. Most of these skiers will be accommodated by the increase in daytime ski terrain. Assume that 25% of these 840 skiers use the new crossover trails. That is 210 out of 10710 or only 2%. But some of these skiers would have used the existing crossover trails. Presume that half of the crossover skiers would not use the current trails. That means the proposed crossover trails would be built for 105 skiers or 1% of the total. I do not think that 1% increase in daytime skiers is worth the irreversible destruction of old growth forest in Section 16. The ski area does not operate at peak capacity every day, so the total number of skiers needing improved crossover trails is less than the numbers above.

Gary Westerlund

Comment:

For most of the downhill skiers, leaving Section 16 alone would have no impact on their downhill skiing experience. Only a small percentage of skiers use the existing crossover trails. The proposed improved crossover trails would increase that somewhat. But it has not been demonstrated conclusively in the DEIS that the small increase in crossover skiers is worth the degradation of an important wildlife corridor including the cutting of old growth forest. The DEIS does not even quantify the increase in crossover skiers expected from the improved crossover trails. Before the irreversible cutting of old growth forest to build the improved crossover trails, the Forest Service must have quantified the expected increase in crossover skiers and the benefit if any to the downhill skiers skiing experience.

Gary Westerlund

Comment:

Section 2.0 of the summary states that there is a "great need" to improve circulation between ski areas. This need has not been demonstrated or proven. It is not shown how much the improved crossover trails would disperse more skiers. No data was provided to support this. There is no data provided on what percentage of skiers use the current crossover trails and there is no data on the expected increase in crossover users with the improved crossover trails.

Group Response:

DEIS and FEIS Section 4.11 - Recreation, describe the effect on skier circulation and the skier experience resulting from development in Section 16 at Summit East. This discussion addresses skiing within the Creek Run and Rampart pods as well as the crossover trails. The DEIS and FEIS do not quantify the specific use of the crossover trails between Silver Fir and Summit East, just as skier use on the remaining ski trails is not quantified. Rather, the crossover trails are incorporated into the overall capacity and circulation analysis. On a capacity day, the trails would provide sufficient access and egress to allow for capacity use on the adjacent lifts and trails.

Charlie Cornish

Comment:

As presented in the DEIS, Ski Lifts, Inc. does not present a strong business case for a major expansion that includes new lifts, parking, and restaurants. Specifically, the Summit at Snoqualmie only reaches maximum demand for 4 to 5 weekends each season. Otherwise, its facilities remain underutilized. The DEIS does not present any market data to support the 25% expansion in Comfortable Carrying Capacity (CCC) at the Summit.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

CCC is the comfortable carrying capacity (lifts, runs, buildings, parking) and is not the maximum. Thus, the DEIS does not evaluate the impacts of times when the use of the area is in excess of the CCC. Nor does it indicate usage per ski area by time. Impacts are quite site specific, and much of the impact is directly related to the amount of use at the times those facilities are open. What is the actual expected numbers of skiers per area and by time? How often does the resort reach CCC level or peak level? The ski area is expected to operate 130 days per year (Appendix J-1), but how many days per year will Hyak be open?

Donald Parks

Alpine Lakes Protection Society

Comment:

The DEIS is proposing a significant increase in down hill skiing capacity for the Snoqualmie Pass Area. The data shown in DEIS Table 3.11.2-6 (page 3-215) shows a flat to decreasing trend for down hill skiing activity between 1994 and 2004. Similar data is also shown in Table 3.10.9-1 (page 3-199) for a shorter period of time. What has been the usage trend for the last 20 to 25 years when the regional population has significantly increased? The DEIS is deficient in that it does not provide actual data on down hill skiing usage over a much longer period of time so that real trends can be understood.

Juli Hammond

Comment:

It kills me to see them wanting to expand while over 1/2 the lifts they already own are not in operation. Before they develop more - they (Snoqualmie Summit) need to utilize what they already have and maintain those ski areas with improvements. They just want to expand to market a larger and "newer" run ski area.

Toby Paterson

Comment:

The economics of the proposed 8 or 9 new lifts is not founded in logic. Take for example the day after Christmas, 2005 (a very popular day to ski historically): the resort was running at an estimated 33% of the total carrying capacity of the lifts. In fact at noon that day, 12/26/2005, in my conversation with four of the resort's employees I gained the facts that 5 lifts were in use (open) and 3 tows were in use (open), and the Hyak resort (East) had been closed for the entire season. The employees indicated that Hyak might open for the weekends, only, at some point. These previous facts show the unnecessary nature of expansion into previously undeveloped terrain. It is as simple as this: The total demand for lift service, on this popular skiing day, is 33% of the resort's total capacity. And similarly, the total supplied lift service, on this popular skiing day, is 33% of the total supply available. So the resort has, on this one-day, 77% un-met supply- or 77% excess lift inventory. The excess capacity from a business standpoint should warrant divesting in unprofitable/unused assets and re-investing in profitable/used assets. And, clearly from the demand data these new investments would not be more lifts.

Toby Paterson

Comment:

The Illusion of Comfortable Carrying Capacity: The unnecessary, and factually unsupported Comfortable Carrying Capacity (CCC) increases sighted in the MDP and DEIS (forthcoming FEIS) should be stricken for the specific reason that: the resort has not shown a "need" or intent to run lifts to maximize CCC. They have not utilized the lifts that cover the terrain they now have, which could potentially maximize CCC, making skiers more "comfortable" as the resort would assert.

Toby Paterson

Comment:

Looking at the main thesis of the Summary as cited on page S-2:

"If implemented, the proposed action would increase the Comfortable Carrying Capacity (CCC) of the Summit from 7920 to 10710 skiers. The CCC at Alpentel would increase from 1880 to 2920 skiers."

The previous "thesis" is not supported by the actions the Resort management practices have demonstrated since they took possession of the resorts. I can attest to this, as a former employee, that they reduced operational acreage dramatically since the first year of operation, compared to the previous operators. The resort insofar closed Hyak in 1998.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need for improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year-round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

By addressing these needs, the Action Alternatives include improvements that also would increase capacity. As a day use ski area The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2). The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accomodate peak visitation periods similar to sporting events and concerts.

The FEIS has been updated to discuss the reasons for lift closure, including staffing deficits, mechanical problems, terrain or slope issues, and redundancy of lifts (see Section 1.1.2.3 - Purpose and Need). The operational schedules of The Summit-at-Snoqualmie are outside the scope of this analysis and are addressed in the Annual Operating Plan.

Charlie Cornish

Comment:

The Summit at Snoqualmie reaches peak visitor loads for weekends in January; that's 8-10 days a year. Contrary to what is stated in the DEIS, most holidays the area is not well attended. For example, I taught skiing on Christmas Eve and Day, and MLK holidays for 2005-2006 and had few lessons. By February, ski visits drop off due to waning interest. Additionally many families elect to take a week long ski vacation elsewhere during their winter break around President's Day.

Charlie Cornish

Comment:

"There is a need to improve circulation and dispersal of skiers and other site visitors in and out of base area, and throughout the ski area."

Comments:

Please provide data and statistics describing the congestion and needs to improve circulation.

Donald Parks
Alpine Lakes Protection Society

Comment:

Our analysis shows that while skier visitation trends at The Summit were essentially flat (1994-2004), the King County population increased by nearly 10% (1994-2003). The number of ski area visits may not respond to ski area expansion?

Group Response:

The FEIS has been updated to include an analysis of visitation relative to capacity (refer to Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2)

Charlie Cornish

Comment:

Additionally, what is the demand for better connectors? Did skiers want to get from area to area all day, or occasionally once or twice during a day? Is convenience worth the price of logging priceless old growth forest? Is there merit in not making the connectors "too convenient", thus keeping Hyak family area, the boarders doing their tricks in terrain park at Central, and the beginner skiers learning in a safe area at West?

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Forest Service has not provided sufficient justification for why providing a shuttle is not a reasonable alternative to cutting swaths through the Hyak Creek corridor. The only rationale seems to be the request of the ski company, presumably based on costs & revenues, but no assessment of this is provided. The Forest Service cannot put the company's profitability or mere convenience of some recreationists above important public resources and uses.

Group Response:

DEIS pages 4-426 and 4-427 describe the effect on skier circulation and the skier experience resulting from development in Section 16 at Summit East. This discussion addresses skiing within the Creek Run and Rampart pods as well as the crossover trails. The DEIS and FEIS do not quantify the specific use of the crossover trails between Silver Fir and Summit East, just as skier use on the remaining ski trails is not quantified. Rather, the crossover trails are incorporated into the overall capacity and circulation analysis. On a capacity day, the trails would provide sufficient access and egress to allow for capacity use on the adjacent lifts and trails.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There are no special provisions for the Pacific Crest Trail (PCT) as it crosses the big parking lot at the Summit for more than a quarter mile. It should have a trail surface provided along with more natural landscaping.

Mike Dawson
Pacific Crest Trail Association

Comment:

While the National Trails System Act of 1968 (NTSA) did indeed seek to assure that designation of the PCT as a National Scenic Trail would not disrupt "..established multi-use plans..", that did not allow the agency to assume that plans developed in the future should automatically be seen to comply with the Act. In the very first part of the NTSA (sec.3) the Act defines National Scenic Trails as follows:

"Sec. 3 The national system of trails shall be composed of --.

..(b) National scenic trails, established as provided in section 5 of this Act, which will be extended trails so located as to provide for maximum outdoor recreation potential and for the conservation of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.."

This sets the framework for the balance of the provisions of the Act and clearly sets out a goal to produce the maximum recreation benefits to users along the trail. The current management and location of the PCT in the area of the Summit ski area clearly fails in this endeavour. This is abundantly clear if one researches the relative use of the trail north and south of the Pass. The section of trail through the ski area development is rarely used and typically only by long distance users who seek to pass through this area as part of a longer hike. The quality of the PCT experience through the ski area does not meet typical scenery management goals for travelway of national significance as noted in the DEIS (page 4-472).

Group Response:

The PCNST traverses a currently developed portion of The Summit-at-Snoqualmie SUP Area, which is managed under Management Area RE-1 Developed Recreation/MA27D Developed Site. The SUP Area is not managed for wilderness attributes. Impacts to the PCNST are disclosed in Section 4.11.5 – Impacts – Modified Alternative 5. Alternative 5 from the DEIS has been modified in the FEIS to include an upgrade of the PCNST where it traverses the Summit West parking lot. The modified location would reroute the PCNST through an adjacent vegetated area, to address these and other issues.

Refer to Section 1.2.8.3 - Pacific Crest National Scenic Trail, which states that "Within Federal lands outside National Parks and Wilderness (57% of the trail) the trail must co-exist in harmony with all other resource uses and activities of the land and determined through the land management planning process....". On this basis, the occurrence of ski area facilities over and surrounding the PCNST is consistent with Section 7(a) of the *National Trails System Act* and the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail*.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

DEIS does not provide information on bicycle use. Such use on these national forest lands is a responsibility of the Forest Service, and the ski area development has a direct effect on that use. Thus, the Forest Service needs to incorporate information on such use, and if it is not currently available should do some research and monitoring.

Kinsey Smith

Comment:

The only thing that I see missing from this expansion is the mountain blike trails for the summer income/recreation.

Group Response:

Section 2.3.3.7 - Other Recreational Activities describes the revegetation of Trail 71, allowing a 12-inch tread width for mountain bike use, which would be the only change to mountain bike trails under the Action Alternatives. As described in Section 4.11.2 – Impacts – Alternative 2 (Proposed Action), the USFS and Ski Lifts, Inc. would continue to update the Mountain Bike Operations Plan to provide management direction and guidance for mountain bike use at The Summit-at-Snoqualmie.

Charlie Cornish

Comment:

"There is a need to balance the capacities of skier service facilities and lift/trail capacities"

This section needs supporting facts, data and statistics.

Charlie Cornish

Comment:

"..need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services, and facilities."

Please provide facts and data including marketing and user surveys to support this statement.

Lars Fisher

Comment:

The quantity of intermediate skiing is abysmal. I either have to be on a bunny slope, or take runs that would seem easy until one is half way down when an unreasonable steep slope frustrates me.

Group Response:

FEIS Section 1.1.2.3 - Purpose and Need has been updated to better describe the need for action, including an analysis of visitation relative to capacity (see Illustration 1.1.2-FEIS-2) and clarification of the existing condition.

Andre Schimmelbusch

Comment:

The pass needs more intermediate terrain to support individuals learning how to ski. This is clearly shown by the number of ski schools that are present at the pass. In the months of January and February (prime skiing months) they jam into the three main ski areas, but really overlook Hyak. The terrain improvements at Hyak could make it a more utilized area, thereby alleviating some of the congestion at other areas.

Anthony Wong

Comment:

There isn't enough intermediate terrain to keep me happy and I ended up waiting for a long time for the ski lift. Adding new intermediate terrain in the Rampart and Creek Run areas will solve this problem and better connects Summit East and Central, allowing more efficient usage of Summit East so that we don't need to build another ski resort and remove more trees.

Cindy Pfeifer

Comment:

Offering more advanced and intermediate runs would greatly enhance my experience as I often "run out" of good runs.

Clifford Olson

Comment:

The area definitely needs more intermediate skiing. We have many friends who visit us who can't ski much at Alpentel but are too good for most of the summit areas. Hopefully, the resort will be allowed to access the alternative which will provide the best ski experience for the level of the skiers addressed.

Colleen Grobstok

Comment:

We are sometimes forced to go to other ski areas to get the more advance terrain that is not currently available at the pass. We would greatly appreciate the enhancements that would allow us to move between resorts without the shuttle and provide a better variety of runs for our entire family.

Dorothy Hart

Comment:

As a ski instructor at the Snoqualmie Summit Central area, I would love to see more terrain opened up and available for skiing and boarding. Currently, we have to go to other ski areas to find better ski terrain. Having more trails and lifts are greatly needed at the Summit.

Douglas Morrison

Comment:

My entire family including my spouse and two children ages 13 and 8 participate regularly in downhill skiing. However, we do not regularly ski at the Summit because it simply does not provide a pleasurable family skiing experience. It lacks varied, accessible terrain suitable for advanced intermediate and expert skiers. This is unfortunate because The Summit is less than a one hour drive from our home. We drive the extra distance to Crystal Mountain to assure an enjoyable skiing experience.

Igor Rozanski

Comment:

I am an intermediate skier and there isn't enough intermediate terrain at The Summit. The proposal to add intermediate and advanced intermediate runs in the Rampart and Creek Run areas will solve this problem. I also like the fact that these areas already are within the resort's existing permit area. I'm really bored with the Summit Ski Resort and I'm not willing to go there probably forever if some serious changes won't be made to improve it.

Mark Glastetter

Comment:

The experience for those of us that like to ski mostly intermediate runs is currently lacking at The Summit. I believe the new lifts and trails proposed for Summit East provide the most potential for improving this condition.

Megan Lewis

Comment:

I am a second year season pass holder for The Summit at Snoqualmie and am an intermediate skier. I have found at The Summit there is not enough terrain for my skill level. I am thinking of getting a

pass to Stevens next year, for it seems to be a more challenging mountain. I know many of the other season pass holders feel the same way, however we like The Summit for it is closer to Seattle. I believe opening more intermediate lifts will help this situation as well as connecting all of the hills.

Steven McMartin

Comment:

I have skied this area for over 35 years. Skiing is a great family activity that I have enjoyed with my father, brothers, sister, all three of my own children, as well as, many friends. Over this time frame there has been some improvements in the ski lodges and lifts but very little development to the skiable terrain. This area is in need of more skiable terrain, particularly in the intermediate to advanced terrain.

Wade and Debra Jelcick

Comment:

The changes also include the expansion of intermediate and glade-type ski runs, all within the boundaries of the current ski area. My young children and parents ski at the intermediate level, and the expansion of Summit East, specifically the installation of two lifts, multiple trails, and glade runs in the Rampart/Creek Run area as proposed in alternative #2, would offer them far more terrain to enjoy.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to address the lack of intermediate and advanced-intermediate terrain, correct skier circulation problems caused by inefficiently aligned lifts and connector trails, and maintain the viability of Summit East by addressing skier connectivity issues between Summit East and Summit Central. The Action Alternatives address these needs. As discussed in Section 4.11.5 – Impact – Modified Alternative 5, development in Section 16 would enhance the intermediate and advanced intermediate level skiing and increase the trail network at The Summit. Section 2.3.6.2 - Trails discusses the trail network modifications, including improved crossover trails between Summit East and Summit Central, intended to address skier connectivity deficiencies.

Dick Lazeres

Comment:

Of great concern is the apparent alteration to the "cross-over" trail between the Summit East and silver fir. Again it is not clear, but it looks as if the proposals for change put a new downhill run across the route that cross-country skiers would take to get to the cross-over trail (trail 71).

Ed Rockwell

Comment:

Trail Maps which show existing Nordic Trail System, and how it will be impacted by each alternative. The statement for Alternative 2 states that it will not have an impact on Nordic Skiing. I don't think this is correct. Access to the Upper Nordic tracks will be impacted by Alternative 2. Remediation effort will be necessary to maintain access to the Upper Nordic Trail System.

Ed Rockwell

Comment:

Clear delineation between Nordic and Downhill Skiing areas. Alternative 2 does not show how the two types of skiing will be delineated. This delineation is essential to provide a quality and safe Cross Country skiing experience.

Michael Feinberg

Comment:

According to Table 4.11.1-1 no cross country trails will be eliminated, this is inconsistent with what is represented on the maps of the various alternatives. If the plan is to leave the present system in place, the cross country trails will traverse the entire length of the alpine slopes at various points including some extremely congested areas in the vicinity of the proposed lift stations, creating serious risks for both alpine and cross-country skiers, particularly children.

