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Region

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WHITE PASS EXPANSION MASTER DEVELOPMENT PLAN PROPOSAL

Final Environmental Impact Statement

Volume 3: Response to Comments



Okanogan and Wenatchee National Forests,
and Gifford Pinchot National Forest



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FEIS ORGANIZATION

The White Pass MDP Proposal FEIS is presented in three volumes, namely: Volume 1 presents Chapters 1-8, Volume 2 presents the Appendices and Figures, and Volume 3 presents the Response to Comments provided by the public. Each of these elements provides an essential element of the environmental impact analysis as required by CEQ and NEPA guidelines. A summary of this document has also been prepared as required by CEQ/NEPA guidelines and is provided below.

Volume 1: Chapters 1-8

Executive Summary

Describes and summarizes the EIS. Stresses the major conclusions, areas of controversy (including issues raised by agencies and the public), and issues to be resolved (including the choice among alternatives).

Chapter 1 - Purpose and Need for Action

Chapter 1 describes the Proposed Action, project background, purpose and need for the Proposed Action, the decision to be made, management direction, the scope of the Proposed Action, scoping process and issues, government and agency coordination, and required permits.

Chapter 2 - Alternatives

Chapter 2 identifies and compares a range of alternatives, including a No Action alternative, as well as the alternatives considered but eliminated before specific detailed analysis in the DEIS or FEIS. The chapter also describes in detail, and compares the six alternatives considered in this FEIS document. This also includes the No Action alternative, as well as the methodology of evaluation and the selection of alternatives. The proposed design features and monitoring measures are also listed in this chapter.

Chapter 3 - The Affected Environment / Environmental Consequences

Chapter 3 describes the existing physical, biological, economic, and social environment that may be affected by the alternatives. These existing conditions are described according to broad categories. The Physical Environment includes natural resource factors such as watershed resources, wildlife, and scenic quality. The Human Environment includes factors such as recreation, socioeconomics, and transportation.

Chapter 3 also describes in detail the physical, biological, economic, and social effects of the alternatives by resource area. Direct, indirect, and cumulative environmental consequences of implementing the alternatives are described. This chapter also identifies adverse environmental effects that cannot be avoided, the relationship between short-term uses of the environment and long-term productivity, and any irreversible and irretrievable commitments of resources.

Chapter 4 - References

Provides a list of references that were used this FEIS.

Chapter 5 - Distribution List

Chapter 5 provides the list of individuals, organizations, and agencies that have requested, or were identified as being interested in receiving this FEIS for review.

Chapter 6 - List of Preparers

Chapter 6 provides a list of the preparers of this FEIS.

Chapter 7 - Glossary

Chapter 7 provides definitions for key terms used in this FEIS.

Chapter 8 – Index

Chapter 8 provides an index of key terms and page numbers found in the FEIS.

Volume 2: Appendices and Figures

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Volume 3: Response to Comments

Volume three provides a summary of the comment procedure, comment tracking method, and displays the substantive comments and their respective responses submitted by the community (individuals, organizations, and agencies) and received by the U. S. Forest Service (USFS). Additionally, Section 2.2 contains full copies of the comment letters received from Indian tribes and all governmental agencies per FSH 24.1.3.

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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 six alternatives presented in the DEIS for the White Pass expansion proposal 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 1,250 individuals, organizations and other agencies on December 10, 2004. The Notice of Availability of the DEIS was published in the *Federal Register* on December 23, 2004 (Volume 69, Number 246) and initiated an extended 60-day public comment period that ended on February 22, 2005. A total of 52 hardcopies and 43 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 377 comment letters were received. Out of the 377 response letters, 512 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 White Pass Draft EIS can be found in Section 2.1.

1.2 COMMENT PROCEDURE

Those receiving a copy of the White Pass 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.

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 White Pass DEIS. Using a template specifically designed for the White Pass DEIS, the commenter's name and demographic information (e.g. address, city, state, and zip) were entered into the database. Then, each public response was read and all substantive comments were identified and coded using the established comment codes. After each comment letter had been read and its substantive comments coded, they 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, and groups (the community) and responses to these comments by the USFS. Full letters are reproduced in this volume for comment letters received from governmental agencies per Forest Service Handbook (FSH) 24.1.1(b) (refer to Section 2.2).

Section 2.1 displays the substantive comments and their respective responses submitted by the community (individuals, organizations, and agencies). Each letter received from an individual, agency, government, or organization was given a reference number. Reference numbers were allocated to letters based on the order in which the letter was received. The reference number can be used to locate individual letters in the public record and all public responses to the White Pass DEIS, which are part of the Administrative Record for the project. Under each reference number in this section, the substantive comments and their corresponding responses are organized by comment code category. Comments that have a similarly corresponding response are presented showing all relevant comments with a single response. All substantive comments provided by the community and their corresponding responses are provided underneath the relevant comment code. The Table of Contents for this volume provides two options for navigating the response to comments: by resource area and by individual commenter.

Section 2.2 contains full copies of the comment letters received from Indian tribes and all governmental agencies per FSH 24.1.3.

2.1 RESPONSE TO COMMENTS

03.0 Out-of-Scope

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

Leech Lake appears to have an elevated trophic status as a result of the developments around White Pass, included failed wastewater systems. The trophic status of Leech Lake needs to be reviewed in the context of the "natural" conditions and the impact of the development assessed.

Response

Discussions with the Washington State Department of Ecology, Washington State Department of Health (Spokane) and local Counties uncovered no documented complaints received in regards to leaching into Leech Lake (WSDOE and WSDH, pers. comm.). Additionally, the USFS has received no documentation of spills or leaching into Leech Lake.

Larry Mitchem

Comment

Since summer activity has been ruled out at this stage (mountain biking) there seem to be no contingency plans to generate summer income that may compensate for an extended period of low snowpack.

Response

FEIS Section 1.1.2.2 describes three specific purposes and needs for the Proposed Action: improved parking, pedestrian access and traffic flow; improved circulation and dispersal; and improved recreational experience of the White Pass skier in response to increasing demand. Increasing summer activities are not a stated purpose of the proposal nor has White Pass Company expressed an interest in such activities. In stating this, summer activities are already provided at White Pass (refer to White Pass Ski Company for further details).

Richard L. Curtis

Comment

As the area is some distance from high population centers such as Seattle and Portland, the demand is and will remain much lower than for areas closer to large cities. In addition, the transportation network serving the White Pass Area is limited to Highway 12, a fairly narrow and steep road which does not provide easy access for large numbers of visitors to the area in winter conditions. Therefore the use of the area will most likely be constrained to the population of the surrounding communities and the access, rather than the facilities available at the area. What analysis has been performed to indicate that an

expanded area will draw more skiers? What impact will the sharply higher prices of automotive fuel have on demand at White Pass Ski Area in view of its remoteness?

Response

FEIS Section 3.10.2.3 - Skiing Trends has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the rise of skier visits nationally. Regionally and at White Pass, the top three skier visit years occurred in the last seven years (regionally) and five years (White Pass). At this time, there is no data to suggest that the public will forego winter sports opportunities because of a rise in fuel prices, nor can we predict the level or seasonality of the price increases. For this reason, the impacts of higher automotive fuel prices are outside the scope of this analysis.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

Will increased usage at White Pass lead to greater use of chemicals for clearing snow and ice off the road? Rock salt is being used on Hwy 12 this year (I noticed it near Windy Point) despite the DoT web page which indicates that rock salt is being used on only two trial areas - neither of which is Hwy 12 or 410 (also receiving rock salt in 2004).

Response

The method of de-icing used by WSDOT is outside the jurisdiction of the Forest Service, and is therefore outside the scope of this EIS. The clearing and de-icing of US 12 would occur regardless of the level of usage at the White Pass Ski Area since US 12 is a major U.S. highway connecting the east and west sides of the state through the Cascades. We recommend you contact WSDOT directly if you have concerns with the type of de-icing being used.

Darrell Howe

Crystal Conservation Coalition

Comment

The USFS should NOT be concerned with the economic viability of the White Pass Ski Area stated in Section 1.1.2.2. The need for the Action should only be for a demonstrated public need.

Response

The National Forests are managed to provide a range of activities that involve both the use and protection of forest resources. The objectives for management of the existing White Pass Ski Area are defined in the 1990 WNF Forest Plan, which allocated this area to a Developed Recreation management prescription. The goal of this prescription is to provide a variety of developed recreation opportunities for the public, including existing and potential downhill ski areas. The 1990 GPNF Forest Plan has a similar Developed

Recreation prescription which was applied to the proposed expansion area as well as a portion of the existing ski area. Although these ski areas are, of necessity, operated by permittees such as White Pass Company, they provide a public benefit that otherwise could not be made available on public land. As such, the government has an ongoing interest in the viability of these operations. Additionally, FEIS Section 3.10.2.3 has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the rise of skier visits nationally. Regionally and at White Pass, the top three recorded skier visit years are in the last seven years (regionally) and five years (White Pass).

Margie Schubert

Jeff Wallace

Leslie Geller

Comment

I strongly urge the Forest Service to assess cumulative impacts of all downhill skiing in the Northwest before allowing expansions such as this. The Forest Service must account for the erosion of accessible backcountry winter recreation opportunities and the impacts to wildlife habitat from past and future ski area developments.

Darrell Howe

Crystal Conservation Coalition

Comment

The USFS needs to follow through with an industry demand analysis, as suggested by the courts (see: Early Winters), prior to considering proposals such as the White Pass expansion.

Peter and Naomi Rimbos

Comment

Finally, we request the Forest Service assess cumulative impacts of all downhill skiing in the Northwest before allowing expansions such as this. We believe the Forest Service must account for the erosion of accessible backcountry winter recreation opportunities and the impacts to wildlife habitat from past and future ski area developments.

Rodney Brown

Comment

Finally, I would like the Forest Service to assess the cumulative impacts of all downhill skiing in the Northwest before allowing expansions such as this.

Lisa Dekker

Comment

In addition, the cumulative impacts of all Northwest downhill ski areas need to be assessed. The Forest Service must account for the decrease in accessible backcountry winter recreation opportunities, and the harsh impacts of downhill ski area development.

Sunny Walter

Comment

Please keep in mind that the cumulative impacts of all downhill skiing in the Northwest should be considered before allowing expansions such as this.

Nicholas Mayo

Comment

Please assess cumulative impacts of all downhill skiing in the Northwest before allowing expansions such as this. The Forest Service must account for the erosion of accessible backcountry winter recreation opportunities and the impacts to wildlife habitat from past and future ski area developments.

Karen Fant

Comment

Finally, the Forest Service needs to conduct a cumulative impact assessment of Northwest downhill ski developments on the decline of backcountry recreational opportunities.

Darrell Howe

Crystal Conservation Coalition

Comment

A region wide Programmatic EIS for the entire Pacific NW is needed to examine the cumulative impacts of the expansion of the entire ski industry which is predominantly operating on public lands.

Common Response

Refer to the USDA Forest Service correspondence dated December 3, 2001, with File Code 1950/2700, which 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."

05.0 General

Pete Schnebele

Comment

Increase the capacity for ski development within the existing White Pass area by improving the existing trail system and upgrading the existing lifts to high speed detachable quads.

Response

A range of options were considered, including infill within the existing SUP area (refer to Section 2.2), and the most feasible options (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 weren't feasible, didn't meet the Purpose and Need, or both. Refer to the FEIS Chapter 2 for further information on the range of alternatives.

Erik Splawn

Hogback Basin Preservation Association

Comment

Furthermore, a 44% projected increase in skier visits with the proposed alternative, would increase congestion on all slopes and particularly the cat tracks at ALL times of the day.

The proposed alternative does not meet the need for increased safety on the ski slopes and will instead dramatically DECREASE THE SAFETY on the ski slopes.

Response

Appendix B - Mountain Plan Specifications acknowledges that the expansion into Hogback Basin would increase skier densities on trails that provide egress from Pigtail and Hogback Basin. The FEIS has been updated to include Modified Alternative 4, the new preferred alternative, which includes provisions to better address skier circulation and density. Specifically, Modified Alternative 4 includes components of Alternative 9 that would improve skier circulation, as well as a reduced lift capacity in the expansion area, which would reduce skier densities in the expansion area and on nearby egress trails. In addition, the FEIS has been updated to include Other Management Provision OMP11, which states that "if skier densities increase, the Hogback Basin lifts would be closed earlier than the other lifts, to reduce crowding on the egress trails." As a result, Modified Alternative 4 addresses skier densities more effectively than Alternative 2 (the Proposed Action).

Darrell Howe

Crystal Conservation Coalition

Comment

Oversight from USFS personnel is part of RA-2 on page 3-172. Is this part of a Vegetation Management Plan or Annual Monitoring? Is funding set aside for the USFS monitor?

Response

As described in 1994 ROD Standard and Guideline RA-2 in Table 3.7-3, trees felled in Riparian Reserves, because of safety risks, should be left onsite when needed to meet coarse woody debris objectives (described under Aquatic Conservation Strategy Objective 8 in Section 3.7). This requirement is a Standard and Guideline established by the Aquatic Conservation Strategy Record of Decision (refer to Section 3.7 - Aquatic Conservation Strategy), and it is part of neither the Vegetation Management Plan nor Annual Monitoring Plan. USFS personnel will provide oversight of tree felling in Riparian Reserves for maintenance of coarse woody debris.

Darrell Howe

Crystal Conservation Coalition

Comment

Should not the NEPA review follow the Decision and not the other way around?

Response

As described in Section 1.1 - Introduction, the FEIS was prepared to analyze the impacts of the proposed White Pass Master Development Plan. Once approved, the MDP (as described in this FEIS) will replace the current but outdated 1979 MDP, and will authorize the site-specific implementation of the new MDP.

Erik Splawn

Hogback Basin Preservation Association

Comment

The proposed Alternatives are not consistent with the White Pass Master Plan and are not indicative of future development planned by the White Pass Company. The DEIS fails to consider development in the Goat Rocks Wilderness Areas and Knuppenburg Drainage as outlined in the White Pass Master Plan.

Response

As described in Section 1.1 - Introduction, the FEIS was prepared to analyze the impacts of the proposed White Pass MDP. Once approved, the MDP (as described in this FEIS) will replace the current but outdated 1979 MDP, and will authorize the site-specific implementation of the new MDP.

Erik Splawn

Hogback Basin Preservation Association

Comment

The White Pass Master Plan is 25 years old and calls for further expansion into the Goat Rocks Wilderness Area and increased condominium development. This document needs to be revised BEFORE consideration of the DEIS. These planned expansions as detailed in the WPMP document as it stands today have direct bearing on this DEIS and should be discussed in full detail in this DEIS.

Response

As described in Section 1.1 - Introduction, the FEIS was prepared to analyze the impacts of the proposed White Pass MDP. Once approved, the MDP (as described in this FEIS) will replace the current but outdated 1979 MDP, and will authorize the site-specific implementation of the new MDP. Assuming approval of one of the Action Alternatives in this FEIS, expansion into the Goat Rocks Wilderness and increased condominium development would no longer be part of the White Pass MDP.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 1-3 - Decision Framework states: "...design of facilities may then be addressed in operational plans...". Will these Operating Plans be open for public review and properly analyzed using the NEPA process? Will there be separate biological evaluations and impact assessments once the ROD is made? This EIS process needs to clearly define the sequence and framework for activities at White Pass. Will the new MDP prepared after the ROD for this proposal also follow the same decision framework?

Response

As described in Section 1.3 - Decision Framework, the design of facilities, construction schedule and other details addressed in operational plans will be approved by the Forest Service prior to project implementation. The public review and analysis required by NEPA is completed once the ROD is published, and this decision will not be revisited once it is made, unless the approved project is substantially changed. Section 1.4 - Scope of the Proposed Action explains that the alternative selected in the ROD will serve as the basis for a new MDP, which will be prepared by the White Pass Company and approved by the Forest Service. No further NEPA review is required after the ROD, unless new projects or expansions are considered.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 2-33 Section 2.3.4.8 Outlines a Pedestrian Management Plan. Please describe how this will be incorporated into the ROD Decision document, Winter Operating Plan and the timeline for implementation. How binding would this Plan be? What would it expect to accomplish?

Response

As described in Section 1.3 - Decision Framework, the design of facilities, construction schedule, relevant plan preparation and other details addressed in operational plans will be approved by the Forest Service prior to project implementation. The public review and analysis required by NEPA is completed once the Record of Decision (ROD) is published, and this decision will not be revisited once it is made, unless the approved project is substantially changed. Section 1.4 - Scope of the Proposed Action explains that the alternative selected in the ROD will serve as the basis for a new Master Development Plan, which will be prepared by the White Pass Company and approved by the Forest Service. No further NEPA review is required after the ROD, unless new projects or expansions are considered. The details and specifics of the Pedestrian Management Plan would be prepared during the implementation phase of the project. The Pedestrian Management Plan would be developed for use by White Pass Company at the White Pass Ski Area. As detailed in the DEIS and FEIS (refer to Section 2.3.4.8), the Pedestrian Management Plan would address opportunities to improve the efficiency of parking operations at the existing and proposed parking lots, prioritization of parking to allow for all available parking lots to be filled prior to parking along the highway, designation of highway crossing areas and other management actions that would improve the safety for arriving and departing White Pass guests.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS should clarify how trail expansion would be covered in any newly adopted SUP. Hopefully, unauthorized trail construction won't be so easy under an updated permit.

Response

As described in Section 1.3 - Decision Framework, the USFS Forest Supervisors of the OWNF and GPNF will decide the elements of the Selected Alternative to be permitted for development, and this decision will be documented in a Record of Decision (ROD). The Forest Supervisors may approve all, part, or none of each element of the Proposed Action or the alternatives to it. The design of facilities, construction schedule, and other details may then be addressed by routine submission of operational plans, but the actual decision will not be revisited once it is made. Any new or expanded trails approved

in the ROD will remain as described in the decision document. Any future expansion plans will be analyzed in a separate NEPA decision process.

The FEIS has been updated to exclude the discussion on the unauthorized Zig Zag Nordic trail. As of the publication of the FEIS, White Pass' use of the Zig Zag Nordic trail has been eliminated and any use of the Nordic trail would require analysis under a separate NEPA action to incorporate the Zig Zag Nordic trail into the MDP. Unauthorized trail use or construction would be an issue regardless of this EIS, therefore any unauthorized trails would be outside the decision space in this NEPA process.

Darrell Howe

Crystal Conservation Coalition

Comment

The Proposed Action, and the MDP which it involves, needs to be clearly defined as a CONCEPTUAL PLAN as defined in the USFS Guidelines and not a working document.

Response

As described in Section 1.4 - Scope of the Proposed Action, any Action Alternative selected in the ROD will serve as the basis for a new MDP, prepared by the White Pass Company and approved by the Forest Service, which will guide development of the ski resort for the next 10-15 years. Section 1.1.2.1 - The Proposed Action explains that the Action Alternatives evaluated in this FEIS would amend the White Pass SUP to authorize site-specific implementation of the MDP.

Richard L. Curtis

Comment

As far as the concerns regarding pedestrians crossing Highway 12, a simple solution would be to build either a pedestrian overpass or underpass from the parking lot to the lodge. This would be an inexpensive long term solution to the potential conflict. Why hasn't this been considered as an alternative?

Response

As described in Section 2.2.2.1 - Pedestrian Overpass Across US 12, a pedestrian bridge over US 12 and/or a tunnel under US 12 were evaluated for feasibility. This project was eliminated from further consideration because of cost and the better pedestrian safety and efficiency of an additional parking lot, which has been included in several of the Action Alternatives.

Mark Lawler

Sierra Club Cascade Chapter

Comment

The "mitigation measures" in the DEIS, e.g. those listed in Table 2.4-2, provide for minimizing impacts to riparian areas but do not account for true mitigation measures that would cause the net impact to be zero.

Response

As described in Section 2.4 - Resource Protection and Mitigation Measures, Mitigation Measures are "intended to avoid, minimize, rectify, and reduce or eliminate potential negative impacts associated with the proposed projects."

Darrell Howe

Crystal Conservation Coalition

Comment

Table 2.4-3 states requirements which are NOT intended to mitigate impacts. (page 2-48) Please explain this statement. These are specifically intended to be mitigation, are they not? The same question is raised for Table 2.4-4.

Response

As described in Section 2.4 - Resource Protection and Mitigation Measures, Mitigation Measures are "intended to avoid, minimize, rectify, and reduce or eliminate potential negative impacts associated with the proposed projects." Mitigation Measures would also be implemented as a requirement of law, regulation or policy. Table 2.4-4 presents Other Management Provisions that are to be implemented in order to protect resources during construction and maintenance.

Tom Uniack

Washington Wilderness Coalition

Comment

Of even greater concern is the assertion in the DEIS that regarding the unauthorized Zig Zag Nordic Trail that, "For the duration of this NEPA process for the White Pass Expansion, White Pass will be granted an annual permit authorizing the continued use of this trail." (DEIS p. III-265). There is literally no documentation of the impacts and environmental consequences nor any analysis or discussion that NEPA or Forest Service regulations would require in order to grant such a permit anywhere in the DEIS.

Response

As described in Section 3.11.3.4 - Nordic Skiing and Snowshoe Trails, no additions or modifications would occur under any alternative to the existing Nordic trail and snowshoe trail system, described in section 3.11.2.2 - Non-Alpine Skiing Analysis. The DEIS describes that under all Action Alternatives, the

continued operation of the existing snowshoe trails and Zig Zag Nordic trail would be authorized under the SUP. Under the FEIS, this trail authorization component for the existing snowshoe trails and Zig Zag Nordic trail) has been removed from all alternatives, and will not be part of this NEPA decision. Additionally, under all Action Alternatives, the 11.55-kilometer Nordic trail system, excluding the 2.1-kilometer Zig Zag Nordic trail, would be redefined and incorporated into the MDP.

Mark Lawler

Sierra Club Cascade Chapter

Comment

The DEIS violates NEPA by not including an alternative that has smaller Nordic and snowshoe trail systems that cause less impact; all alternatives treat these systems the same way.

Response

As described in Section 3.11.3.4 - Nordic Skiing and Snowshoe Trails, no additions or modifications would occur under any alternative to the existing Nordic trail and snowshoe trail system, described in Section 3.11.2.2 - Non-Alpine Skiing Analysis. Under the Action Alternatives, the existing Zig Zag loop and snowshoe trail system would no longer be used by White Pass unless a separate NEPA process is initiated to analyze the impacts of these loops.

Darrell Howe

Crystal Conservation Coalition

Comment

Table 3.3-21 & 22 indicate only 0.3 acres of Impacts relating to White Pass Projects yet Table 2.6-2 indicates 5.3 Acres of impacts to wetlands alone. Please describe clearly these apparent differences between the Tables. Where did the 0.3 acres data originate? Was there mapping of original wetlands prior to the existing development?

Response

DEIS Table 2.6-2 was intended to show that 5.3 acres of wetlands are present in the White Pass Study Area, and that Alternative 1 would not impact any wetlands. For Alternatives 2, 4, 6 and 9, the table was intended to show the number of acres impacted (as negative), and in parentheses, the total acreage of affected wetlands including the existing affected wetlands. This section of the table was in error in the DEIS. In the FEIS, Table 2.6-2 has been modified to better explain that 2.3 acres of previously impacted wetlands are present in the White Pass Study Area. The table has also been updated to better display the additional impact to wetlands by alternative, and the total area of impacted wetlands including previously impacted wetlands. Tables 3.3-21 and 3.3-22 in the DEIS did not show the 5.3 acres of wetlands because 5.3 represents the total acreage of wetlands in the White Pass Study Area. Similar to Table 2.6-2, these

tables did not correctly display that 2.3 acres of previously affected wetlands exist under Alternative 1. The FEIS has been updated to correct this omission.

Erik Splawn

Hogback Basin Preservation Association

Comment

In a similar vein, the estimated costs of this EIS process as well as the entity funding it should be stated.

Response

Disclosure of estimated costs and funding is not required by the National Environmental Policy Act (CEQ CFR 1500-1508).

Darrell Howe

Crystal Conservation Coalition

Comment

MR14 states control actions will be initiated. Please identify what these are and how they will be incorporated into the Monitoring Plan and who will identify these for LAC exceedence. What are the conditions for non-compliance?

Response

During the implementation phase, these control actions would be developed in conjunction with the Monitoring Plan and would be approved by the USFS. Monitoring for level of acceptable change (LAC) exceedences would be conducted using an approach similar to the current monitoring during the summer period. Similarly, conditions for non-compliance would be similar to the current non-compliance conditions.

Erik Splawn

Hogback Basin Preservation Association

Comment

GPS coordinates of the terminals of Chair 5 and the mid-mountain lodge were provided in the 1998 EIS for the Proposed Expansion of the White Pass Ski Area. GPS coordinates were specifically requested by HBPA in our scoping letter for the 2004 DEIS. Because the proposed development is located on or near wetland and riparian influence areas and most of the grading, clearing, and construction is within established Riparian Reserves, the exact location of these structures, roads, ski trails, drain fields, and clearing are crucial. HBPA again requests GPS coordinates of the base pod and upper terminals of Chair 5 and 6, the mid-mountain lodge, and other relevant structures.

Response

GPS Coordinates for the facilities are available in the project file.

Christine Reichgott

Environmental Protection Agency

Comment

Although the draft EIS states that the potential impacts on wetlands would be minimized through implementation of the proposed mitigation measures, avoidance of impacts is preferable than minimization to the maximum extent practicable. Based on information presented in the draft EIS, Environmental Protection Agency recommends that Alternative 2 (Preferred Alternative) incorporate lifts and trails design under Alternative 4.