Group Response:

The DEIS and FEIS acknowledge that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS-3), as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Ann Marie Dahl

Comment:

After reviewing the proposed improvements to the Summit at Snoqualmie, I was struck by the massive proposed improvements to the Alpine ski areas but NO improvements to the Nordic ski area. I believe if Booth Creek is allowed to improve only the Alpine areas and not be required by the Forest Service to improve the Nordic area as well, Nordic skiing will become a thing of the past or relegated to substandard levels of commitment. As a long term Cross Country season pass holder, I have

already seen a decreasing level of commitment to maintenance let alone any improvement to the Cross Country venue.

Ann Marie Dahl

Comment:

Grand Junction is the hub of the upper trail system and is so crowded as to be unavailable on most weekends. It should be large enough to accommodate the lunch time traffic and have a small manned Nordic Ski Patrol/Nordic Staff area for help/questions on the Nordic system. It would also be nice to have lockers for clothing used to ride the chairlift up but not needed to ski the day. Water should be available at all huts!

Ann Marie Dahl

Comment:

Currently there are no restrooms, porta-potties available in the Cross Country area. There needs to be either permanent pit toilets or porta-potties provided at all huts as people are forced to pollute the environment in any place they can. This is difficult, uncomfortable and not environmentally friendly.

Carmi Weingrod

Comment:

Clearly, the DEIS does not address the needs of all recreational users in particular those of Nordic skiers. Since Ski Lifts, Inc. operates on public land under permit from the USFS, we consider this omission to be a major flaw in the MDP DEIS and recommend that you go back to the drawing board to address the concerns we've stated above.

Charlie Cornish

Comment:

At Snoqualmie Pass, Silver Fir and Hyak have a long tradition of Nordic skiing and snowshoeing that predates the involvement of Ski Lifts, Inc. and Boothcreek, Inc. The Nordic skiing and snowshoeing recreational user community have supported the previous and current operators of the Nordic skiing and snowshoeing venues. However, Boothcreek has failed to reciprocate. By operating on public lands, Boothcreek/Ski Lifts, Inc. has an obligation to meet the needs of all recreational users. If Boothcreek/Ski Lifts, Inc. does consider Nordic skiing and snowshoeing worth the effort, then they should consider relinquishing their public use permit to another organization.

Toni Sloan

Comment:

As a cross-country skier who uses the facilities and trails at Summit East (Hyak), I am concerned about the lack of consideration given to the whole cross country program there in the Master Development Plan. Some of the Nordic and snowshoe trails will be removed, old growth forest will

be cut down to create new downhill runs (old growth that the Forest Service strongly protected when there was a proposal to create new Nordic trails some years back), the lighted Nordic trails and the lower trail system for beginners will be eliminated and there are no plans to improve the base facilities at Summit East.

Group Response:

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Barbara Root

Comment:

I would like there to be a beginner/intermediate route down. Right now many less skilled xc skiers do not go up top and to Mt Catherine because of the difficulty getting back down to Hyak on the Alpine runs or on the expert level section of Hidden Valley. It would be more friendly to the average xc skier if an alternate less difficult route down were in the plan. If a new lift increases the # of down hillers and snowboarders on "Creek Run" or the "Serpentine", it will be even more dangerous and intimidating for the xc skier. Novice and intermediate XC skiers would essentially be unable to use the upper area. Hence they would probably go else where or worse not XC Ski. I have XC skied at the Summit for many years and have heard many less skilled XC skiers lament the lack of easier terrain for the return down. I, myself will not attempt to ski down the expert section of Hidden Valley except in the best of conditions.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

Cross country ski and snowshoe trails and use is expected to remain the same. Nothing in the DEIS suggests an effort to increase opportunities for this type of winter recreation, and the XC ski trails seem to be optional. In fact, new lifts and runs near Hyak Cr will negatively impact Nordic skiing and snowshoeing. Cross over ski runs at Hyak Creek will conflict with Nordic Pass XC ski and snowshoe

routes. (DEIS 4-430) The proposed new Creek Run lift and runs will conflict with Nordic ski routes (see Figure 2.3.2-5)

The FS should require the permit holder to provide a minimum level of that type of use and to provide increased service over the plan period.

Donald Parks
Alpine Lakes Protection Society

Comment:

Without any analysis, the proposal assumes that other winter activities, such as cross-country skiing and snowshoeing will remain static. At the same time the proposal seriously impacts areas for that use, such as Hyak Creek. This is unacceptable, unrealistic, and unfair to those other uses. Nordic skiing is growing as the Boomer generation progresses into the Golden years. Improvements for Nordic and other uses should be provided for in the MDP.

Katherine P. Ransel

Comment:

These alternatives eliminate existing nordic skiing and snowshoe trails, including Snow Train, a portion of the Sunrise Loop from Hyak to Grand Junction, Serpentine, and access to Cold Creek from the Old Milwaukee Lodge for new lifts and downhill runs. Moreover, they do not favor restoring lighted Nordic ski trails for night-time racing and touring, and beginner and intermediate trails near base facilities that were lost when the Nordic Center moved from the Silver Fir chair to Summit East (Hyak).

Additionally, the proposed alternatives to not propose any improvements for accessing the upper trail system by means of a chair lift or access trails that are suitable for nordic skiers and snowshoers. There are no planned improvements of base facilities at Summit East (Hyak) - such as improved restrooms, or new or updated warming huts on the Nordic trail system. It is as if nordic skiers and snowshoers did not exist.

Liane Owen

Comment:

Changes include adding 4 new chairlifts, new runs, and a new restaurant at the top of the current Hyak chair. While these proposed changes sound like improvements in and of themselves, the fact is that they will adversely affect Nordic skiing at this area. These are the negative impacts in my view:

- Mature forest will be cut along the current Nordic upper trail system
- Many Nordic trails on the upper trail system will be obliterated and not restored by the construction of new runs.

- No new Nordic trails will be added at the base area, which are badly needed.

Mark Lawler
Sierra Club

Comment:

We urge the Forest Service, in its final EIS decision, to retain the Nordic Pass backcountry route and to provide further impact mitigation. For example, if the ski company is allowed to develop yet another crossover trail that will affect the Nordic Pass route, then it would be appropriate to mitigate this impact with additional measures to benefit backcountry recreationists. For example, better winter access is needed to cross the creek at the lower end of the Nordic Pass route. Currently the stream can be challenging and sometimes even dangerous to cross in winter and early spring. A primitive log structure that would retain snow would enhance safety and make the route more accessible to a range of backcountry users. Moving the ski company's marked snowshoe routes away from the Nordic Pass route would be another simple type of mitigation. These simple forms of mitigation measures would go a long way to reduce overall impacts to the Nordic Pass route and its backcountry users.

Group Response:

The DEIS and FEIS acknowledge that an increase in conflicts between alpine and Nordic users would result from the Proposed Action (Alternative 2, see DEIS page 4-430). FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit at Snoqualmie (see Illustration 3.11-FEIS 3) as well as additional discussion regarding the coexistence and conflicts between alpine and Nordic users. Figure 2.3.2-5, Nordic Trail Network has been updated in the FEIS to include the location of alpine trails under the Action Alternatives. FEIS Section 4.11 - Recreation has been updated to include additional discussion on the impacts to Nordic skiing under the Action Alternatives.

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

65.0 – VISUAL RESOURCES COMMENTS

Andrey Borodachyov

Comment:

As for the gondola access to the top of Alpental and trails that would be accessible to the disabled, the beauty of the place is such that it simply demands to be shared and admired, and celebrated, and not only by those few who have the black diamond skills. That's just being plain fair! I remember my first experience in a restaurant on top of a mountain at a Lake Tahoe ski resort, which ultimately made me want to take my first skiing lesson: nature's beauty is a very powerful driving force, and people deserve to have a chance to admire the scenic views from atop of Alpental, which may in turn make them want to partake in other joys the resort has to offer.

Response:

This is consistent with Section 1.1.2.3 - Purpose and Need, that people of differing abilities should have the ability to enjoy the mountain recreation experience. The range of alternatives presented in the FEIS address this need. Ski areas on NFSL must comply with State, local and Federal regulations regarding accessibility for skiers with disabilities. The proposed action is designed to comply with all State, local and Federal requirements (including the American with Disabilities Act and Section 504 of the Rehabilitation Act of 1973). Project facilities will be designed using recommendations from the Forest Service *Accessibility Guidebook for Ski Areas Operating on Public Lands* (USDA 2000b)

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

"The [Denny] Mountaintop restaurant would not be discernable from Snow Lake Trail due to the surrounding landscape and distance from viewer." (DEIS 4-474) This is a questionable assertion, since the trail crosses avalanche paths and talus slopes that provide view across and down valley. It is certainly visible from Snoqualmie Mtn. Night lighting at Alpental and new restaurant will be visible from wilderness. (DEIS 4-474)

Response:

FEIS Alternative 3 does not include the Pulse Gondola and mountain-top restaurant at Alpental to address this and other issues (see Section 1.5 - Scoping, Significant Issues, and Public Participation).

DEIS page 4-474 (FEIS Section 4.15.2 – Impacts – Alternative 2 [Proposed Action]) does note that although lighting from night skiing at Alpental would increase the amount of ambient reflection or night glare during the winter months, the impacts resulting from the operation would not likely be discernable when compared to the existing night skiing lighting already operating at Alpental.

James Adcock

Comment:

Also, my understanding is that the proposed Alpental restaurant would be served with at least a section of surface-laid sewer pipe. This to me would be very visually objectionable - it is not in the Pacific Northwest tradition to have sewers visible running down from the tops of mountains.

Response:

FEIS Alternative 3 does not include the Pulse Gondola and mountain-top restaurant at Alpental to address this and other issues (see Section 1.5 - Scoping, Significant Issues, and Public Participation).

Bill Preston

Washington State Department of Transportation

Comment:

Any proposed lighting should be directed down towards the site, and away from I-90.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The expansion of night skiing from existing 515 acres to 657 acres (28% increase), will increase light and glare. This will extend into the Source Lake roadless area and Alpine Lake Wilderness. This adds to the already substantial spread of artificial light into the wilderness and unroaded lands (including Hyak Creek).

Tad Sommerville

Comment:

Also, I am concerned with night-time light pollution. The only lights should be available down Edelweiss Bowl and I-90. It would be a real bummer if one saw a bright quartz-halogen light from the Source Lake basis, Snow Lake Summit, or the Mt. Snoqualmie area. Let's limit the light pollution to only a small arc.

Group Response:

FEIS Section 4.15 - Visual Resources recognizes that night skiing at Summit Central and Summit East would increase the amount of ambient light reflection and glare present in the area during the winter months under all the Action Alternatives. At Alpental, the lighting from expanded night skiing would also increase the amount of ambient reflection or night glare, but notes that it would likely not be discernable when compared to the existing night skiing lighting already operating at Alpental.

Other Management Provision OMP42 (see Table 2.4-2) would be implemented to provide low glare, directional night lights to minimize the effect of additional night lighting. In addition, the proposed

night skiing lighting structures are designed to cast the light downward, on to the ski slopes and not up into the atmosphere.

James Adcock

Comment:

However, I would still find the proposed mountaintop restaurants to be visually acceptable to me IF they are actually maintained and operated, so that skiers can enjoy them during the winter, and so Washington State has the economic advantages of tourism during the summer. However, what I have seen historically by the operators of these ski resorts, first Moffit and now Ski Lifts Inc., is a pattern of overly-ambitious building combined with under-investment in good management, leading to goof-ball employees, leading to poor food, leading to users avoiding the restaurants, leading management to conclude users don't want to pay for the food, leading to increasing restaurant closures, leading to skiers and hikers finding the restaurants being closed when they are counting on them, leading the skiers and hikers to choose other locations for their dining, leading to complete restaurant closures, leading to the "Alpine Blight" of restaurants sitting empty and decaying on mountaintops for decades [for example Thunderbird Restaurant] which ends up combining the worst of all worlds: Environmental Damage, objectionable VQO's, no economic activity, and no enjoyment for the potential users. Another example of these kinds of restaurant closures - not on mountaintops - is Webbs.

James Adcock

Comment:

Existing current similar practices that I find visually objectionable include the decaying closed Thunderbird Restaurant, now used as a repository of visually offensive cell phone towers, placing lamps on top of ancient decaying abandoned ski lift poles and calling it "night skiing lighting" and any other low-value secondary uses established to justify continued "Alpine Blight" rather than visually cleaning up after yourself.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need to balance the capacities of skier service facilities and lift/trail capacities. The Action Alternatives include upgrades to the existing guest service facilities and construction of new guest service facilities to increase guest service capacity, and are designed to compliment The Summit-at-Snoqualmie's overall CCC and located so they accomodate the distribution of CCC throughout the various base areas and on-mountain facilities.

The Action Alternatives include facility upgrades to address this need. Section 4.15 - Visual Resources describes how under the Action Alternatives proposed facility renovations would represent an improvement as compared to the existing visual condition. However, development at the Summit

West base area overall would continue to meet the definition of Maximum Modification and the prescribed VQO of Retention would continue to not be met.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

"Expansion of Parking Lot 1 would repeat the form of existing parking lots, and would not be discernable to the casual observer." (DEIS 4-474) So, it is OK to expand ugly parking lots because they look like other ugly parking lots! This is unacceptable. The openings/trail at Summit West would not meet the prescribed Visual Quality Objective of Retention for the Pacific Crest Trail, and certainly not for the quarter mile through the parking lot.

Nancy Keith
Mountains to Sound Greenway

Comment:

Re-vegetation of all parking lots is essential, particularly those bordering I-90. Without more commitment for re-vegetation in and around parking lots and vegetated buffer zones to reduce run-off and integrate these lots into the surrounding forest landscape, it will be difficult for the Greenway Trust to support a final alternative at one of the most scenic points on a National Scenic Byway. Such investments will enhance the appeal to summer visitors of the Summit recreation and commercial facilities. When so much investment is being planned to upgrade the summit recreation environment, the current plan alternatives do not begin to address these problems and they should.

In particular, parking lot improvements at Summit West should include restoration and improvement of the connection to the Pacific Crest Trail running south.

Group Response:

As described in FEIS Section 3.15.2 - Existing Visual Condition, the existing visual condition at The Summit-at-Snoqualmie on National Forest System lands is either moderately altered or heavily altered. The FEIS identifies that the Summit at Snoqualmie scenic integrity has been greatly affected by many factors, including timber harvesting, clearing for alpine ski development, and utility right-of-way clearing. FEIS Section 4.15 - Visual Resources acknowledges that The Summit-at-Snoqualmie does not and will continue to not meet the VQO of Retention. While some clearing and grading is necessary to expand Parking Lot 1, the parking expansion has been designed to minimize the amount necessary by incorporating a vault system for stormwater management.

The PCNST traverses a currently developed portion of The Summit-at-Snoqualmie SUP Area, which is managed under Management Area RE-1 Developed Recreation/MA27D Developed Site. The SUP Area is not managed for wilderness attributes. Impacts to the PCT are disclosed in FEIS Section 4.11.5 – Impacts – Modified Alternative 5. Alternative 5 from the DEIS has been modified in the

FEIS to include an upgrade of the PCNST where it traverses the Summit West parking lot. The modified location would reroute the PCNST through an adjacent vegetated area, to address these and other issues.

Refer to FEIS Section 1.2.8.3 - Pacific Crest National Scenic Trail, which states that "Within Federal lands outside National Parks and Wilderness (57% of the trail) the trail must co-exist in harmony with all other resource uses and activities of the land and determined through the land management planning process....". On this basis, the occurrence of ski area facilities over and surrounding the PCNST is consistent with Section 7(a) of the *National Trails System Act* and the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail*.

70.0 – SOCIAL AND ECONOMIC RESOURCES COMMENTS

Charlie Cornish

Comment:

Furthermore, the DEIS does not present a cost-benefit analysis justifying expenditures for improvements on public lands, nor assurance that such improvements will be adequately funded, properly maintained, and sufficiently managed.

Response:

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose for the MDP is to "ensure the long-term economic viability of The Summit-at-Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE-1 – Developed Recreation/MA-27D – Developed Site, which recognize the USFS partnership with private sector operations to provide quality recreation opportunities on NFSL. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

As a private enterprise, the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. It is assumed that Ski Lifts Inc. would invest in capital improvements only when financially able to do so and when the need and demand is present. Individual projects may be postponed due to unforeseen changes in Ski Lifts Inc.'s financial status or changes in skier demand, however the intent is to complete all of the approved projects. Approval of an Action Alternative does not necessarily mean that Ski Lifts will implement all of the projects as outlined in the description of the Selected Alternative.

Charlie Cornish

Comment:

The gross underestimation of costs and lack of financial transparency is disconcerting; Does Boothcreek have the financial means to carry out this plan?

Response:

Refer to Table 4.10.2-2 (Estimated Construction Costs by Alternatives [Millions]) for an estimate of the construction costs for the MDP. Discussions with Ski Lifts, Inc. suggest that they are confident that the projected increase in visitor spending as a result of the Action Alternatives will adequately offset the fixed operational and development costs outlined in Table 4.10.2-2.

As a private enterprise the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. Individual projects may be postponed due to unforeseen changes in Ski Lifts Inc.'s financial status or changes in skier demand, however the intent is to complete all of the approved projects. Approval of an Action Alternative does not necessarily mean that Ski Lifts will implement all of the projects as outlined in the description of the Selected Alternative.

Charlie Cornish

Comment:

Hence, I request that a business case document be prepared and added to the DEIS that describes and justify the needs for expanding the ski area from current operations (Alternative 1) to preferred Alternative 2 (MDP) and Alternative 5 (USFS preference) to warrant:

- Increasing CCC at Alpental by +1040 and +2790 at the Summit, when the areas reach maximum usage for only 4-5 weekends in January;
- Increasing the SUP by +53 acres at the expense of old growth forest, wildlife corridors, and other recreation usage (hiking, XC skiing, snowshoeing, winter backcountry travel);
- Increasing night skiing (+124 acres, +3660 skiers) at the Summit, when Boothcreek has decreased their night skiing operations (no Sunday nights, no evenings at West on Mon, Tues);
- Increasing ski terrain, but decreasing beginner terrain by 4 acres, which is in greatest demand on weekends in Jan during peak teaching periods;
- Increasing parking for 2000+ people but fails to meet needs on busy days by 1800+ people;
- Not addressing road infrastructure concerns while increasing base facilities, trails, parking, lifts by double digit increases. The current road infrastructure is overburdened on busy weekends in Jan. Parking along State Route 906 at West and Central, pedestrians walking to/from the ski area and crossing from parking lots greatly inhibits traffic circulation.
- Citing increasing local employment when Boothcreek hires temporary workers from Latin America and discontinues their bus transportation for local employees;
- Logging old growth forest for a few weekends of winter usage;
- Clearing wildlife habitat corridors.

Response:

The FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Since the DEIS did not consider the effects of climate change on the ski area, there is no evaluation of the economic viability of areas most vulnerable to reduced snow pack, such as Hyak. Since the Forest Service purpose is to ensure that the ski area is economically viable, the lack of this critical analysis leaves the Forest Service without a rationale for the impacts to the natural resources there.

The DEIS provides no estimate of economic viability of the gondola and restaurant, especially when in competition with two other mountain top restaurants (at Summit West to be reopened and a new restaurant at Mt Hyak). How many days per year would it operate? What hours? Weather will have a dramatic effect on numbers of customers, as few will want to pay to eat in the fog.

The permit fee for use of the national forest lands averaged \$237,500 per year (1997-2004). (DEIS 3-198) This does not seem adequate when considering the current cost of land near I-90. Just leasing the land under the base facilities at the Summit and Alpentel on national forest land could exceed that amount.

Response:

The effects of climate change are outside the scope of this analysis, which evaluates the direct and indirect impacts of the installation of facilities and infrastructure over a projected ten year period.

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose for the MDP is to "ensure the long-term economic viability of The Summit-at-Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities..." As a private enterprise the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

The FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS-4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

The fee for the SUP is outside the scope of this NEPA analysis.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS estimates "investments" for the action alternatives between \$42.4 to \$48.4 million (not including restoration projects). (DEIS 4-406) However, the DEIS presented no estimate of revenues or other economic analyses to substantiate that the proposed MDP will achieve the stated goal of economic viability for the ski resort, nor which of the elements contribute most to that goal. It did not even set a standard by which to measure economic viability. With the very site specific nature of the impacts, that key piece of information is essential before the Forest Service makes a decision.

Response:

The FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS-4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

No economic analysis of the various elements of the proposal are provided, nor a long term assessment of viability with various climate scenarios. Since impacts are site specific, that information would be crucial to a decision maker trying to accommodate competing demands. If economic viability is a goal of the MDP, what standard or measure is being used to determine if that goal has been reached? For instance, no feasibility analysis of shuttles was provided in the DEIS, only the assertion that cutting new crossover runs would be better for the ski area. The preferred alternative includes crossover runs cut through the forest rather than shuttles between Hyak and Central, despite the statement that such shuttles would continue to be available.

Donald Parks
Alpine Lakes Protection Society

Comment:

No economic analysis of the various elements of the proposal are provided, nor a long term assessment of viability with various climate scenarios. Since impacts are site specific, that information would be crucial to a decision maker trying to accommodate competing demands. For instance, no feasibility analysis of shuttles was provided in the DEIS, only the assertion that cutting crossover runs through the forest would be better for the ski area. The preferred alternative includes crossover runs cut the rough the forest rather than shuttles between Hyak and Central, despite the statement that such shuttles would continue to be available for the short run.

Group Response:

The FEIS does not assume that climate change will not occur within the lifetime of the SUP, but states that "any impacts to the climate at The Summit-at-Snoqualmie from global warming over the next 30-40 years are outside the scope of this EIS" (see Section 4.1.3.1 - Climate). The effects of climate change are outside the scope of this analysis, which evaluates the direct and indirect impacts of the installation of facilities and infrastructure over a projected ten year period.

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose of the MDP is to "ensure the long-term economic viability of The Summit at Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide alpine skiing opportunities. As a private enterprise the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. The need for the expansion is tied to resolving deficiencies at The Summit-at-Snoqualmie along with the need to improve the quality of the skiing experience, including improving skier circulation, existing skier support services and facilities.

Consolidating Summit East with Summit Central and Summit West is consistent with the stated Purpose and Need (see Section 1.1.2.3). By installing strategically designed and placed lifts and connector trails, there will be less reliance on shuttle service between The Summit's three base areas. As the stated goal was to allow for a wider spectrum of guests to traverse between the resorts, a crossover trail from Summit Central to Summit East met the stated need more efficiently than continued use of the shuttle service.

The FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS-4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

Patricia A. White
Defenders of Wildlife

Comment:

The project area falls within an area identified by the people of Washington as important, valuable and worthy of long-term preservation and resoration. This project threatens to negate millions of dollars in investment in protecting the Central Cascades, including:

- Washington State citizens and the United States Congress have recently invested about \$70 million in acquiring and protecting wildlife corridors in the area.
- The Cascades Conservation Partnership led a four-year campaign to acquire and protect over 34,000 acres of forest habitat in the Cascades since May 2000.

- As part of the I-90 widening, WSDOT is preparing to build several wildlife passages between Hyak and Easton at an estimated cost of \$10 million. Incorporating bridges and other structures that allow wildlife passage at strategic locations will greatly improve wildlife connections while making travel safer and more efficient. This project would decrease or eliminate the effectiveness of this investment.

Response:

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose of the MDP is to "ensure the long-term economic viability of The Summit-at-Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide quality recreation opportunities on NFSL.

The cumulative effects to wildlife are discussed in Section 4.6.7 – Cumulative Effects and include a discussion of the Mill Creek land donation, in Alternative 3 and Modified Alternative 5, that would provide habitat on the south side of I-90 for wildlife to use as a travel habitat to access the south side or to disperse into available habitat on the south side of the interstate after crossing it from the north.

Scott Kaden

Pacific Northwest Ski Areas Association

Comment:

Washington's winter sports facilities provide major economic assistance to the rural parts of Washington that are growing less dependent on extractive industries, but more dependent on year-round tourism activities. Out of every ski dollar spent by skiers and snowboarders, it is estimated that less than 20 cents directly benefits the operators of ski areas. (The ski facility creates off-site demand for services provided by restaurants, gas stations, grocery stores, sporting good stores, lodging entities, and the like.) Each year, The Summit employs more than 1,300 people (a payroll in excess of \$5 million) with many of these individuals coming from sectors of the local economy with opposite, seasonal employment peak needs.

Response:

Section 3.10.4 - Impact Communities contains a discussion of the communities most likely to benefit economically from the operation and growth of The Summit-at-Snoqualmie. Refer also to Table 3.10.6-1 (The Summit at Snoqualmie Employees/County of Residence) and Table 4.10.2-4 (Estimated Direct Employment Generated Under Each Alternative).

Toby Paterson

Comment:

We see nowhere in the DEIS the economic value compared with the economic cost of development to Washington citizens.

Response:

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose of the MDP is to "ensure the long-term economic viability of The Summit at Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide quality recreation opportunities on NFSL."

Section 4.10 - Social and Economic Factors presents a discussion of the potential social and economic impacts for each alternative. The section includes a comparison of expected impacts to population, employment, income, spending and economic characteristics, public services, and environmental justice.

Toby Paterson

Comment:

Any appraiser who would look at the asset base at the Snoqualmie Pass Ski resort would scarcely be able to come up with a figure anywhere close to 1.1 million dollars. 1.1 million dollars would barely enable the construction of the Alpental lodge alone. The way the fee is calculated uses an accounting scheme to dramatically undervalue the asset base of the resort. And in documents requested via the FOIA, the figures are blacked out "redacted" and can only be calculated using a reverse iterative method as I have done. It is no surprise that the figures of the actual asset base calculation are considered trade secrets and are not available for public view. Also, the SE Group-who calculated the fee structure- wrote the SUP, MDP, and the DEIS. The SE Group is rating their own work, which they stand to profit from- if the Forest Services approves the MDP/DEIS.

Response:

The fee structure and SUP were developed by the USFS with no involvement from any outside contractor. SE GROUP (formerly Sno.engineering) prepared the MDP under a contract with Booth Creek, the former owner of the resort. Upon acceptance of the completed MDP, the USFS agreed to initiate a NEPA process as described in Section 1.5 - Scoping, Significant Issues and Public Participation, and Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP.

Based on their qualifications, SE GROUP was subsequently selected to act as a third-party contractor for the preparation of this NEPA document. The Council on Environmental Quality "40 Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" discusses third-party contracts (question 16) and disclosure statements (question 17). The response to question 17 says "When a consulting firm has been involved in developing initial data and plans for the project, but does not have any financial or other interest in the outcome of the decision, it need not be disqualified from preparing the EIS. However, a disclosure statement in the draft EIS should clearly state the scope and extent of the firm's prior involvement to expose any potential conflicts of interest that may

exist." As required by NEPA, SE GROUP signed a disclosure statement which certifies that they have no direct or indirect financial or other conflicting interest in the outcome of The Summit-at-Snoqualmie MDP EIS. All work conducted by SE GROUP in this NEPA process has been under the direct supervision, and approval authority, of the USFS ID team.

Chris Lyons

Comment:

British Columbia continues to supply to Washington skiers, an upscale resort environment, which causes people to drive anywhere from 6 to 8 hours from the Puget Sound region out of state to spend on an average \$440 per day or \$1520 per trip. Many would say it is better snow, but I have skied at Whistler several times, and for me, their snow is the same snow brought in from the Pacific marine air, but what they offer is a full experience of diverse slopes, dining, lodging, and other retail and festive facilities.

The numbers can easily be found on the Canadian Tourism Commission website where leisure travelers to Canada is 4.6 million alpine skiers per year. British Columbia makes up 41% of that number or 1.886 million per year. Washington state provides more than 10% of all ski tourists to Canada or at a minimum 460,000 skiers which is roughly the amount it would take to supply one entire ski area similar to Summit-at-Snoqualmie. Someone please pass this on to Mr. Raines, as there is no accessible e-mails to him on Sierra Club's website, to figure what that this is doing to our environment through the emissions of the road trips, let alone to our state's economy.

If Washington ski areas are not able to compete in the long run they will eventually be forced to cut back or eliminated all together. That is business. I urge all to pick up any current issue of Puget Sound Business Journal and read the Canadian advertisement from Red Resort Properties "Be one of the first to stake your claim at Red Resort..Get there fast for the best choice of new homes on the slopes.." We have a great opportunity at Snoqualmie Pass that no other ski area in Washington has, in that we already have residential subdivisions and a Interstate highway. Do we really want all our future skiers driving to BC? I am also attaching Major Resort Development Projects in British Columbia Ministry of Small Business and Economic Development March 2005 as I believe it gives a good look at what their plans are and what our ski areas will be up against in the future.

Here was a quote from the Washington Trails Association newsletter referring to our National government, "Regrettably, the Administration's budget ignores the critical role that recreation plays in the Forest Service," said Jonathan Guzzo, Advocacy Director for Washington Trails Association. "Fifty-nine percent of the National Forest Service's contribution to the GDP comes from recreation. If we don't invest in our public lands, we'll lose the economic benefit we get from them." Doesn't skiing play an important role in recreation?

Erik Giesa

Comment:

I worry that as my children improve (and they are rapidly) The Summit will cease to be desirable. Without these improvements we will be more likely to drive to Crystal (which already is too crowded) or go to B.C. more often taking our recreational dollars out of state.

Tracy Prescott

Comment:

The pass is too crowded on the weekends. Therefore, we drive four times the distance and burn four times the gas to go to less crowded, more advanced areas. We also take vacations in other states and provinces. There are no destination resorts in our state and we must take our vacation business elsewhere. In March we are going to Keystone for ten days. We would prefer to ski closer, log fewer miles and keep the business at home.

Group Response:

Refer to Section 1.1.2.3 - Purpose and Need of the FEIS. Among other things, it states that the purpose of the MDP is to "ensure the long-term economic viability of The Summit-at-Snoqualmie." Further, these objectives conform with the Forest Plan allocations of RE1 - Developed Recreation/MA27D - Developed Site, which recognize the USFS partnership with private sector operations to provide quality recreation opportunities on NFSL."

Jill Bolduc

Comment:

it's hard for me to understand why they are not planning to upgrade the nordic trails and associated facilities, which I understand to be a profitable portion of their business. I, and many people I know, spend our money at the nordic ski area rather than the alpine ski area. The proposed changes will not result in me being any more likely to ski the alpine areas, and may decrease the money I spend to ski the nordic areas.

Marla Husnik

Comment:

If the SS is interested in creating a recreational environment that is suitable for additional capacity, why are they not proposing improvements in the areas of accessibility to optimal groomed trails (i.e. the current trail system on top near Grand Junction) for beginner/advanced beginner *nordic* skiers as well? It is my understanding that the nordic center at Hyak (out of the Old Milwaukee Lodge) has supported itself financially through trail pass sales, instruction (of which I ran a very successful Wednesday night adult skate ski course in past years -- although not this year since they closed the nordic ski area for Wednesday nights), and ski race series.

Group Response:

As described in Section 3.11.4 - Dispersed Winter Recreation, the Nordic facilities are located at Summit East, and comprise approximately 500 Nordic skiers during peak periods. FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS-3).

Improvements to the Nordic facilities have not been included in the MDP proposal to the USFS (see Section 1.1.2.2 - The Proposed Action). As a result, the DEIS and FEIS do not analyze improvements to the Nordic facilities. Any proposed improvements in the future would require a formal proposal by Ski Lifts, Inc. and a separate NEPA process to address these Nordic improvements. However, Footnote 7 (DEIS page 1-7, FEIS footnote 10) notes that The Summit-at-Snoqualmie has received approval from the USFS to replace and realign the existing *Dinosaur* chairlift at Summit East with a new chairlift called *Mt. Hyak*. For analysis purposes, removal of the *Keechelus* and *Dinosaur* chairlifts and construction of the presently approved *Mt. Hyak* chairlift is considered an existing condition. Construction of the *Mt. Hyak* chairlift would benefit both alpine and Nordic skiers at the Summit East facility by providing a bottom terminal at a lower elevation and a detachable chairlift for easier loading and unloading.

Charlie Cornish

Comment:

I take issue with Forest Supervisor Y. Robert Iwamoto's statement in his cover letter that the USFS prefers Alternative 5 in part to maintain long-term economic viability of the facilities at Summit East. I find this statement particularly disingenuous, given the fact that it has been primarily the Nordic and snowshowing community that has kept Summit East (Hyak) open and producing revenue, especially since the Summit Nordic Center moved from the Silver Fir chair to Summit East (Hyak) five years ago.

Charlie Cornish

Comment:

2. Maintain long-term economic viability of facilities at Summit East (Hyak).

Was this statement written in the original 1998 Sno-Engineering plan? It is obsolete today. Nordic Center operations at Hyak for the past 5 years have demonstrated how to run Hyak profitably.

Charlie Cornish

Comment:

Moving the Nordic Center to Hyak has already revived Hyak economically. Why is this not included in the MDP and DEIS?

Group Response:

As described in Section 3.11.4 - Dispersed Winter Recreation, the Nordic facilities are located at Summit East, and comprise approximately 500 Nordic skiers during peak periods. FEIS Section 3.11 - Recreation has been updated to include an illustration depicting participation in developed/dispersed winter recreation activities by user type at The Summit-at-Snoqualmie (see Illustration 3.11-FEIS-3).

Cliff Chatel

Comment:

Specifically, the Summit-at-Snoqualmie only reaches maximum demand for 4 to 5 weekends each season. Otherwise, its facilities remain underutilized. The DEIS does not present any market data to support the 25% expansion in Comfortable Carrying Capacity (CCC) at the Summit. Furthermore, the DEIS does not present a cost-benefit analysis justifying expenditures for improvements on public lands and assurance that such improvements will be adequately funded.

Jorie Wackerman

Washington Ski Touring Club

Comment:

In addition, from our review of the DEIS, we conclude that Ski Lifts, Inc. does not present a strong business case for a major expansion that includes new lifts, parking, and restaurants. Specifically, the Summit-at-Snoqualmie only reaches maximum demand for 4 to 5 weekends each season. Otherwise, its facilities remain underutilized. The DEIS does not present any market data to support the 25% expansion in Comfortable Carrying Capacity (CCC) at the Summit. Furthermore, the DEIS does not present a cost-benefit analysis justifying expenditures for improvements on public lands, nor assurance that such improvements will be adequately funded.

Group Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need for improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year-round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

By addressing these needs, the Action Alternatives include improvements that also would increase capacity. As a day use ski area, The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2). The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accommodate peak visitation periods similar to sporting events and concerts.

The FEIS has been updated to include a break-even analysis by alternative in Section 4.10 – Social and Economic Factors. Illustrations 4.10.2-FEIS-1 through 4.10.2-FEIS-4 document the viability of the Action Alternatives by evaluating the visitation necessary to support each alternative.