Response

In respect to the placement of fill material, wetlands would be avoided altogether. Under all Action Alternatives, the construction of ski trails, utilities and infrastructure would require vegetation removal in or near wetlands (e.g. aerial utility crossings - refer to Section 2.3.1.8). Mitigation Measures would be implemented to minimize these effects. Additionally, the deciding official has the option to choose and combine elements of any and all alternatives analyzed in the FEIS.

Eric Burr

Comment

I did not find the two trail catch line I'd previously suggested for the bottom of the lifts. An upper trail to gravity feed skiers to the bottom terminals and a nordic trail groomed just below that requiring some walking and poling, or skating to access to bottom terminals. Such a two trail catch line system would be double insurance against lost skiers, while simultaneously allowing ski touring, as opposed to Telemarking, XC skiing to be entertained while other members of their family or group are yo-yoing on the lifts. This seems logical to complete to Recreation Opportunity Spectrum in an area dominated by lifts.

Response

Modified Alternative 4 of the FEIS includes an egress trail that would be suitable for both alpine and Nordic skiers. Due to the presence of steep slopes and talus along the trail alignment, only this corridor is provided to accommodate both uses.

Erik Splawn

Hogback Basin Preservation Association

Comment

The proposed location of the lifts, towers and upper lift terminals in relationship with the Pacific Crest National Scenic Trail should be stated in feet and adequately marked on a separate large scale map. In addition, the location of the base lift facilities, upper lift terminals and mid mountain lodge should be given in GPS coordinates. All maps should be professionally presented, easily read, with topographic lines labeled at least every 100 feet in elevation.

Response

Refer to FEIS Section 2.3 - Alternatives Considered in Detail for a description of the location of the upper lift terminals of new lifts for each alternative, and their distance (in feet) from the Wilderness boundary. These lift terminals are also shown in Figures 2-2, 2-4, 2-6, and 2-8. Appropriate facility and structure locations are to be field fit, during the implementation phase of the project according to developed and approved Forest Service requirements or other agency permit requirements. The FEIS figures have been updated to show elevation lines for each Action Alternative.

Erik Splawn

Hogback Basin Preservation Association

Comment

The distance in feet from the CLOSEST POINT from the boundary of the Goat Rocks Wilderness Area should be clearly stated and shown on a map as well as the difference in elevation between the upper lift terminals and the adjacent Wilderness boundary. It appears that the claim in the DEIS that the upper terminus of Chair 6 is 650 feet from the Wilderness boundary is inaccurate.

Response

Refer to FEIS Section 2.3 - Alternatives Considered in Detail for a description of the location of upper lift terminals for new lifts for each alternative, and their distance (in feet) from the Wilderness boundary. These lift terminals are also shown in Figures 2-2, 2-4, 2-6, and 2-8.

Darrell Howe

Crystal Conservation Coalition

Comment

The USFS and its consultants should examine the weaknesses in the Action Alternatives in relation to the terrain currently under developed recreation use. Alternatives 2, 4, & 6 fail to indicate any modifications to the existing trail system and facilities.

Response

Refer to FEIS Section 2.3 - Alternatives Considered in Detail, which details the proposed modifications to the existing trail system and facilities for each Action Alternative. As an example, Modified Alternative 4 proposes grading the Holiday trail to allow for the utilization of the trail by beginners from the mountain summit back to the base.

Erik Splawn

Hogback Basin Preservation Association

Comment

Because of the confusing and wildly disparate data concerning White Pass skier visits, an "increased demand" as it pertains to skier visits has not been demonstrated for the proposed alternative.

Response

Refer to Illustrations 1-2 and 1-3 in Section 1.1.2.2 - The Purpose and Need for Action and Section 3.11.2.1 - Alpine Skiing Analysis, particularly the visitation section, for a description of visitation trends at White Pass, and increased demand for ski facilities.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is a need for improvement of terrain, facilities, and the recreational experience of the White Pass skier in response to the increasing demand.

This statement is vague and unsubstantiated. Does "increased demand" mean increase in the number of skiers or an increase in requests and comments supporting the expansion?

Response

Refer to Section 1.1.2.2 - The Purpose of and Need for Action for a complete description of increased demand for improved terrain, facilities and recreational experience. This need is based on the market demand for novice and advanced intermediate terrain as well as increased skier visitation and demand for expanded facilities at White Pass.

Erik Splawn

Hogback Basin Preservation Association

Comment

A demand for expansion based on data other than skier visits has not been shown in this DEIS. The author of this document merely states that a demand exists. However, a demand cannot exist without an a priori basis in fact. The documentation which is the basis for this claim does not exist in the files of the

Forest Service. Demand or need cannot be shown to exist based solely on a handful of comment letters sent to the Forest Service by stockholders of and boosters for the White Pass Company. There are many comment letters that support just the opposite: that no expansion is necessary. Where are the independent studies to corroborate that a demand or need exists to expand the ski area?

Response

Refer to Section 1.1.2.2 - The Purpose of and Need for Action, which includes Illustrations 1-2 and 1-3 to graphically depict the increasing demand at White Pass. The FEIS has been updated to include national, regional, and local data to describe the increased visitation realized at White Pass. Comment letters from the public have not been used in this analysis to account for skier demand at White Pass. As described in Section 1.1.2.2, the Purpose and Need includes six specific needs, one of which relates to increased demand. The range of alternatives presented in the FEIS is intended to meet, or partially meet, all of these needs, rather than focusing on one.

Darrell Howe

Crystal Conservation Coalition

Comment

The definition of Mitigation in the Glossary includes NOT taking an action by avoiding the impact altogether. Where are these types of mitigation measures identified?

Response

Refer to Section 2.2 of the FEIS for components considered but eliminated from further analysis. An example of an alternative that was considered but eliminated for further analysis to avoid the impact of blasting large quantities of rock, is Alternative 5. This provides an example of where the action was not analyzed further to avoid the impact altogether.

Erik Splawn

Hogback Basin Preservation Association

Comment

Neither the description of the general location of Chair 5 and 6 nor the description of the upper terminals is clearly described in the DEIS. Instead, the public is referred to the 1990 EIS and 1998 EIS for their locations and lengths (page 26). The public should not be required to research old and out dated documents when it is the responsibility of the authors of the DEIS to clearly provide that information. This unacceptable and precludes the public from making informed decisions and comments on the DEIS.

Response

Refer to Section 2.3 - Alternatives Considered in Detail, and Figures 2-1, 2-2, 2-4, 2-6, and 2-8 for descriptions and maps of the location, length, and elevation of terminals for Chairs 5 and 6, as well as additional specific information about each alternative.

Erik Splawn

Hogback Basin Preservation Association

Comment

5) THE DEIS RELIES HEAVILY ON OUTDATED DOCUMENTS AND SUPPORTING MATERIALS

The DEIS relies on the 1990 and 1998 EIS in its description of the proposed Hogback chair lifts. These documents are 15 and 7 years old respectively. It also requires the public to have those documents easily available to them to understand the central basis of this proposal.

Response

Refer to Section 2.3 - Alternatives Considered in Detail, and Figures 2-1, 2-2, 2-4, 2-6, and 2-8 for descriptions and maps of the location, length, and elevation of terminals for Chairs 5 and 6, as well as additional specific information about each alternative.

Erik Splawn

Hogback Basin Preservation Association

Comment

The mitigation measures discussed in the DEIS are vague and do not include an assessment of the feasibility and effectiveness of the measures. There are numerous examples of this including vague commitments to best management practices that need further explanation and description.

A vague reference to early closing of the Hogback Chairs to reduce skier congestion is made but no explanation or calculation of how that would reduce congestion.

No mitigation is discussed for the increased entry of skiers into the Goat Rocks Wilderness Area.

Response

Refer to Section 2.4 - Resource Protection and Mitigation Measures and Table 2.4-2 - Mitigation Measures for the White Pass Ski Area Expansion for a discussion of Mitigation Measures and their effectiveness. If needed, reference is made to staggered closing times in Section 3.11.3.2 - Terrain Distribution, Trail Density and Circulation. The FEIS states that, under Alternative 2 and Modified Alternative 4, without staggered closing times, skier densities on egress routes would become overcrowded. If Hogback Basin lifts were to close earlier than other lifts, there would be less crowding at

these egress trails than if all skiers were leaving the mountain at the same time. If needed, staggered closing times are mentioned in the FEIS to illustrate a possible solution to potential crowding under Alternative 2 and Modified Alternative 4, but would not be required. Mitigation Measure MM15 (refer to Table 2.4-2) states that a Boundary Management Plan would be developed to manage use of the Goat Rocks Wilderness by White Pass skiers.

Mark Lawler

Sierra Club Cascade Chapter

Comment

It would be more sensible economically, and certainly would entail less harmful development of irreplaceable public resources, to satisfy skier demands at already developed ski areas; for example, add more Expert terrain at White Pass and Beginner and Novice terrain at Crystal Mountain.

Response

Refer to the United States Department of Agriculture, Forest Service correspondence dated December 3, 2001, and with File Code: 1950/2700 in respect to that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". In summary, "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 Purpose and Need refers to the White Pass operation, any terrain modification at Crystal Mountain would not meet the purpose and need at White Pass.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS does not identify the author of the DEIS, Bill Granger of SE Group, as a paid consultant hired by White Pass Company to present the company's proposal to the Forest Service. Without identifying Mr. Granger and the other consultants listed under SE Group as paid by the White Pass Company, the public might conclude that he and the other SE Group consultants are analyzing this proposal as unbiased consultants to the U.S. Forest service. Mr. Granger's bias along with the other SE Group consultants, toward the White Pass Company in this document should be clearly stated from the outset.

Response

SE Group is a consultant to the U.S. Forest Service and has operated entirely under the supervision of the agency in the development of the Plan of Study. Similarly, each chapter and appendix item in the EIS has been thoroughly reviewed, edited and approved by the agency.

Kees Kolff

Comment

There are plenty of ski acres nearby to accommodate the need without destroying valuable natural resources. There is also no documented need to place lifts that cross over the historic Pacific Crest Trail.

Response

Section 2.2.1.8 - Alternative 12 - Pigtail Basin Lift with Top Terminal Below the PCNST describes an alternative including development in the Pigtail Basin without a chairlift crossing the PCNST. This alternative was considered, but eliminated from further analysis.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 2.4 states measures CAN be incorporated into action alternatives but WILL they and at what time and where? Are these already required such as the Boundary Management Plan?

Response

Section 2.4 - Resource Protection and Mitigation Measures describes measures that can be taken to reduce the likelihood of impacts and ensure that standards and guidelines are met. The tables in this section list the specific resource protection and Mitigation Measures required for each alternative. Resource protection measures include Lift and Trail Construction Techniques for each alternative (listed in Table 2.4-1) that will be implemented at the time of construction. Mitigation Measures are listed in Table 2.4-2, Management Requirements in Table 2.4-3, and Other Management Provisions in Table 2.4-4, and these measures will be included in site plans and construction plans of the chosen alternative, as appropriate.

Erik Splawn

Hogback Basin Preservation Association

Comment

Since the preferred alternative does not include construction of additional parking lots, then the need for improved parking is not met.

Response

The deciding official has the option to choose and combine elements of any and all alternatives analyzed in the FEIS.

Erik Splawn

Hogback Basin Preservation Association

Comment

The need for improved traffic flow is not met by the proposed alternative, but instead raises serious safety and highway congestion issues.

Response

The DEIS acknowledges that Alternative 2 does not address the need for improved traffic flow and parking. Modified Alternative 4, Alternative 6 and Alternative 9 include additional off-highway parking to address the need for improved traffic flow, parking, and pedestrian access.

Regan Smith

Northwest Ecosystem Alliance

Comment

The second portion of the purpose and need statement addresses better matching terrain distribution to market demand. The purpose and need specifically address the lack of novice and advanced intermediate terrain. Expanding into Hogback Basin means not meeting the need for increased novice terrain, and expanding within the existing SUP means not meeting the need for advanced intermediate terrain, so none of the action alternatives do a great job of meeting the portion of the purpose and need statement.

Response

The DEIS and FEIS acknowledge that the terrain at White Pass does not easily match the market demand due to the presence of the cliff band. Nonetheless, the Action Alternatives include project components that attempt to meet the overall Purpose and Need, rather than focusing of one component of the Purpose and Need. Refer to Appendix B - Mountain Plan Specifications and FEIS Section 3.11.3.2 - Terrain Distribution, Trail Density and Circulation for a discussion of terrain distribution and how well each alternative meets the Purpose and Need for improved terrain distribution. Additionally, the decision officer has the option to combine elements of any and all alternatives analyzed in the FEIS.

Ron Eng

The Moutaineers

Comment

The Purpose and Need of the DEIS appears to be skewed toward the economic interests of the concessionaire, and this is in direct conflict with USFS Manual, Section 2343. Significant components of

preferred Alternatives 2, 4 and 6 appear to benefit the ski area concessionaire rather than address recreational needs.

Response

The economic interest of the concessionaire is part of the Purpose and Need (refer to Section 1.1.2.2), Consistency with the Forest Plan is part of the purpose. 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. FEIS Section 1.1.2.2 has been updated to better explain the relationship between the Forest Service objective for the White Pass Ski Area, and the economic viability of the concession operation. The lands within the current SUP area for the White Pass Ski Area were allocated in the 1990 Wenatchee National Forest Land and Resource Management Plan to RE-1, Developed Recreation. The area proposed for expansion by the White Pass Company was also allocated to a Developed Recreation prescription (MA 2L) by the 1990 Gifford Pinchot Land and Resource Management Plan. The goal of these allocations is to provide for a diverse range of developed recreation opportunities, including existing and potential alpine ski areas which are specifically recognized by both plans. This developed winter recreation experience is currently being provided by the White Pass Company under SUP from the Forest Service. The SUP enables the Forest Service 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 Forest Service.

Erik Splawn

Hogback Basin Preservation Association

Comment

Although there are many alternatives and proposals for development in the Hogback Basin, the maps provided are of small scale, hard to read, and lack 100 foot elevation lines. This is unacceptable and precludes the public from making informed comments on the DEIS. There is no map overlying the proposed alternatives over the Riparian Reserves.

Response

The FEIS figures have been updated to include elevation lines, improved readability, and clarity to the written documentation provided in the FEIS text. Refer to Figures 3-17 and 3-18 for impacts to Riparian Reserves.

Erik Splawn

Hogback Basin Preservation Association

Comment

The maps included in the DEIS are of too small of scale, lack topographic information, hard to read, and should include elevation lines every hundred feet.

Response

The FEIS figures have been updated to include elevation lines, topographic data and clarify the written documentation provided in Volumes 1 and 2 of the FEIS.

Darrell Howe

Crystal Conservation Coalition

Comment

The reader cannot discern if this new egress trail is part of the Terrain analysis given the lack of proper map labeling.

Response

The FEIS figures have been updated to include labeled ski trails, as proposed under each Action Alternative. The new egress trail proposed under Modified Alternative 4 is labeled as Trail 4-16 on Figure 2-4 and in Appendix B of the FEIS.

Darrell Howe

Crystal Conservation Coalition

Comment

Page B-12 Terrain narrative describes trails 2-1 and 2-2 as egress and access trails. Why are these not on the following Table -9 shown on any mapping in the DEIS?

Response

The FEIS figures have been updated to include trail numbers. Trails 2-1 and 2-2 are referred to as Alt 2-1 and 2-2 in Table 7 in Appendix B.

Erik Splawn

Hogback Basin Preservation Association

Comment

According to a foot note on page 22 of the DEIS, there is a confusion as to how many acres is to be included in this proposal. According to the foot note, the DEIS admits there is a discrepancy of 95 acres, nearly 12% of the project. This is a significant omission from the DEIS and renders the DEIS invalid in

its discussion of the project. How can the public comment on a proposal when the exact acreage of the project is unknown? Stating that the acreage will be recalculated at some other time is unacceptable and restricts and nullifies public comment.

Response

The footnote referenced in the letter refers to Section 1.1 - Introduction and Section 2.3.2 - Alternative 1: (No Action Alternative). The footnote refers to a discrepancy in the measurement of the current SUP area (in acres). The FEIS has been updated to clarify that "the current SUP indicates the permit area accounts for 710 acres, however GIS analysis indicates that the actual area of the SUP is approximately 805 acres. As a result of the NEPA process of which this FEIS is part of, the acreage has been re-calculated based on best available data." The current permit area, as detailed in the SUP, was calculated at a small scale without a computer or GIS analysis. It is very common for SUP acreage to be revised once a GIS analysis is undertaken.

Erik Splawn

Hogback Basin Preservation Association

Comment

The EIS should include the GPS coordinates of the base pods and upper terminals of proposed Chairs 5 and 6 and the mid mountain lodge. The supplemental to the 1998 EIS had this information. Because most of the construction is in and near wetland areas, this information is crucial in the public's understanding of this project.

Response

The GPS coordinates are available in the project file.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 2-50 identifies a Travel Route Plan which is to be developed. Please identify when this will be implemented and if it will be part of the FEIS.

Response

The Travel Route Plan will not be included in the FEIS, but will be included in the Stormwater Pollution Prevention Plan (SWPPP) in the Construction Plan. The Travel Route Plan will be completed after approval of this Master Development Plan FEIS, prior to the implementation and construction of site-specific projects.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain how flying in concrete and steel by helicopter is "practical" or trenching water lines 8 feet underground (waterlines Page 3-258) without disturbing the vegetation is "feasible".

Response

The use of a helicopter to transport equipment is a BMP utilized by the ski industry to reduce the effects of projects to the surrounding environment. While this may be more expensive and less practical than over-the-road transport, the Proposed Action and alternatives include the use of a helicopter in order to prevent the need for road construction in the White Pass Inventoried Roadless Area. The DEIS and FEIS acknowledge that utility installation would affect vegetation. Specifically, Table 2.3.1-2 indicates that waterline installation would affect a 15-foot corridor. In the case cited on page 3-258 of the DEIS, installation of the waterline to the mountain-top restaurant would take place in the existing access road to the summit. Nonetheless, the DEIS and FEIS analyze the 15-foot disturbance corridor within the access road as grading.

Glenn Bandy

Ellensburg Cross Country Ski Club

Comment

An examination of the White Pass trail map indicates much undeveloped terrain within their existing permit area. Could trails be established in these areas to relieve the congestion that the area claims? It seems runs could be cut into the woods north of the "Bird" runs, east of Mach V and west of Lower Roller that would create much new terrain for the area. Congestion issues stemming from traffic being funneled onto the Cascade cat track could be mitigated by regrading at Cascade Cliff.

Tom Cottrell

Central Washington University

Comment

If White Pass wishes to expand, they can easily add high speed lifts, and new runs in areas already impacted by development.

Darrell Howe

Crystal Conservation Coalition

Comment

The statement of Purpose and Need is unreasonably narrow by focusing on the expansion of an Special Use Permit Area. The Master Development Planning process should address ways of satisfying need within the existing permit area foremost.

Chris Prowell

Comment

Increase the capacity for ski development within the existing White Pass area by improving the existing trail system and upgrading the existing lifts to high speed detachable quads.

Mark Lawler

Sierra Club Cascade Chapter

Comment

Please also add features to Alternative 9 to address the present bottlenecks; for example, has this alternative done all it can to widen ski runs that approach bottleneck areas, and are lifts configured optimally to service the terrain? Can terrain be slightly modified to reduce effects of the steeper ("cliff band") terrain at a few key locations? Such changes to ski runs are common at other ski areas, and while they do cause environmental impacts, overall the impacts would probably be far less than developing pristine backcountry such as Hogback Basin.

Common Response

Alternative 9, as described in Section 2.3.6 - Alternative 9 (Infill: Maintain Existing Cliffline), was developed to address the Purpose and Need for action without expansion of the SUP area into the Hogback Basin (White Pass Inventoried Roadless Area). The final decision may include parts of or the whole of any alternative analyzed in the EIS.

Additionally, Section 2.2 describes alternatives that involved expansion of the ski area without expansion of the SUP area which were considered, but eliminated from further analysis. These include Alternative 5 - maximum development in the SUP area, Alternative 8 - Pigtail Basin lift with partial infill, Alternative 13 - lift replacement and upgrades. Section 2.2 of the FEIS also describes the rationale for elimination of these alternatives from detailed analysis.

Darrell Howe

Crystal Conservation Coalition

Comment

The proposed action provides specifications for Terrain on page 2-21 but fails to provide any reference for the Map. Reference #'s 38-52 should be located for public review.

Christine Reichgott

Environmental Protection Agency

Comment

Chapter 2 provides tables of proposed trails under each alternative. However, it is difficult to understand how these trails would affect skier circulation without knowing the locations of them. In order to help readers to assess skier circulation under each action alternative, the final EIS should provide a map of proposed trails.

Common Response

The FEIS figures have been updated to include labeled ski trails proposed under each alternative.

Glenda Phillips

Comment

Monitoring as described on page 2-54 is vague with little substance. There should have been some monitoring plan discussed within the DEIS, specifying what will be monitored, for how long, and what the expectations are (plant survivability, invasive species percentage, etc.)

Darrell Howe

Crystal Conservation Coalition

Comment

Monitoring of the results to mitigation and restoration needs to be identified for positive results and future projects need to be implemented only after success. What signifies a failure?

Darrell Howe

Crystal Conservation Coalition

Comment

Section 2.5 identifies an annual monitoring plan but again lacks details on it's implementation. Describe the Plan and its intent clearly within the EIS process. Should it not be part of the Final EIS?

Christine Reichgott

Environmental Protection Agency

Comment

Section 2.5 discusses monitoring but rather in general terms. The draft EIS repeatedly concludes proposed mitigation measures would minimize the potential impacts (see above). The final EIS should include a more detailed discussion of monitoring to show a commitment to ensure that effects are kept to the predicted minimal level.

Common Response

Detailed plans would be developed and approved prior to construction as indicated in Section 2.5 - Monitoring. All monitoring required by the Forest Service, Environmental Protection Agency, or other agencies would be included in an Annual Monitoring Plan, with the objective of monitoring the implementation of mitigation, effectiveness of management practices, and validation of the impact analysis. This plan will also include monitoring required by Mitigation Measures described in Table 2.4-2. Monitoring of all construction activities would be carried out according to the construction plans, as approved by the Forest Service and other involved agencies, and will include a Stormwater Pollution Prevention Plan, which includes monitoring of onsite BMPs and evaluation of water quality. The exact requirements of the Annual Monitoring Plan are subject to permitting requirements (refer to Chapter 1 of the FEIS), which would be obtained during the implementation phase of the project.

Darrell Howe

Crystal Conservation Coalition

Comment

The density index on page B-10 indicates the existing trail system at White Pass is not typically overcrowded. Please explain the need for more terrain and ski runs given this statement.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-216 indicates the current terrain as being acceptable with density at half of industry standards and then clearly states this is 'a desirable situation'. Please explain why more terrain is needed beyond the existing permit boundary given this statement.

Common Response

As described in Section 3.11.2.1 and Appendix B, the density index score indicates that trails at White Pass are typically not over-crowded. However, it does not take into account the circulation issues associated with the cliff band that crosses the White Pass Ski Area mid-mountain at approximately 5,300 feet elevation, where skier density can exceed industry standards on capacity days. Refer to Section

1.1.2.2 - The Purpose of and Need for Action for additional information regarding the need for improved safety, circulation and dispersal on the ski slopes.

Design density is discussed in Appendix B. The ranges shown are generally applicable to all ski areas, however specific numbers within that range were developed for White Pass, taking into account regional and market differences and preferences. For example, ski areas in the Western United States generally exhibit lower skier densities than ski areas in the Eastern United States. Similarly, beginner or family oriented resorts generally exhibits higher ski area densities than expert oriented ski areas. The skier densities assigned to White Pass are consistent with a Western United States, local, 'intermediate-expert' ski area.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The nordic skiing area is mostly outside of the SUP and within the W.O. Douglas Adjacent IRA (why is the IRA not shown on map 1-3), including the Dog Lake, Dark Meadows, Corral and Deer Creek Loops plus the Biathlon loop. All of these are in addition to the ZigZag, which is listed as "unauthorized" in table 2-6.1, none of the others appear to have been mentioned by name in the proposal. Requiring a pass from the White Pass Ski company to cross this area seems to be an unfair blockage to accessing the Pacific Crest Trail to the north, which is a pleasant cross country ski tour once the meadows around Sand Lake are reached.

Mark Lawler

Sierra Club Cascade Chapter

Comment

We also recommend that Alternative 9 be modified to not expand Nordic ski trails beyond the original system authorized in the ski area master plan. In no case should the ski area permit boundary be expanded in areas north of Highway 12.

Tom Uniack

Washington Wilderness Coalition

Comment

The DEIS also indicates that as part of Alternatives 2, 4, 6 & 9 the unauthorized snowshoe and Nordic trail systems would be incorporated into the SUP, again lacking the analysis and discussion in the DEIS that would be expected in order to make such a decision. (DEIS p. II-232).

Regan Smith

Northwest Ecosystem Alliance

Comment

According to the DEIS, authorization of any of the Action Alternatives would incorporate and integrate the current Nordic and snow shoe operations into the MDP and SUP. However, the DEIS never discloses the impacts associated with these trails. The DEIS states that some of these trails, specifically the Zig Zag trail were not authorized. Does this mean that construction of these trails never went through a public-commenting period? The DEIS should clarify this question, and disclose the impacts of these trails, specifically with regard to the Zig Zag trail which enters the Late-Successional Reserves, and the cumulative effects of the whole trail system.

Tom Uniack

Washington Wilderness Coalition

Comment

Upgrading existing outdated lifts (some 20 and 45 years old) with newer higher capacity lifts should be considered as part of Alternative 9.