As a private enterprise, the business operations of Ski Lifts, Inc. are not reviewed as part of the NEPA process, and are not considered in the USFS review of the MDP. Individual projects may be postponed due to unforeseen changes in Ski Lifts, Inc.'s financial status or changes in skier demand, however the intent is to complete all of the approved projects. Approval of an Action Alternative does not necessarily mean that Ski Lifts will implement all of the projects as outlined in the description of the Selected Alternative.

75.0 – TRANSPORTATION COMMENTS

Babs Smith

Comment:

Have Park and Ride lots in North Bend, with bus service to the ski areas, with drop off areas that can accommodate the buses, and designated bus parking at the ski areas. This would alleviate the demand for parking by Seattle residents at the ski area. This would also address the problem of total parking deficit of 1,844 spaces for the entire ski area.

Response:

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

All of the Action Alternatives include additional parking.

Bill Preston

Washington State Department of Transportation

Comment:

The accident information in the DEIS should be updated. The text mentions the most recent accident report is from 1996. Current accident information from 1999 through 2005 is available.

Response:

The annual collision data summary and Table 3.12.2-3 have been updated in the FEIS to include the most recent data from the WSDOT.

Bill Preston
Washington State Department of Transportation

Comment:

The DEIS Transportation section indicated no data was found for pedestrian/vehicular incidents on SR906. There have been two accidents involving pedestrians and vehicles since 2000.

Response:

FEIS Section 3.12.2.1 - Data Collection has been updated to include the most recent data available providing a discussion of the two pedestrian-motor vehicle collisions reported since 2000.

Bill Preston
Washington State Department of Transportation

Comment:

The project is adjacent to State Highway 906. SR 906 is a Class 4 access managed highway with a posted speed limit of 35 miles per hour. Generally, on-street parking has been permitted where sufficient shoulder width exists between mileposts 0.22 to 1.54. Parking is restricted from midnight to 7:00 AM to accommodate snow removal in the segment. Otherwise, parking is prohibited along SR906.

Response:

FEIS Section 3.12 - Transportation has been updated to include this information.

Catherine Weatbrook

Comment:

Why shuttle from West to Central or from Central to East? Because as often as not, the cross over is closed. I drive my son and his friends to West from Central every Saturday morning because the lifts and crossover aren't open in time for them to arrive at The Summit Learning Center in time for their coaching commitments. The shuttles don't start running in time, and so far are unreliable.

Response:

As described in Section 1.1.2.3 - Purpose and Need, there is a need for balanced capacities, improved vehicular circulation, parking and shuttle services. By addressing these needs through realigning inefficient lifts and trails, adding approximately 9.8 additional acres of parking (discussed in Section 2.3.6 - Alternative 5 - Mitigated Proposed Action) and improving skier circulation between Summit East and Central through improved crossover trails, less reliance on the shuttles is anticipated.

The FEIS has been updated to discuss the reasons for lift closure, including staffing deficits, mechanical problems, terrain or slope issues, and redundancy of lifts (see Section 1.1.2.3 - Purpose and Need and Section 3.11.3 - Developed Winter Recreation).

The schedule of the intra-resort shuttles would be addressed in the Annual Operating Plan and not reviewed as part of this NEPA analysis.

Catherine Weatbrook

Comment:

90-minutes is the actual time it takes to get from Central to Alpentel by the existing shuttle service level. Nothing in this plan addresses that, in fact, there are consistent mentions of the reduction of need for shuttle services. Dropping young children off unsupervised, while having to drive to and part at Summit East, doesn't work. Neither does driving the entire car load to East, parking, and taking the shuttle to the other areas because East doesn't have any beginner lift services.

Response:

The schedule of the intra-resort shuttles would be addressed in the Annual Operating Plan and not reviewed as part of this NEPA analysis. However, Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes balanced capacities and improved vehicular circulation, parking and shuttle services. By addressing these needs through realigning inefficient lifts and trails and adding approximately 9.8 additional acres of parking (discussed in Section 2.3.6 - Alternative 5 - Mitigated Proposed Action) and improving skier circulation between Summit East and Summit Central through improved crossover trails, less reliance on the shuttles is anticipated.

The FEIS has been updated to better describe of the effect of insufficient parking at Alpentel on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Charlie Cornish

Comment:

Final note on Creek Run area chairs: How does Boothcreek propose to access these chairs for installation and maintenance. My understanding is that the owners of 55 and 56 in Division 1 of Hyak Estates could block commercial access to the Forest Service road crossing their property. There are other possible right-of-ways, created at the expense of logging old growth forest and crossing private lands.

Response:

Table 2.4-1 details the Lift and Trail Construction Techniques for the Creek Run area. The USFS has an easement through the private section of the 9070 road and 120 and 110 spurs in Section 15. This easement allows access to Section 16 for construction and maintenance of chairlifts and other infrastructure. The FEIS has been updated to include this information (see Section 4.12 – Transportation).

Charlie Cornish

Comment:

Please provide data and statistics on how many skiers travel and many desire to travel from base area to base area.

The current shuttle bus fleet run by the Summit is in fair to poor condition. What plans does the Summit have to improve this fleet?

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes balanced capacities and improved vehicular circulation, parking and shuttle services. By addressing these needs through realigning inefficient lifts and trails and adding approximately 9.8 additional acres of parking (discussed in Section 2.3.6 - Alternative 5 - Mitigated Proposed Action) and improving skier circulation between Summit East and Summit Central through improved crossover trails, less reliance on the shuttles is anticipated. The current demand for and use of the shuttle system validates the need for improved circulation between The Summit base areas. The Purpose and Need has been updated in the FEIS to provide additional discussion regarding the need for improved skier connectivity between The Summit ski areas.

The improvement of the shuttle bus fleet is an operational issue, and is outside the scope of the EIS process, which specifically addresses facility issues.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The DEIS states that there will be .56 miles of road removed (DEIS 2-49). That is 2,957'. The DEIS lists 1,560' of M-5 at Summit East (DEIS 2-49) and 350' of Road C at Summit West (App F-45). Where is the other 1,047'? Furthermore, the roads data in Table 2.7-1 (DEIS 2-88) does not match with Table 2.3-1 or 2.3.3-8.

Response:

The other road is at the lower end of the Creek Run ski run. It has been used as a road, but was never given a number. It will be eliminated for use as a road. It shows up well in Figure 6 of Appendix F. It appears on many other maps also.

The difference in mileage is based on two different views of roads in the GIS analysis for the EIS: one version looks at “usable roads” (the alternative descriptions in Chapter 2) and the other view looks at all roads, including those that are no longer used (the summary of consequences and resource sections). This was done to provide the highest measurable road mileage for the resource sections. The FEIS will be revised to clarify this issue.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

While the ski area insists it needs snowboarder crossover runs between Hyak and Central, it does not have them for the other ski areas. There is no such connection between Summit and Alpentel. "Due to the linear, confined nature of Alpentel Valley, parking shortages would continue to be an issue on peak capacity days [under alternative #2], although more often than alternative #1 due to increased capacity at Alpentel. The CCC at Alpentel would be greater than the capacity of the parking lots at Alpentel. Therefore, Alpentel skiers would increasingly have to rely on shuttle service to provide access to the lifts and other facilities at Alpentel." (DEIS 4-432) Alternative #5 is the same as #2 (DEIS 4-441) Since they will not be lighted (at least in this iteration of the MDP) the Hyak/Central crossover trails will only be used until about 5:00 or 6:00 in the evening. What happens to night snowboarders at Hyak? If they can take a shuttle, why not during the day?

Response:

Skiers at Summit East would be able to utilize existing night skiing terrain as well as expanded night skiing terrain in the Rampart and Mill Creek pods (described in Section 2.3.6 – Modified Alternative 5 – Mitigated Proposed Action). The shuttle system would be available for skiers to traverse between areas during night skiing operations. The shuttle system also is available during the day and would be available for resort users to transfer between areas during day skiing operation. However, as described in Section 1.1.2.3 - Purpose and Need, there is a need to maintain the viability of Summit East by improving skier connectivity between The Summit base areas. The proposed crossover trails would meet this need by allowing for a wider spectrum of guests to traverse between the areas. This in turn, would result in less reliance on the shuttle system for access between The Summit base areas, and thereby allowing for more efficient use of shuttle busses between The Summit and Alpentel.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The proposal would result in an additional 10 acres of parking, increasing vehicle capacity by 20% (2.2 persons per car). Much of this is in riparian reserves (Summit 1b, Silver Fir 2c, 3c, 4d - Figure 2.3.6-1). It is hard to see how this meets the SPAMA guidelines. How often is there a lack of parking? How many days or portions of days? How much of the national forest must be graded or paved to provide parking for portions of a few days per year? The MDP should rely more on public transportation, and offsite parking areas to meet transportation needs at peak times.

Most of the parking lots are free, giving no incentive to reduce vehicles. The ski area currently (2006) offers free parking for car poolers in one pay parking lot at Summit and one at Alpentel during

weekends in January and February (Summit web site, 1-21-06). This program should be expanded and be a required part of the MDP.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year-round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

By addressing these needs, the Action Alternatives include improvements that also would increase capacity. As a day use ski area The Summit-at-Snoqualmie receives a majority of its visits on weekends and holidays. As a result, the majority of crowding takes place during these periods. The FEIS has been updated to include an analysis of visitation relative to capacity (see Section 1.1.2.3 – Purpose and Need and Illustration 1.1.2-FEIS-2). The Action Alternatives address crowding by improving facilities and increasing capacity to better provide for visitation during these peak periods. The ski area capacity is designed to accommodate peak visitation periods similar to sporting events and concerts.

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

Consistency with SPAMA standards and guidelines is addressed in Section 4.6.9 - Adaptive Management Area Standards and Guidelines.

Chris and Patty Lund

Comment:

As we age and our daughter becomes more dependent, we need more handicapped parking and easier access to the snow. Someone like my husband who has skied all of his life, loves the freedom of coming down that hill, but finds it a struggle to climb up to the hill over ice and snow mounds carrying all of his gear.

Response:

This is consistent with Section 1.1.2.3 - Purpose and Need, that people of differing abilities should have the ability to enjoy the mountain recreation experience. The range of alternatives presented in the FEIS address this need. Ski areas on NFSL must comply with State, local and Federal regulations regarding accessibility for skiers with disabilities. The Proposed Action is designed to comply with

all State, local and Federal requirements (including the American with Disabilities Act and Section 504 of the Rehabilitation Act of 1973). Project facilities will be designed using recommendations from the USFS *Accessibility Guidebook for Ski Areas on Public Lands* (USDA 2000b).

Curtis Christman

Comment:

Parking at the summit is another reason we are considering another ski area. Parking capacity is less than minimal. There have been times this year, as season pass holders, that we have had to turn around and go home. Who would want a pass where parking is full on the weekends? This is especially true of our favorite area, Alpental. If parking is not expanded we will not be pass holders, regardless of more lifts. Shuttle is not a good alternative. We use our car as a base for lunch and rest. Current RV parking is not sufficient or acceptable. We bought our RV specifically for skiing. I have not been to a ski area that is worse for RV parking than the summit (although I haven't tried parking at Stevens yet). We have parked at Mission Ridge and Big White, which were superior to the summit by far. The summit parking is less than minimal.

Response:

Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpental in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). No new parking is included at Alpental, however stormwater management proposals (discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities without expanding existing lots. The DEIS and FEIS acknowledge that parking at Alpental would continue to be less than the capacity of the lift and trail network, requiring some Alpental guests to use the shuttle to access the facilities at Alpental.

The FEIS has been updated to include discussion about expansion of parking lot 6 at Alpental (see Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2 – Modifications to the Proposed Action). In the 1998 MDP lot 6 was originally proposed to be expanded to the north. Due to the confined nature of the Alpental Valley and concerns over proximity to Riparian Reserves the USFS determined that expansion of parking lot 6 was not feasible. As a result, none of the Action Alternatives include expansion of parking at Alpental. The FEIS has been updated to better describe of the effect of insufficient parking at Alpental on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Dan Brewster
Ski Lifts, Inc.

Comment:

Alpentel parking fills on a regular basis, and therefore it is vital we maintain, not lose, any parking capacity in the Alpentel Valley. We had hoped to increase parking uphill of Lot 6, but eliminated this from our proposal due to concerns for the riparian area. Please do not let this fact go forgotten. While we do hope to make a number of on-hill improvements such as the International Chair and Pulse Gondola, neither of these are particularly aimed at increasing volumes during peak times. The International Chair is aimed to better balance uphill capacities with available terrain. This is an important objective, due to the fact we have our longest wait times of the entire Summit today on Chair 1 and Chair 2 at Alpentel. The International Chair will allow much improved dispersal of crowds, and avoid overcrowding in the base area.

Response:

Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpentel in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). The DEIS and FEIS acknowledge that parking at Alpentel would continue to be less than the capacity of the lift and trail network, requiring some Alpentel guests to use the shuttle to access the facilities at Alpentel. By improving skier circulation, and allowing for additional parking in The Summit area, the shuttle service would be better positioned to respond to increased demand to shuttle skiers from Summit West to Alpentel.

The FEIS has been updated to better describe of the effect of insufficient parking at Alpentel on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Section 1.1.2.3 - Purpose and Need, as described in the DEIS and FEIS, acknowledges that skiers wishing to ski the Internationale bowl are required to ride two lifts and to cross through lower level terrain to access the bottom terminal of the *Armstrong Express*. As a result, the bottom of Alpentel is often crowded and lift line wait times are excessive.

As discussed in FEIS Section 4.11.5 – Impacts – Modified Alternative 5, with the installation of the *Internationale* chairlift, lift served backcountry skiing (via *Edelweiss*) would be replaced with lift-served alpine skiing in the Internationale basin. The addition of the *Internationale* chairlift will accommodate a CCC of 440 expert level skiers, accessing expert terrain in the northwest portion of the SUP area, encouraging dispersal of skiers and reducing congestion at base area facilities (Section 2.3.6.1 - Lifts).

Dawn MacLaurin

Comment:

I think that it would be great to be able to reduce the need for a shuttle bus. I have waited over an hour for a shuttle before. By the time I finally made it off the shuttle and up the chair I had a real hard time warming up again. It ended up being my last run because I felt it was not safe skiing when my muscles were so stiff.

Response:

Section 1.1.2.3 - Purpose and Need discusses the current parking and shuttle condition at The Summit. While no expansion of parking is proposed at Alpental, the guest drop-off area and stormwater management proposals (paving of lots, snow storage options and use of MgCl as a de-icer/ice-inhibitor, as discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities at The Summit and Alpental without expanding existing lots.

As described in Section 1.1.2.3 - Purpose and Need, by increasing skier connectivity between Summit East and Summit Central, less reliance on the shuttle system is expected at The Summit ski areas, allowing more efficient shuttle service between The Summit and Alpental.

Gordon Jay

Comment:

After reviewing the changes, I see something missing - PARKING!. The majority of the additions are at Summit East and Alpental yet I see no parking nor transportation improvements at those two sites. Yes I do see some parking additions at the Central and West sites but it is not uncommon for the parking lot at Alpental to get full quickly and then the resulting long lines for the shuttle.

Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which include balanced capacities and improved vehicular circulation, parking and shuttle services. By addressing these needs through realigning inefficient lifts and trails and improving skier circulation between Summit East and Summit Central through improved crossover trails, less reliance on parking and shuttles is anticipated and more reliance would be placed on skier connectivity.

Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpental in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). However, stormwater management proposals (discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities at Alpental without expanding existing lots. The DEIS and FEIS acknowledge that parking at Alpental would continue to be less than the capacity of the lift and trail network, requiring some Alpental guests to use the shuttle to access the facilities at Alpental.

The FEIS has been updated to include discussion about expansion of parking lot 6 at Alpental (see Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2 – Modifications to the Proposed Action). In the 1998 MDP lot 6 was originally proposed to be expanded to the north. Due to the confined nature of the Alpental Valley and concerns over proximity to Riparian Reserves, the USFS determined that expansion of parking lot 6 was not feasible. As a result, none of the Action Alternatives include expansion of parking at Alpental. The FEIS has been updated to better describe of the effect of insufficient parking at Alpental on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Jill Sherensky

Comment:

Currently, after my Sunday shift at Alpental, I often see traffic backups of up to an hour just to reach I-90 from Alpental. This congestion contributes to air pollution in the valley, makes it impossible to walk on the Alpental road, and creates the potential for multi-vehicle accidents. I don't believe the ski area is adequately addressing these concerns.

Sergei Osobov

Comment:

the parking lots at Alpental are full early in the morning on weekends and holidays. Adding restaurant visitors to the area will stress the parking even more and will inevitably cause the following scenario. A lot of people will come to Alpental, won't find parking space, will go to Summit parking areas and ride shuttle buses back to Alpental. Apart from wasted time this would result in increased traffic (both personal vehicles and shuttle buses), congestion and more harmful exhaust from cars.

Common Response:

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

The impacts to air quality are compared by alternative in Section 4.8 - Air Quality.

Mark Lawler
Sierra Club

Comment:

The EIS should have more thoroughly examined the possibility of parking garages, shuttles, carpool subsidies, and other measures to reduce the need for large parking areas with their large environmental impacts.

Response:

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2):.MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

Refer to Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.1 - Alternatives Considered and Eliminated from Further Study, which has been updated to include a discussion of a parking structure at Alpental and/or The Summit. As described in the DEIS, Alternative 4 would decrease the area of parking lots 4, 5, and 6 at Alpental by approximately 0.9 acre. This would decrease environmental impacts associated with parking lots in Riparian Reserves.

Mishelle Maas

Comment:

I see there are plans for handling an increase in number of skiers/riders more efficiently, what about traffic? Is there consideration for shuttles from North Bend and parking for buses and carpools only? Currently, on a busy weekend it is challenging to park your car at any of the areas.

Response:

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

Steve Savage
Coughlin Porter Lundeen

Comment:

The gridlock, traffic and parking mess on typical winter weekends is almost unbearable. The difficulty of getting my kids to ski lessons is nothing short of painful. A couple weekends ago, we parked in the lot below the Ski Patrol building at Central, and my wife went out an hour later and our Durango was completely blocked in on all sides!! The lot manager had to drive her back to our cabin at Alpental! The parking situation is chaotic, and at times, dangerous.

Response:

The MDP specifically addresses concerns over traffic and parking in Section 4.12 - Transportation (including pedestrian safety), and is designed to spread parking demand across The Summit, by improving skier circulation between base areas.

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

All of the Action Alternatives include additional parking to address issues associated with parking on peak visitation days.

Bill Preston
Washington State Department of Transportation

Comment:

As a condition of development approval, we request the proponent develop a Traffic Management Plan (TMP) in conjunction with the WSDOT to mitigate their impacts by the proposed expansion. This plan will be reviewed and approved by WSDOT, and required to be implemented as part of the development. As these impacts are created by the development, the proponent is responsible to fund the necessary improvements. The initial meeting needs to be prior to May 1, 2006. The TMP, at a minimum, is required to address the operational and safety conditions identified below:

- Address traffic congestion created at peak times at the I-90 interchanges.
- Pedestrian safety in general, and at identified pedestrian crossings. For example, the additional parking at Silver Fir (SR906 milepost 1.90 Left) will significantly increase the usage of this

pedestrian crossing. As a result, improvements at this location are likely to include illumination, signing, pavement markings, and a certified flagger.

- Illumination requirements on SR 906.
- Carpooling, vanpooling, transit, etc. to reduce congestion on SR 906 and at the I-90 interchanges.
- Notifying patrons of pass conditions prior to departure. There are often restrictions on I-90 that were not required when patrons arrived.
- Fee parking at approved parking lots, and its impacts to SR906.
- Congestion that inhibits WSDOT's ability to maintain SR 906, and the blocking of emergency response vehicles.
- Residents' inability to access to their homes due to ski patrons blocking their driveways.
- General guide, outdoor advertising and motorist information signing requirements.

Catherine Weatbrook

Comment:

Traffic on the frontage road - Highway 906 - is very heavy with cars progressively going further east to try to get parking. Then large crowds of people waiting for shuttles, or walking along the highway where there is no safe walking area.

Charlie Cornish

Comment:

On business winter weekends, State Route 906 can be very congested. On one busy Sunday in January 2006, it took the Suttle Bus 1 hour to go from Summit Central to Alpental. Another Sunday, due to snow conditions it took a friend living who lives at Alpental 3 hours to go home from Hyak to Alpental. More parking and larger base facilities will exacerbate these problems if appropriate mitigation measures are not undertaken.

- The plan needs to include a comprehensive transportation strategy that includes:
- Bus transportation from Seattle/Puget Sound area Park and Rides to Snoqualmie Pass and return for skiers to supplant individual cars and more parking;
- Renewal of employee bus transport from Ellensburg and North Bend, which was discontinued by Boothcreek in the past couple years;
- Efforts for increased fuel efficiency and reduced greenhouse emissions;
- Incentives for carpooling.

John Aiken

Comment:

I see nothing in the proposal that deals with the horrific traffic and parking problems at the Summit. This season in particular has been terrible. On the weekends, literally every parking lot is full by 9:00 a.m. Once the parking lots fill up, the traffic back-ups getting in and out of the Summit area are extreme. The proposal will only add to these problems with increased numbers of skiers/snowboarders visiting the Summit. Without addressing the parking and traffic issues, the proposed improvements will lead to a traffic and parking disaster.

Katherine P. Ransel

Comment:

Probably the most egregious omission from your plans is the lack of transportation alternatives to cars, such as buses from Park-and-Ride lots in the Puget Sound region, congestion parking pricing, and carpool recommendations. At the same time, your plans propose an increase of 9 percent in parking lot area, which will in any event not meet parking needs at peak times. Air quality concerns demand and the public deserves transportation alternatives to this popular day skiing and snowshoeing recreation area, such as public buses and car parking price incentives to promote carpooling.

Rick Holmstrom

Comment:

Omitted from our response letter was a rather significant point that the Level of Service threshold is LOS C for both SR 906 and I-90 at the Summit. As the existing operation is below the accepted threshold during peak periods, the development is responsible to mitigate their probable impacts. That is our basis for requesting the TMP, as no transportation mitigation was identified in the DEIS to address their impacts.

Group Response:

During peak arrival and departure periods the function of SR906 shifts from conducting traffic at the posted speed limit to delivering traffic from or to the highway (I-90). In this way, it functions more like a driveway than a road (albeit a very long driveway) and LOS decreases. The MDP specifically addresses concerns over traffic and parking in Section 4.12 - Transportation (including pedestrian safety), and is designed to spread parking demand across The Summit by improving skier circulation between base areas. By design, improved skier circulation would reduce reliance on vehicles, including shuttle busses.

The FEIS has been modified to include a new Mitigation Measure (MM3) regarding transportation (see Table 2.4-2). MM3 includes the development and implementation of a Traffic Management Plan, which documents the efforts to be undertaken in reducing the effects of the ski area operation on SR-906 and I-90. These efforts include incentives for the use of busses and car pools by increasing

preferential car pool parking areas, working with Metro and others to increase bus service on weekends, providing incentives for those that take the bus, and to promote bus and car pool use through various means, including the ski area website. In addition, employee shuttle busses will be included in the Traffic Management Plan.

The DEIS Section 4.12.5 - Pedestrian Access acknowledges that parking lot expansion at Silver Fir would not alleviate the need for resort patrons utilizing Lot 2 to cross SR-906. However, the DEIS does note that the increased parking would reduce the need for patrons to park along SR-906. Reduced parking on SR-906 would result in fewer vehicle/pedestrian conflicts.

Andre Schimmelbusch

Comment:

The only improvement I would suggest to this plan is to examine parking requirements. If there is one thing I would pick that has changed the most in the last several years, it's the parking. There simply is not enough. Especially at Alpental!

Babs Smith

Comment:

There is presently insufficient parking, and on Sunday, February 29, 2006 the Alpental lot was closed (including Alpental road access) at noon because all the lots were full. Anecdotally, I tried to drop off my two 13 year olds at the Alpental ski area at noon, and police had the road closed so the children had to walk up the road until a shuttle came by. My concern was the speed of drivers leaving Alpental ski area, and no way for the children to get off the road if a car approached too closely. I also could not find any parking at Summit West, so dropped off two other guests at Summit West and returned to park in our driveway on St. Anton in the Alpental Community and walked with my equipment to Summit West along Alpental Road.

Catherine Weatbrook

Comment:

Having used the shuttle service frequently this year to try and avoid the reparking nightmare - I can say it consistently takes 45 minutes to take a shuttle from West to Central, and 90 minutes to go from Central to Alpental, and another 90 minutes to get back. It's not that there were that many people - there are simply no shuttles. By adding lift capacity at Alpental, and no parking, you're creating more of a problem, and solving nothing except for those few people who can get there will have no lines.

Debbie Faulkner

Comment:

We would also appreciate more parking, especially at Alpental. The enjoyment of the outdoor experience is diminished knowing you have a very long walk to the car, or many times if we can't

leave Seattle first thing in the morning choose not to ski because we know parking will be a challenge later in the morning.

Giovanni and Paula Fagioli

Comment:

We noticed they did not have any parking expansion plans at Alpental and at this time there is not enough parking at Alpental to meet the demands. If they add lifts where are the people going to park?

Greg Jensen

Comment:

Parking.. We frequent Alpental more than West and Central, and the need for guest drop-off and better shuttle service is clear. We would petition for additional parking area, but the lack of space for that is also pretty clear.

Joe Hoch

Comment:

First, where would all the proposed additional people go? As a long time Alpental skier and frequent summer hiker I have seen the bottleneaking that already occurs. In winter, the small ski area becomes extremely crowded. As it stands, the Summit has no capacity for the cars that enter the valley on a given winter weekend, and has to turn away many cars to parking lots across the pass.

Kathy Rowell

Comment:

There is not enough parking at Alpental or the Summit now. I've had to turn around and go home twice this winter because there was no where to park. I don't see any additional parking.

Luke Williamson

Comment:

I have also been forced to wait in traffic for up to an hour both coming from and going to Alpental. There needs to be improved parking areas and better traffic flow to accommodate the number of frequent visitors.

Mark Niemi

Comment:

You are adding 2 New chairlifts at Alpental. Why no additional parking lots? You need more parking on the weekends.

Nancy Keith
Mountains to Sound Greenway

Comment:

We understand the complex issues of snow storage and removal at the Summit. However, we visit other ski areas that have been well laid out to accommodate cars without completely denuding the landscape. We do not see any new approaches for reducing the number of cars or housing them in the MDP. Final planning should be looking at under- or above-ground garages. If those facilities are not feasible, then there should be significant provision for expanded shuttle services from the metropolitan area and programs to encourage or require their use. The valley of the Snoqualmie Summit is imply too narrow to accommodate the number cars predicted in the user capacities identified in the MDP.

Sandy Ruggles

Comment:

Another concern is the limited amount of parking at Alpental. The lots are already full every weekend.

Siri Erickson-Brown

Comment:

Parking? This year, parking at Alpental on the weekends seems to be worse than ever. How does the summit propose to accommodate the additional cars that will inevitably come to the mountain once there is more lift/terrain capacity?

Group Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which include balanced capacities and improved vehicular circulation, parking and shuttle services.

Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpental in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). However, stormwater management proposals (discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities at Alpental without expanding existing lots. The DEIS and FEIS acknowledge that parking at Alpental would continue to be less than the capacity of the lift and trail network, requiring some Alpental guests to use the shuttle to access the facilities at Alpental.

The FEIS has been updated to include discussion about expansion of parking lot 6 at Alpental (see Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2 – Modifications to the Proposed Action). In the 1998 MDP lot 6 was originally proposed to be expanded to the north. Due to the confined nature of the Alpental Valley and concerns over

proximity to Riparian Reserves, the USFS determined that expansion of parking lot 6 was not feasible. As a result, none of the Action Alternatives include expansion of parking at Alpentel. The FEIS has been updated to better describe of the effect of insufficient parking at Alpentel on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Hank Allen

Comment:

Two weeks ago, I took my family skiing and it took us over an hour to find parking and this parking wasn't even near the ski school. If the changes were made at the Summit so it was easier to ski from one side of the ski area to the other we could have parked at Hyak and skied over to Summit East. People were parking on the side of the road which was not allowing the snow plow to pass. This also didn't leave space for these people to walk to the ski area on unsafe slick roads. Cars had to dodge skiers heading to the lift area.

Timothy M. Sullivan

Comment:

The need for the service expansion across the board was evidenced on a recent trip to Summit Central after a heavy snowfall. Alpinists came in droves and cars were being parked on Highway 906. This situation could be increasingly avoided in the future by the implementation of the proposals outlined in the MDP. Increasing the interconnection of the alpine areas would increase options for parking as well as providing a more diverse alpine experience.

Group Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes balanced capacities, consolidation of Summit East with Summit West and Summit Central, improved vehicular circulation, parking and shuttle services.

Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, new crossover trails would dramatically increase skier circulation between Summit Central and Summit East, and chairlifts at The Summit would be realigned in order to better distribute and circulate skiers on the mountain.

Mark Glastetter

Comment:

The current parking facilities are often full or near full making it difficult and frustrating to find a spot if one arrives at mid-morning.

Marty Reichlin

Comment:

The ski area also needs more parking. People park in the roads. I have been trapped by other vehicles and was unable to leave when I needed to.

Group Response:

All the Action Alternatives include additional parking

Bill Preston

Washington State Department of Transportation

Comment:

The proposed action, Alternative 2, would provide parking for a total of 14,786 people. However, the expansion would allow for a total of 16,630 people. The current parking capacity accommodates 12,346 people with the facility capacity being 12,800. This means the disparity between parking capacity and expected number of users will actually increase exacerbating existing operational and safety concerns. Adequate on-site parking should be provided for the users of the existing and expanded facilities.

Danny Miller

Comment:

The other problem with adding an Internationale Lift and Pulse Gondola is it increases skier capacity by 50%, thus resulting in a parking shortage that grows from 454 to 1844 (by their own calculations). Is making almost 2000 extra people than there are parking spots for driving around this tiny community (where children live) actually an improvement? I think new lifts shouldn't be considered until parking is addressed.

Group Response:

Section 1.1.2.3 - Purpose and Need discusses the need for action, which includes improved circulation and dispersal, consolidation of Summit East with Summit West and Summit Central, balanced capacities, year round recreation for site visitors, and watershed restoration. Note that the purpose and need does not include an increase in capacity.

By addressing these needs, the Action Alternatives include improvements that also would increase capacity. Under Modified Alternative 5 (see Section 2.3.6 - Alternative 5 - Mitigated Proposed Action), approximately 9.8 additional acres of parking would be created at The Summit, and a designated drop off area would be developed at Alpental in front of the proposed visitor service building (see Section 2.3.6.4 - Parking). However, stormwater management proposals (discussed in Appendix G – Conceptual Stormwater Management Plan) would help to maximize existing parking opportunities at Alpental without expanding existing lots. The DEIS and FEIS acknowledge that parking at Alpental would continue to be less than the capacity of the lift and trail network, requiring some Alpental guests to use the shuttle to access the facilities at Alpental.

The FEIS has been updated to include discussion about expansion of parking lot 6 at Alpentel (Appendix A – Alternatives Considered and Modifications to The Summit-at-Snoqualmie MDP, Section 1.2 – Modifications to the Proposed Action). In the 1998 MDP lot 6 was originally proposed to be expanded to the north. Due to the confined nature of the Alpentel Valley and concerns over proximity to Riparian Reserves, the USFS determined that expansion of parking lot 6 was not feasible. As a result, none of the Action Alternatives include expansion of parking at Alpentel. The FEIS has been updated to better describe of the effect of insufficient parking at Alpentel on the recreation experience (see Section 3.11 - Recreation and Section 4.11 - Recreation).

Charlie Cornish

Comment:

The attached document maps Hyak Final Planned Unit Development (HyakAmendedFinalPUD006.pdf) and Hyak Estates (HyakEstatesMap004.pdf) show plans filed with Kittitas County for the Hyak Planned Unit Development. If developed, the Hyak PUD would eliminate most of Parking Lot 1 for parking, eliminate existing cross country trails and teaching area near the Hyak (Old Milwaukee) Lodge, encroach in downhill runs, and severely restrict ability to expand or renovate base operations at Hyak. In building a mountain top restaurant atop Hyak would be an unrewarded effort.

How Boothcreek does plan to secure long-term access parcels at Hyak? Do they plan to buy them?

Charlie Cornish

Comment:

At Summit East, Ski Lifts, Inc. only owns Lot 2 outright. It only owns a portion of Lot 1 down the middle, which is reserved as a right-of-way to existing condos and permitted commercial and residential developments that included portions of Lot 2. Parts of Lot 1 are committed to long-term parking leases for the Sundowner and Sundance condos. Ski Lifts Inc. does not own Lot 3, which is permitted for commercial development. See document, Stewart Title Map, (HyakTitleMap003.pdf) showing the complex ownership of Lot 1.

At Silver Fir, Lots 2a, 3a, and 4a, located on the former Lower Nordic Trail System, lie on roads and parcels previously designated for residential development. At Summit West, Lot 4 is commercially zoned land not owned by Ski Lifts Inc. and could be sold and developed. Unless Ski Lifts, Inc. guarantees the designated land use of these lots for parking for the duration of the proposed development, a considerable shortfall in parking will result.

Can and will Boothcreek guarantee all proposed parking areas are available for the lift time of the MDP? Will the USFS hold Boothcreek accountable in meeting their parking commitments?

Group Response:

Agreements between the ski resort operator and other private individuals on properties located outside

of NFSL are outside the scope of this NEPA analysis. The MDP submittal in 1998 included these parking areas as a component of the existing and proposed facilities. For purposes of this analysis, the parking at Summit East is considered an existing condition.

80.0 – UTILITIES COMMENTS

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

There will be considerable construction of pipes for water, sewer and electricity under the proposed MDP. 2,400' of new water and sewer line would be built to a new Mt Hyak restaurant. 2,300' of new water sewer line installed at Summit West. More than a mile of new water, sewer and power lines will be required for the proposed Denny Mtn restaurant, with the upper 2,900' in aboveground "utilidor". (DEIS 4-456) The construction of these facilities and the retention of the above ground facilities in upper slopes is not inconsequential as implied in the DEIS. Once again, mitigation is inadequate or non-existent.

Response:

The Pulse Gondola and mountain-top restaurant at Alpentel are not included in FEIS Alternative 3 to address these and other issues. Water and sewer lines to the Summit East restaurant and Summit West have been designed to utilize existing access points and areas previously cleared and/or graded. Installation of all subsurface utilities would be in accordance with the Other Management Provisions outlined in Table 2.4-2. Any disturbance in these utility corridors will be temporary and expected to have no negative impact.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The ski area estimates 0.96 lbs of solid waste is generated per skier, totaling about 470,000 lbs per year, and increasing to 608,000 lbs in year ten. (DEIS 4-459) This is trucked to a landfill near Ellensburg. (DEIS 3-235) A recycling program started in 2003 reduced solid waste by 12%. However, there is no mention of increasing recycling goals. This should be a condition of the MDP.

Response:

The development and implementation of recycling programs are an operational issue not covered under the MDP, which specifically addresses facility issues.