Common Response

The DEIS describes that under all Action Alternatives, the continued operation of the existing snowshoe trails and *Zig Zag* Nordic trail would be authorized under the SUP. Under the FEIS, this trail authorization component has been removed from all alternatives, and will not be part of this NEPA decision.

James and Elsie Burke

Comment

I do believe that the proposed lift #6 should go higher on the mountain to better utilize the terrain to the west.

Mike Hiler

Comment

Preferred alternative: the upper hogback runs will not extend the ski season for White Pass. Additional runs are only needed for a few days each winter. Upper lift construction will impact upper area resources and visitors. All of these impacts, and the above concerns, can be addressed by expanding the ski area to the west toward Knuppenberg lake. This area would be safer, easier to access, will avoid impacts and hazards to Hogback Basin, and will allow White Pass to expand.

Lori Flemm

Comment

I encourage the creation of additional nordic trails, even though this is not addressed in any alternative. More snowshoe trails would be welcome also.

Kathy Wilmering

Comment

The White Pass Ski Area seems large enough to accommodate further development of its slopes, especially if a more efficient chair lift system was utilized.

Darrell Howe

Crystal Conservation Coalition

Comment

Existing lifts should also be evaluated for increased capacity potential prior to the installation of new facilities.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is one mitigation measure that should be discussed: The moving of the upper lift terminals farther down the ridge. This would help mitigate 6 different areas of concern:

- 1) The Yakima Tribe's expressed concern over the sacred values of the Hogback Ridge and surrounding areas.
- 2) The interference with the Pacific Crest National Scenic Trail.
- 3) The safety concern of skiers entering the high avalanche areas of the Miriam Basin.
- 4) The detrimental effects on the Goat Rocks Wilderness by the injection of hundreds of skiers over the boundary.
- 5) The visual impact of the towers.
- 6) The detrimental effects of noise and pollution on the Wilderness Area Boundary.

Eric Quinn

Comment

With good run and trail design White Pass could serve both markets without compromising quality. Backcountry products based in the new lodge could include guided backcountry trips, snowshoe, ski and avalanche classes, gear rental and sales, overnight room or cabin rentals or a hut-to-hut trail.

Mark Lawler

Sierra Club Cascade Chapter

Comment

We are also concerned that as presented in the DEIS, Alternative 9 has been made undesirable. There is no reason we know of why a somewhat more extensive system of new runs could not be created on the eastern edge of the existing permit area to provide a range of ski terrain, and be served with new or modified lifts. The presence of only one new run on the eastern edge of the existing permit area makes us question whether this was truly prepared as a viable alternative.

Common Response

A range of options were considered, and those most feasible options (that met the Purpose and Need) were chosen for further analysis. Within the Action Alternatives, a variety of options were considered but rejected because either they weren't feasible alternatives, didn't meet the Purpose and Need, or both. Refer to FEIS Chapter 2 for further information on the range of alternatives.

10.0 Climate and Snow

Elinor A Graham

Comment

Developing this area with lifts, roads and cutting the trees makes no sense when the ski area already has sufficient land to increase their skier capacity (and they may not be able to operate in the future if global warming continues to produce low snow winters).

Response

Refer to the Purpose and Need for the proposed project (Section 1.1.2.2), which does not specifically aim to increase the capacity of the White Pass Ski Area. In addition, refer to section 3.1 - Climate and Snow for a discussion of national and regional climate. As described, the White Pass Study Area is located between approximately 4,400 feet and 6,700 feet elevation. According to the Pacific Northwest National Laboratory (PNNL) climate change model, snow cover in Washington State will be lost within the existing snowline, resulting in a projected rise of the average Cascade snowline from its current 3,000 feet to approximately 4,100 feet in the next 50-80 years (PNNL, 2004). Alternative 2, Modified Alternative 4 and Alternative 6 would provide terrain above the predicted 4,100-foot snowline prior to 2050.

Additionally, the planning period for this analysis and the proposed operation period is 10-20 years. Note that the localized effects of global warming are still being debated and modeled, and climate change predictions typically have 50-80 year timeframes.

Erik Splawn

Hogback Basin Preservation Association

Comment

Climate change in the form of decreased snow pack and receding glaciers (ex. Paradise Glacier, Mt. Rainer) has been in evidence for many years. The DEIS should show regional and White Pass yearly average snow pack data for the last 60 years to demonstrate any trends.

There are many studies available which discuss climate change in the Pacific Northwest and in particular the Cascades. Regional climate models and trends although not specific to White Pass can be helpful in predicting future snowfall.

Erik Splawn

Hogback Basin Preservation Association

Comment

The economic viability of this expansion is 100% reliant on future snowfall. After last year's disastrous season, wouldn't it be prudent to discuss future snowfall as it relates to global warming?

Erik Splawn

Hogback Basin Preservation Association

Comment

The author provides no documentation for off the cuff statements on pg. 122 that "global warming effects are not anticipated to affect the planning period for this analysis, or the operational period of the proposed chairlift (10 to 20 years)". In fact there are several studies that dispute this statement.

W.D. Frank

Hogback Basin Preservation

Comment

Furthermore, any discussion of expansion should consider all relevant information concerning projected snow accumulations based on models for continued global warming and the effects of El Nino as demonstrated by the weather patterns of this winter.

Regan Smith

Northwest Ecosystem Alliance

Comment

While the DEIS states on page 3-3 that global warming or climate change has inherent uncertainty's and won't be included in the analysis, it would be wise to consider potential effects of forecasted climate change in your socio-economic analysis. More repeats of the 2004-2005 season could have real impacts on the economic viability of the resort, specifically with increased capital investment.

Regan Smith

Northwest Ecosystem Alliance

Comment

A few highlights we want to mention is that April 1 snow pack in the cascades has declined by 50% between 1950 - 2000. In 25 years, it is likely only a quarter of the current snowpack will remain. Peak snow pack occurs earlier and earlier (a shift of up to 40 days earlier between 1916-1997), which means shorter ski seasons. While it is true that there are many uncertainties associated with modeling climate change effects, the trend is certainly towards less snow, which means less ski days, less skiers and less revenue.

Karen Fant

Comment

It is ironic that expansion of White Pass Ski Area is under discussion again in a year then the snowpack was 26% of normal and, until last week, only one ski area in the state was open! Recent reports that the Northwest is overdue for a serious, long-term drought add to the incongruous nature of considering this project.

Richard L. Curtis

Comment

The weather will determine the economic viability of the ski area far more than the proposed expansion. Global warming is a phenomenon that is widely accepted at this point and will most likely adversely impact the White Pass Ski Area. How will the ski area address this problem? Simply giving the ski area control of more public land and gaining a few more feet in elevation will not solve any problems if weather patterns do not cooperate. What studies of long term weather trends have been performed or planned to support the viability of a ski area in this location?

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to discuss the effects of climate change on future snowfall, ski season length, skier visitation and the economic viability of the ski area. This is a real issue that is considered every day by banks, lending institutions, investors and government agencies to determine future viability of projects and enterprises that rely on snowfall, snow pack and water availability. The author of the DEIS dismisses out right any discussion of climate change "due to the inherent uncertainty of the ability of regional climate models to predict the localized impacts associated with global warming." Failing to present any discussion on climate change and how it may impact the region and White Pass is capricious and irresponsible.

Common Response

FEIS Section 3.1 - Climate and Snow has been updated to provide further discussion on national and regional climate. As described, the White Pass Study Area is located between approximately 4,400 feet and 6,700 feet elevation. According to the Pacific Northwest National Laboratory (PNNL) climate change model, snow cover in Washington State will be lost within the existing snowline, resulting in a projected rise of the average Cascade snowline from its current 3,000 feet to approximately 4,100 feet in the next 50-80 years (PNNL 2004). Alternative 2, Modified Alternative 4 and 6 would provide terrain above the predicted 4,100 foot snowline elevation prior to 2050. Additionally, the planning period for the analysis and the proposed operation period is 10-20 years. Note that the localized effects of global warming are still being debated and modeled, and climate change predictions typically have 50-80 year timeframes. In addition, as stated in FEIS Section 3.1, White Pass' "year-to-year climate variations correlate with two large-scale climate oscillations: El Niño/Southern Oscillation and Pacific Decadal Oscillation, both of which are associated with warm years tending to be dry, and cool years tending to be wet (NAST 2000). Therefore, the Cascades would likely continue to witness variable weather conditions, resulting in low snow deposition during some weather cycles and excessive snowfall during other periods. Specifically, refer to the Northwest Weather and Avalanche Center or www.skimountaineer.com for White Pass snowdepth data from 1976 to 2006 (Andalkar 2006), which shows snowdepth oscillations during this period." The existing SUP expires in 2035, and upon renewal, if global warming more noticeably affects the White Pass operation, subsequent Master Planning and environmental analyses will address the viability of the operation at that time.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The lack of early (or late) season snow in the vicinity of the lodge will still limit the season, the expansion area may be high enough to be skiable early in the season but access will still be limited by the area near the lodge.

Erik Splawn

Hogback Basin Preservation Association

Comment

How does the proposed expansion improve the Main Street egress during low snow conditions considering Main Street is the primary egress for Hogback area skiers accessing the base facilities? When there is inadequate snow cover on the lower mountain, how will skiers access the facilities and parking lot from the Hogback runs? Is there a plan for downloading skiers from Pigtail peak on the Great White Chair or Pigtail Peak chair?

Common Response

The Purpose and Need (refer to FEIS Section 1.1.2.2) refers to the existing "Main Street trail that provides cat tracks for intermediate and higher level skiers to descend from the upper mountain to the lower mountain. While these cat tracks allow non-expert skiers to negotiate the cliff line, the majority of skiers at White Pass (ie., novice to intermediate skiers) are required to negotiate the long traverses over the cliffline, resulting in unacceptably high skier densities on these trails." Therefore, the Purpose and Need does not specifically aim to improve Main Street egress during low snow conditions. Refer to Chapter 2 for a description of access/egress trails for each alternative. While no improvements to the Main Street egress are planned under any of the alternatives, Modified Alternative 4 and Alternative 9 propose to regrade the Holiday trail to allow this trail to be used by novice skiers to access the lower mountain from the top of the mountain. Additionally, Trail 4-18 in Figure 2-4 (also labeled Trail 9-6 in Figure 2-8) has been incorporated to reduce density increases associated with 'end of day' egress of Pigtail and Hogback Basin area skiers. With inadequate snow cover on the lower mountain, skiers would continue to be able to access the lodge and parking lot from the Pigtail/Hogback runs by downloading via the Great White Express or Pigtail chairlifts. Such downloading would be included in the annual operating plan and is not a component of this NEPA analysis and/or decision.

15.0 Geology and Soils

Darrell Howe

Crystal Conservation Coalition

Comment

Bare soils defined as areas larger than 0.5 acres in Table 3.2-1. Does this definition apply to Environmental Consequences and Soil Compaction? Are all activities which impact small areas under 1/2 acre not evaluated?

Response

As detailed in the footnote to Table 3.2-1, bare soil areas are existing, human-caused unvegetated areas larger than 0.5 acre. Areas of bare soil were evaluated during field review, field mapping and by aerial photography. The 0.5-acre threshold value was determined to be the most appropriate minimal acreage size for mapping purposes based on best available data (field and GIS analysis). Bare soil areas smaller than 0.5 acre may exist on-site, however the total of these smaller areas would not increase the percentage of the White Pass Study Area in detrimental conditions above the GPNF and WNF Forest Plan compliance standard of 20 percent. Soil compaction is considered to be compacted soils caused by historic construction of ski lifts and trails, and is measured by percent of the White Pass Study Area that is currently in detrimental soil conditions, as shown in Table 3.2-1.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.2.3.2 page 3-19 states 12 acres of grading would occur in Alternative #9. Section 3.2.5.3 page 2-37 states 3 acres of grading would occur in Alternative #6. But on Page 3-18 the DEIS states 5.6 acres of grading would occur. Please explain the information gap. Generally there is a break in the analysis which needs to be bridged for proper evaluation of the Alternatives.

Response

The FEIS has been updated to clarify the grading areas and impacts of grading. DEIS page 3-18 refers to 5.6 acres of grading as a result of constructing one new lift, building the mid-mountain lodge, trenching in utilities, constructing a road to the bottom terminal of the Basin chairlift and building a new parking lot. In comparison, Table 3.2.5-3 on DEIS page 2-36 describes total grading requirements, but does not incorporate the construction of the new lift (top and bottom terminals) (0.85 acres), utility trenching (1.19 acres) and trail 6-1 grading (0.27 acres).

Darrell Howe

Crystal Conservation Coalition

Comment

Table 2.3.6-3 Showing ground disturbance fails to include the 3 acres of permanent grading with the creation of a 2.5 acre parking lot mentioned on the next page (2-43). The ground work for the proposed lodge at the summit also is missing from the table. Please explain the inconsistency.

Response

FEIS Chapter 2 has been clarified to highlight that Table 2.3.6-3 (and similar tables in the document) is a summary of construction and ground disturbance from new trail activities (including utility installation) for Alternative 9. Table 2.3.6-3 is not set-up to incorporate parking lot or proposed lodge construction and ground disturbances. Therefore, refer to Tables 2.6-1 and 2.6-2 (also refer to Section 3.2 - Geology and Soils) for a summary Comparison of Facilities by Alternative and of Environmental Consequences by Alternative, respectively.

Christine Reichgott

Environmental Protection Agency

Comment

The draft EIS states that impacts on soil resources would not be significant due to the small scale of the proposed actions, the implementation of mitigation measures, and the use of sediment control Best Management Practices (BMPs). However, it is difficult to evaluate whether the proposed BMPs are sufficient unless it is shown how BMPs are applied and performed at a specific location. The final EIS should provide further explanation of BMPs to verify their sufficiency to minimize the potential soil impacts.

Response

FEIS Section 3.3 - Watershed Resources has been updated to provide a 'worst case scenario' soil detachment analysis with use of the representative hillslope WEPP model. Additionally, further research has been provided in the FEIS to discuss the effectiveness of certain BMPs on reducing erosion and minimizing the 'worst case scenario' soil yield for the White Pass Study Area.

Darrell Howe

Crystal Conservation Coalition

Comment

Compare Section 3.2.3.2 to the Tables in Chapter 2. The existing impacts of 35.4 under Grading Impacts Table 3.2-4 compared to Table 2.6-2 is misleading. The Grading impacts are listed as N/A. The FEIS needs to use consistent terminology and data for the analysis.

Response

FEIS Table 3.2-4 has been updated to refer readers to Section 3.2.3.1 and that approximately 45.1 acres refers to the existing detrimental soil conditions resulting from historic ski area development. The change in existing grading impact numbers is a result of human error and is an approximate value.

Darrell Howe

Crystal Conservation Coalition

Comment

What other associated impervious surfaces or ground disturbance are excluded from the figure? [Re: Figure 3-15]

Response

The DEIS Figure 3-15 is now labeled Figure 3-22 in the FEIS. The data provided is best available data.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS states on p. 3-13 that grading for an emergency egress trail is required under Alternative 4, yet elsewhere the DEIS states that no grading will occur under this alternative. Please clarify and fully disclose the impacts associated with this emergency trail.

Response

The FEIS has been updated to graphically show the relevant trail names (i.e., Trail 4-16) on Figure 2-4 and other relevant figures. Additionally, all references to the "emergency egress trail" have been replaced within the FEIS document and are now referred to as Trail 4-16. For further details on Trail 4-16, refer to Table 2.3.4-3 for relevant ground disturbance and construction activities associated with the ski trails (including utility installation). Updated Sections 3.2 - Geology and Soils and 3.3 - Watershed Resources, Appendix F, and Appendix G also provide relevant impacts associated with Trail 4-16.

Darrell Howe

Crystal Conservation Coalition

Comment

On Page 2-27 last sentence the claim is made "NO grading for ski trails would occur". In Figure 3-6 the Egress Trail is identified as a Grading Impact. Please explain and quantify for the reader the impacts.

Response

The FEIS has been updated to remove the statement that "no grading for ski trails would occur". Alternative 4 has been removed from the alternatives considered in detail. Instead, Alternative 4 has been

replaced with Modified Alternative 4. Refer to Section 2.3 and Chapter 3 for further details on this alternative.

Darrell Howe

Crystal Conservation Coalition

Comment

Will topsoils be replaced to create functioning topsoils? [Re: Project #20 Table 3.5-7]

Response

The specific details in regards to the unstable slope repair project known as Project #20 in the DEIS (DEIS Table 3.5-7) is outside the scope of this EIS. However, for each National Forest, the Forest Service website has a Schedule of Proposed Actions (SOPA) which details the project name, project purpose, planning status, decision, expected implementation and project contact for all projects occurring in the National Forest area. Therefore, refer to the SOPAs by relevant National Forest to determine the relevant project's status and to obtain further information. Project #20's general information has been gathered for the purposes of analyzing the cumulative effects discussions associated with the proposed White Pass Ski Area expansion (refer Section 3.0 of the FEIS).

Erik Splawn

Hogback Basin Preservation Association

Comment

What kind of construction equipment would be used to grade, clear land, dig wells, dig drain fields, pour cement, or construct structures in the Hogback Basin? What are the dimensions and weight of these vehicles and how would they be transported to the building site? When would they be transported? What type of tread or tires do they have?

Response

The types of specific construction equipment would be detailed further during the construction phase of the project. Refer to Section 1.1.2.2 for the specific Purpose and Need details for the project.

Regan Smith

Northwest Ecosystem Alliance

Comment

We were a bit confused on how to read the decimals contained in the percentage columns of Table 3.2-7 and beyond. Would you read 0.20 as 2/10ths of a percent or 20 percent?

Response

Values in these tables represent impact value/watershed area x 100 to obtain a percentage of the watershed impacted. These values confirm that the White Pass Ski Area is currently in compliance with the GPNF and WNF Forest Plan standards of 20 percent for detrimental soil conditions (USDA 1990a, 1990b) as per FEIS Section 3.2 - Geology and Soils.

20.0 Watershed Resources

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS states on page 3-49 that if an underground utility waterline would be too impactful to streams and wetlands, then an on-site well would be drilled. Since this is a proposed activity under the DEIS, NEPA requires that the impacts associated with digging a well be fully disclosed. How big would the well be? How deep? How might this impact water quality in the aquifer or wherever its' drawing water from? Would a drilled well impact any wetlands in the area? The FEIS should fully disclose the impacts associated with this potential activity.

Response

FEIS Sections 3.13 - Utilities and Infrastructure and 3.3 - Watershed Resources have been updated to clarify the requirements for construction of the well. Under Modified Alternative 4, there are two options proposed to provide water supply to the mid-mountain lodge, namely construction of a waterline or a well. If it is determined that the proposed waterline utility is unfeasible, an on-site well would be drilled to provide a water supply for the proposed mid-mountain lodge. The well would be located upslope of the mid-mountain lodge, within the 50-foot building envelope surrounding the lodge. Drawdown requirements would be as described by each Action Alternative within Section 3.13 - Utilities and Infrastructure. FEIS Section 3.3.3.5 - Flow Regime states that if the well was to be built, the overall projected water demand for Modified Alternative 4 would be the same as under the trenched waterline, but the domestic water demand for the mid-mountain lodge would come from the groundwater well. The groundwater withdrawal would be approximately 450 gallons/day for potable use by the guests of the mid-mountain lodge. The localized soil moisture and flow regime impacts from the proposed groundwater withdrawal are not expected to be measurable due to the low volume of the withdrawal and surface disposal of grey water through a septic drainfield. Refer to Section 3.3.3.5, Section 3.2 - Geology and Soils, Section 3.4 - Fish, Section 3.5 - Vegetation, and Section 3.6 - Wildlife for other relevant disturbances. As detailed in FEIS Section 3.3 - Watershed Resources, there is minimal groundwater data available within the White Pass Study Area. To minimize any potential effects to the expansion area, where the proposed well would be constructed, groundwater sampling and other requirements would be

considered a separate action under NEPA (a tiered action) and therefore would be analyzed during the implementation phase of the project.

Darrell Howe

Crystal Conservation Coalition

Comment

Linking of road decommissioning to occur at a later date per Page 3-15. Explain why it is part of this analysis and how the decision making process will take place for this activity. On page 3-18 it is stated it will be addressed at a later time outside of this analysis. Please remove this road obliteration from the White Pass EIS process.

Response

Alternative 2, Modified Alternative 4, and Alternative 9 do not include the construction of new roads. The DEIS and FEIS acknowledge that Alternative 6 includes a road in a Tier 2 Key Watershed and an Inventoried Roadless Area. As stated in Section 2.3.5.5, the construction of a road within the White Pass IRA and Tier 2 Key Watershed would require a determination of consistency with the Northwest Forest Plan by the Regional Executive Interagency Committee. Road decommissioning is included in Alternative 6 as a means of reducing the net road mileage within the Tier 2 Key Watershed. If the decision was to include the road construction under Alternative 6, it would also include the road obliteration project. As with all components of the Action Alternatives, additional site specific planning would be carried out prior to obliteration of the road. As detailed in Chapter 2, in order for the decision makers to select this road and for the road to be constructed, the Regional Executive Interagency Committee would have to formally determine that the construction of such a road would be consistent with the Aquatic Conservation Strategy, as outlined in the Northwest Forest Plan (USDA and USDI 1994). If the Roadless Area Conservation Rule is formally implemented, then this road would not be allowed in the White Pass IRA and construction techniques (as described in the other Action Alternatives) would be implemented.

Darrell Howe

Crystal Conservation Coalition

Comment

On page 3-37 it is stated that 'stream temperatures and riparian shade were not directly measured' in the field. When will these critical parameters for water quality be taken? How were assumptions made regarding these parameters.

Response

Appropriate water quality parameters will be measured during project implementation according to permit requirements. Section 3.3.2.3 of the FEIS discusses the general assumptions made regarding parameters

and details that riparian shade was estimated by analyzing existing tree canopy cover within Riparian Reserves using GIS analysis.

Erik Splawn

Hogback Basin Preservation Association

Comment

Alternatives 2, 4, and 6 in the DEIS involve building roads and structures in a high yield Tier 1 Key Watershed with numerous wetland features. Such action would be detrimental to the ground water and head water supply to Millridge Creek.

Response

As described in Chapter 1, the Clear Fork Cowlitz River watershed has been classified as a Tier 2 Key Watershed. There are no Tier 1 Key Watersheds in the vicinity of the White Pass Ski Area. As described in the FEIS, Alternatives 2 and 6, as well as Modified Alternative 4 contain project elements that would be constructed within the Tier 2 Key Watershed. As described in the analysis of watershed resources (refer to Section 3.3 – Watershed Resources), which includes discussions of ground and surface waters, no impacts to Millridge Creek are expected to be measurable.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The DEIS stated that erosion on the existing ski trails was minimal, without describing how this was evaluated and whether regrading to eliminate the worst gullying would have influenced this assessment - the lack of top soil would seem to indicate severe erosion, please clarify.

Response

As described in the FEIS (refer to Section 3.2.3.1 - Soil Compaction and Productivity), approximately 45.1 acres of the White Pass Study Area currently has pre-existing detrimental soil conditions resulting from historic ski area development. FEIS Section 3.2.2.2 - Soil Erosion describes the method of evaluating and describing the range of erodible conditions with the White Pass Study Area. Specifically, "three soil erosion hazard classes were evaluated, namely: low, medium and high erosion hazard."

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.3.3.4 Water Quality states there will not be any new sources of pollution. What are the States current use of and plans for the use of Magnesium Chloride or other types of deicer on Highway 12?

Response

FEIS Section 3.2 - Geology and Soils has been updated to include the WSDOT's current deicing practices. The specific volumes of magnesium chloride or other types of deicers utilized on US 12 or other state highways is outside the scope of this EIS. Therefore, for the best available data and details of plans of use and deicing requirements on state highways, refer to WSDOT.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS states on page 3-23 that sand application to US 12 is the largest source of sediment to the Upper Tieton and Clear Fork Cowlitz River watersheds. Because no baseline data was available to know current direct input of tons/per/year, the DEIS simply quotes other known amounts from different ski resorts with no context provided. Inputs elsewhere range from 694 to 3,324 tons per year. What is the probability that operations on Highway 12 fall within that range? What are the impacts to water quality and fish habitat associated with sediment delivery at that level (and obviously concentrated during one season). Furthermore, would the expansion increase the amount of sand application?

Response

FEIS Section 3.2 - Geology and Soils has been updated to include the WSDOT's US 12 road sand application data from the 2004-05 and 2005-06 winter seasons. Approximately 2,196 tons of sand were applied in 2004-05, which is within the range provided in the DEIS. Potential impacts to water quality and fish includes an increase in sedimentation, however, impacts associated with WSDOT operations are outside the scope of this FEIS and therefore not included. The proposed White Pass expansion is not expected to increase the amount of sand applied to US 12, as sanding operations are administered by WSDOT.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-47 states 'snowbridges' would be utilized for stream crossings in alternative #2. Where will this snow come from and will grooming equipment be used when there is less than 3 feet of snow on the ground to not impact vegetation?

Response

FEIS Section 3.3 – Watershed Resources has been updated to detail more thoroughly the use of 'snowbridges'. Specifically, 'snowbridges' would be used during winter operations for ski trail access and egress, as described in Other Management Provision OMP9 (refer to Table 2.4-4). Snow would be obtained from natural snowfall and filled in as needed. As described in Other Management Provision

OMP8 (refer to Table 2.4-4), no grooming would occur with less than 3 feet of snow to protect vegetation in riparian zones and key watersheds. During operation of the White Pass Ski Area, snowbridges would be used over intermittent and ephemeral streams. Additionally, during the implementation phase of the project, 'snowbridges' would be utilized when possible and if/when the snow melts, a temporary corduroy crossing (felled tree debris) over intermittent and ephemeral streams would be utilized (refer to Table 2.4-4, OMP10). The corduroy crossing would be utilized during the implementation phase and removed after the completion of the implementation phase.

Regan Smith

Northwest Ecosystem Alliance

Comment

The information in Table 3.7-1 that attempts to address baseline information and the effects of the proposed action is somewhat incomplete.

For example, on page 3-162, the DEIS states that Millridge Creek is a sensitive stream and that further sediment delivery would further adversely impact this stream. However, in the adjacent box which seeks to address the effects of the proposed actions, there is no discussion of whether Millridge Creek would be effected by the actions.

Response

FEIS Table 3.7-1 has been updated to incorporate reference to the Water Erosion Prediction Project (WEPP) analysis undertaken and detailed in Appendix L. No development would occur directly along Millridge Creek, however Section 3.3 - Watershed Resources details the sediment detachment for the various land cover types within each affected sub-watershed of the White Pass Study Area. While sediment detachment is likely to occur, delivery to Millridge Creek is low because Mitigation Measures and Management Requirements listed in Tables 2.4-2 and 2.4-3.

Christine Reichgott

Environmental Protection Agency

Comment

We are concerned about the potential increased erosion on steep slopes and highly erodible soils and subsequent water quality degradation downstream. The Upper Tieton River is important habitat for char and bull trout and the Clear Fork Cowlitz River currently supports salmon and trout spawning, core rearing and migration. There is also the potential that ski area construction could adversely affect the flow regime, and subsequently wetlands and surface water within the project area during low flow situations in drought season.

Response

Refer to FEIS Section 3.2 - Geology and Soils for a discussion of the erodible conditions within the White Pass Study Area. As described in Section 3.4 - Fisheries, special status fish species do not occur in the White Pass Study Area, but do occur 6 miles downstream of the White Pass Study Area in Clear Lake (Upper Tieton watershed) and 8 miles downstream in the Clear Fork Cowlitz River. As described in Sections 3.2, 3.3, 3.4 and 3.5, the use of construction techniques and Management Requirements (as listed in Tables 2.4-2, 2.4-3 and 2.4-4) would reduce soil erosion, and impacts to soil productivity, flow regime, wetlands, water quality and vegetation. Leech Lake and Knuppenburg Lake act as sediment traps to increased sediment delivery (estimated from WEPP model), which will make potential effects to downstream fish habitat (SS species) negligible or immeasurable.

Darrell Howe

Crystal Conservation Coalition

Comment

Table 3.7-1 also suggests felled trees and woody debris will be placed in streams. What impact would this action have on habitat and streamside vegetation? Who will determine how much and where debris will be placed?

Response

Refer to FEIS Table 2.4-2, Mitigation Measure MM3, which provides the logic of tree clearing and felling towards stream channels. Specifically, MM3 details this action as providing in-channel LWD recruitment and maintenance of streambank stability. Refer to Sections 3.4 and 3.6, as well as Appendices H and I, which generally describes that there would be short-term habitat disruption, but long-term increases in habitat complexity. On-site determination of which trees would be felled and where debris would be placed within streams would be at the discretion of the on-site USFS personnel during the construction phase of the project.

Clar Pratt

Cascadians

Comment

Western water law recognizes state waters. U.S. waters are sometimes defined as those that are navigable; 15 miles of navigable water in the White Pass area? We haven't got a lot of navigable water in the interior of Washington - Lake Chelan being one by virtue of history. White Pass?? This touches on an argument on federal lands with which I was once overly familiar. Might be cleared up a bit in the final EIS.

Response

Refer to Section 3.3.2.1 of the FEIS, which discusses streams in the White Pass Study Area that meet the definition of "Waters of the United States" as described in 33 CFR 328.3 (a)(1)-(8). The federal water/lands discussion is outside the Purpose and Need of the White Pass FEIS.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain the attainment goals for water supply mentioned on page 3-40. Are they being achieved? When will more data be collected in the watersheds for water quality? Page 3-41 states water quality is considered good for aquatic life and goes on to say limited data exists. How was this quality of 'good' determined and when was the last quality measurements taken?

Response

Section 3.3.2.4 - Water Quality has been updated to provide further clarification to the State of Washington Surface Water Quality Standards (SWQS). Specifically, this FEIS follows the Environmental Protection Agency-approved revisions to the SWQS, but uses the 1997 standards for sections still under review by the Environmental Protection Agency as of September 2006. A summary of current SWQS in use can be found on the WDOE website (www.ecy.wa.gov). The discussions relating to existing surface water quality data collected in the White Pass Study Area has been updated as it relates to the Environmental Protection Agency's SWQS review and is detailed in Section 3.3.2.4. Appropriate water quality parameters and monitoring will be undertaken during project implementation according to Forest Service, Environmental Protection Agency, or other agency permit requirements. Monitoring of all construction activities will be carried out according to the monitoring plans, as approved by the Forest Service and other involved agencies, and will include a Stormwater Pollution Prevention Plan (SWPPP), which includes monitoring of onsite BMPs and evaluation of water quality. The water quality data provided in the updated FEIS represents the best available data.

Darrell Howe

Crystal Conservation Coalition

Comment

How was it determined that only projects occurring in Riparian Reserves will be evaluated as outlined on page 3-83? Large areas of grading and the creation of bare soils outside of RR's could contribute to impacts on the watershed resources could they not?

Response

Section 3.3.3.3 of the FEIS has been updated to clarify that projects that occur within Riparian Reserves are more likely to impact the parameters evaluated in Section 3.3 - Watershed Resources (i.e. streams,

wetlands, water quality, flow), because of the proximity of the actions to the watershed resources in comparison to activities that have no relation to waters.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-51 mentions 4 new bridges and miles of culverts will be constructed for ski trails. Are these also made of snow and how are they different from Alt-#2? What is the criteria for placement of streams into culverts rather than creating fords?

Response

The bridges proposed under Alternative 9 would be permanent structures, whereas the ski trail stream crossings described under Alternative 2 would be constructed from snow. Chapter 2 has been updated to detail the assumed bridge width of 40 feet, while Mitigation Measure MM5 (refer to Table 2.4-2) further details the installation requirements of bridge crossings. The specific design requirements of bridges proposed under Alternative 9 would be detailed in construction plans. Fords are generally used when culverts and bridges are not an option because of high debris loading in the stream channel, or because the crossing is too difficult to maintain. Fords have a high potential to generate and deliver sediment downstream, and so are only considered suitable in sites with minimal vehicle traffic, locations where access limits regular maintenance, or variable stream widths exist because of landslides, debris, or ice flows (WSDNR 2006). Fords are only allowed in Type Np (perennial, nonfish) and Ns (seasonal, nonfish) waters during periods of low water (WAC 2001a). Bridges and culverts are allowed for Type Np and Ns waters, and are subject to provisions outlined in WAC 222-24-040 Sections 2 and 3 (WAC 2001a).

Christine Reichgott

Environmental Protection Agency

Comment

Environmental Protection Agency recommends that the U.S. Forest Service (USFS) conduct modeling to quantify potential sediment yields to streams in and downstream of the project using the Watershed Erosion Prediction Project soil erosion model (WEPP) or similar model. This would provide a basis from which to compare alternatives for potential water quality impacts. The final EIS should then compare short term and long term sediment yield that would occur from implementing each alternative.

Response

The FEIS has been updated to incorporate a representative Water Erosion Prediction Project (WEPP) analysis of the White Pass Study Area (refer to Section 3.3 - Watershed Resources and Appendix L). The WEPP analysis included within the FEIS compares short-term (year of construction) and long-term (two to five years after construction) increases in soil detachment between the alternatives. It is important to

note that the output of the process provides an estimate of soil detachment, and not actual delivery to the stream system. The WEPP documentation cautions that “at best, any predicted runoff or erosion value, by any model, will be within only plus or minus 50 percent of the [actual] value. Erosion rates are highly variable, and most models can predict only a single value. Replicated research has shown that observed values vary widely for identical plots, or the same plot from year-to-year. Also, spatial variability... of soil properties add[s] to the complexity of erosion prediction” (USFS 2000b).

Darrell Howe

Crystal Conservation Coalition

Comment

When will data be gathered for sediment delivery? On page 3-100 per the Tieton River analysis little data exists. How can evaluations be made without a baseline of information. Would this be another opportunity for assumptions to be made of existing conditions? How can impacts be 0.00 acres on Table 3.4-4 for Alternative 1 & 2 Cumulative Impacts which include PAST projects?

Response

The FEIS has been updated to incorporate a Water Erosion Prediction Project (WEPP) analysis of the White Pass Study Area (refer to Appendix L). Additionally, FEIS Section 3.3 - Watershed Resources has been updated to incorporate the results of the WEPP analysis and its findings for each Action Alternative. As described in Section 3.4 - Fisheries and Appendix I, the best available data indicates that the watershed is functioning adequately with regards to sediment. Past projects for this analysis include a time frame of five years. No known projects occurred within the White Pass Study Area that would have resulted in a cumulative impact to fisheries within this timeframe. Additionally, there are no impacts to Riparian Reserves under Alternatives 1 and 2.

Darrell Howe

Crystal Conservation Coalition

Comment

As described for the construction of the proposed parking lot in Alternative # 4, grading and associated ground disturbing activities will be primary sources of sediment delivery. What types of stormwater plans are being implemented for the long term use of sand or deicer on these impervious surfaces? Will snow removal and storage areas have catch-basins, swales, detention ponds or filtration measures? Has the quantity of materials from these sources been calculated for the life of the MDP? Will there be like-kind replacement of functioning soils lost to the creation of impervious surfaces?

Response

The FEIS has been updated to provide a Conceptual Stormwater Management Plan to address impacts of the proposed parking lot (refer to Appendix M for further details). White Pass does not currently use, and

is not proposing to use, deicers or sand on existing or proposed parking lots. Snow storage areas will drain to the larger stormwater management system for the parking lot, which will include detention areas and oil-water separators. Additionally, snow pack is highly variable in the White Pass Study Area. Therefore, no sizing of snow storage facilities was made.

Darrell Howe

Crystal Conservation Coalition

Comment

On page 3-19 the egress trail for the Paradise Pod is described. Can this trail be constructed lower on the slope to avoid wetland impacts. Explain why it needs to have 2 switchbacks in undisturbed terrain. Depositing skiers on the existing Lower Roller trail would avoid numerous impacts to streams and vegetation would it not?

Response

The location of the egress trail for the Paradise pod, Trail 9-6, is designed as a low intermediate trail. As such, the trail is constructed at an 11 percent grade, thus requiring two switchbacks to get beginner/low intermediate skiers to gentler slopes on Lower Roller. Depositing skiers higher on Lower Roller (by eliminating the switchback) would result in less clearing and stream crossings, but would create additional safety concerns (i.e. beginners on advanced slope).

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

On page 1-3, it is noted that replacement of the sewer line has not been completed. In 1993 (I believe that is the correct year), a complaint was received of raw sewage discharging to Leech Lake and documented, that is after the upgrade completed during 1991-1992. The chemical analyses of Leech Lake included in table 3.3-8 are old (1990) and indicative of a lake of a relatively high trophic status (high phosphorus, dissolved oxygen below saturation). The abundance of emergent plants and the periphytic algae growing on them in recent years are consistent with an elevated trophic status, especially in comparison to Deer and Sand Lake a mile or so to the north in a similar setting (except for the human activity adjacent to Leech Lake).

Darrell Howe

Crystal Conservation Coalition

Comment

Water Quality Data as outlined on Table 3.3-8 for Leech Lake is 15 years old and should be updated for current conditions.

Christine Reichgott

Environmental Protection Agency

Comment

The water quality data in Table 3.3-8 includes ortho-Phosphorus levels that appear to be elevated and dissolved oxygen levels that appears to be lower than what would be expected for the recorded water temperatures. We recommend that the final EIS explain these discrepancies.

Common Response

FEIS Section 3.3 - Watershed Resources has been updated to provide the best available water quality data for Leech Lake, which was gathered in 1989 and 1990. Additional influences to Leech Lake include the daily on-shore campground activity, vehicular use of the campground's exit/entry roadway, and other recreational activities (e.g. fishing/boating/swimming) which occur predominantly during spring and summer, but may occur throughout the year.

Darrell Howe

Crystal Conservation Coalition

Comment

The Trail Construction techniques described for the PCT Chair Pod on page 2-47 fails to identify a SWPPP or Erosion Control Plan which would be needed for ground disturbing activities in Riparian Reserves. The EIS process should clearly describe procedures and timelines for mitigation for the reader.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 2-52 identifies Stormwater Pollution Prevention Plans which is to be developed. Please identify when this will be implemented and if it will be part of the FEIS.

Common Response

A Stormwater Pollution Prevention Plan (SWPPP) will be developed during project permitting.

25.0 Vegetation

Darrell Howe

Crystal Conservation Coalition

Comment

Canopy cover estimates have been made with ranges of 23% to 74%. Please describe the methodology used to make estimates of average existing conditions given such wide variations. What type of protocol is followed to generate data for this GIS analysis?

Response

A USGS aerial photograph with a 1-meter pixel resolution was used to create the canopy coverage analysis. The aerial photo is an 8-bit raster where each pixel has a value that ranges from 0 to 255. The darker colors (i.e. higher numerical values) in the photo represent dense canopy whereas the lighter colors (i.e. lower numerical values) represent absence of a canopy.

A range of values were established that represented the presence or absence of trees. The aerial photo was then reclassified into a binary, 2-value raster--tree/no tree (i.e., each pixel was assigned a tree or no tree status). A nearest-neighbor analysis was then run to determine the average value for each pixel. Canopy cover was then calculated by averaging the number of 'tree' pixels for each alternative.

Darrell Howe

Crystal Conservation Coalition

Comment

Please describe to the reader where the removal of hazard trees will take place. Have these been identified previously? Is this 15 acres of timber removal on Table 3.5-6 in the Study Area?

Response

According to the available project information, hazard tree removal would occur within the Highway 12 right-of-way. No specific trees have been identified for removal at this time. As described in Table 3.5-6, the approximate size of the treatment area is 545 acres along a 15 mile stretch of Hwy 12, however, the exact locations of specific trees that would be removed is unknown at this time.

Darrell Howe

Crystal Conservation Coalition

Comment

Describe the type of impact which would take place with Project #20 Table 3.5-7. Will this be 13.2 acres of full clearing and vegetation communities reestablished within a 2-3 year timeframe?

Response

According to the available project information, it is expected that impacts would include clearing and grading. No specific revegetation requirements have been identified as the exposed slopes are within the existing Hwy 12 right-of-way and contain little or no mineral soil. According to WSDOT, rocky areas would not be revegetated.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS should detail:

- 1) What date were the last surveys completed for PETS botanical species in Hogback Basin?
- 2) What is the protocol for how long botanical PETS surveys are valid?

Response

As described in Section 3.5.2.3, PETS surveys have been conducted as recently as 2004. The FEIS has been updated to include a table listing all surveys conducted within the White Pass Study Area for Special Status Species. Surveys are typically valid until new information is obtained, e.g., a new population is located, a new species is listed, or there reason to believe original surveys were inadequate, or otherwise outdated. As described in the FEIS, surveys have been conducted as recently as 2004 within the White Pass Study Area with no detections of special status species.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The existing ski trails are quite broad for the most part, while the trails proposed for the expansion into Hogback Basin are shown as narrow (and over top of the existing drainages). The vegetation has been completely altered (a brief survey near the lodge in the summer of 2004 found none of the species present in the nearby woods on the ski slopes) and no topsoil remaining. The discussion of the existing conditions did not note this or explain how and why the native species were eliminated along with the top soil or why this would not occur in the new development.

Response

As ski areas are considered developed recreation sites, one would reasonably expect to observe different plant species within the developed area (i.e. around buildings) than what is present in adjacent, undisturbed areas. The existing vegetation communities are described in Section 3.5.2.1 and include a summary of species typically encountered in each community.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain how Trail Construction for the Basin Pod would retain vegetation less than 3 feet tall in Table 2.4-1 given grooming equipment operating with power tillers often work on snow cover of less than 18". Would these trails and the ski area be closed until there is a snowpack of 36" or greater?

Response

Construction of trails is a different procedure from trail grooming operations, which are considered winter maintenance activities. During construction, understory vegetation would be retained at a height of 3 feet, meaning that there would be no cutting of shrubs or sapling tree less than 3 feet tall. As described in Other Management Provision OMP8 in Table 2.4-4, "No snow grooming would take place within riparian or key watershed areas unless there is a minimum of 3 feet of snow pack."

Darrell Howe

Crystal Conservation Coalition

Comment

Table 3.3-5 notes 10.4 acres of RR's have been developed. Table 2.6-2 notes Wetland Impacts to be 5.3 acres under Alt #1. Page 3-35 provides an excellent description but lacks data to support the existing direct impacts to wetlands. Is it more than ZERO?

Response

DEIS Table 2.6-2 intended to show that Alternative 1 represents the amount of existing acreage of wetlands. The number displayed in the Action Alternative columns represents the amount of impacted acreage, with negative numbers indicating detrimental impacts (likewise, positive numbers would indicate beneficial impacts). The resulting acreage that is not impacted is displayed in parentheses. To clarify this, the FEIS has been updated by removing the word 'Impact' from these rows.

There is no data available to quantify historic grading or filling impacts to wetlands within the White Pass Study Area. The FEIS has been updated to include an estimate of historic clearing impacts to wetlands that resulted from construction of ski trails within the existing SUP area. Table 3.3-3 indicates that approximately 2.3 acres of wetlands have been cleared for ski trail construction within the Upper Tieton watershed. The text has been updated to include a brief description of how this number was calculated.

Christine Reichgott

Environmental Protection Agency

Comment

The draft EIS states that noxious weed surveys have not found the existence of noxious weeds in the study area, except for the Highway 12 corridor. However, the final EIS should include survey data for areas near the base area day lodge. It should discuss the potential spread of noxious weeds that may result from construction of the mid-mountain lodge, proposed new parking lot under Alternative 4 and potential new road construction under Alternative 6.

Response

Refer to the discussion in Section 3.5.3.3 for the potential spread of noxious weeds. The US 12 corridor includes the White Pass parking lots and day lodge area, as they are connected to the highway.

The Botanical Report for the Proposed Dog Lake Campground and White Pass PCNST Trailheads Maintenance and Expansion Project (USFS 2005) reported that Oxeye daisy, tansy ragwort, and hairy cat's ear (trace) were found at the White Pass North and South Trailheads, and Horse Camp. These locations are outside of the White Pass Study Area and are therefore not considered in the analysis.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.5 Vegetation mentions management within the existing ski area done as routine maintenance. Is there a Management Plan to outline the parameters for clearing and trimming? What types of equipment are used to mow vegetation? What areas are not maintained and are part of restoration? Summer Operating Plans should have guidelines and standards for vegetation manipulation.

Response

Routine vegetation management is contained within an Annual Operating Plan, which is reviewed and approved by the USFS prior to project implementation. The Annual Operating Plan is not a part of the FEIS, and is therefore not included.

Darrell Howe

Crystal Conservation Coalition

Comment

Please describe the restoration and revegetation of 12 acres as described on page B-38. Will this area be planted with native plantings? Will it be closed and ungroomed during the ski season? What is the timeframe for implementation? Can this effort take place on other portions of the SUP? Why is this proposal only for Alternative 9?

Response

The 12 acres of revegetation refers to the construction of tree islands within the existing ski trails, refer to Figure 2-8. As described in Chapters 1 and 2, the proposed timeframe for construction of the selected alternative is two years. BMPs for revegetation of areas disturbed by construction activities would apply to all Action Alternatives.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to adequately discuss the impact on mountain heather in the proposed expansion area.

Response

The FEIS discloses impacts to vegetation communities located within the White Pass Study Area in Section 3.5 - Vegetation. Mountain heather does not have any State or Federal listing status and is therefore not specifically addressed in the document.

Darrell Howe

Crystal Conservation Coalition

Comment

The re-vegetation proposed on Page 2-42 lacks quantification. Is total terrain reduced?

Response

The FEIS has been updated to indicate that approximately 12 acres would be revegetated. As described in Appendix B - Mountain Plan Specifications, the 12 acres of revegetation is removed from the expanded skiable terrain calculation (53 acres), resulting in a total of 41 acres.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The discussion of weeds in the DEIS was restricted to noxious weeds, this is excessively narrow. The thrust of the noxious weed list is primarily agricultural impact, therefore the list is grossly incomplete for a discussion of high elevation, forested terrain. It is also incorrect, there conspicuous concentrations of weeds (including noxious weeds) in White Pass. The ones I am most familiar with are at the east end of the parking lot and at the trailhead for the PCST headed north from Leech Lake, which may be and are outside of the SUP. These infestations should not have been ignored. With wilderness areas and inventoried roadless areas (potential wilderness) so close, any weeds are of concern!

Response

The list of noxious weeds used in the analysis was developed by the Washington State Noxious Weed Board (WAC 2001) and the Yakima County Weed Control Board (Yakima County 2001). The species listed in Table 3.5-4 is based on known or potential occurrence within the White Pass Study Area.

The Botanical Report for the Proposed Dog Lake Campground and White Pass PCNST Trailheads Maintenance and Expansion Project (USFS 2005) reported that Oxeye daisy, tansy ragwort and hairy cat's ear (trace) were found at the White Pass North and South Trailheads, and Horse Camp. These species are included on the list of noxious weeds used in this analysis. The locations of these species are outside of the White Pass Study Area, as defined in the vegetation section as the SUP area and SUP expansion area. However, these species do occur within the Nordic trail area, which is approved for use by the SUP. Although these locations are outside the White Pass Study Area, the Forest Service is concerned and has documented their occurrence. They will be included in the future Program of Work for Prevention and Treatment of Invasive Species. Additionally, the FEIS has been updated to include the noxious weed species and locations identified in the Botanical Report.

Darrell Howe

Crystal Conservation Coalition

Comment

On page 3-126 and 3-31 it states "Historic impacts to wetlands in the study area include the creation of lift terminals, ski trails, and roads within the existing SUP." Could you direct the reader to where these impacts are identified and quantified?

Response

There is no data available to quantify historic grading or filling impacts to wetlands within the White Pass Study Area. The FEIS has been updated to include an estimate of historic clearing impacts to wetlands that resulted from construction of ski trails within the existing SUP area. Table 3.3-3 indicates that approximately 2.3 acres of wetlands have been impacted for ski trail construction within the Upper Tieton River watershed. The text has been updated to include a brief description of how this number was calculated.

Darrell Howe

Crystal Conservation Coalition

Comment

Within the Indirect Impacts Section 3.4.3.2 narrative there is repeated reference to "revegetation" as part of BMP's under OMPs for the Action Alternatives. Please describe what types of activities will trigger revegetation and what this is. Will some % of vegetation cover within a given amount of time be a required target? Will there be a requirement to replace lost vegetation with like kind? Is there a % of bare

ground with is unacceptable? What measures will be taken to assure timely planting? What types of penalties will be imposed for failure to achieve stated goals of restoration? Why are the Vegetation Management Guidelines mentioned in Table 2.4-4 not already in place? When will they be approved? Prior to ground disturbing activities?

Response

This refers to the revegetation of exposed soils during construction of the selected alternative. Specific details regarding revegetation will be included in the construction plans and Stormwater Pollution Prevention Plan (SWPPP) prepared prior to construction. The SWPPP will contain appropriate monitoring requirements to ensure that revegetation efforts are successful. Revegetation will involve native or desirable non-native vegetation, depending on nature (frequency, scale, etc.) and location of disturbance. BMPs ensure timely planting. All standards and BMPs are currently in place.

30.0 Wildlife

Darrell Howe

Crystal Conservation Coalition

Comment

Please explain why Project #19 & #20 are not part of Table 3.6-14 under Cumulative Impacts.

Response

DEIS projects #19 and #20 are included in Table 3.6.14 as UT-26 and UT-27. Projects have been omitted from and added to the table, which results in a shift of numbers from the DEIS. No long-term impacts to wildlife are expected, as these projects occur within existing disturbed areas. There may be short-term avoidance of these areas during construction due to noise. Additional projects identified since the publication of the DEIS have been incorporated into the cumulative effects analysis in this FEIS. The FEIS has been updated to include updated past, present, and reasonably foreseeable projects in the cumulative impacts section.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.6.2.5 Management Indicator Species have been selected to coordinate habitat management planning. (page 3-132). Since goats, martins, and others are known to occur in the Study Area could the EIS outline how this project will effect planning for these species or will the planning simply be to monitor the decline in habitat? What types of management will take place? Will hunting seasons be modified or trapping be banned?

Response

Management of wildlife hunting seasons and trapping are outside the scope of this project. Section 3.11 - Recreation has been updated to include impacts to hunting (refer to Section 3.11.3.5). Planning for and managing individual species is outside the scope of this analysis. The FEIS discloses potential impacts to Management Indicator Species in Section 3.6.3.

Regan Smith

Northwest Ecosystem Alliance

Comment

The BE relies upon habitat characteristics to make the assumption that Canada lynx would not be negatively affected by the ski expansion. Have any actual surveys been completed to verify that lynx do not use the area?

Response

No surveys for lynx have been completed, as it was determined that no suitable lynx habitat is present. Refer to Appendix H - Wildlife Technical Report and Biological Evaluation for additional information on Canada lynx.

Erik Splawn

Hogback Basin Preservation Association

Comment

Although there are nesting pairs of spotted owls on both the east and west sides of the ski area south of highway 12, the discussion is inadequate in considering the effect of ski area expansion on the species.