Gwen Clear
WA Department of Ecology

Comment:

Snoqualmie Pass Utility District (SPUD), which provides wastewater treatment for the ski area, has a permitted 'maximum month' capacity of 0.368 MGD based on their 2002 Facility Plan. As a first estimation, it appears that the treatment plant will not have the capacity to treat the increased flows. At a minimum the EIS should estimate the quantity of wastewater what will be generated by the expansion of ski operations and evaluate the ability of the existing treatment works to provide treatment for the increased volumes of wastewater.

Response:

The FEIS has been updated to include an estimate of additional wastewater generation by alternative (see Section 4.13 - Utilities). The SPUD treatment facility has a design capacity of 368,000 gallons/day. SPUD has indicated that the facility is operating significantly below capacity, and has ample capacity to accommodate the increase in demand. Project level approval would be required for implementation of individual projects and would be subject to available treatment capacity at SPUD.

Heidi Elvestrom

Comment:

If Booth Creek puts this gondola in, how are they going to manage the restaurant waste?

Response:

The Pulse Gondola and Alpentel mountain-top restaurant are not included in FEIS Alternative 3 to address this and other issues (see Section 1.5 - Scoping, Significant Issues, and Public Participation).

John Chapman

Comment:

The maps/figures in the master plan of Summit East indicate the existence of a paved road running parallel to and in between Keechelus Drive and Hyak Drive East. There is no road in this location, and there can never be a road in that location. What exists there is a drainage and utility easement, and details can be found in the Kittitas County Plat Description for "Hyak Estates No. 3"

Response:

The FEIS has been updated to reflect no paved road in this location.

85.0 – NOISE COMMENTS

John Chapman

Comment:

The maps/figures of Summit East have some errors. Specifically, there are several residential structures that exist on Keechelus Drive, just across the street from the lower Summit East Parking Lot #2. This is important, because the many of the plan alternatives will significantly increase the utilization of Summit East and its parking lots. Because of the adjacency of the parking lots to existing residences, the owner of the Summit at Snoqualmie needs to be required to avoid excessive noise creation after-hours in their Operations and Maintenance Plan. This could be easily accomplished by not using equipment with back-up warning alarms, nor high-decibel snow blowing equipment in parking lots between 11pm and 6am, or as otherwise required by county noise ordinances.

Response:

As described in Section 3.16 - Noise, the King County noise code outlines construction and equipment operation requirements, restricting exceedences of maximum permissible sound levels during construction to between 7:00 am and 10:00 pm on weekdays and between 9:00 am and 10:00 pm on weekends. Kittitas County code restricts excessive noise levels from 10:30 pm to 7:00 am. As described in Section 4.16 - Noise, implementation of the Action Alternatives would result in temporary noise increases, but no noticeable long-term increases in noise levels due to operations are expected.

90.0 – LAND USE COMMENTS

Amy Gulick

Comment:

I understand that 140 acres of old mining claims adjacent to the Alpine Lakes Wilderness are owned by the ski area. Why not donate the land and add it to the Wilderness area to offset any loss made by ski area improvements?

Response:

As described in the cumulative effects sections of Chapter 4 – Environmental Consequences in the FEIS, a reasonably foreseeable project (The Cave Ridge Land Donation) involves the donation of 138 acres of patented mining claims west of Guye Peak to the National Forest by The Summit-at-Snoqualmie. Up to 100 acres of this donation may be added to the Alpine Lakes Wilderness, and the remainder will be managed in its current unroaded condition.

Charlie Cornish

Comment:

Additionally why is the cross-country hut at Grand Junction included in the SUP if Ski Lifts Inc. has no plans to improve Nordic facilities?

Response:

As described in Chapter 2 - Alternatives, the Action Alternatives would include a non-significant Forest Plan amendment to add 53 acres to The Summit-at-Snoqualmie SUP, including 0.01 acre at the cross-country warming hut. This SUP expansion would connect Summit East and Summit Central at Hyak Creek, as well as incorporate existing recreational facilities operated by The Summit-at-Snoqualmie into the SUP, such as the warming hut and the egress area at the top of the *Silver Fir* chairlift.

Charlie Cornish

Comment:

Why should the cross-country hut a Grant Junction be included in the SUP when there are no plans to improve Nordic skiing in the DEIS? Does this that mean alpine skiers and snowboarders can then intrude on Nordic and snowshoe trails to reach the hut?

What is the reason for the purposed reallocation of 433.01 acres of WNF lands from AMA (ST-a-Scenic-Travel) to AMA (RE-1-Developed Recreation)? Is this consistent with other ski areas at White Pass, Stevens Pass, etc?

The 53 acres in the SUP adjustment and 0.01 acre near Grand Junction XC warming hut should not be included in SUP and remain Scenic Travel. Why are these changes being made?

Response:

As described in Chapter 2 - Alternatives, the Action Alternatives would include a non-significant Forest Plan amendment to add 53 acres to The Summit-at-Snoqualmie SUP, including 0.01 acre at the cross-country warming hut. This SUP expansion would connect Summit East and Summit Central at Hyak Creek, as well as incorporate existing recreational facilities operated by The Summit-at-Snoqualmie into the SUP, such as the warming hut and the egress area at the top of the *Silver Fir* chairlift.

The reallocation of 433.01 acres of OWNF land to AMA (RE-1 - Developed Recreation) is to allow for the existing and future recreational use of these areas. NEPA does not require the comparison of the Proposed Action to other similar actions (ski areas) if they are outside of the vicinity of the Study Area.

Charlie Cornish

Comment:

DEIS does not provided a detailed parcel map of property ownership. Please include one, including public and private lands used by the ski area but not owned by them and what is the nature of the land use arrangement and commitment. This is particularly important with regards to parking and land use issues.

Response:

DEIS Figure 1.1.1-2, Existing Ownership and Land Allocation contained the existing public and private land ownership. Land allocation and ownership have been verified using most recent USFS and County GIS data in the FEIS. As a result of discrepancies between USFS and County data sources, the FEIS has been updated to include a new map showing private land zoning according to King and Kittitas County data (refer to Figure 1.1.1-FEIS-3, Existing Private Land Ownership and Zoning) and a new figure for NFSL allocation has been included in the FEIS (refer to Figure 1.1.1-FEIS-2, Existing NFSL Allocation). The land use agreement between private parties is outside the scope of this analysis.

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

While the MDP is estimated to last around 10 years, I have not found a time frame for the SUP. What date does it expire?

Response:

The permit terminates in 2032. [Since preparation of this response, a new SUP has been issued by the USFS to the new owner. The SUP now expires in 2046.]

Charlie Raines

Sierra Club - Cascade Chapter

Comment:

The title and frequent description of Alternative 4 says no development in section 16. I presume you mean no new development, as there are numerous ski runs and roads in that section, that appear to be retained as part of the proposal under this alternative. Beyond that, however, there appears on map 2.3.5-1 some new roads or other grading in the SE quarter of section 16. There is also additional clearing and lift construction in the north half of section 16 (Summit Central). These don't seem consistent with the title and description.

Response:

You are correct, it means no new development. The development in the SE quarter of Section 16 is installing utility lines (power, water, etc.) to access the restaurant and chairlift that would be developed on the private land in section 21. We considered the work in the north half of the section to be outside the suitable habitat that is driving this alternative. In the Final, some additional language will need to be developed to better clarify the intent.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

As I previously asked Dan, the Booth Creek land ownership in section 28 (Alpental) and section 5 (near Beaver Lake) do not appear to match county assessor's maps.

Response:

The ownership shown on the maps comes from FS records. We struggled with the County records and had similar problems as you are describing. However, our records indicate the National Forest ownership is as it is shown in the DEIS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There seems to be significant error in the Wildlife Resources Report (appendix D). In its description of section 10, it states, "The Snoqualmie Pass Advisory Council plan foresees considerable development in this area, especially in section 10 where a golf course, residential development and community facilities are envisioned." (p20) Since section 10 is national forest land and within SPAMA, I don't believe that there is any development planned in that section. As a matter of fact the Cle Elum RD is planning on removing roads in that section. Is there some new information that I am not aware of? On the next page it suggests that a large corridor along the creek is planned, though the advisory committee has no legal authority. Recent activity indicates major development is being planned for the creek. At the same time, considerable public and private funds are being targeted towards acquiring habitat there. The report seems out of date and ill-informed about the complex nature of development in this area.

Response:

The section 10 statement is a typo. It should be Section 15. At the time the report was written, the landowner had indicated the desire to have a corridor along the corridor. This section will be updated for the FEIS. In developing cumulative effects, no assumptions were made on the corridor existing. Development for housing, condos and retail were anticipated.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The existing SUP includes about 140 acres of forest on the slopes of Mt. Catherine, which is an uninventoried roadless area of about 1,100 acres. The DEIS provides little information on the resources there and non on potential uses or impacts to this parcel. It should be given formal protection, with no developments allowed.

Response:

The Action Alternatives include no proposals to develop or make changes to this portion of the SUP. Therefore, it is not further analyzed in the FEIS.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Would the land in section 21 that would be donated to the FS in alternatives #3 and #5, be included in the SUP? What Forest Plan allocation would it have?

Response:

The land donated to the Forest Service would not be in the SUP and it would be allocated as AMA to be managed for Late Successional Habitat. (Page 2-53, 1st partial paragraph and Figure 1.1.2-3)

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

There appear to be attempts to minimize the value of the Hyak Creek corridor by erroneously suggesting that there will be development in section 10, creating a blockage. (Appendix D, p20)

Response:

The discussion of development in Section 10 in Appendix D – Wildlife Resources Report of the DEIS was in error, the area in question should be Section 15. This error has been corrected in the FEIS, as there are no plans to develop Section 10.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The isolated parcel of SUP SW of Mill Creek should be deleted from the SUP. There are no current development plans (email; Larry Donovan 1-20-06). Similarly, the eastern portion of the SUP in

section 22 should be deleted from the SUP. Protection of the roadless areas around Source Lake should be enhanced by deleting some of the remote lands from the SUP.

Response:

The non-significant Forest Plan amendment to modify the SUP area is meant to incorporate Hyak Creek into the SUP area in order to remove the administrative and operational boundary between Summit East and Summit Central (see Section 1.1.2 – Purpose and Need for the Proposed Action). Other modifications to the SUP area are a permitting issue, and are outside the decision space of this FEIS.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

Section 2.3.4 Alternative 3 identifies a proposed land donation of 390 acres to offset impacts of 397.01 acres that would change from a Forest Service designation of "Scenic Travel" to "Developed Recreation". Due to the complexity of the proposed action and the format of the EIS, the information provided about the current habitat and functions provided by Section 16 was difficult to evaluate relative to the long-term beneficial impacts expected from the proposed land donation.

Response:

The FEIS has been clarified to better explain that the 390-acre land donation is intended to offset the development impacts in Section 16, not the reallocation.

Jen Watkins
Conservation Northwest

Comment:

As noted in the Habitat Connectivity section above, there are additional variables effecting wildlife connectivity in the Snoqualmie Pass area that are outside of the public's control and must be considered in evaluating this expansion. The ski area is only one of several developments in the vicinity. Four resort developments (748 acres) in Gold Creek and at Hyak interchange have been proposed and zoning is set. The DEIS avoids estimating those impacts, claiming uncertainty of when they will be built. However, those are foreseeable and measurable impacts that should be evaluated. It can be estimated that much of this development could occur during the ten year (or longer) life of the MDP. Recent cabin building at the pass and renewed real estate activity in Gold Creek are two examples. This analysis is critical to determining the appropriateness of the proposed action.

Response:

Section 4.6.7 – Cumulative Effects and Table 4.6.7-1 describe the impacts of a 798-acre development on private land in the Gold Creek valley that would have the "greatest potential impact on wildlife habitat connectivity in the Snoqualmie Pass area." The cumulative effects analysis in the FEIS has

been updated to include all past, present, and reasonably foreseeable projects within five years of publication.

Mark Lawler
Sierra Club

Comment:

We are very concerned about "opening up" roadless backcountry next to Denny Mountain that is currently undeveloped and is strictly out-of-bounds and out of control of the ski company. Much of the undeveloped areas around Alpentel are in fact roadless and are suitable for addition to the Alpine Lakes Wilderness. The EIS should have recognized these uninventoried roadless areas adjacent to wilderness and considered the impacts to them, including the inability to add them to wilderness if developed.

Response:

As described in Section 3.14.2.1 – Public Lands, no Inventoried Roadless Areas exist within 20 miles of the Study Area in the MBSNF, where Alpentel is located. Figure 1.1.1-FEIS-2, Existing NFSL Allocation shows the existing land allocations surrounding Alpentel as Congressionally Withdrawn - Alpine Lakes Wilderness to the west, Administratively Withdrawn - Developed Recreation to the north, Administratively Withdrawn - Special Area to the south, and Commercial Business to the east. There is no proposal to expand the SUP area at Alpentel, therefore areas that are currently out-of-bounds will continue to be considered out-of-bounds and will not be managed by The Summit-at-Snoqualmie. The inventory of uninventoried roadless areas outside the Study Area, or their consideration for wilderness eligibility, is outside the scope of this NEPA analysis.

Nancy Keith
Mountains to Sound Greenway

Comment:

Information in the DEIS does not adequately help us weigh the trade-offs between recreation and wildlife habitat. We note that the Snoqualmie Pass Adaptive Management Area Plan identified Section 16 as one of three "connectivity emphasis areas at the summit" but we do not find resulting criteria or standards applied to the proposed MDP.

Response:

As described in the ROD for the Snoqualmie Pass Adaptive Management Area Plan, new recreation uses or facilities within CEAs are allowed if they are "neutral or beneficial to late-successional habitat." Alternative 3 and Modified Alternative 5 mitigate for the developments in Section 16 by donating 390 acres of private land in the Mill Creek watershed to the National Forest to be managed as LSR (see DEIS footnote 19 or FEIS footnote 25 in Section 2.3.4 – Alternative 3 – Reduced Section 16 Development).

Table 2.7-2 summarizes the environmental consequences of each alternative, including impacts to habitat connectivity and habitat types as well as recreation. Table 2.7-1 summarizes the recreation facilities by alternative.

Paul Balle
I-90 Wildlife Bridges Coalition

Comment:

The cutting of the late-successional forest in the Hyak Creek corridor and the grading of riparian habitat for parking does not appear to meet the requirements of the SPAMA.

Response:

As described in Chapter 2 - Alternatives, the Action Alternatives include a Forest Plan amendment to reallocate 433.01 acres of WNF lands from AMA (ST-1 - Scenic Travel) to AMA (RE-1 - Developed Recreation). The amendment would add 53 acres to The Summit-at-Snoqualmie SUP, and provide for construction of ski area facilities. SPAMA allows for new recreation uses and facilities as long as they are "neutral or beneficial to late-successional habitat." Alternative 3 and Modified Alternative 5 mitigate for the developments in Section 16 by donating 390 acres of private land in the Mill Creek watershed to the National Forest to be managed as LSR (See FEIS Footnote 25 in Section 2.3.4 – Alternative 3 – Reduced Section 16 Development).

Richard Artley

Comment:

Since the proposed expansions will occur on 2-3 square miles of national forest land and since the ski areas are privately run, I cannot determine how they have such access to use public land for their own personal profit. Will this land be sold to the ski resort owners? Are these ski resorts running under special use permit? Either way, it seems to me like the people's land is being used to provide financial profit for a few, at the ecological expense of hundreds of millions of people.

Response:

The mission of the USFS is to "achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of people," which includes developed recreation such as alpine ski areas. Section 2343 of the Forest Service Manual recognizes that operations, such as ski areas, will be operated by private parties, and that private parties generally operate for a profit. This developed winter recreation experience is currently being provided by Ski Lifts, Inc. at The Summit-at-Snoqualmie under a SUP from the Forest Service. The SUP enables the USFS to offer public recreational experiences at the ski area that otherwise would not be possible.

William Vogel
Washington Chapter of the Wildlife Society

Comment:

Three key issues were identified in the SPAMA as critical for resolution to ensure connectivity for organisms along this portion of the Cascade Crest. The first issue eliminates the checkerboard ownership pattern through land exchanges and other means if possible. The Interstate-90 Land Exchange Act of 1998, as amended (105 Pub. L. 277; 106 Pub. L. 113), served as the catalyst to start the process and many sections have been transferred to Forest Service ownership, thereby allowing the consistent management of the LSR lands through the Central Cascades. The second issue is the I-90 highway corridor and the inability of organisms to cross this highway without potentially deadly consequences for both animals and people. The I-90 DEIS produced by the Washington Department of Transportation is attempting to resolve the issue of highway permeability for species, and hopefully an alternative will be selected that will provide a high level of movement by organisms across the highway. The third issue is connectivity at Snoqualmie Pass. Since this area was determined by a wide range of scientists to contain unique and rare assemblages of species, it is especially critical to provide for connectivity in the only location along the crest where a low elevation pass exists and meta-population functions have already been identified as critical. This was further emphasized in the SPAMA, providing the direction that management of the ski area and its infrastructure needed to ensure compliance with Forest Service plans.

Response:

FEIS Section 4.6.9 – Adaptive Management Area Standards and Guidelines outlines the Snoqualmie Pass Adaptive Management Area as it relates to The Summit-at-Snoqualmie. Table 4.6.2-1 summarizes the components and effects of the Action Alternatives in relation to the AMA/LSR Standards and Guidelines that are relevant to wildlife and vegetation.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The MDP offers no improvements to the habitat in this area. Even the proposed management allocation does not provide sufficient protection from future development as evidenced by the current proposal in Hyak Creek, which is designated AMA/CEA. The proposed plan would redesignate lands from ST1 (scenic travel) to RE-1 (developed recreation), including the Hyak wildlife corridor. This is the wrong direction. At the same time, there is no effort to redesignate other lands around the Pass to emphasize protection of natural habitat. The forest area around Hyak Creek and Hyak Lake should be given a stronger protective designation, such as RE3 (unroaded recreation, non-motorized) with allowances for the existing powerline and trails. National forest lands surrounding the pass should be redesignated RE3 to assure that habitat will be protected.