Response

Refer to Appendix H- Wildlife Technical Report and Biological Evaluation and Appendix N - Biological Assessment for the complete analysis of impacts to northern spotted owl. The USFWS issued a biological opinion that the proposed ski area expansion 'May Affect, [is] Likely to Adversely Affect' northern spotted owl and concluded that the proposed expansion would not likely jeopardize the continued existence of northern spotted owl.

Mark Lawler

Sierra Club Cascade Chapter

Comment

Although the area is south of wolf and grizzly bear recovery areas, the ski area development will still have an impact on these species, which are wide-ranging and have occasionally been seen in the Gifford Pinchot and southern Wenatchee National Forests.

Response

Possible effects to gray wolf and grizzly bear are discussed in Appendix H - Wildlife Technical Report and Biological Evaluation. Refer to FEIS Section 3.6 - Wildlife for a discussion of impacts to the gray wolf and grizzly bear. It should be noted that there have been no confirmed sightings of gray wolf within the Hogback Basin area.

Erik Splawn

Hogback Basin Preservation Association

Comment

In addition, Hogback Basin is considered gray wolf habitat with several sightings with the wolf's range in Hogback Basin. No discussion of possible effects on the gray wolf is provided.

Jim Scarborough

Olympic Forest Coalition

Comment

Gray wolf presence has been documented in recent years as far south as Mount St. Helens. It has repeatedly been demonstrated in the empirical literature that wolf mortality is closely associated with proximity of human developments. The Forest Service's speculation that gray wolves would not be affected due to the predicted lack of human visitation within the expanded ski area in summer holds no water. With the proposed power line and ski run swaths cut into the forest, summer visitation to Hogback Basin will most definitely increase; perhaps dramatically.

Response

Possible effects to gray wolf are discussed in Appendix H - Wildlife Technical Report and Biological Evaluation. Refer to Section 3.6 - Wildlife for a discussion of impacts to the gray wolf. It should be noted that there have been no confirmed sightings of gray wolf within the Hogback Basin area.

Regan Smith

Northwest Ecosystem Alliance

Comment

Also, the DEIS mentions that there will be No Effect to listed species by the proposed actions. Please qualify the No Effect. Is it meant that there will be No Effect that would cause further jeopardy to the species, or does it mean that there will be No Effect to efforts to recover the species? The courts have differentiated between jeopardy and recovery and we would request that the DEIS do the same.

Response

Refer to Appendix H - Wildlife Technical Report and Biological Evaluation and Appendix N - Biological Assessment for a complete analysis of the effects of the proposed expansion on Threatened and Endangered species. The USFWS has issued its biological opinion for the proposed project.

Mark Lawler

Sierra Club Cascade Chapter

Comment

Although the area is south of wolf and grizzly bear recovery areas, the ski area development will still have an impact on these species, which are wide-ranging and have occasionally been seen in the Gifford Pinchot and southern Wenatchee National Forests.

Response

Refer to Appendix H - Wildlife Technical Report and Biological Evaluation for a discussion of impacts to these species. As described in the FEIS and Appendix H, the Action Alternatives result in 'No Effect' to grizzly bear and is 'Not Likely to Adversely Affect' gray wolf.

Christine Reichgott

Environmental Protection Agency

Comment

The draft EIS does not adequately describe the potential affects of each alternative on habitat connectivity. In particular, the loss of forest and creation of vegetation breaks have the potential to alter habitat used by elk, deer and mountain goat. The final EIS should include a more detailed discussion of the affect of each alternative on habitat connectivity for wildlife that are present and potential forage and inhabit this area.

Response

Refer to FEIS Section 3.6 and Appendix H - Wildlife Technical Report and Biological Evaluation, which discuss connectivity and associated impacts. The best information available was used to prepare the analysis of the effects to wildlife.

Jim Scarborough

Olympic Forest Coalition

Comment

Ski area expansion will not only compromise the integrity of the large block of self-willed land anchored by the Goat Rocks Wilderness, but will improperly bottleneck the migration corridor between the Goat Rocks and William O. Douglas Wilderness/Mount Rainier National Park complex. Even a passing comprehension of the dynamics of island biogeography (in this case, where inland, intact habitats are

surrounded by human development) on the part of the Forest Service should demonstrate that adverse and irreparable impacts to carnivorous species viability would occur.

Response

Refer to Section 3.6 - Wildlife and Appendix H in the FEIS for a discussion of connectivity and associated impacts. The best information available was used to prepare the analysis of the effects to wildlife.

Regan Smith

Northwest Ecosystem Alliance

Comment

The Biological Evaluation completed for Wildlife is located in Appendix H. However, the BE lacked the survey protocol information for listed species, specifically the northern spotted owl, the Canada lynx, grey wolf and grizzly bear. Are surveys required to locate these species?

Response

Surveys for spotted owl are discussed in Appendix H - Wildlife Technical Report and Biological Evaluation. No surveys for Canada lynx, gray wolf, or grizzly bear were conducted because it was determined that no suitable habitat exists. Occurrences of these species within the White Pass Study Area are expected to be rare and limited to pass-through events. Additionally, surveys are not required for Canada lynx, grizzly bear, or gray wolf as there are no specific survey protocols in place.

Kevin Kane

Comment

Is the area lynx or spotted owl habitat? Were effects of development on these species honestly discussed? You would need to show in your analysis that you have sufficient data to make the claims you make in your analysis.

Response

The FEIS has been updated to include a discussion of suitable habitat (nesting, roosting, foraging, and dispersal) for the northern spotted owl. Refer to Section 3.6 - Wildlife and Appendix H for a description of species and habitats within the White Pass Study Area.

Darrell Howe

Crystal Conservation Coalition

Comment

GPNF Management Area MM/ML sets aside a wildlife allocation and management goals of maintaining carrying capacity for goats. What are the current statistics for these animals and what is the population

trend within the Study Area? How will winter recreational activities be managed to avoid animals? Reliable data of populations is needed prior to conversion of habitat to developed winter sports areas.

Response

The White Pass Study Area is not located within the Administratively Withdrawn – (GPNF) Management Area MM/ML (Mountain Goat) land allocation. The Mountain Goat allocation in the GPNF is not directly contiguous to the White Pass SUP area (refer to Figure 3-43). Therefore, the standards associated with Mountain Goat do not apply.

Lands allocated to MM/ML are located north of and approximately 750 – 1,000 feet away from US 12. The goal of Management Area M is to manage habitat to provide forage and cover that maintains the present (1990) carrying capacity of 230 animals. Mountain goat use of the White Pass Study Area is described in Section 3.6 - Wildlife and Appendix H - Wildlife Technical Report and Biological Evaluation.

40.0 Riparian Reserves

Darrell Howe

Crystal Conservation Coalition

Comment

WR-3 states: 'Mitigation or restoration should not be used as a substitute for preventing habitat degradation'. The EIS process needs to indicate where avoidance has taken the place of mitigation within Riparian Reserves.

Response

Mitigation Measures, Management Requirements, and Other Management Provisions have been incorporated into the document in Tables 2.4-2, 2.4-3, and 2.4-4. These are intended to reduce impacts to resources.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS discloses there are over 6 acres of wetlands in the project area and over 600 acres of Riparian Reserves. The DEIS is also requesting an amendment to the Gifford Pinchot National Forest Plan to allow structures, roads, ski trails, clearing, and grading within established Riparian Reserves. It is critical that the exact location of these structures, roads, ski trails, clearings, and grading are known to the public and decision maker in the EIS.

Response

Refer to Figures 3-18 through 3-30 for the locations of wetlands and Riparian Reserves within the White Pass Study Area and the proximity of proposed facilities to these resources.

Regan Smith

Northwest Ecosystem Alliance

Comment

Watershed Analysis has been completed for both watersheds contained within the proposed Ski Expansion boundaries, and these 'analyses' adopted the Riparian Reserve widths recommended by the NWFP. The DEIS states that "Riparian Reserves are larger and provide more protection to aquatic resources" than Riparian Influence Areas which are identified in the GP LRMP (p. 3-33). This means that the appropriate area to analyze for purposes of the DEIS is the Riparian Reserve, and it is inappropriate for the DEIS to analyze impacts to any area less than the full Riparian Reserve area.

Response

Refer to Section 3.3.3.3 for a discussion of the impacts to Riparian Reserves. Riparian Reserve impacts are displayed in Tables 3.3-14 and 3.3-15.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS states that the Riparian Reserves in the majority of the watershed are properly functioning because little management activity has occurred in the riparian areas. However, the Effects of Proposed Action box does not indicate whether or to what extent the proposed actions might have on the Riparian Reserves. More specifically, will the Riparian Reserves still be functioning properly after the development of any of the action alternatives?

Response

Refer to Tables 3.7-1 and 3.7-2 for a discussion of the effects of the Proposed Action. As discussed in Table 3.7-1, clearing and grading impacts to Riparian Reserves range from a low of 4.1 acres in Alternative 9 to a high of 22.2 acres in Modified Alternative 4 in the Clear Fork Cowlitz watershed. Clearing and grading impacts to Riparian Reserves range from a low of 0 acres in Alternative 2 to a high of 20.3 acres in Alternative 9. Implementation of the Action Alternatives is not expected to adversely impact Riparian Reserves (refer to Section 3.3.3.3).

Darrell Howe

Crystal Conservation Coalition

Comment

The listing of design constraints from the Riparian Reserve Standards and Guidelines on Table 3.7-1 includes 'No access corridors, staging areas, spoils piles or other construction related materials would be placed in Riparian Reserves.' The EIS needs to disclose how it is feasible to perform any construction activity in any RR given these considerations? How is this 'built into the Alternatives' as described. Will activities be halted during low snow years such as the current one due to the inability to operate equipment over snow?

Response

The FEIS acknowledges that no materials would be placed within Riparian Reserves, including spoil piles, construction equipment, and other materials (fuel, oil, etc.). No roads would be constructed within Riparian Reserves, and disturbances within Riparian Reserves would be limited to a minimum. Ancillary actions, such as those listed, would be excluded from Riparian Reserves.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS admits to arbitrarily changing the required 300-foot riparian zone on wetlands to 25 feet, stating unqualified rationale that 25 feet more adequately provides a measure of evaluating impacts (p. 3-33). First of all, what science was used to support the notion that the Forest Plan requirement of a 300 foot riparian area is incorrect, and 25 feet is appropriate to use? Second, what administrative or legal authority was used to make the determination that the DEIS would only analyze impacts to 25 foot riparian zones? The Watershed Analyses' and Amendment 11 require 300 feet Riparian Reserves on all wetlands less than 1 acre, and 150 feet Riparian Reserves on all wetlands greater than 1 acre.

Response

The FEIS has been updated to include a comparison of Riparian Reserve and RIA default widths. Additionally, further clarification has been made to the FEIS to indicate that both Riparian Reserves and RIAs are analyzed in this FEIS.

Christine Reichgott

Environmental Protection Agency

Comment

We recommend that the final EIS explain the relationship of Riparian Influence areas and the Northwest Forest Plan's (NWFP's) aquatic conservation strategy recommendations for riparian buffer widths. The NWFP aquatic conservation strategy and the Interior Columbian River Basin Ecosystem Management

Plan recommends the use of PACFISH Riparian Habitat Conservation Areas (RHCA). The summary of finding for the Interior Columbian Basin finds that interim RHCAs in the range of anadromous fishes and bull trout are prescribed at 300 foot minimum width for fish-bearing streams to maintain stream function and prevent sediment inputs from nonchannelized sources.

Response

The FEIS has been updated to include the 300-foot default width for perennial fish bearing streams in Table 3.3-4. Additionally, further clarification has been made to the FEIS to indicate that both Riparian Reserves and RIAs are analyzed in the document.

Regan Smith

Northwest Ecosystem Alliance

Comment

There is some confusion as to how to read Table 2.6-2 on p. 2-57 with regards to Wetland Impacts, Riparian Reserve Impacts and Riparian Influence Area Impacts. It is assumed that Alternative 1 is existing or baseline impacts, so how can additional development cause a decrease in number of acres impacted, as denoted by using a negative sign and lesser total acres impacted? Please clarify.

Response

The intent is that Alternative 1 represents the amount of existing acreage. The number displayed in the Alternative column represents the amount of impacted acreage, with negative numbers indicating detrimental impacts (likewise, positive numbers would indicate beneficial impacts). The resulting acreage that is not impacted is displayed in parentheses. To clarify this, the FEIS has been updated by removing the word "Impact" from these rows.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-100 states a maximum of 4.2 acres of grading would occur within RIA's. yet the Tables on the same page describe Riparian Reserves as being effected not RIA's. Please explain why difference types of areas are used in cumulative effects analysis.

Response

The projects listed in Tables 3.4-2 and 3.4-3 are not associated with the Action Alternatives considered for the White Pass Proposal, and could easily be determined if they occur within Riparian Reserves or not. If the project occurs outside of Riparian Reserves, it was assumed that impacts to fish would be less likely.

The text on DEIS page 3-100 describes the contribution of the White Pass proposal to cumulative effects on fish. In the context of this analysis, RIAs occur within the designated Riparian Reserve width. Similarly, since RIAs are described in Section 3.3 - Watershed Resources as being in closer proximity to streams and wetlands, ground disturbing activities would be more likely to contribute sediment that could impact fish.

The FEIS has been updated to include a discussion of sediment generation from the Action Alternatives. Sediment generation was modeled using the Watershed Erosion Prediction Process (WEPP) model developed by the US Forest Service.

45.0 Air Quality

Les Ornelas

Yakima Regional Clean Air Authority

Comment

Considering the limited access for most of the ski lifts, runs, and development sites, there appears to be a need for burning clearing debris. To minimize the impact of the smoke from these fires, they need to be regulated by the Department of Natural Resources under the Smoke Management Plan. In addition the contractor doing the burning will need to verify the daily burn status by either calling the Authority or visiting our website.

Response

No burning of debris will take place during construction of the proposed development projects. Table 2.4-1, Lift and Trail Construction Techniques, explains that felled trees will be lopped and scattered, and excess slash will be chipped or scattered onsite in accordance with USFS regulations. In addition, all understory vegetation less than 3 feet tall will be retained.

Darrell Howe

Crystal Conservation Coalition

Comment

Air Quality Standards per Table 3.8-1 measure Carbon Monoxide (CO) in Micrograms per cubic meter. The analysis on Table 3.8-4 & 5 uses tons per year as a unit of measurement. This makes it impossible to evaluate the data without a conversion and common denominator. Please provide consistent unit of measurements.

Response

Table 3.8-1 shows National Ambient Air Quality Standards which are measured concentrations of pollutants in the air ($\mu\text{g}/\text{m}^3$) averaged over a time period (i.e. 1-hour, annual, etc.). Table 3.8-4 shows a "worst-case scenario" of possible 1-hour emission levels from White Pass pollution sources. Emissions are measured in lbs/hour, as they reflect the rate of release of a pollutant rather than a concentration in the air. Table 3.8-5 shows a "worst-case scenario" of increased air emission rates by alternative for White Pass. This table shows the increased amount of emissions (tons/year) for each alternative, compared to the Prevention of Significant Deterioration (PSD) Significant Emission Rates (tons/year). This table has been updated in the FEIS to include lbs/year. Usually, analysis of specific concentrations for a project site would be determined through complex modeling and/or on-site air quality sampling. Considering the low level of emissions associated with the proposed White Pass expansion, complex modeling and on-site air quality sampling was deemed unnecessary. The PSD Significant Emission Rates are standards established by the Environmental Protection Agency under the Clean Air Act Amendments of 1977 to, among other things, determine the degree of potential impacts on air quality (for more discussion on PSD, refer to FEIS Section 3.8.1.1). Table 3.8-5 should be referred to when comparing air quality impacts of the alternatives.

Les Ornelas

Yakima Regional Clean Air Authority

Comment

Transported construction dust can be a nuisance or a safety hazard particularly close to Hwy 12. Therefore, contractors doing earth moving work will be required to obtain either a project or a general dust control plan from the Authority that identifies how they plan to reduce or mitigate fugitive dust emission and who will be the contractor representatives on the project.

Response

The FEIS has been updated to include a Management Requirement to obtain a Dust Control Plan from the Yakima Regional Clean Air Authority to reduce fugitive dust emissions during construction (refer to Management Requirement MR15 in Table 2.4-3). Other Management Provision OMP3 in Table 2.4-4 has also been updated to reference a Dust Control Plan for the purposes of dust mitigation. Additionally, Section 3.8 - Air Quality of the FEIS has been updated to include reference to Management Requirement (MR15) and Other Management Provision (OMP3) as they pertain to dust mitigation.

50.0 Aquatic Conservation Strategy

Mark Lawler

Sierra Club Cascade Chapter

Comment

Expanding the developed ski area into an inventoried roadless area in a key watershed, and developing riparian areas within, clearly violates the Northwest Forest Plan's Aquatic Conservation Strategy. As such, a decision that allows such development would be in violation of federal law.

Response

The FEIS has been updated to include more discussion regarding the Roadless Conservation Rule. Specifically, FEIS Section 3.14 has been renamed from Land Use to Inventoried Roadless Areas, which now incorporates text from the roadless rule and indicates that development could take place in an IRA and outside a SUP area provided that no road is required and that tree removal is not undertaken as a "timber harvest". Tree removal for the construction of ski trails in the Hogback Basin expansion area would be incidental to the construction of the ski area facilities, as opposed to the harvest of trees specifically for the purposes of a timber sale. Refer to Section 1.1.1.1 - Washington Wilderness Act and section 3.14 - Inventoried Roadless Areas for information regarding the White Pass Inventoried Roadless Area, its removal from wilderness, and Congressional intent.

Additionally, as stated in FEIS Section 2.3.5.5 - Utilities and Infrastructure, the construction of a road within the White Pass IRA and Tier 2 Key Watershed under Alternative 6 would require a determination of consistency with the Northwest Forest Plan by the Regional Executive Interagency Committee. The remaining Action Alternatives provide for no road construction in the Expansion Area. Chapter 2 and associated figures clearly outline the roads, structures, ski trails and grading associated with the Action Alternatives. Analysis of the alternatives in regard to the Northwest Forest Plan and the Gifford Pinchot Forest Plan is contained in Section 3.7 - Aquatic Conservation Strategy.

FEIS Tables 3.7-1, 3.7-2 and 3.7-3 describe the effects of the alternatives at the site and watershed scales including a description of the existing condition, the effects of the Proposed Action and alternatives, and design and assessment considerations. Additionally, the alternatives are described in reference to Riparian Reserve Standards and Guidelines in order to assess compliance with the Aquatic Conservation Strategy.

It should be noted that the Northwest Forest Plan is not federal law, rather the Northwest Forest Plan provides Standards and Guidelines that amend the Forest Plans for the Gifford Pinchot and Wenatchee National Forests.

Christine Reichgott

Environmental Protection Agency

Comment

The NWFP Aquatic Conservation Strategy requires a watershed analysis in Key Watersheds, for roadless areas in non-Key watersheds, and riparian reserves prior to determining how proposed land management activities meet Aquatic Conservation Strategy Objectives. We recommend that the final EIS explain how this project would comply with the NWFP Standards and Guidelines for recreation related management activities in riparian reserves.

Response

Section 3.7.2 in the DEIS and FEIS describes project-specific adherence to the Aquatic Conservation Strategy (ACS) objectives. As described in the section, "the ACS objectives were never intended to be applied or achieved at the site-specific (project) scale or in the short-term, rather they were intended to be applied and achieved at the fifth field watershed and larger scales...Indeed, failing to implement projects due to short-term adverse effects may frustrate the achievement of the goals of the ACS." FEIS Table 3.7-3 evaluates the range of alternatives against the Riparian Reserve Standard and Guidelines.

55.0 Heritage Resources

Sam Jim

Comment

Water, land and air are all sacred elements. The steams that would be impacted by this project are at the beginning of an important watershed that sustains the culture of not only the YN but also neighboring Tribes. We cannot stress enough that where this water originates high up in the mountains, on a ridge to where you look east is the ceded land of the YN and to the west is usual and accustomed land of the YN, will always be a sacred and sensitive place. A place which our people travel to and bless the sacred elements.

Response

Protection of the watershed and its resources are indeed very important and, for that reason, were identified as significant issues during scoping (refer to Section 1.5.2.3 - Water and Watershed Resources). The range of alternatives within the EIS was, in part, designed to reduce the impacts to Watershed Resources. Modified Alternative 4 in the FEIS includes modifications to the Proposed Action (Alternative 2) to address impacts to riparian areas, including streams. In addition, Modified Alternative 4 incorporates portions of Alternative 9 that do not require extensive grading or bridge structures over perennial streams. The FEIS analyzes the use of culverts as protection measures for stream corridors during lift terminal construction (refer to Section 2.3.1.7 - Culvert Placement), and includes Mitigation Measures that are intended to protect streams (including MM1 - MM11 in Table 2.4-2). Finally, the FEIS has been updated

to specifically indicate that the upper watershed is a sacred and sensitive place to the Yakama Nation (refer to Section 3.9.5 - Tribal Consultation).

Erik Splawn

Hogback Basin Preservation Association

Comment

We find the off-hand dismissal in the DEIS that "Continued development and expansion of the ski area may be viewed by some members as a diminishment of the values and resources associated with the White Pass area and Hogback Basin" as distasteful. It is our view that all concerns of the Tribe should be given proper consideration.

Response

The text describing the diminishment of values and resources of importance to the Yakama Nation is located in Section 3.9.4. The purpose of this section is to display the environmental consequences of the Action Alternatives when evaluated in combination with other past, present and reasonably foreseeable actions ("cumulative effects"). As such, this section describes the possible cumulative effects of development and activities in the vicinity of White Pass and of alterations to the Hogback Basin area on at least some members of the Yakama Nation.

Several sections of the FEIS highlight the consideration given to Yakama Nation issues during the analysis. Specifically, Section 1.6.1 - Tribal Government Consultation and Section 3.9.4 - Tribal Consultation discuss the efforts of the USFS to solicit issues from the Yakama Nation, and Section 3.9.5.2 - Direct and Indirect Effects Common to All Action Alternatives discusses the effects to resources of importance to the Yakama Nation. The FEIS has been updated to include a discussion of government to government consultation with the Yakama Nation since the DEIS was published. The effects section has also been updated to better reflect the use of Mitigation Measures that respond to Yakama Nation issues.

60.0 Recreation

Michael Frey

Comment

I also question whether the terrain provided in hogsback ridge/basin justifies the plan for most skiers? It looks like a lot of cat track travel to/from the proposed new area to me--a definite turn off for any skier used to the other resorts in the northwest.

Response

A detailed analysis of the ski terrain by alternative is provided in Appendix B - Mountain Plan Specifications.

Mike Dawson

Pacific Crest Trail Association

Comment

PCTA is concerned with the characterization in the DEIS of direction for the Pacific Crest National Scenic Trail found in both the National Trails System Act and the Comprehensive Plan for the PCT. The section of the Act quoted in section 1.2.7 of the DEIS is taken out of context. The purpose of the wording in this section of the Act was to assure that selection of new trail routes would not adversely impact land uses that were in place at the time of the location decision. Since the land involved in this decision is and always has been undisturbed wildlands there is clearly a real stretch to apply that wording here.

Response

Accepting the commenter's basis that the selected wording from the Comprehensive Management Plan for the PCNST and the National Trails System Act of 1968 refers to new segments of the trail, the congressional removal of the White Pass IRA from Wilderness in 1984 dramatically altered the desired land use in this area. Specifically, the 1984 Wilderness Bill detailed that "the legislated purpose" of the area is non-wilderness and the 1990 Forest Plan allocates the area to Developed Recreation - 2L. On this basis, the presence of the PCNST does not preclude development of ski area facilities in Hogback Basin.

Darrell Howe

Crystal Conservation Coalition

Comment

Access and Egress Trails need to be quantified if they are part of the proposal given their length. The ability levels will have to be treated as only speculative until further described.

Response

Access and egress trails are considered in the evaluation of the Action Alternatives. Appendix B - Mountain Plan Specifications includes detailed discussions about the trail network under each alternative. Information from Appendix B is incorporated into the analysis of the alternatives in the FEIS. The ability levels of the access and egress trails is determined using the same methodology as the remainder of the terrain and is, therefore, not speculative.

Scott Kaden

Pacific Northwest Ski Areas Association

Comment

Consequently, it is vital that White Pass be allowed to expand so the facility is able to provide safe, uncongested snow riding experiences even during periods of peak attendance.

Response

Appendix B - Mountain Plan Specifications addresses terrain density and peak visitation scenarios for each of the alternatives.

Christine Reichgott

Environmental Protection Agency

Comment

Overall impacts on watershed resources, particularly wetlands and riparian reserves, would be lower under Alternative 2 than under Alternative 4. However, Section 3.6.3.1 states that this is due to the fact that Alternative 4 includes a parking lot construction. Under Alternative 4, the top terminal of the Basin chairlift would be located to avoid wetlands and development near the Wilderness boundary. While this makes the Comfortable Carrying Capacity (CCC) under Alternative 4 slightly lower than that under Alternative 2, there appears no difference in predicted skier visitations under the two alternatives (Appendix D).

Response

As described in Appendix B - Mountain Plan Specifications, the CCC is based on many factors including the uphill capacity of the lifts, and the downhill capacity of the trail system - all physical characteristics of the ski area facilities. Both Alternative 2 and Modified Alternative 4 provide two chairlifts in the Hogback Basin. Appendix D - Social, Economic and Recreation Assumptions provides the assumptions used to project the skier visitation numbers including an initial increase of 40,000 visits after construction of the expansion under Alternative 2 and Modified Alternative 4, followed by a growth rate of 1 percent annually. Appendix D of the FEIS has been updated to clarify that "it is assumed that because both alternatives provide similar facilities in the Hogback and Pigtail Basins, visitation growth rates would be similar." The FEIS has also been updated to include a lower CCC under Modified Alternative 4, however for the same reason as above the visitation growth rates would be similar to Alternative 2.