Eng Ron
The Mountaineers*Comment:*

We oppose changing the Forest Plan designation of the Hyak Creek forest from ST-1 (scenic travel) to RE-1 (developed recreation). Even if new development in section 16 is not included in this particular master development plan, such a change in designation will make it easier to develop in the future when our concerns will almost certainly remain the same. In the highly unlikely event that enough other improvements are made to support wildlife and non-motorized recreation along the I-90 corridor to warrant allowing expansion of the ski area into the Hyak forest, which would be the time to change the designation, not now when the connection is so fragile. We therefore support either keeping the designation as ST-1 or changing some or all of it to RE-3 (unroaded, non-motorized).

Group Response:

As described in FEIS Section 1.1.2.3 - Purpose and Need, the purpose of the reallocation is to ensure that the allocation of the 380 acres is consistent with the current use (i.e., Silver Fir pod and crossover trails) and their existence within the SUP area. The reallocation does not facilitate any development proposal. Any current or future proposal for development in Section 16 would require analysis under NEPA, which includes the development of alternatives that address significant issues. In this NEPA analysis, significant issues are described in FEIS Section 1.5.2 - Significant Issues. Several of the alternatives in this NEPA analysis provide for reduced or no development in Section 16. For example, FEIS Section 2.3.4 - Alternative 3 - Reduced Section 16 Development states that "Alternative 3 represents reduced development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." In addition, FEIS Section 2.3.5 - Alternative 4 - No Section 16 Development states that "Alternative 4 represents no new development in Section 16 and addresses concerns to late-successional habitat and wildlife connectivity..." Finally, FEIS Section 2.3.6 - Alternative 5 - Mitigated Proposed Action states that Modified Alternative 5 represents a reduced version of the Proposed Action and addresses concerns to late-successional habitat and wildlife connectivity.

100.0 – CUMULATIVE EFFECTS COMMENTS**Charlie Raines**
Sierra Club - Cascade Chapter*Comment:*

There is a significant error in the Wildlife Resources Report (appendix D). In its description of section 10, which is national forest land, it states, "The Snoqualmie Pass Advisory Council plan foresees considerable development in this area, especially in section 10 where a golf course, residential development and community facilities are envisioned." (p20) Larry Donovan confirmed that this was a typo in the DEIS, and it should be referring to Section 15. (Larry Donovan email, 1-

26-05). But then, on the next page it suggests that a large corridor along the creek is planned, though the advisory committee has no legal authority. Recent activity indicates major development is being planned for the creek. At the same time, considerable public and private funds are being targeted towards acquiring habitat there. The report seems out of date and ill-informed about the complex nature of development in this area.

Response:

The FEIS Appendix D - Wildlife Resources Report has been corrected to indicate that Section 15 is considered for the development that was erroneously attributed to Section 10 in the DEIS. While the technical report provides information regarding potential development in Section 15 and retention of a corridor along the creek, the cumulative effects analysis in the EIS does not consider the corridor because no formal proposal has been made, and the corridor is not reasonably foreseeable (see, for example, Table 4.3.8-1 and Table 4.13.6-1).

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The evaluation of roads is only for that portion of the Coal Creek and South Snoqualmie watersheds considered in the study area, leaving out substantial roads immediately adjacent to the SUP. This underestimates the impacts, as much of the adjacent land is heavily developed and more is expected.

Response:

As described in FEIS Section 3.12.1 - Introduction, the analysis of transportation impacts describes traffic, parking and transit conditions in the Study Area along the major transportation routes to The Summit-at-Snoqualmie. The Study Area includes I-90, SR 906, Alpental Road, and interchanges 52, 53, and 54 along I-90. Section 4.16.5 – Cumulative Effects, the cumulative effects analysis in the transportation section, analyzes the combined impact of the Proposed Action and past, present, and reasonably foreseeable projects in the vicinity of The Summit-at-Snoqualmie.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Cumulative effects of this and other ski area expansions in the central Cascades is significant, but totally ignored in the DEIS. Increases in snowmobile use in central Cascades in the past 20 years have displaced backcountry skiers and snowshoers. Similarly, past ski area expansions near White Pass, Stevens Pass, and Crystal Mountain have displaced backcountry skiers and snowshoers from areas they used to enjoy. Conversion of formerly free, undeveloped backcountry ski and snowshoe areas to groomed, fee routes at many Washington ski areas has also created cumulative impacts to the undeveloped, backcountry forms of recreation.

The Forest Service cannot allow, on the one hand, ski area expansion to be justified on the basis of its economic value in a larger regional or statewide context, while on the other hand not account for the regional or statewide cumulative environmental impacts of ski area expansion.

Response:

USDA Forest Service correspondence dated December 3, 2001, File Code 1950/2700, states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". As summarized in the memo: "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand... Finally, the cumulative impacts of ski area expansion cannot be appropriately addressed through a Programmatic Environmental Impact Statement (PEIS). The appropriate scale for cumulative effects analysis is dependent on the type of effects of concern associated with the proposed actions rather than the similarity of the actions and is best addressed when a specific proposal is made."

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The proposal is a ten year master plan, but the document does not state how long the underlying special use permit is valid. Actually, it is until 2032. (Larry Donovan 1-22-06) Since it is beyond the time frame of this master plan, the EIS needs to identify what types of developments are expected during that additional period. Booth Creek should divulge any long term interest in additional lands or facilities. While they have wisely dropped plans for Lodge Lake, Mt. Catherine and Radio Mtn. for this MDP, this is only for ten years. What will happen then? Are current decisions on land use and facilities a precursor to future expansion? If so, that must be divulged in the EIS. The FS cannot profess ignorance if it has not even asked the question. While such expansion would be the subject of further review, at least approval of changes proposed today should be encumbered with binding statements that this decision provides no right or expectation for additional terrain or facilities.

If the proposed projects are not built in ten years, will another MDP be needed to maintain their viability? What environmental review would be necessary? How would new cumulative effects be considered?

Response:

The SUP was recently renewed by the USFS, and now expires in 2046. The FEIS has been updated to reflect this change (FEIS Section 1.1.1 - Background).

As described in Section 1.1.2 – Purpose and Need for the Proposed Action, the purpose of the proposal is to update The Summit-at-Snoqualmie's MDP for the long-range (10-15 years) management and development of the ski area. As described in Section 1.1 - Introduction, this FEIS is designed to inform the public of the Proposed Action and alternatives, disclose the direct, indirect and cumulative environmental effects of the alternatives, indicate any irreversible commitment of

resources that would result from the alternatives, and determine if the MBSNF and WNF Forest Plans should be amended to add 53 acres to the SUP. The cumulative impacts analysis included in the FEIS considers past, present and reasonably foreseeable projects that have or will occur within five years of publication of this FEIS. For these reasons, the analysis of developments or planned expansions not included in the Action Alternatives or reasonably foreseeable projects in the vicinity of The Summit-at-Snoqualmie is outside the scope of this FEIS.

The MDP analyzed in the FEIS would govern development of the ski resort for the next 10-15 years, but would not expire. Any additional expansions or facility improvements on NFSL not approved in the ROD would require additional, separate NEPA analysis and approval at that time.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

The EIS evaluation of cumulative impacts explains that MDP impacts to watershed resources (soil and related water quality impacts from sediment) are negligible because only 0.56% of the watershed will be in a disturbed, detrimental condition, including soil disturbance of 10%, which is below the 20% threshold established for soil disturbance. Impacts are assessed as being adequately offset by the much larger amount of land to be managed to improve late successional habitat that will in turn improve the soil productivity and reduce sediment impacts to streams. (4-49).

We recommend that the cumulative impacts section contain additional detail explaining what long-term impacts to local drainages are expected as a result of the proposed action. This information is important to allow the public and subsequent regulatory permitting agencies to understand whether drainages of particular concern are likely to continue to exceed identified thresholds thus serving an indication of impacts to resources (water, wildlife, etc.).

Response:

The DEIS contained a discussion of the impacts to drainages of particular concern (DPC) in Sections 4.2.2 – Impacts – Alternative 1 (No Action Alternative) through 4.2.6 – Impacts – Modified Alternative 5. Additionally, Appendix I – Physical and Biological Resource Data Tables contained full versions of the tables used to generate the DPC analysis. The FEIS has been updated to include a table in Appendix I that identifies threshold values and the reasoning for selecting those thresholds. This analysis has been carried forward into the FEIS. The cumulative effect analysis, FEIS Section 4.2.7 – Cumulative Effects, did not have sufficient information to determine DPCs that would be impacted. The basis of the cumulative effect analysis to gain understanding of potential effects of multiple projects across a larger landscape. For this analysis, cumulative effects were evaluated for projects overlapping in space and time at the site and 5th field watershed scales. Furthermore, a majority of the projects identified in Tables 4.2.7-1 and 4.2.7-3 occur outside of the Study Area and are therefore not included in the DPC designations, which are only made for the Study Area.

Christine B. Reichgott
U.S. Environmental Protection Agency; Region 10

Comment:

We recommend that the final EIS or ROD provide a summary that better explains the key changes from the proposed action as it relates to significant issues identified in Section 1.5.2, in particular riparian reserves, old-growth and mature forest, wetlands, and water quality. For example, Section 3.0 identifies existing mature forest supporting wildlife and providing important habitat connectivity. Under alternative 5, there are 35 acres of mature forest identified as being impacted (Section 4.0 vegetation and wildlife sections). The cumulative impacts discussion concludes that there will be a net beneficial impact from the proposed project in the long-term because of the proposed land donation. Since the proposed land donation is in sapling stage, the "short-term" impacts to mature forest at the local project level will persist over several decades, when habitat connectivity will be impacted for that period of time for species dependent on mature forest in the area. Please add a section to the cumulative impacts discussion explaining the extent of temporal impacts associated with the impacts to mature forest and its habitat and the length of time it will take for the donated land to replace those habitat functions.

Response:

The FEIS has been updated to indicate the land donation includes approximately 45 acres of existing mature forest and 345 acres of existing immature forest (see FEIS Section 4.6.4.2 – Habitat Connectivity). As such, Alternative 3 and Modified Alternative 5 would result in a net gain of mature forest considering that the donated acreage of mature forest is greater than the mature forest impacted under these alternatives. Additionally, the FEIS has been updated to indicate that over the life of the Northwest Forest Plan and SPAMA, the amount of LSH in the Snoqualmie Pass vicinity would increase as a result of the maturation of the donated immature forest and other land trades in the area. These land exchanges are contained in the cumulative effect discussions (see Section 4.6.7 – Cumulative Effects).

Charlie Cornish

Comment:

The MDP needs to consider land use patterns and growth in the Snoqualmie Pass area. Ongoing residential construction in Alpental, the Summit, Yellowstone Road area, Central and Hyak will add demands for road access and parking. The attached map, Snoqualmie Pass Recreation Area, (SnoqPassRecMap010.pdf) gives an overview of current and planned developments. The planned Ski Acres Estates and Snoqualmie Summit Village developments as well as the former lower Nordic Trail system are on Boothcreek land and available for possible development. What are Boothcreek's plans for these projects? If developed, how will traffic, parking, snow removal, water and sewage, stream flow, etc be affected?

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS must evaluate the cumulative effects of related developments in the vicinity (e.g., Alpentel, Gold Creek), and whether the new SUP facilities would encourage such developments. The ski area is only one of several developments in the vicinity. Four resort developments (748 acres) in Gold Creek and at Hyak interchange have been proposed and zoning is set. The DEIS avoids estimating those impacts, claiming uncertainty of when they will be built. However, those are foreseeable and measurable impacts that should be evaluated. It is probable that much of that buildout will happen during the ten year (or longer) life of the MDP. Recent cabin building at the pass and renewed real estate activity in Gold Creek are two examples.

Donald Parks
Alpine Lakes Protection Society

Comment:

The DEIS failed to adequately consider cumulative effects of reasonably foreseeable actions in the vicinity. Despite the permitting and construction activity, the DEIS ignores this with the excuse that they are uncertain. If anything is certain, it is more development in upper Kittitas Country on private lands. However, the DEIS uses even more uncertain mitigation and conservation efforts as a basis to allow additional impacts to important natural and recreational resources.

Group Response:

The DEIS and FEIS include analysis of cumulative impacts of past, present and reasonably foreseeable projects within five years of publication. One project considered in the cumulative effects analysis in the DEIS and FEIS, "Private Land Developments", includes the development of four Planned Unit Developments in the vicinity of The Summit-at-Snoqualmie: Hyak Estates, Ski Acres Estates, Chikamin Vista/Gold Creek Valley, and Mountain Grandeur 1 and 2 (see, for example, Table 4.3.8-1 and Table 4.13.6-1). Additionally, the FEIS cumulative effects sections in Chapter 4 – Environmental Consequences have been updated to reflect changes in current projects and to include new reasonably foreseeable projects.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

SPUD current sewage capacity is 368,000 gpd, and a current average daily flow of 188,000 gpd. (DEIS 3-233) The DEIS does not indicate what the peak flow is, though the nature of the ski area generates very high peaks on weekend afternoons. The DEIS acknowledges that new spray fields may be needed for sewage - depending on the rate of buildout of 4 planned unit developments (798 acres)

in the service area. (DEIS 4-462,3) Since this expansion of the spray fields will likely be on national forest lands, what is the impact on wildlife and recreation?

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The combination of expanded ski area capacity and other development will require expansion of sewage spraying. This would likely occur on national forest lands. However, the DEIS does not evaluate these indirect and cumulative impacts.

Group Response:

As described in FEIS Section 3.13.2 – Existing Conditions, SPUD has indicated that the wastewater treatment facility has ample capacity to accommodate The Summit-at-Snoqualmie expansion. Section 4.13.6 – Cumulative Effects notes that SPUD has proposed additional spray fields/reservoirs to accommodate higher daily flows as demand increases in the service area, but no formal proposals for expansion or addition to the wastewater treatment system have occurred as of publication of the FEIS.

Because there is no formal proposal, the project is not included as a cumulative effect, and therefore is not analyzed for effects to wildlife or recreation.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

Currently, Coal Creek runs under I-90 in a large culvert that provides some crossing opportunity for smaller animals. A WSDOT biologist has said this is a good location for crossing (Paul Wagner, pers. comm. 2005), and the agency explored designs for an overpass.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The Summit, through their website and mailings, is publicly pushing for Alternative #2. In recent presentations, ski area representatives have reiterated their desires to add facilities on Mt. Catherine, in Lodge Lake basin and other locations. Thus, the FS has not considered cumulative effects of future ski area development during the life of the permit (until 2032). Such development would counter and likely render ineffectual any mitigation efforts the Forest Service is relying on to provide for LSH and wildlife connectivity. In order to reduce the likelihood of this, the land allocations in the surrounding forests must be changed to strengthen the protection of LSH and habitat connectivity.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS did not even mention the pending permit for vegetation management on the Puget Sound Energy powerline through the SUP.

Charlie Raines
Sierra Club - Cascade Chapter

Comment:

The DEIS failed to adequately consider cumulative effects of reasonably foreseeable actions in the vicinity. Despite the substantial permitting and construction activity in the vicinity of the SUP, the DEIS ignores this with the excuse that they are uncertain. However, it uses even more uncertain mitigation and conservation efforts as a basis to allow additional impacts to important natural and recreational resources.

Group Response:

The cumulative impacts analysis contained in the DEIS and FEIS considers past, present and reasonably foreseeable projects occurring within five years of publication. The FEIS cumulative effects sections in Chapter 4 – Environmental Consequences have been updated to reflect changes in current projects and to include new reasonably foreseeable projects.

3.0 Letters from Indian Tribes and Government Agencies

This section contains comment letters regarding the Summit-at-Snoqualmie MDP Proposal DEIS received by the USFS from other government agencies and Indian Tribes.

e

01.0 - NEUTRAL

BG.

#1005

February 17, 2006

Attention: Y. ROBERT IWAMOTO, Forest Supervisor
Larry Donovan, Team Leader
Mt. Baker-Snoqualmie National Forest, 21905 64th Ave. W.,
Mountlake Terrace, WA 98043-2278

Dear Mr. Iwamoto,

I am writing on behalf of the Environmental and Natural Resources [ENR] Department of the Snoqualmie Tribe. The ENR Department is supportive of restoration, but is also concerned about other activities of the project proposal that would have an impact on natural resources in this area, both project impacts, as well as cumulative impacts with other activities in this region. This is of special concern given the project proposal's suggestion to reclassify land use from Scenic Travel to Developed Recreation.

[There needs to be full government-to-government consultation with the Tribe to comply with federal laws and Executive Orders on this proposed project. Until such an ongoing dialog is engendered, further action within the proposed project area or activities relating to the proposed project, including development and reclassification to recreational areas, is inappropriate and without consultation would be unlawful.

At this time, the ENR Department requests that consultation be established to create a dialog and to afford an opportunity for review and discussion of issues and alternatives relating to the proposed project. The ENR Department reserves the right to comment further on this proposed project.]

} N-05.3

I look forward to the possibility of discussing this in more detail with you.

Sincerely,

Ian Kanair
Environmental and Natural Resources Department Director
Snoqualmie Tribe
P.O. Box 280
Carnation, WA 98014

0/0-Neutral

#0130



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

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January 10, 2006

Mr. Larry Donovan
Mt. Baker-Snoqualmie National Forest
21905 64th Avenue West
Mountlake Terrace, Washington 98043-2278

Re: Summit at Snoqualmie Project
Log No: 011006-03-USFS-MBS

Dear Mr. Donovan:

Thank you for contacting our department. We have reviewed the materials you provided for the Draft Environmental Impact Statement (DEIS) for the proposed Summit at Snoqualmie Master Plan in King and Kittitas County, Washington. While the DEIS provides summary findings we look forward to your Section 106 consultation on the documentation on the Area of Potential Effect (APE), and the subsequent results of the inventory efforts, Determination of Eligibility and Finding of Effect.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.). Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov



01.0-Neutral #10976 ✓



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

BC

IN REPLY REFER TO
ER06/12

Electronically Filed

January 31, 2005

Larry Donovan
Team Leader
Mt. Baker – Snoqualmie National Forest
21905 64th Ave. W.
Mountlake Terrace, WA 98043

Dear Mr. Donovan:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for The Summit at Snoqualmie Master Development Plan Proposal, Mt. Baker-Snoqualmie/Okanogan-Wenatchee National Forests, King County, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeper
Regional Environmental Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

B

#1109

same as #1024 -
use this for codes

February 21, 2006

Reply To
Attn Of: ETPA-088

Ref: 99-004-AFS

Larry Donovan
Mt. Baker-Snoqualmie National Forest
21905 64th Avenue West
Mountlake Terrace, WA 98043

01.0 - NEUTRAL

Dear Mr. Donovan:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for **The Summit at Snoqualmie Master Development Plan (MPD), Proposal to Ensure Long-Term Economic Viability, Mt. Baker-Snoqualmie / Okanogan / Wenatchee National Forests, King County, WA** (CEQ No. 20050534) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA disclosure requirements.

The draft EIS analyzes five (5) alternatives, including the no action alternative. Alternative 5, identified as the Preferred Alternative, is a mitigated version of Alternative 2 that seeks to reduce impacts to Section 16^a, Riparian Reserves, late-successional reserve habitat, and wildlife connectivity. Under Alternative 5, The Summit at Snoqualmie would operate 31 chairlifts on approximately 810 acres of formal ski terrain. The Comfortable Carrying Capacity (CCC) would increase from 9,800 to 13,630 for an increase of approximately 39%, or 3,830 skiers. Similar to Alternative 3, the preferred alternative also includes a land donation of 390 acres in the Mill Creek watershed to offset development impacts to Section 16.

EPA has reviewed the EIS and rated the preferred alternative EC-2 (Environmental Concerns - Insufficient Information). We are concerned about potential water quality and other resource impacts at the local (7th field) drainage level. We recommend that objectives should be specified for the planned watershed restoration that will improve conditions in the local drainages where impacts would be most significant. Our concerns can be addressed in the final EIS and ROD by providing additional detail about implementation of the preferred alternative. EPA's comments are organized under the following headings:

- Provide Additional Rationale for CCC Increase
- Summarize Resource Impacts and Land Donation at Project Area Level
- Clarify Baseline Water Quality Impacts

^a Impacts to Section 16 occur from existing and proposed ski development at Summit East. Alternative 5 includes a land donation of 390 acres adjacent to Summit East to offset impacts. (see EIS, Section 2.3.4, and Figure 1.1.2-3)

- Clarify Wetlands Impacts and Proposed Restoration
- Clarify Expected Long-Term Impacts to Local Drainages
- Individual Project Elements Should Be Scrutinized
- Desired Watershed Restoration Goals Should Be Stated

EPA's detailed comments are enclosed, along with an explanation of EPA's rating system. A copy of our comments will be published in the Federal Register. If you have questions or comments concerning this review, please contact Peter Contreras at (206) 553-6708 or by email at contreras.peter@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

**EPA Comments on Snoqualmie MDP
Draft Environmental Impact Statement**

EPA acknowledges and appreciates the extensive analysis undertaken for preparation of this EIS. The proposed master development plan spans a 10 to 15-year time period, encompassing three distinct phases of construction, with approval by the Forest Service of annual construction and monitoring plans throughout the life of the plan. Significant environmental impacts are evaluated across two watersheds, the Upper Yakima Watershed and the South Fork Snoqualmie River Watersheds, and several local drainages within those areas. Adding to the complexity of analysis is the presentation of several individual project elements, including 10 realigned and 14 new chair lifts, utility corridors, parking lots, and additional new amenities.

It was challenging to assess the relative significance of various environmental impacts and benefits in the context of clearly identified significant impacts to local drainages and otherwise acceptable impacts when evaluated at the larger 5th field watershed scale. EPA's comments request clarification on certain issues and encourages the Forest Service to work with the regulatory permitting agencies to closely scrutinize individual project elements when considering whether to approve those elements during the annual construction and monitoring implementation plan approval process. We also request clarification of the expected outcomes from identified restoration actions.

Provide Additional Rationale for CCC Increase

[There is limited explanation supporting the rationale for the proposed action increase of Comfortable Carrying Capacity (CCC) by 39%, although important pieces of information related to CCC are provided. The relationship of the various elements are not clear. The CCC is identified as a key element for determining the adequate capacity of individual project elements that are included in the master development plan (MDP) (e.g., parking lot capacity, utilities needs, restaurant capacity). Because the CCC is a key element of the MDP and the related resource impacts, we recommend that additional rationale be included in the EIS purpose and need section to explain the interrelationship between the CCC increase and proposed action elements.]

N-
60.4

Section 2.3.1.1 explains CCC as a concept separate from visitation, and tables (e.g., Table 2.3.3-1) show the CCC for individual project elements, both existing and proposed. The purpose and need of the project is described in terms of improving connectivity among ski areas, the need for economic viability and desired facility upgrades. It is not clear from the EIS whether the CCC is derived from the purpose and need of the project or if the level of facility expansion is based on some other analysis. We request that the EIS clarify the interrelationship between these elements. We believe this is important in order to demonstrate that those project elements that have the greatest impact on the environment are needed to fulfill the purpose and need.

Summarize Resource Impacts and Land Donation at Project Area Level

[Section 2.3.4 Alternative 3 identifies a proposed land donation of 390 acres to offset impacts of 397.01 acres that would change from a Forest Service designation of "Scenic Travel" to "Developed Recreation". Due to the complexity of the proposed action and the format of the

EIS, the information provided about the current habitat and functions provided by Section 16 was difficult to evaluate relative to the long-term beneficial impacts expected from the proposed land donation.]

N-90.2

[We recommend that the final EIS or ROD provide a summary that better explains the key changes from the proposed action as it relates to significant issues identified in Section 1.5.2, in particular riparian reserves, old-growth and mature forest, wetlands, and water quality. For example, Section 3.0 identifies existing mature forest supporting wildlife and providing important habitat connectivity. Under alternative 5, there are 35 acres of mature forest identified as being impacted (Section 4.0 vegetation and wildlife sections). The cumulative impacts discussion concludes that there will be a net beneficial impact from the proposed project in the long-term because of the proposed land donation. Since the proposed land donation is in sapling stage, the "short-term" impacts to mature forest at the local project level will persist over several decades, when habitat connectivity will be impacted for that period of time for species dependent on mature forest in the area. Please add a section to the cumulative impacts discussion explaining the extent of temporal impacts associated with the impacts to mature forest and its habitat and the length of time it will take for the donated land to replace those habitat functions.]

N-100.0

Clarify Baseline Water Quality Impacts

[In describing the proposed action (p.4-84), the EIS indicates that several streams in the Upper Yakima Watershed exceed water quality standards for turbidity, temperature and dissolved oxygen most likely because of historic development at the Summit at Snoqualmie. Impacts from Alternative 5 are assumed in the EIS to be the same as Alternative 2 (p.4-157), and the EIS states that impacts to these water quality parameters would continue to have water quality impacts. Stream channel conditions are described as expected to undergo long-term improvements (p. 4-152 and 153), but the water quality exceedances are not fully consistent with that assessment. The EIS should discuss whether planned restoration actions will address the identified surface water quality exceedances discussed at page 4-84 and 4-147. The cumulative impacts analysis should evaluate whether the proposed action (or individual elements) are likely to exacerbate surface water quality issues at the identified streams.]

N-20.2

Clarify Wetlands Impacts and Proposed Restoration

[The EIS identified two wetlands by number (207 and 142) and describes a general location for restoration as part of the proposed action. We could not locate those wetlands on the map. We recommend that the final EIS locate on a map both the wetlands proposed for restoration and those that would be impacted by the preferred alternative.]

N-20.6

EPA supports the mitigation and management measures identified in the EIS that require avoidance and minimization measures to be taken during construction (e.g., Table 2.4-1 Lift and Trail Construction Techniques). Appendix F further lays out a scheme requiring annual monitoring reports, calling for more detailed analysis to occur during the course of obtaining individual permits for each year or phase of construction.

Clarify Expected Long-Term Impacts to Local Drainages

The EIS documents significant, localized impacts that have occurred and will continue to occur at the 7th field watershed scale (section 3). At least two of the 7th field drainages exceed all

seven (7) of the selected parameters for identifying drainages of particular concern, including reduced riparian functions and impacted water quality. The rationale provided for evaluating 7th field scale drainages in the affected environment chapter is that 6th field scale does not allow existing conditions at the four different ski areas to be adequately described (See Section 3.3.2 at p. 3-72). The Forest Service also notes that the 5th field watershed scale has been designated as the appropriate scale to evaluate achievement of Aquatic Conservation Strategy Standards and Guidelines (Section 1.2.1.4, page 1-22).

[The EIS evaluation of cumulative impacts explains that MDP impacts to watershed resources (soils and related water quality impacts from sediment) are negligible because only 0.56% of the watershed will be in a disturbed, detrimental condition, including soil disturbance of 10%, which is below the 20% threshold established for soil disturbance. Impacts are assessed as being adequately offset by the much larger amount of land to be managed to improve late successional habitat that will in turn improve the soil productivity and reduce sediment impacts to streams. (4-49).

N-100.0

We recommend that the cumulative impacts section contain additional detail explaining what long-term impacts to local drainages are expected as a result of the proposed action. This information is important to allow the public and subsequent regulatory permitting agencies to understand whether drainages of particular concern are likely to continue to exceed identified thresholds thus serving an indication of impacts to resources (water, wildlife, etc.).

Individual Project Elements Should Be Scrutinized

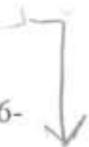
EPA strongly supports the statements in the EIS, including Section 2.6 of the EIS, that actual approval of projects on an annual basis will hinge upon review by the USFS or appropriate specialists and approval by the authorized officer, commensurate with the success of mitigation measures as determined by monitoring.

[EPA recommends that the Record of Decision (ROD) include a condition underscoring the need for watershed restoration specifically in the 7th field drainages. The ROD should emphasize that specific design elements may be reconsidered, modified, or eliminated if necessary to meet regulatory permit requirements if information is discovered during annual monitoring or further design development during various phases of construction that indicates an individual project element is not acceptable. Including such a condition will help ensure that the need for watershed restoration in the localized drainages of the study area will be properly balanced against the socioeconomic needs for the project. This also will provide appropriate context for subsequent evaluation of the detailed design construction plans that will occur over the next 10-15 years.]

N-20.1

Desired Watershed Restoration Goals Should Be Stated

We support the stated purpose and need component to “take advantages [sic] of opportunities to restore conditions in the Upper South Fork Snoqualmie River and Coal Creek watersheds” through various actions. [Appendix F, Section 5 specifies restoration projects identified as part of the proposed master development plan. Projects listed in Table 5-1 of the appendix are described as having been included in the analysis for the DEIS. It is unclear from this statement whether the summary tables for Drainages of Particular Concern (e.g., Table 4.3.6-



1) are assessed assuming that the restoration projects are implemented? Page 4-150 states "These restoration projects would help to address areas of concern identified in the DPC analysis", but it is not readily clear from the analysis whether the planned restoration is intended or expected to result in some measurable improvements (i.e., reducing one or more parameters below a threshold in a specific project area drainage). We recommend that the EIS/ROD include a requirement that measurable outcomes be targeted for the improvement of the documented impacts to local drainages.

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**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

c

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 West Yakima Avenue, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

February 10, 2006

Larry Donovan, Team Leader
Mt. Baker-Snoqualmie National Forest
21905 64th Ave. West
Mountlake Terrace, WA 98943

Dear Mr. Donovan:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for The Summit at Snoqualmie Master Development Plan. We have reviewed the documents and have the following comments.

Water Quality

[Snoqualmie Pass Utility District (SPUD), which provides wastewater treatment for the ski area, has a permitted 'maximum month' capacity of 0.368 MGD based on their 2002 Facility Plan. As a first estimation, it appears that the treatment plant will not have the capacity to treat the increased flows. At a minimum the EIS should estimate the quantity of wastewater that will be generated by the expansion of ski operations and evaluate the ability of the existing treatment works to provide treatment for the increased volumes of wastewater.]

H-80.3

If you have any questions concerning the Water Quality comments, please contact David Dunn at (509) 454-7846.

Sincerely,

Gwen Clear

Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012



01.0 - Neutral

B4

H1020

February 21, 2006

Mt. Baker-Snoqualmie National Forest
21905 64th Avenue W.
Mountlake Terrace, WA 98043-2278

Attention: Larry Donovan, Team Leader

Subject: U.S. Department of Agriculture, Forest Service
Mt. Baker-Snoqualmie National Forest; Ski Lifts, Inc.
The Summit at Snoqualmie Master Development Plan (MDP)
SR 906, MP 0.00 (I-90 Exit 52) to 2.65 (I-90 Exit 54)
I-90, Exits 52, 53, & 54 Vicinity

We have reviewed the proposed Master Development Plan (MDP) for The Summit at Snoqualmie. We are not opposed to this proposal, but we have concerns. We have the following comments.

1. The proposed project is adjacent to Interstate 90. I-90, including the ramps, is a fully-controlled limited access highway. The posted speed limit is 65 miles per hour. No direct access to I-90 will be allowed.
2. The project is adjacent to State Highway 906. SR 906 is a Class 4 access managed highway with a posted speed limit of 35 miles per hour. Generally, on-street parking has been permitted where sufficient shoulder width exists between mileposts 0.22 to 1.54. Parking is restricted from midnight to 7:00 AM to accommodate snow removal in this segment. Otherwise, parking is prohibited along SR 906. 75.1-N
3. Stormwater and surface runoff generated by this project must be retained and treated on site in accordance with regulating agencies' standards, and not be allowed to flow onto WSDOT rights-of-way. N-20.5
4. Any utility line that crosses WSDOT rights-of-way requires a crossing permit. The proponent should contact the South Central Region Utilities Engineer, Jamil Anabtawi, to coordinate any work and obtain the crossing permit(s). He can be reached at (509) 577-1785. No open cutting of the highway will be allowed to cross the highway. Any utility line crossing the highway will need to be done by jacking and/or boring underneath it.
5. Any proposed lighting should be directed down towards the site, and away from I-90. 65.4-N
6. The accident information in the DEIS should be updated. The text mentions the most recent accident report is from 1996. Current accident information from 1999 through 2005 is available. 75.1 N
7. The DEIS Transportation section indicates no data was found for pedestrian/vehicular incidents on SR 906. There have been two accidents involving pedestrians and vehicles since 2000. 75.1-N

Mr. Larry Donovan – The Summit at Snoqualmie Master Development Plan
February 21, 2006
Page 2

8. WSDOT employee Joe St. Charles is misidentified as Joe St. Claire in Section 3.12 (Transportation) and Chapter 5 (References).

N
02.1

9. The proposed action, Alternative 2, would provide parking for a total of 14,786 people. However, the expansion would allow for a total of 16,630 people. The current parking capacity accommodates 12,346 people with the facility capacity being 12,800. This means the disparity between parking capacity and expected number of users will actually increase exacerbating existing operational and safety concerns. Adequate on-site parking should be provided for the users of the existing and expanded facilities.

75.3-N

10. As a condition of development approval, we request the proponent develop a Traffic Management Plan (TMP) in conjunction with the WSDOT to mitigate their impacts by the proposed expansion. This plan will be reviewed and approved by WSDOT, and required to be implemented as part of the development. As these impacts are created by the development, the proponent is responsible to fund the necessary improvements. The initial meeting needs to be prior to May 1, 2006. The TMP, at a minimum, is required to address the operational and safety conditions identified below:

- Address traffic congestion created at peak times at the I-90 interchanges.
- Pedestrian safety in general, and at identified pedestrian crossings. For example, the additional parking at Silver Fir (SR 906 milepost 1.90 Left) will significantly increase the usage of this pedestrian crossing. As a result, improvements at this location are likely to include illumination, signing, pavement markings, and a certified flagger.
- Illumination requirements on SR 906.
- Carpooling, vanpooling, transit, etc. to reduce congestion on SR 906 and at the I-90 interchanges.
- Notifying patrons of pass conditions prior to departure. There are often restrictions on I-90 that were not required when patrons arrived.
- Fee parking at approved parking lots, and its impacts to SR 906.
- Congestion that inhibits WSDOT's ability to maintain SR 906, and the blocking of emergency response vehicles.
- Residents' inability to access to their homes due to ski patrons blocking their driveways.
- General guide, outdoor advertising and motorist information signing requirements.

75.1 N

Thank you for the opportunity to review and comment on this proposed project. If you have any questions regarding our comments, please contact me at (509) 577-1630.

Sincerely,

Bill Preston, P.E.
Regional Planning Engineer

BP: rh/jjg
cc: File #1, SR 906
Jamil Anabtawi, Utilities Engineer
Rick Gifford, Traffic Engineer
Terry Kukes, South Central Area 1 Maintenance Superintendent