Darrell Howe

Crystal Conservation Coalition

Comment

There appears to be adequate terrain capacity in the existing SUP area. Please explain why it is not being utilized.

Response

As described in Appendix B - Mountain Plan Specifications, the terrain distribution and circulation issues, particularly the egress trail density issue, constrain the terrain capacity.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain how the Basin Chairlift would create skiing opportunities in the Goat Rocks Wilderness as outlined on page 3-234. Would the Wilderness become de facto part of the expansion? Would the Wilderness be receiving spill-over from White Pass? Is this an appropriate use of the Wilderness as an extension of the commercial activities at White Pass? Will the White Pass Company have a permit to operate within the Wilderness like most outfitters?

Response

As described in FEIS Section 3.11.3.5, under Alternative 6 the presence of the Basin chair would modify the backcountry experience in Hogback Basin resulting in increased pressure for backcountry skiing in Miriam Basin. Backcountry skiers could ride the Basin chair and enter Miriam Basin if the boundary was open for backcountry skiing. Following the referenced DEIS text is a paragraph that describes the Boundary Management Plan referred to as Mitigation Measure MM15 (refer to Table 2.4-2). The Boundary Management Plan would ensure that only capable backcountry enthusiasts leave the ski area through specified exit points. As described in Section 3.11.2.2 - Backcountry Skiing, lift-served backcountry skiers at White Pass currently ski in Goat Rocks Wilderness comprise approximately 35 percent of the backcountry skiing associated with the White Pass commercial operation. Under the existing condition, the skiers are considered out of bounds. The proposed Boundary Management Plan would treat lift served backcountry skiing in the wilderness similar to the existing condition. Because the skiers would be skiing in an area that is clearly identified as out of bounds, their presence would not qualify White Pass as a Wilderness outfitter. Therefore no Wilderness Outfitter Permit would be required for White Pass.

Erik Splawn

Hogback Basin Preservation Association

Comment

The table on page 340 of the DEIS shows 18 backcountry skiing areas within the White Pass Ski Area's Market Area. What the author fails to mention is 13 of those areas are either 5 to 10 miles from a plowed highway, or are more than a 6 hour drive from Yakima. The other 5 areas are at least a 3 hour drive from Yakima and more than a 6 hour drive from Packwood or Morton. The DEIS fails to consider the lack of quality, high alpine, intermediate, reasonably accessible terrain available to the majority of backcountry skiers in the White Pass Market Area.

Response

As detailed in FEIS Section 3.11.2.2, "although no survey has been made and only local observations are available, due to the difficulty of accessing the area without the chairlift, visitor use by this route most likely does not exceed 50 Nordic skiers annually. Ski area personnel estimate that approximately 65 percent of backcountry skiers at White Pass utilize terrain in Pigtail and Hogback Basins while the remaining 35 percent utilize terrain in Goat Rocks Wilderness, including Miriam Basin and the Cirque (McCarthy, pers. comm.)." This is the best available data, and no other data has been provided for the FEIS. For clarity the term "hike-to" has been added to the heading of Table 3.11-1. The FEIS has been updated to clarify that these areas provide some of the most easily accessible and skiable backcountry terrain in the vicinity of White Pass when compared to other backcountry skiing areas within White Pass' market area (refer to Table 3.11-1).

Darrell Howe

Crystal Conservation Coalition

Comment

How will the creation of signage "...be expected to insure only capable enthusiasts leave the ski area thru gates"? Have any studies been done of the effectiveness of signs? Perhaps they would have the opposite effect to entice the visitor to seek "excitement".

Response

As detailed in MM15, Table 2.4-2 of the DEIS and FEIS, a "Boundary Management Plan would be developed to manage use of Goat Rocks Wilderness by White Pass skiers. The Boundary Management Plan would include designation of no more than two gated ski area exit points along the boundary between Pigtail Basin and Miriam Basin. The plan would also include signage indicating that skiers, would be responsible for any search and rescue costs." On this basis signage is not the only suggested tool for managing out of area use. Additionally, Section 3.11.3.5 of the FEIS has been updated to state that "the limitation on exit points and gravity of the search and rescue language would help to insure that only capable backcountry enthusiasts leave the ski area through the exit points, thereby minimizing the potential for search and rescue operations." The FEIS has also been updated to include a discussion regarding the success of a similar boundary management plan that is currently used at Mt Baker Ski Area (refer to Table 2.4-2, MM15).

Ron Eng

The Moutaineers

Comment

The DEIS drastically underestimates the number of climbing backcountry skiers and snowshoers that utilize the Hog Back area. Skiers/snowshoers visit this area early in the season before the Ski area opens

and quite awhile after the ski area closes in the spring. Other ski clubs and private trips result in more backcountry skier visits to the area.

Response

As detailed in Section 3.11.2.2, "although no survey has been made and only local observations are available, due to the difficulty of accessing the area without the chairlift, visitor use by this route most likely does not exceed 50 Nordic skiers annually. Ski area personnel estimate that approximately 65 percent of backcountry skiers at White Pass utilize terrain in Pigtail and Hogback Basins while the remaining 35 percent utilize terrain in Goat Rocks Wilderness, including Miriam Basin and the Cirque (McCarthy, pers. comm.)." This is the best available data, and no other data has been provided for the FEIS. In the effects analysis, the number of skiers is considered a minor issue compared to the impact on backcountry skiing areas, as detailed in Section 1.5.

Glenn Bandy

Ellensburg Cross Country Ski Club

Comment

The Hogback Basin is unique for its high-elevation, easily-accessed gentle slopes ideally suited to ski touring and snowshoeing. Avalanche hazard is minimal. If this expansion happens, these user groups will be displaced into less attractive and/or more hazardous areas.

Response

As detailed in Section 3.11.3.5 - Backcountry Skiing, "the displacement of backcountry skiers into Miriam Basin would move backcountry skiers to an area that is a higher avalanche risk than either Hogback or Pigtail Basin. Steep slopes and cirque basins comprising Miriam Basin and the Goat Rocks Wilderness would create more difficult search and rescue situations, require more advanced skill sets among backcountry users and would require more effort for skiers to return to White Pass base area facilities than under existing conditions."

Darrell Howe

Crystal Conservation Coalition

Comment

Page 2-51 identifies a Boundary Management Plan which is to be developed. Please identify when this will be implemented and if it will be part of the FEIS.

Response

As detailed in Table 2.4-2, "the Mitigation Measures identified below would be included in the site plans and construction plans, as appropriate. All plans would be approved by the USFS prior to authorization

for construction." The Boundary Management Plan has not been included in the FEIS because it would be developed prior to implementation of the selected alternative.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The nordic ski trails need to be addressed in a comprehensive fashion. The DEIS suggests that their status will be resolved, but the SUP boundary is not adjusted on the maps for any of the alternatives. The construction of the trails removed the native vegetation, leaving a relatively barren path (fortunately the slopes are gentle and the canopy is largely intact) in an Inventoried Roadless Area, why was this allowed or allowed to continue?

Response

As discussed in Section 1.1.2.2 of the FEIS, the White Pass SUP was amended to include Nordic trails in 1984. A portion of these Nordic trails are located outside the SUP boundary and the remainder are inside the SUP boundary. However, all Nordic trails (except for Zig Zag) are authorized by the SUP and no permit boundary modification is proposed in any of the alternatives.

Jeff Hagen

Comment

The rationale for the proposed expansion of ski lifts into the Hogback area seems primarily to be for increasing the amount of intermediate and beginner terrain for the ski area. This is a double-edged sword. Most of the terrain in Hogback Basin is gentle, which is suitable for beginners. However, it is a terrible place to have beginners skiing if the weather should turn nasty. I have been in Hogback Basin in winds clocked at more than 100 mph, sometimes with snow falling, and the resulting whiteout is no place for a beginner skier. As an experienced backcountry skier and mountaineer who is very familiar with the area I have personally had trouble finding my way when the conditions get really bad. I can envision beginners getting lost and ending up stranded on the Knuppenberg Cliffs. Whiteout conditions are not rare occurrences in Hogback Basin, and sometimes they arise with little or no warning.

Jeff Hagen

Comment

Although Hogback Basin consists of mostly beginner terrain, moving beginners there would be a mistake, because they would still eventually have to return to the base of the ski area. This means negotiating the difficult cat-tracks, which are sometimes icy and dangerous for novice skiers. It would be better to keep beginners near the bottom where they can more easily be helped if they run into problems.

Response

As stated in Chapter 2 and Appendix B - Mountain Plan Specifications, the proposed terrain in Hogback Basin would be rated low intermediate and above. Beginner skiers would not be encouraged to use this terrain.

Darrell Howe

Crystal Conservation Coalition

Comment

Is there a CCC for other activities besides alpine skiing? How many snowshoers can be accommodated? Please provide utilization rates for the entire Study Area in the FEIS.

Response

CCC has not been calculated for other types of activities. As these alternative activities represent a significantly lower percentage of users, they are not driving the Proposed Action.

Darrell Howe

Crystal Conservation Coalition

Comment

The Capacity Analysis needs to frame the ski areas current usage in terms of utilization. The CCC is defined as an optimal level of utilization and most evaluations of ski hills provide utilization rates for comparison of proposals.

Response

CCC is defined as optimal utilization, or a utilization level for which the resort is designed. Actual utilization rates are proprietary information held by the ski resort, but tend to closely reflect CCC, as the market tends to naturally adjust to available capacity (assuming there is sufficient market demand).

Darrell Howe

Crystal Conservation Coalition

Comment

Sections 3.11.2.1 page 3-215 defines CCC as skiers as one time (SAOT). Does this include snowshoers, condominium visitors and others such as drive by tourists? What is implied by the statement: 'Given proper identification of the mountain's TRUE CAPACITY..'? Would not the true capacity include off-piste terrain and accessible terrain beyond the boundary?

Response

CCC represents alpine skiing capacity, and as such does not include snowshoers, condo visitors, or drive-by tourists, as they are not using the alpine lift and trail system. However, aspects of the capacity analysis,

such as parking and restaurant capacity that are used by these visitors, do include them. Regarding the off-piste terrain question, the CCC calculation is based on lift capacity, balanced to terrain capacity. Since off-piste conditions are unreliable, CCC is balanced to the developed trail system, to avoid over-crowding situations that could occur on the frequent days when the off-piste terrain is not heavily utilized. Further, uphill capacity is not affected by a differentiation between skiers using the developed trail network and off-piste skiers, as there are still the same numbers of skiers getting off the lifts at any given time.

Darrell Howe

Crystal Conservation Coalition

Comment

How will closing lifts early improve the circulation? Would this not only make the congestion worse on open runs in the afternoons? Are you assuming skiers will quit earlier? Why would the proposed PCT Lift need to be closed earlier given its proximity to the base area and parking?

Response

Closing lifts early would only improve circulation if the skiers were to leave early. However, both Alternative 9 and Modified Alternative 4 contain grading and new trail projects specifically to address the issue of high densities on existing egress trails.

Sanjeev Mehrotra

Comment

Alt. 9 also does a better job of increasing skier circulation within the resort which aids in skier safety and enhances skier enjoyment.

Response

Components of Alternative 9 that assist with skier circulation have been added to DEIS Alternative 4 to create FEIS Modified Alternative 4.

Darrell Howe

Crystal Conservation Coalition

Comment

The 'standard design density' is not part of the Assumptions on page 2-12. Where do these designations originate? The Study Area is not the entire United States is it? Is there a Cascade or Pacific NW standard?

Response

Design density is discussed in Appendix B - Mountain Plan Specifications. The ranges shown are generally applicable to all ski areas, however specific numbers within that range were developed for White Pass, taking into account regional and market differences and preferences.

Ron Eng

The Moutaineers

Comment

The ski area does not have enough skiers to support running the lifts they currently have during the mid-week period. Typically the operator only runs the front High-speed quad (Great White) toward the end of the season. So much quiet, natural area has already been given away to downhill skiing and the associated towers, wires, dirt roads, and clear cuts, only to have the area used on weekends, and only for a few months.

Response

FEIS Section 1.1.2.2 describes three specific Purpose and Needs for the Proposed Action: improved parking, pedestrian access and traffic flow; improved circulation and dispersal; and improved recreational experience of the White Pass skier in response to increasing demand. FEIS Section 3.10.2.3 - Skiing Trends has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the rise of skier visits nationally, regionally, and locally within the last decade. If White Pass was to cater only to weekday demand, weekend skier visitation experiences would suffer and not meet the Purpose and Need.

Darrell Howe

Crystal Conservation Coalition

Comment

In Sections 3.11.2 it is stated that skiers will exit the SUP area boundary from Pigtail Peak to access wilderness. Please define the Study Area for the Recreation portion of the EIS. Will skiers access other areas not mentioned. What types of restrictions are put on ticket holders when they leave the SUP? What effects do they have on these areas?

Response

FEIS Section 3.0 details that "the White Pass Study Area includes the existing SUP boundary as well as the proposed SUP boundary modifications. Analyses provided in this FEIS use a common White Pass Study Area boundary, however at times, it is necessary to discuss areas outside the project boundary (e.g. wildlife, watershed resources, socio-economics, etc.)." Additionally, Section 3.11- Recreation of the FEIS has been updated to clarify that the "the White Pass Study Area includes the existing SUP boundary as well as the proposed SUP boundary modifications." No penalties or restrictions currently exist for patrons whom disregard ropes and signs, therefore there are no measurable effects.

Darrell Howe

Crystal Conservation Coalition

Comment

The Study Area needs to be defined for this analysis since Illustration 3.11-3 represents out of State activities. How many visitors to White Pass come from Oregon? When was the last survey taken of White Pass visitors to define the market area?

Response

FEIS Section 3.0 details that "the White Pass Study Area includes the existing SUP boundary as well as the proposed SUP boundary modifications. Analyses provided in this FEIS use a common White Pass Study Area boundary, however at times, it is necessary to discuss areas outside the project boundary (e.g. wildlife, watershed resources, socio-economics, etc.)." Additionally, FEIS Section 3.11- Recreation has been updated to clarify that the "the White Pass Study Area includes the existing SUP boundary as well as the proposed SUP boundary modifications." Visitor numbers have also been provided for other states and nationally to enable readers the opportunity to understand the local, state and national markets.

Darrell Howe

Crystal Conservation Coalition

Comment

The claim of White Pass not meeting increased demand needs to be viewed in terms of utilization. Illustration 1-3 shows only the peak visitations which appear to fall well within comfortable operating parameters.

Response

FEIS Section 3.11 - Recreation has been updated to clarify that "White Pass primarily serves the day-use market, which exhibits peak visitation on weekends and during holidays, and low visitation during the weekdays." As a result the White Pass market does not demand increased utilization during the week, and the facilities at White Pass must be designed to accommodate the peak visitation periods. Illustration 1-3 shows that White Pass exhibits an increasing trend of capacity or near capacity days. As described in the Purpose and Need (refer to Section 1.1.2.2) several components of the White Pass operation do not meet industry standards or market demand during peak visitation periods.

Darrell Howe

Crystal Conservation Coalition

Comment

The Boundary Management Plan should already be a required part of the existing SUP. Please include it in the FEIS.

Response

FEIS Section 3.11.2.1 has been updated clarify that there is currently no Boundary Management Plan required as part of the existing SUP. Additionally, as detailed in Table 2.4-2, "the Mitigation Measures identified below would be included in the site plans and construction plans, as appropriate. All plans would be approved by the USFS prior to authorization for construction."

Darrell Howe

Crystal Conservation Coalition

Comment

What is the current management of ropelines along the boundary of the SUP area? Are violators fined? What kinds of penalties are incurred from disregarding ropes and signs?

Response

FEIS Section 3.11.2.1 has been updated to clarify that up until this year (ski season 2006-07), no ropelines were used along the boundary of the existing SUP (only signage has been used). However, this season, White Pass Company will be trialing the use of a ropeline along a portion of the southern boundary of the SUP area (McCarthy 2006) in order to assist patrons from getting disorientated and entering the Goat Rocks Wilderness inadvertently (McCarthy 2006). No penalties currently exist from disregarding ropes and signs.

Darrell Howe

Crystal Conservation Coalition

Comment

Visitation on page 3-217 is analyzed for only the past 7 years. Why would the timeframe be consistent throughout the entire document? The life of a typical MDP is currently 10-15 years and all assessments should be made within this timeframe. The following Illustrations 3.11-2 thru -4 should be modified to reflect a longer timeframe than 7 years.

Response

FEIS Section 3.11.2.1 has been updated to include all skier visitation through 2005-06, and this section details that "prior to 1998 White Pass exhibited visitation ranging from 80,000 to 90,000 annual visits".

Erik Splawn

Hogback Basin Preservation Association

Comment

The discussion of backcountry skiers displaced into the more dangerous slopes of the Miriam Basin is also lacking.

Response

FEIS Section 3.11.3.5 details that both hike-to backcountry and lift-served backcountry skiing opportunities would be eliminated from Pigtail and Hogback Basin, while additional lift-served backcountry skiing terrain would be created adjacent to White Pass Ski Area, particularly in Miriam Basin within Goat Rocks Wilderness.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is no discussion of the displacement of backcountry skiers, snowshoers, and campers from the Hogback Basin because of the proposed expansion.

Response

FEIS Section 3.11.3.5 details that both hike-to backcountry and lift-served backcountry skiing opportunities would be eliminated from Pigtail and Hogback Basins while additional lift-served backcountry skiing terrain would be created adjacent to the White Pass Ski Area, particularly in Miriam Basin within Goat Rocks Wilderness. FEIS Section 3.11 - Recreation has also been updated to describe the displacement of snowshoers and campers.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to discuss whether the towers and lift structures will be visible from the Wilderness Area.

Response

FEIS Section 3.15 - Visual Resources describes that Viewpoint #1 is located on the saddle between Hogback Basin and Miriam Basin (in the Goat Rocks Wilderness). Section 3.15 also describes that vegetation and topography would screen all development from this viewpoint.

Darrell Howe

Crystal Conservation Coalition

Comment

Would helicopter use be restricted within 500 feet of the Wilderness boundary or are the impacts from this activity only vertical?

Response

Helicopter transport would occur within 500 feet of the Wilderness boundary to supply equipment and materials to construct the proposed upper terminal of the Basin chairlift under Alternative 2, and for both the Basin and Hogback Express chairlifts under Modified Alternative 4 and Alternative 6.

Darrell Howe

Crystal Conservation Coalition

Comment

Why is the Main Street trail considered Expert given its gradients? Also, on Page 1-9 the Main Street trail is identified to provide terrain for Intermediate level skiers.

Response

In addition to a simple analysis of maximum slope of a given trail, it is crucial to see the context of the trail in assigning an ability level. If a flat trail can only be accessed by higher ability trails, then that trail must be rated the ability level of the trail that is used to access it, as it would not be possible for a lower level skier to get to that trail to ski it. Also, if a flatter trail leads to a steep trail with a higher ability level, then the first trail must be rated the same as the steeper one.

Christine Reichgott

Environmental Protection Agency

Comment

Under action alternatives, an increase in skier visitation is expected due to the interest in the new development. To estimate the increase, the draft EIS uses the Comfortable Carrying Capacity (CCC) of each action alternative. The 40,000 annual increase in skier visits estimated to occur under Alternative 2 and 4 is derived from the statement in the draft EIS that near capacity visitation would occur approximately 25 times. While we understand the idea that the excitement generated by the expansion would trigger an increase in skier visitation, the draft EIS appears to lack clear explanation to support its analysis of visitation predictions. For instance, why is near capacity visitation estimated to occur 25 times? Would the initial increase due to the excitement generated by the expansion continue in the future?

Response

In FEIS Illustration 1-3, the number of days near capacity ranged from 19 to 34 and averaged just over 25, excluding the 2004-05 season, which only saw 2 days due to the limited operating season. As described in FEIS Appendix D - Social, Economic and Recreation Assumptions, the 40,000 additional visits would added to the 109,782 (Alternative 1 base visitation) and incrementally increased at 1 percent per year under Alternative 2 and Modified Alternative 4.

Richard L. Curtis

Comment

What studies and analysis have been performed to determine the adverse impacts of the expansion and associated disturbance to the wilderness character of the Goat Rocks Wilderness area?

Response

In the DEIS, Section 3.14.2.3 - Land Designation and Use, specifically discussed the distinguishing characteristics for IRAs used in the evaluation of impacts, as described in the Forest Service Handbook and Roadless Area Review and Evaluation II process. None of these characteristics discussed refers to "wilderness character". Rather, these characteristics include challenging experiences, historic and scientific study, manageability and boundaries, natural integrity, natural appearance, opportunities for solitude, opportunities for primitive recreation, special ecological features, and special places. In the FEIS, these characteristics are described for the Goat Rocks Adjacent and the William O Douglas Adjacent IRAs, as well as the White Pass IRA. In the FEIS, Section 3.14 - Inventoried Roadless Areas articulates the effects to each of these roadless areas, including an assessment of the IRA's qualification as potential Wilderness.

Sanjeev Mehrotra

Comment

Alternatives 2,4 & 6, which grant a new SUP to expand into the White Pass Inventoried Roadless Area, do not meet the stated Purpose and Need of the proposal. Adding additional access through building two new chair lifts and a new ski lodge will only add to congestion on existing trails and will contribute to dangerous skiing conditions.

Nathan Rice

Peter Smart

Heather Grube

Tess Thyer

Joe Simpson

Peggy Printz

Sharon Cody

Robert Triggs

Jennifer Johnson

Eric Wilborn

Allison Mclean

Matthew Thyer

Paul Kennard

Julia Paulsen

Comment

Alternatives 2, 4, and 6, which grant a new Special Use Permit to expand into the White Pass Inventoried Roadless Area, do not meet the stated Purpose and Need of the proposal. Adding additional access through building two new chair lifts and a new ski lodge will only add to congestion on existing trails and will contribute to dangerous skiing conditions.

Common Response

Key elements of Alternative 9 have been added to Alternative 4 to create Modified Alternative 4. These have been added specifically to address the Purpose and Need of the project, including addressing the egress trail density issue.

Darrell Howe

Crystal Conservation Coalition

Comment

Who 'widely accepts' these standards as stated on page 3-216? Has a survey been done of White Pass skiers to identify if the terrain is not properly distributed amongst skier ability levels? This would be the appropriate way to assess market demand.

Response

Market demand is stated for the ski industry as a whole. Those are the percentages for the skier market. The point is to show what the general ski market is, and show what an individual ski resort can do to more closely match the whole market, not just the skiers that it currently serves. For example, if a resort had only beginner terrain, then essentially only beginners would ski there. If a survey was done of the skiers at that resort, it would determine that the resort's market was exclusively beginners, whereas the truth probably would be that higher level skiers would ski there if the terrain was available.

Mark Orrico

Comment

The result has been serious congestions at several dangerous bottlenecks, such as the top of the Cascade cat track, all of the cat tracks themselves, the access to the loading area of the Paradise chair and the giant convergence zone at the Great White chair.

Response

Modified Alternative 4 addresses the cat track density issue through grading and construction of an additional egress trail, the additional lifts would ease densities at the other locations noted.

Ron Eng

The Moutaineers

Comment

The ski area does have places where serious congestion does occur, but only on the busiest days does it occur beyond the "going to lunch" and "returning to the lodge" rush hours. Also, these rush hours only occur on some weekends. Projected expansion of skier visits in Alternatives 2, 4, and 6 would only increase the skier traffic at described cliff band bottlenecks, during the rush hours.

Response

Modified Alternative 4 contains key elements from Alternative 9 to address the issue of the high egress trail densities.

Darrell Howe

Crystal Conservation Coalition

Comment

The USFS states sightseeing as one of the most popular recreational activities on our Forests. Are these visits included? What about summer visitations to the Study Area?

Response

Neither the Purpose and Need or the alternatives in the FEIS include summer developed recreational activities, and the ski area is closed during the summer. Summer sight seeing activities are not part of the ski area operation and therefore are not included in this FEIS. However, public access to the White Pass Ski Area during the summer months would not be precluded under any of the alternatives.

Ron Eng

The Moutaineers

Comment

The White Pass ski area, while providing wonderful winter recreation, has not done well in terms of levels of non-winter recreational use. For instance, the trails used by cross-country skiers around the lake on the north side of route 12 are a muddy, trash filled mess in the summer. The downhill runs also have a "wasted" look in the summer. Why should an inventoried roadless area of Hog Back be slated to be similarly destroyed for summer recreation? Note that Alternatives 2, 4 and 6 will do just that.

Response

Neither the Purpose and Need or the Alternatives in this FEIS include summer developed recreational activities, and the ski area is closed during the summer. Summer sight seeing activities are not part of the ski area operation and therefore are not included in this FEIS. However, public access to the White Pass Ski Area during the summer months would not be precluded under any of the Alternatives. The FEIS acknowledges the effects to the roadless character in Hogback and Pigtail Basins (refer to Section 3.14 - Inventoried Roadless Areas). In order to address this issue, the FEIS analyses Alternative 6, which reduces development in the White Pass IRA, and Alternative 9, which includes no development in the White Pass IRA.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is no discussion of avalanche control or monitoring in the adjacent Miriam Basin.

Response

No avalanche control or monitoring is proposed in the Miriam Basin as it is out of bounds under all alternatives.

Eric Vogt

Comment

The current layout forces a large percentage of the skiers and snowboarders to move down a crowded and restrictive cat track to gain access to the lower intermediate slopes. I have seen this crowding lead to people being hit by other skiers, falling in the path of oncoming skiers, and the general reduction in the outdoor experience we go there for.

Response

Refer to Appendix B - Mountain Plan Specifications for a discussion of this issue. Modified Alternative 4 addresses the issue through grading and construction of an additional egress trail.

Paul Reeder

Comment

We all agree that it is becoming more and more crowded. We are very much in need of more lifts and trails.

Response

Refer to Appendix B - Mountain Plan Specifications for discussions of density under all the alternatives.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to make a reasonable argument for the dramatic 44% increase in skier visits with the addition of Chairs 5 and 6 in the Hogback Basin. This increase in skier visits in a 10 year period is unheard of in the Washington market and has never happened with the addition of new chairs and terrain at other areas.

Response

Refer to FEIS Appendix D - Social, Economic and Recreation Assumptions for discussions of projections and assumptions in preparing skier visitation projections and the break-even analysis under all the alternatives.

L.H. Reeves

Comment

Alternatives 2, 4, and 6 physically and visually impact Wilderness and road less areas such as the Goat Rock Wilderness and from Mount Rainier National Park.

Response

Refer to FEIS Section 3.15 - Visual Resources, which details the visual environmental consequences by each Action Alternative.

Darrell Howe

Crystal Conservation Coalition

Comment

How will the installation of proposed lifts above the couloir impact this area?

Response

Refer to Mitigation Measure MM15 with respect to the development of a Boundary Management Plan. The Boundary Management Plan will address the responsibilities of White Pass by providing no more than three gated exit points and indicating that skiers would be responsible for any search and rescue costs. The grand couloir is not considered part of the lift served ski terrain as a result Modified Alternative 4 includes an egress trail (Trail 4-16) to provide a skiable trail away from the grand couloir. Similar to the existing condition, skiers who enter the grand couloir would enter an uncontrolled and unpatrolled area.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS is lacking an adequate discussion of proposed Boundary Management Plan that would have a significant impact on the adjacent Goat Rocks Wilderness Area. The DEIS fails to discuss the effects of hundreds of alpine skiers and snowboarders deposited immediately on or near the boundary of the adjoining Wilderness Areas.

Response

Refer to Mitigation Measure MM15, which describes the development of a Boundary Management Plan. The Boundary Management Plan would address the responsibilities of White Pass by providing no more than three gated exit points and indicating that skiers would be responsible for any search and rescue costs. Additionally, as detailed in Table 2.4-2, "the mitigation measures identified below would be included in the site plans and construction plans, as appropriate. All plans would be approved by the USFS prior to authorization for construction." The Boundary Management Plan has not been included in the FEIS because it would be developed prior to implementation of the selected Alternative.

Glenn Bandy

Ellensburg Cross Country Ski Club

Comment

The expansion will push the ski area boundary to the edge of the Miriam Creek basin, an area characterized by steep, open, east-facing slopes prone to wind loading and subsequent avalanches. These slopes still within the Goat Rocks Wilderness, will be very attractive to White Pass Resort customers. What responsibilities will the White Pass Company assume in regulating their patrons' visits into Miriam Creek with the resultant injuries, avalanche incidents and getting lost.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is no discussion of increased search and rescue costs associated with more skiers entering the high avalanche areas of the Miriam Basin. There is no discussion of increased skier injuries and death due to the proposed expansion.

Response

Refer to Mitigation Measure MM15, which describes the development of a Boundary Management Plan. The Boundary Management Plan would address the responsibilities of White Pass by providing no more than three gated exit points and indicating that skiers, would be responsible for any search and rescue costs.

Lawrence Jacobson

Comment

Alternatives 2 and 4 would definitely tempt inexperienced backcountry skiers to ski in the Miriam Basin and on to Shoe Lake. Will White Pass Co. or the Forest Service provide marked trails and/or guide service on weekends to mitigate this safety impact? Guide Service would also be a form of mitigation, especially if combined with avalanche control.

Response

Refer to Mitigation Measure MM15, which describes the development of a Boundary Management Plan. The Boundary Management Plan would address the responsibilities of White Pass by providing no more than three gated exit points and indicating that skiers would be responsible for any search and rescue costs. The grand couloir is not considered part of the lift served ski terrain. As a result, Modified Alternative 4 includes an egress trail (Trail 4-16) to provide a skiable trail away from the grand couloir. Similar to the existing condition, skiers who enter the grand couloir would enter an uncontrolled and unpatrolled area. The purpose of Mitigation Measure MM15 is to avoid areas like Miriam Basin, therefore no guide service is considered in the range of alternatives.

Erik Splawn

Hogback Basin Preservation Association

Comment

Finally, the DEIS fails to adequately discuss the effect of human and machine noise and air pollution, increased human entry, and disruption of wildlife in the Goat Rocks Wilderness Area and adjacent road less areas due to the proposed action.

Response

Refer to Section 3.16 - Noise for a discussion of noise impacts in the Goat Rocks Wilderness under each alternative. Refer to Section 3.8 - Air Quality for description of air quality/pollution impacts from each alternative. Refer to Section 3.14 - Inventoried Roadless Areas for a discussion of impacts to adjacent IRAs and Wilderness areas under each alternative.

Darrell Howe

Crystal Conservation Coalition

Comment

Please explain how the Skiers at One Time (SAOT) is calculated in your assumptions. Given this is the single most important decision making tool, there should be a clear explanation of how it is created. Should not this calculation be available to the public, or better yet, the USFS for review? Appendix B has extensive data but without an analysis tool such as a simple mathematical formula the information is unsubstantiated and should not be used in the Assumptions Section 2.3.1.

Response

Refer to the existing conditions section of Appendix B - Mountain Plan Specifications for an explanation on how CCC is calculated. As stated, CCC is simply calculated by dividing vertical supply by vertical demand. Both numbers are shown.

Darrell Howe

Crystal Conservation Coalition

Comment

The entire DEIS claims there is 0.5 acres of beginner terrain. Why does Table B-2 not identify any existing terrain as being Beginner Ability Level?

Response

Refer to the note provided in Table 2 in Appendix B- Mountain Plan Specifications, which states "Half an acre of beginner terrain is located within the boundaries of the Near Side trail, which is accessed by the Magic Carpet conveyor." The near side trail is rated low intermediate but contains a half acre of beginner level terrain that can be round trip skied using the Magic Carpet conveyor.

Darrell Howe

Crystal Conservation Coalition

Comment

The list on page B-7 shows a broad range of skiers per acre and if applied to White Pass would indicate an acceptable capacity of approximately 3000 skiers not the 2670 on Table 5 and elsewhere in the DEIS.

Response

Refer to the text immediately above Table 5, in Appendix B - Mountain Plan Specifications, for an explanation of CCC calculation. It is not a simple terrain capacity calculation. Terrain capacity is stated in the "Resort Balance" sections of Appendix B.

Mark Lawler

Sierra Club Cascade Chapter

Comment

The purpose and need for this project is heavily driven by the claimed need for the White Pass ski area to provide more beginning and novice terrain (p. 3-215). The Forest Service should compare the market data in Illustration 3.11-1 to a similar chart for the Crystal Mountain Master Development Plan FEIS, on p. 3-189.

If the market demand shown in the White Pass DEIS were more similar to that shown in the Crystal FEIS, then there would be much less need to develop new Beginner and Novice terrain at White Pass, and

contrarily, there would be much more of a need to develop expert terrain. White Pass should focus on developing more Expert terrain (which is not available in Hogback Basin) and not make many provisions for more Beginner and Novice terrain.

Response

Refer to the USDA, Forest Service correspondence dated December 3, 2001, File Code: 1950/2700, which states that “there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)”. In summary, "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 Crystal Mountain FEIS provides an industry standard terrain distribution that is based on the western United States in general, while the White Pass standard distribution presented in Appendix B - Mountain Plan Specifications reflects a pattern exhibited by a day use area in the western United States. This refinement of the market preference appears as a "skewing" of the preference away from the expert category and towards the low intermediate category.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to address the fact that other accessible cross-country areas near highway passes have been lost to ski area development at Snoqualmie Summit, Stevens Pass, and Crystal Mountain. A comprehensive study of ski area development and its impact on backcountry skiing in Washington State and the Pacific Northwest needs to be included in this document along with a comprehensive study of Ski Areas on Forest Service lands in the Pacific Northwest.

Response

Refer to the USDA, Forest Service correspondence dated December 3, 2001, with File Code 1950/2700, which states that “there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)”. In summary, "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."

Darrell Howe

Crystal Conservation Coalition

Comment

Page B-10 states NONE of White Pass's trails are typically overly crowded. Can you indicate if any other ski areas locally meet the preferred Terrain Market distribution or it some hoped for ideal which all ski areas desire to be?

Response

Refer to the USDA, Forest Service correspondence dated December 3, 2001, with File Code 1950/2700, which states that "there is no legal basis to conduct a national level Programmatic Environmental Impact Statement (PEIS)". In summary, "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 ability level designations are standardized by SE Group and are widely accepted in the ski industry as standard. They are used in the FEIS to ensure accuracy and consistency.

Darrell Howe

Crystal Conservation Coalition

Comment

Please describe how the terrain downslope from the proposed expansion area will be managed. The boundaries will not be closed in any action alternative to ticketed skiers and there does not appear to be any management guidelines in place to restrict access. This terrain will become a de facto extension of the ski area without any restrictions imposed on its users. This area should be considered in the Study Area for impacts given the evidence of activities on similar terrain at existing winter recreation areas on Federal Lands nationwide. Education alone with the use of signage will not eliminate visitations and may in have the opposite effect and in fact encourage enthusiasts given the media hype on out of bounds adventures. The cost for rescues should be born by the White Pass Company as well as all management related costs incurred by 'spillover' recreation.

Response

Section 3.11.2.2 describes use in this area under the existing condition, indicating that approximately 35 percent of the backcountry skiing at White Pass takes place in the area downslope of the proposed expansion. The FEIS has been updated to clarify that this area is known as the "grand couloir". In FEIS Table 2.4-2, Mitigation Measure MM15 has been updated to incorporate boundary management in the area downslope of the expansion area. As stated in Mitigation Measure MM15, skiers who enter this area would be responsible for any search and rescue related costs. The use of ungroomed, unpatrolled and

unevaluated ski terrain is a risk that is inherent in any winter backcountry activity and the Boundary Management Plan is designed to inform "would be" backcountry skiers of the potential dangers associated with leaving the ski area.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS is silent as to even the traditional use of this area by winter backcountry enthusiasts let alone the unique backcountry skiing and snowshoeing opportunities there. This demonstrates bias toward downhill ski area development by the author of the DEIS. It is apparent that little to no effort was expended to study the benefits and traditional uses of Hogback Basin as a natural backcountry area. The DEIS must provide a vigorous discussion of the benefits of the current and traditional uses of Hogback Basin.

Response

Section 3.11.2.2 provides a detailed analysis of backcountry skiing and Section 3.11.3.5 details the environmental consequences on backcountry skiing under each alternative. The FEIS has been updated to clarify that these areas provide some of the most easily accessible and skiable backcountry terrain in the vicinity of White Pass when compared to other backcountry skiing areas within White Pass' market area (refer to Table 3.11-1).

Regan Smith

Northwest Ecosystem Alliance

Comment

There is no discussion of the Density Index anywhere in the Capacity portion of the EIS even though it may be one of the most important components of understanding a resort's skier capacity. This must be more fairly and clearly addressed in the FEIS.

Response

Terrain density is a key element in analyzing a resort's capacity, and, as such, the density index is discussed in detail in Appendix B - Mountain Plan Specifications.

Regan Smith

Northwest Ecosystem Alliance

Comment

Currently, the White Pass Ski Resort has a Density Index of 52%. Using common sense, this Density Index also means that current capacity (cited at 2,670 persons per day) could more than double before trail density would be maxed out. The DEIS should disclose this fact.

Response

The 52 percent is an overall density. Doubling the number of people on the existing terrain would have serious negative effects on particular aspects of the resort, such as the already over-crowded egress trails. There would be no way to increase the overall density to the maximum acceptable level without creating major problems throughout the resort. Further, simply doubling the number of skiers on the existing terrain without addressing the issues of circulation and distribution would not meet the Purpose and Need of the project. The FEIS discloses terrain density in Appendix B - Mountain Plan Specifications.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain why the Lower Paradise run is rated as an Expert Ability Level given the Slope Gradient Table 2.3.1-1 on page 2-13. This egress trail is almost flat with an average grade of 8% and should be rated a Beginner. The Main Street run also needs to be reevaluated since it is a roadway in the summer and an access road for grooming equipment in the summer. This raises doubts about the entire terrain and slope evaluation having any value as a design tool. An example of another access road would be the narrow Kelly's Gap Road at Crystal Mountain which is given an Ability Level of intermediate by the SE Group. The Cascade Trail at White Pass is considered a Novice ability level with a maximum gradient of 43%. Explain the Specifications tables inconsistencies.

Response

The ability level designation of any given ski trail is determined by the steepest sustained slope in that trail, as described in Table 2.3.1-1. In addition to maximum slope the ability level of any given trail, incorporates the context of the trail. For example, if a low intermediate trail can only be accessed by expert level terrain, then that trail must be rated expert, because it would not be possible for a low intermediate level skier to access that trail. Conversely, if a low intermediate trail leads only to an expert trail, then the first trail must be rated expert, because one would need to be an expert skier to successfully ski the low intermediate trail. Additionally, the FEIS has been updated to include a footnote to Table 2.3.1 that details "the ability level designation of any given ski trail also includes consideration of the access to or egress from the ski trail". Intermediate skiers who access the Cascade trail have the opportunity to

egress via Noname trail or Lower Hour Glass trail, which are also intermediate levels. This is an example of the use of context in the designation of Cascade's ability level.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain to the reader why the EIS process needs 6 different levels of skier ability and corresponding terrain designations. The analysis needs to simplify trail types for ease of capacity and utilization rate calculations.

Response

The ability level designations are standardized by SE Group and are widely accepted in the ski industry as standard. They are used in the FEIS to ensure accuracy and consistency.

Regan Smith

Northwest Ecosystem Alliance

Comment

The acreage distribution by Ability Levels should be simplified. At any ski resort we've ever been to, the runs have been divided into beginner runs, intermediate runs and expert runs. Indeed, to think about acreage distribution in these terms helps to determine which Alternative better meets Skier Market demand. Consider Table 3.11-2 revised to fit the three categories of runs: Beginner and Novice are combined into Beginner; Low Intermediate and Intermediate are combined into Intermediate; and Advanced Intermediate and Expert are combined into Expert.

Response

The ability level designations are standardized by SE Group and are widely accepted in the ski industry as standard. They are used in the FEIS to ensure accuracy and consistency. When posting ability level signs, resorts do simplify the classifications into three levels, as you state.

Glenn Bandy

Ellensburg Cross Country Ski Club

Comment

The terrain in the proposed expansion is for the most part very gentle. Does the White Pass Company really expect that the addition of many acres of gentle slopes will enhance the resort's appeal? I would suggest that most skiers and snowboarders will find this terrain to be boring.

Ray Philen

Comment

The Hogback area is not steep enough to provide advanced and intermediate level skiing so the ski runs would just be at the beginner and intermediate level, of which White Pass ski area already had plenty.

Response

The ability level designations of the runs are determined by the steepest section. So, while much of the terrain is gentle, the short, but steeper sections dictate the higher ability level classification.

Darrell Howe

Crystal Conservation Coalition

Comment

The DEIS indicates there is a need for 70+ new acres of formal trails. The existing terrain can be calculated to be a minimum of 15 acres of ski trails deficient from Table B-3. Why is this not mentioned anywhere in Chapters 2 or 3? Is it necessary to expand 800 acres into new terrain to create 15 acres of ski trails? Given that the existing trail system is 67,430 feet in length (Table 2) the deficiency in terrain could be made up by widening the existing trails by approximately 10 feet. Put more simply, White Pass Company could use another 1-1/2 Lower Roller ski trails to make-up for any shortages they claim they have for Advanced Intermediate visitors.

Response

The DEIS does not specifically state that there is a need for 70+ acres of new terrain. Rather, the Purpose and Need (refer to Section 1.1.2.2) addresses several different needs, one of which includes a need to "increase the proportion of both novice and advanced intermediate terrain at White Pass." While increasing the width of existing novice and advanced intermediate terrain in the current SUP area would increase the acreage and proportion of terrain, it would not address other needs, which include improvements to skier circulation and dispersal, additional facilities for current and anticipated growth, and improved early season skiing. The Action Alternatives carried forward for analysis in the FEIS better address all of the needs than an alternative that would simply address ski terrain needs on the basis of acreage.

Darrell Howe

Crystal Conservation Coalition

Comment

Is all 'off-piste' terrain considered advanced to expert as described on page 3-220? What is the skier Capacity of off-piste terrain within the Study Area? How many acres of off-piste are available to the visitor? Please quantify the skiable acreage outside of the formal trail system at White Pass.

Response

The DEIS does not state that all off-piste terrain in the White Pass vicinity is advanced to expert. Rather, the footnote on page 3-220 of the DEIS defined "off-piste" as skiable terrain that is not associated with the formal trail network and typically includes gladed, open-bowl, chute and "other advanced to expert terrain types". Because the off-piste terrain is not a component of the formal terrain at White Pass, its ability levels are not considered in the formal terrain distribution calculations, nor does it drive capacity of the ski area. Under all Action Alternatives, the majority of the Hogback Basin area would remain available as off-piste terrain. The FEIS has been updated to include a calculation of available off-piste terrain in the SUP area for each alternative (refer to Section 3.11 - Recreation). Regarding the off-piste terrain capacity, neither the 2L allocation nor the roadless designation provides for levels of acceptable change or specific user density limits. Using the lowest skier density from Appendix B (two skiers per acre for expert terrain), the 767 acre expansion area (Alternative 2 and Modified Alternative 4) could accommodate 1,534 skiers at one time and operate within the lower range of expert terrain density. However, such a theoretical calculation provides no basis for analysis in the FEIS because the available data indicate that the highest recorded lift-served backcountry use in the area was approximately 1,400 skiers per season (refer to Section 3.11.2.2 - Non-Alpine Skiing Analysis), which suggests that the capacity of the Hogback Basin area far exceeds the highest recorded use.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain why the other Action Alternatives lack the new egress trail from Main Street described in Alternative 9.

Response

The DEIS included this new egress trail in Alternative 9 because Alternative 9 was designed to analyze improvements to the existing SUP area, whereas the other Action Alternatives address expansion into Hogback/Pigtail Basins. As a result, the DEIS includes a range of projects that could include an expansion scenario coupled with improvements to the existing SUP area. In the FEIS, Modified Alternative 4 includes such a mix of projects, including the new egress trail along Main Street.

Regan Smith

Northwest Ecosystem Alliance

Comment

The environmental consequences defined under each Alternative do not address the core Capacity issue and are therefore inadequate. For example, the bolded statement under Alternative 9 says "With the lowest CCC of the Action Alternatives, and with no expansion into Hogback Basin, Alternative 9 represents the lowest potential for White Pass to meet the need to absorb the existing growth in demand"

(p. 3-224). However, instead of comparing Alternative 9 ONLY to the other action alternatives, the DEIS should also state how this Alternative relates to existing CCC. According to Appendix B, Alternative 9 would only be at 48% Density Index, meaning that trails would decrease in density compared to existing conditions. This is much less than any other Action Alternative!

Response

The density index under Alternative 9 would be lower than the other Action Alternatives and lower than the existing conditions because a significant amount of new terrain would be developed, with a corresponding low increase in uphill lift capacity. Alternative 9 does not address all aspects of the Purpose and Need for the project, and it would create the highest amount of environmental impacts. Key elements of Alternative 9 have been incorporated into Modified Alternative 4.

Kevin Geraghy

Comment

There are really very few ski-from-the-car backcountry skiing opportunities in Washington, and Hogback Basin is the only one of these few which is easily accessible to Wenatchee area residents. This is a gorgeous basin, and the installation of lift lines, service roads, and other dreck would seriously damage the value of this place for summer as well as winter non-motorized recreation.

Response

The FEIS has been updated to clarify that these areas provide some of the most easily accessible and skiable backcountry terrain in the vicinity of White Pass when compared to other backcountry skiing areas within White Pass' market area (refer to Table 3.11-1). As detailed in the FEIS, Section 3.11.2.2 states that "these opportunities provide widely varying degrees of terrain difficulty and ease of access; however, there are thousands of acres available for this type of use throughout the region. Overall, the Cascade Range holds substantial backcountry skiing opportunities. However, with the exception of the developed ski areas, access to the majority of this terrain requires considerable driving, effort, and available parking and/or services are often limited."

Darrell Howe

Crystal Conservation Coalition

Comment

Describe the access and egress trails to the proposed lifts mentioned on page 3-226. Would snowboarders be walking portions of these trails to access the lifts in Pigtail and Hogback since they cannot skate or pole? How long and wide are these trails and what slope gradient do they have? Are they properly represented on the appropriate tables?

Response

The figures for the alternatives (i.e., Figures 2-2, 2-4, 2-6 and 2-8) have been revised to include the trail names for all proposed trails. These trails are described in the respective White Pass Terrain Specifications tables (i.e., Tables 2.3.3-2, 2.3.4-2, 2.3.5-2 and 2.3.6-2). These tables include the length, width and slope for the access and egress trails. Under Alternative 2 (the area of discussion on page 3-226 in the DEIS), the access trail is labeled as Trail 2-2, a trail with an average width of 39 feet and an average grade of 9 percent. Similarly, the egress trail, Trail 2-1, would average 34 feet wide with an average gradient of 6 percent. However, as noted in the Appendix B, there are sections throughout the proposed terrain (including the access and egress trails) that extend for lengths of 150 feet or more and are at grades where it would be difficult to maintain speed. This is due to the proposed runs being restricted to the existing natural terrain gradients.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain why the proposed PCT lift could not have a greater capacity than 1800pph as indicated on Table B-24? The proposed Basin Express with comparable vertical gain has an hourly capacity of 2400pph.

Response

The higher level terrain accessible off this lift is better served with lower skier densities than the low level terrain off the Basin chair. As such, the PCT lift is proposed as a triple chair, which has a maximum capacity of 1,800 pph. The FEIS has been updated to include Modified Alternative 4, which provides a Basin chairlift with a capacity of 1,800 persons/hour, to reduce skier densities in a manner similar to the PCT chair.

Jeff Hagen

Comment

Many of the glades in Hogback Basin are so flat that it is necessary to use a cross-country stride technique to keep moving. All but novice skiers would soon be bored with the terrain, and having to pole uphill (such as is now necessary on one section of the Holiday ski run) is something that does not appeal to any downhill skier. Because of the gentleness, I anticipate that many downhill skiers would simply point their skis downhill at the top and run the whole thing without turning. There are a few places on the slope that are steep enough where it would be dangerous for beginning skiers who might get in the way of these "downhill racers".

Ron Eng

The Moutaineers

Comment

The very fact that this terrain is so gentle makes it a dead zone for the intended snowboarders who make up the newer customer base of the ski areas.

Dorothea Driggers

Comment

The Hogback area does not have particularly steep slopes, so the ski runs would just be at the beginner and intermediate level, of which White Pass ski area already has plenty. The area is not suited for snowboarding which appears to be rapidly increasing in popularity and replacing downhill skiing.

Patricia Shannon-Garve

Comment

Hogback Basin is ill-suited for expansion because it consists of mostly gentle slopes that are not sought after by the increasing numbers of snowboarders the area is seeking to serve.

Response

The Hogback Basin area is characterized by gently rolling terrain, and there are sections of terrain throughout the area that have slopes of 10 percent or less extending for 150 or more feet, as described in Appendix B - Mountain Plan Specifications. These sections are not optimal for skiing and could present a challenge for lower level skiers and snowboarders. Telemark skiers would have no trouble crossing the flatter sections. However, on the average, the terrain has skiable grades and regular grooming can help make it easier to cross flat sections.

Gregory Freed M.D.

Comment

Although not an expert on such things I would consider the area's rolling terrain and graceful meadows to be poor alpine skiing but precious telemarking.

Curt Newsome

Comment

Sacrificing the roadless Hogback Basin to expand the White Pass ski area does not make economic sense. Hogback Basin is ill-suited for expansion because it consists mostly of gentle slopes not particularly well suited to snowboarders.

Response

The Hogback Basin area is characterized by gently rolling terrain, and there are sections of terrain throughout the area that have slopes of 10 percent or less extending for 150 or more feet, as described in

Appendix B - Mountain Plan Specifications. These sections are not optimal for skiing and could present a challenge for lower level skiers and snowboarders. Telemark skiers would have no trouble crossing the flatter sections. However, on the average, the terrain has skiable grades and regular grooming can help make it easier to cross flat sections. Additionally, the ability level designations of the runs are determined by the steepest section. So, while much of the terrain is gentle, the short, but steeper sections dictate the higher ability level classification.

Darrell Howe

Crystal Conservation Coalition

Comment

The EIS should explain why the PCT lift described in Alternative #9 (fixed grip triple) could not be a detachable Quad with Hourly Capacity above 1800 pph. All other lifts in the Proposed Action have 2400 pph capacities with comparable terrain.

Response

The hourly capacity of the PCT chairlift is based on the density analysis provided in Appendix B - Mountain Plan Specifications. Specifically, a detachable quad or a chairlift with a capacity of 2,400 people per hour would deliver more people to the top terminal location, resulting in an increase in the density index. An hourly capacity of 1,800 people per hour would result in a density index of approximately 50 percent. FEIS Modified Alternative 4 has been revised to include an hourly capacity of 1,800 people per hour for the Basin and Hogback Express lifts, in an effort to maintain acceptable densities during high egress periods. The lift capacities in the Proposed Action (Alternative 2) are based on White Pass' proposal and, as shown in Appendix B of the FEIS, operation of these lifts at 2,400 people per hour would result in unacceptable densities on the egress trails.

Mike Dawson

Pacific Crest Trail Association

Comment

The contention in the DEIS that such uses as ski area development are automatically appropriate for any given section of the PCT is clearly an assumption that does not reflect present direction. The Comprehensive Plan states that "...the trail must coexist with all other resource uses and activities of the land as determined through the land management planning process." Determining how to manage the PCT for its maximum outdoor recreation potential is the question before us. It is important that the experiences and other outputs of Forest land surrounding the PCT be managed to provide maximum public benefit in a national context of opportunities.

Response

The land management planning process for the White Pass IRA is articulated in the Gifford Pinchot Land and Resource Management Plan, which allocated the area to Management Area 2L - Developed Recreation. In the Forest Plan it is stated that "expansion of the White Pass Ski Area is anticipated during the first decade" (refer to Section 3.14 - Inventoried Roadless Areas).

Larry Mitchem

Comment

I have reviewed the draft EIS extensively and I find it disturbing that the document completely ignores the impact on hunting. Hiking the PCT is reviewed to every detail, but the other main recreational users--hunters--are ignored. Why? This oversight should be addressed. Would hunting be allowed within an expanded ski area boundary? Currently, all the buildings are adjacent to Highway 12, a place where game is unlikely to congregate. Although there should be little user conflict between hunters and skiers, with a mid-mountain lodge, I foresee potential restrictions on hunting. Initially, new mid-slope buildings could push game away from the quality habitat present in the hogback basin, but with expanded open areas for ski runs, and as animals get used to new buildings, game will return, perhaps in greater numbers. Will hunters be able to pursue that game? I strongly urge the Forest Service to address the impacts on hunting in the final EIS.

Response

The land within and nearby the existing SUP area is not closed to hunting, only to vehicle access. The area includes Game Management Units 364 (Rimrock) and 516 (Packwood). Hunters must adhere to State of Washington regulations, including the Washington Administrative Code (WAC) and also to the Code of Federal Regulations (CFR). 36 CFR 261.10 (d) states the following is prohibited: Discharging a firearm or any other implement capable of taking human life, causing injury, or damaging property: (1) In or within 150 yards of a residence, building, campsite, developed recreation site or occupied area, or across or on a Forest Development road or a body of water adjacent thereto, or in any manner or place whereby any person or property is exposed to injury or damage as a result in such discharge. As long as hunters are not shooting near buildings, then they are free to hunt. No other special restrictions are in place.

Hunting would continue to be allowed within the expanded permit boundary in accordance with the State of Washington and federal regulations. Hunting would not be allowed within 150 yards of the mid-mountain lodge, in accordance with the CFR mentioned above. This would be a very small area relative to the entire area to be placed under permit. No additional special restrictions would be instituted within the expansion area by the Forest Service.

Additionally, hunting was not brought up as a scoping issue and therefore not analyzed in the DEIS. However, Section 3.11 - Recreation of the FEIS has been updated to address hunting (refer to Section 3.11.3.5).

Regan Smith

Northwest Ecosystem Alliance

Comment

Appendix B notes on pg. 18 and 27 that the densities of the Cascade Track would increase from their already high levels under Alternatives 2 and 4. This is not adequately discussed anywhere in the DEIS. We request that this discussion be included in the FEIS.

Response

The Modified Alternative 4 contains key elements from Alternative 9 to address the issue of the high egress trail densities.

Darrell Howe

Crystal Conservation Coalition

Comment

The text on page 2-42 states the Holiday trail will be graded to a maximum slope of 48% yet the Terrain Specification Table in the previous section lists the existing Maximum Grade at 38%. Existing maximum grade for the Elevator Shaft trail is listed as 48% yet the statement following the Table claims it is currently 65% grade. Please explain these discrepancies.

Response

The numbers presented in the DEIS were in error and have been updated in the FEIS. Specifically, the Elevator Shaft trail has an existing maximum grade of 48 percent. This grade would be retained under Alternative 9. Holiday has an existing maximum grade of 39 percent. Under Alternative 9 and Modified Alternative 4, the maximum grade on Holiday would be reduced to 25 percent, thereby reducing its ability level from intermediate to novice. FEIS Table 2.3.6.2 has been updated to reflect these numbers and the discussion in Section 2.3.6.2 has been revised. Appendix B has also been revised to reflect these corrections.

Darrell Howe

Crystal Conservation Coalition

Comment

What happened to the simplified definition of CCC as 1/2 of uphill capacity? Can this criteria be useful if terrain descriptions are simplified?

Response

The term CCC is defined as optimal utilization rate, and is described to some detail in the FEIS. CCC is calculated the same way for resorts throughout the country, and is done so to ensure accuracy and consistency.

Susan Fairbrook

Comment

The White Pass DEIS states on page 2-20 that under Alternative 2, the Hogback Express Chairlift upper terminal would be built within 650 feet of the Wilderness boundary. In which direction from the Wilderness boundary on Hogback Ridge is this 650 feet measured?

Response

The use of 650 feet in the DEIS was an error. FEIS Section 2.3.3.1 has been updated to clarify the distance from the Hogback Express chairlift to the Wilderness boundary. Refer to FEIS Figure 2-2, which details the location of the Hogback Express chairlift upper terminal.

Darrell Howe

Crystal Conservation Coalition

Comment

Where does the 5,548 people capacity of existing terrain come from? How is it calculated?

Response

The value is calculated through the skier capacity of the available terrain shown in the terrain distribution data and percentage of active skiers shown in the density analysis.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain why the Proposed Action fails to address existing trail system inadequacies. The entire existing SUP appears to lack evaluation to address the stated purpose and need. Explain why the existing lift system is not considered for upgrading or why the existing trails are not improved.

Response

The White Pass Company proposal (The Proposed Action) is analyzed as Alternative 2. The Proposed Action does not address issues relating to the existing terrain. Based on issues raised during scoping (refer to Section 1.5), alternatives to the Proposed Action were developed. Specifically, in the DEIS, Alternative 9 evaluated improvements to the existing trail system. In the FEIS, Alternative 13 was added to the evaluation (refer to Section 2.2) to analyze increased lift capacity within the existing SUP area.

Additionally, in FEIS Section 2.3.4, Modified Alternative 4 incorporates numerous improvements from Alternative 9 in order to address the existing trail system.

Erik Splawn

Hogback Basin Preservation Association

Comment

Is there a plan for the installation of snow making machines and what will be their effect on water supplies?

Richard L. Curtis

Comment

The area is attempting to use snow making equipment to provide a covering for skiing. If the area is expanded will additional snow making equipment be installed? What impacts will snow making on an even larger scale have on ground and surface water hydrology? Will springs and seeps be adversely impacted? What will the impacts be to plants and wildlife in the area?

Response

There is no snowmaking proposed.

Erik Splawn

Hogback Basin Preservation Association

Comment

The proposed alternative does nothing to change the slope of the middle mountain cliff band or add or improve any new trails or cat tracks to alleviate the congestion on the existing ski area. With the anticipated 44% increase in skier visits as stated in the DEIS with the proposed alternative, more skiers, not less, will have to negotiate this cliff band at the afternoon closing time when skiers from the proposed expansion area in the Hogback are funneled down through the unimproved cat tracks of the existing ski area. Furthermore, because the mid mountain lodge will provide only "limited food service", many skiers on the Hogback runs will opt for better lunch and bar facilities at the main lodge during lunch time and will increase the cat track congestion, not decrease it at this stated high skier density time.

Christine Reichgott

Environmental Protection Agency

Comment

Section 1.1.2.2 states that poor circulation caused by the steep cliff-band in the middle mountain results in unacceptably high skier densities on some trails (e.g. Holiday and Cascade Trucks) and safety concerns. We are concerned that Alternative 2, 4 and 6 would increase safety concerns on these trails. Under these alternatives, additional improvements would be made to the existing egress trails so that more skiers

would potentially use the trails. The draft EIS predicts that higher skier densities on the egress trails would be mitigated by the proposed Mid-Mountain Lodge and a staggered closing time. However, the draft EIS does not demonstrate how many skiers would utilize the Mid-Mountain Lodge and, thus, how effectively skier densities would be reduced. In addition, we remain concerned about the effectiveness of the staggered closing time. The final EIS should clarify the model used to assess the skier densities.

Response

This issue has been addressed in the Modified Alternative 4. Capacities on the two proposed lifts are significantly reduced from Alternative 2 and the grading projects and additional egress trail from Alternative 9 have been included, the reason for both of these changes is specifically to address the issue of densities on the cat tracks. The model to assess skier densities on the cat tracks is the same as used in the 1999 Master Plan, where the issue was discussed at length.

Dave and Carol Ludwig

Comment

There should be a trail from the new higher chair (to the right as you look up the new hill) back to the existing ski area. For skier safety, I don't think it would be a good idea for an injured skier to be transported up the other chair in order to make the cat track back to the existing ski area.

Response

This trail is included in the DEIS as Alternative 4 and in the FEIS as Modified Alternative 4.

Darrell Howe

Crystal Conservation Coalition

Comment

[Page B-12; Re: trails 2-1 and 2-2] Why are they not rated Novice given their slope gradients? The average gradient of 6% for the 2-1 access trail does not even qualify as a Beginner run. White Pass desires more Advanced Intermediate slopes yet skiers and boarders will unlikely be 'excited' about the flats they will have to cross on the way there and back.

Response

Trails 2-1 and 2-2 are rated low intermediate for two reasons. The FEIS has been updated to include a footnote to Table 2.3.1-1 that details "the ability level designation of any given ski trail also includes consideration of the access to or egress from the ski trail". There is no novice route back to the ski area base from the Hogback Basin proposed in Alternative 2. Trail 2-1 (the egress trail) is rated low intermediate based on its terrain and Trail 2-2 (the ingress) is rated low intermediate because of trail 2-1's designation. Additionally, as noted in Appendix B - Mountain Plan Specifications, there are areas throughout the Hogback Basin terrain that are less than 10 percent grade for periods exceeding 150 feet in

length. These areas are less desirable for skiing and would make the terrain difficult to ski for true novice skiers, due to the possible need to pole or skate.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

Traffic patterns on the ski area involve expert runs crossing trails used by skiers of lesser ability and the difficulty for skiers of less than expert skill to cross the cliff band

* none of the conflicts between crossing trails appear to have been removed

* access to the expansion area will increase the use of trails such as Main Street, which has a very difficult drop (resulting in the trail being classed as expert level), to return to the main lodge from the expansion area.

Response

While Alternatives 2 and 6 do not address the conflicts as noted, or the issue of higher densities on the existing cat tracks during the mountain egress time period, these issues are addressed in Modified Alternative 4 and Alternative 9. These issues are addressed through an additional egress route and grading of existing runs. Also, Alternative 9 includes construction of a lift below the cliff band, to help reduce skier conflicts.

L.H. Reeves

Comment

The DEIS lists of backcountry use areas aren't really areas that can be used; either the access roads aren't really open, or one would need a special vehicle, or one would be mingling with snowmobiles, which negates the backcountry experience.

Ron Eng

The Moutaineers

Comment

The DEIS incorrectly identifies other backcountry use areas that, in reality, are not available. Clearly 50% of the areas on the backcountry list in the DEIS are not accessible in winter. Furthermore, no area near snowmobiles is really a backcountry area, the noise is too great.

Darrell Howe

Crystal Conservation Coalition

Comment

Table 3.11-1 needs some serious revision. The first 3 areas are all inaccessible during the winter months with the closest open road 12 miles away at an elevation of 2750 ft. Many of the others fail to provide comparable terrain to White Pass. Few sites in the Cascades have all season paved roadway access to 5000+ ft elevation terrain for backcountry skiing.

Common Response

As detailed in the DEIS and FEIS, Section 3.11.2.2 states that "these opportunities provide widely varying degrees of terrain difficulty and ease of access; however, there are thousands of acres available for this type of use within the region. Overall, the Cascade range holds substantial backcountry skiing opportunities. However, with the exception of the developed ski areas, access to the majority of this terrain requires considerable driving, effort, and available parking and/or services are often limited." For clarity the term "hike-to" has been added to the heading of Table 3.11-1. Additionally, Table 3.11-1 has been updated to provide further information regarding the needed experience level and round-trip distance of the ski tours listed.

Ronald and Ceona Chitwood

Comment

I may have missed discussion about the issue but I see an opportunity for "out of area" skiers (and there will be some) who slip into the trees and the steeps to both the East and West of Chair 6 Runs. If they don't cut back to the base soon enough, they will be in the difficult terrain of upper Millridge Creek where the fall line leads them to Knuppenburg Lake or even worse, the Clear Fork of the Cowlitz. Some consideration might be given to an intercept track and lots of markers to aid their return to the base of Chair 6.

Darrell Howe

Crystal Conservation Coalition

Comment

How will visitors be restricted from this area or should it be considered as part of the lift served ski terrain? Will the White Pass Company be responsible for visitor safety in this Couloir?

Common Response

Refer to Mitigation Measure MM15, which describes the development of a Boundary Management Plan. The Boundary Management Plan will address the responsibilities of White Pass by providing no more than three gated exit points and indicating that skiers would be responsible for any search and rescue costs. The grand couloir is not considered part of the lift served ski terrain. As a result, Modified

Alternative 4 includes an egress trail (Trail 4-16) to provide a skiable trail away from the grand couloir. Similar to the existing condition, skiers who enter the grand couloir will enter an uncontrolled and unpatrolled area.

Lori Flemm

Comment

The lodge is crowded on weekends; filled to capacity. A new lodge is needed to provide services (food, restrooms, rental gear) for skiers.

Lorraine Hamilton

Comment

The lunch hours present another dilemma. The lodge is unbearably crowded between the hours of 11:00 and 1:30 pm on weekends as weary skiers spend 20-30 minutes just trying to find a table to sit for lunch, then have to wait in long lines for food. Many give up on finding a coveted table spot and simply take their trays outside, sit on the cold patio, or grab a place downstairs in the hallway or on the stairs which are neither safe nor comfortable alternatives. The proposal to build a mid-mountain lodge would ease this overcrowding considerably, allow families to actually sit together, and make for a much more enjoyable day at the Pass.

Phillip and LaVerna Fenner

Comment

The current lodge is too small for the current crowds and a mid mountain lodge would greatly reduce the crowding

John Aurand

Comment

Expanding to the back with a lodge will reduce the congestion in the main lodge and allow people a reasonable chance of finding a spot to sit with their family for lunch. The new lodge will reduce the numbers that come to the main lodge; why make the trip up front if you do not have to?

Joel Attaway

Forty Below, Ltd.

Comment

The recent addition of the Yurt and restrooms near the top of the mountain is very much appreciated, so now you don't have to go all the way to the main lodge, which is often overcrowded, and so far away from skiing that it disrupts your skiing time. This is a great start, but a much larger lodge style building with seating for hundreds of skiers, and multiple restrooms is desperately needed. For example, I have had to wait for 10 or more minutes sometimes to use that upper mountain restroom! This has to be changed!

Common Response

Refer to Section 3.11- Utilities and Infrastructure and Chapter 2 of the FEIS, which detail the relevant facilities proposed by each Action Alternative.

Erik Splawn

Hogback Basin Preservation Association

Comment

Furthermore, because the 2004/05 skier visitation data will be available before the printing of the FEIS, in the interest of being up to date and complete, we request that this years 2004/05 skier visitation data be added to all graphs and charts concerning National, Regional, Oregon, and Washington ski areas. We further request that the 2004/05 skier visitation data be used to calculate any and all projections and statements contained in the EIS.

Erik Splawn

Hogback Basin Preservation Association

Comment

If this years skier visits are calculated, Washington state ski areas would show the lowest 5 year skier visit average since the late 1980s.

We request that this years 2004/05 skier visitation data be added to all graphs and charts concerning National, Regional, Oregon, and Washington ski areas. We further request that the 2004/05 skier visitation data be used to figure any and all calculations and projections.

Erik Splawn

Hogback Basin Preservation Association

Comment

The FEIS should include the skier visit, snowfall, and snow pack data for the 2004/05 season for Washington ski areas and White Pass. This data should then be used to calculate any and all predictions and observations concerning ski area visitation as a trend or as a basis for calculating economic viability or "need" for expansion.

W.D. Frank

Hogback Basin Preservation

Comment

For the benefit of the public interest, I suggest that the FEIS for the proposed expansion at White Pass include all skier visit data for the ski season 2004-2005. In addition, any calculations concerning the economic viability of the expansion should include data from this season.

Peggy Whitaker

Comment

Please include the 2004/2005 skier visit data in the FEIS. This data should then be used in any and all calculations and projections of economic viability and future skiing trends. It is important to have the latest data and statistics presented in the FEIS.

Cindy and Rick Johnson

Comment

I feel it is imperative that operational data from this current year be included in the final EIS. Please be sure to incorporate the current year's (2004-05) skier visits.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.10.2.3 fails to quantify long term visitations and simply states 'wide fluctuations' in the past decade. It would be reasonable to request that visitor counts from the current season be included in any EIS analysis to provide conservative estimates of future trends instead of focusing on the bumper seasons only.

Common Response

Refer to FEIS Chapter 1 and Section 3.10 - Social and Economic Factors, which have been updated to incorporate skier visitation for the 2004-05 and 2005-06 ski seasons nationally and for Washington State. Specifically, refer to Illustration 1-2 which graphically depicts the annual skier visitation at White Pass, while Table 3.10-5 summarizes Washington State's skier visitation numbers for ski resorts, in thousands, from 1990 to 2006. Both suggest an increase in skier visitation numbers. Additionally, Washington data suggests that White Pass accounts for 6-8 percent of total skier visits (PNSAA 2004). Section 3.10 of the FEIS details the rise of skier visits nationally, regionally, and locally within the last decade. This data has then been incorporated throughout the FEIS.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to consider the effect of hundreds of skiers and snowboarders injected into the Miriam Basin due to the proposed expansion.

Mike Hiler

Comment

Because of the remote nature of Hogback Ridge and it's proximity to the Marian Basin slopes, the placement of a lift overlooking these slopes will present a danger to skiers who fail to understand the combined hazards of extreme slope, weather and elevation.

Common Response

As detailed in Section 3.11.3.5, "implementation of Mitigation Measure MM15 (refer to Table 2.4-2) would require the development of a Boundary Management Plan that would include designation of no more than two gated ski area exit points along the boundary between Pigtail Basin and Miriam Basin, and one gated ski area exit point along the boundary downhill of the expansion area. The plan would also include signage indicating that skiers would be responsible for any search and rescue costs. The limitation on exit points and gravity of the search and rescue language aims to insure that only capable backcountry enthusiasts leave the ski area through the exit points, thereby minimizing the potential for search and rescue operations."

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS contains wildly disparate and conflicting claims regarding skier visits at White Pass. On page 27, of the DEIS states that "Over the last ten years, skier visitations at White Pass increased by approximately 70%." No ski area in the Northwest has enjoyed that kind of increase in skier visits during the same time period. In fact, using the figures presented in the Skier Visitation Table on page 32 of the DEIS, skier visitation has increased by 28% over the last 10 years not 70%. It appears that the author of the DEIS picked the difference between the lowest skier visit year (1995-96) and the highest (2001-02) in the last 10 years and erroneously concluded that skier visits have increased by 70%. One could just have easily picked the difference between the highest skier visit year (2001-02) and the lowest year (2004-05) and claimed an 85% DECREASE in skier visitation in the last 10 years.

Erik Splawn

Hogback Basin Preservation Association

Comment

Furthermore, the DEIS reports a 56% increase in skier visits from years 1996-97 to 2003-04 at White Pass. During the same time period according to the table on page 323, other Washington ski area skier visits ranged from a 3% decrease at Snoqualmie Pass to a 14% increase at Stevens and Crystal Mountain. In fact during this same time period, according to the table on page 337, cumulative ski area visits from Oregon actually show a net DECREASE in skier visits. This calls into question the validity of the White Pass skier visit data from 1997-98 to the present as stated in the DEIS. Because of the importance of

accurate skier visitation records and their role in establishing "need" as it relates to increased demand, we request an accurate skier visitation count and explanation of this inconsistency. Skier visitation records, season pass sales, and all methodologies used to calculate skier visits from season pass holders, ski school, and daily pass sales need to be stated clearly in the DEIS.

Erik Splawn

Hogback Basin Preservation Association

Comment

Other ski areas in Washington either show a decline, or a modest growth in skier visits over the last 5 years while Oregon ski areas have shown no growth within the last 5 years. It is evident that the inflated skier visit figures for White Pass are inconsistent with other areas and need to be examined and re-calculated.

Christine Reichgott

Environmental Protection Agency

Comment

There are some uncertainties in the estimation of future skier visitation. The draft EIS states that there is a need for expanded facilities to meet increased demand. According to the draft EIS, the number of skiers visiting White Pass has been growing over the last ten years and continued growth in demand for skiing at White Pass is expected. Under all alternatives, skier visitation growth is expected at a rate of 1% annually due to projected population growth in the market area (Appendix D). However, the draft EIS also states that Oregon and Washington skier visits have been steady and skier visits can vary depending on weather conditions (Section 3.11.2.1).

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS uses inflated skier visit data, unsubstantiated claims, and rosy forecasts for future skier visits as a result of the proposed expansion:

- a) The DEIS reports a 56% increase in skier visits from the 1996/97 season to the 2003/04 season at White Pass. This is totally inconsistent with other ski areas in Washington and Oregon. Such a large disparity calls into question the accuracy and validity of the skier visit data from White Pass. There needs to be a full accounting concerning the calculation of skier visits at White Pass including, but not limited to: daily skier visit data, season pass sales, calculations involved in determining skier visits from season pass holders, changes in season pass skier calculation formulas, ski school passes and special promotions.

b) The DEIS incorrectly asserts on many different occasions that White Pass Ski Area has enjoyed a 70% increase in skier visits over the last 10 years. This is blatantly false. Even the inflated skier visit data presented in the DEIS disputes this. The data in the DEIS shows a more realistic 28%.

c) The DEIS claims that the preferred alternative would generate a 44% increase in skier visits in 10 years on top of the already inflated skier visit figures. Several ski areas in Washington State have added new chairs and opened up new terrain in the past 15 years and not one has shown such a steep increase within 10 years. White Pass opened Chair 4 which added 30% additional terrain and realized only a 10% increase in skier visits in the following 10 years. More realistic skier visit projections based on the experience at other Washington ski areas and formulated for White Pass' limited market needs to be forthcoming.

Common Response

The skier visitation data is obtained from PNSAA data and records provided by White Pass Ski Area. These are available in the public record.

Darrell Howe

Crystal Conservation Coalition

Comment

On page 3-229 per Alternative #9 the text describes significant grading to accommodate Novice skiers. Please modify your Terrain Specification Tables in Chapter 2 to indicate properly which runs are Novice. Page 31 of Appendix B describes a Novice Terrain as having a gradient less than 25%. The Tables in Chapter 2 such as 2.3.2-2 show numerous trails with 25% or less gradient as being intermediate or Low intermediate such as Jaw Breaker or Lower Paradise. These errors put the entire Capacity analysis in doubt.

Erik Splawn

Hogback Basin Preservation Association

Comment

In addition, many of the terrain types, especially the novice, low, intermediate, and advanced overlap in their degree of slope. The differences between novice and low and intermediate and advanced intermediate are so small, and subjective, the same run could be characterized as novice or low, and another run could be characterized as intermediate or advanced. In fact, the Table on pg 73 shows many examples of this: Lower Holiday is characterized as low intermediate but according to the table on Page 70, actually should be novice. Upper Roller is characterized as expert but according to the table on page 70, should be advanced intermediate.

Common Response

The ability level designation of any given ski trail is determined by the steepest sustained slope in that run, as described in Table 2.3.1-1. In addition to maximum slope the ability level of any given trail incorporates the context of the trail. For example, if a low intermediate trail can only be accessed by expert level terrain, then that trail must be rated expert, because it would not be possible for a low intermediate level skier to access that trail. Conversely, if a low intermediate trail leads only to an expert trail, then the first trail must be rated expert, because one would need to be an expert skier to successfully ski the low intermediate trail. Additionally, the FEIS has been updated to include a footnote to Table 2.3.1-1 that details "the ability level designation of any given ski trail also includes consideration of the access to or egress from the ski trail".

65.0 Visual Resources

Mike Dawson

Pacific Crest Trail Association

Comment

We are also deeply concerned regarding the application of the system to assess the relative impacts of various alternatives. While cultural landscapes are a relatively new element in assessing the desirability and value of landscapes, we believe that important cultural features are an important part of what makes a National Scenic Trail valuable. It may be reasonable to say that the existing ski area, which is over 40 years old, may constitute a valuable and important cultural landscape worthy of conservation. It is not reasonable to declare that a piece of ground that is presently in an undisturbed natural condition can be an instant cultural landscape to be "preserved".

Response

Although mitigation and design criteria would enable the project to meet the Retention VQOs along the PCNST, the FEIS acknowledges that there would be negative effects to the sense of place in Hogback Basin from the expansion developments (refer to the viewpoint discussions in FEIS Section 3.15.3). The proposed reroute of a portion of the PCNST in Modified Alternative 4 would at least reduce the viewer's exposure to these developments (refer to FEIS Section 3.15.3.2).

Eric Quinn

Comment

Development and erosion impacts will be visible from wilderness trails in Goat Rocks and Mount Rainier National Park.

Response

As described in DEIS Section 3.14 - Land Designation and Use, the White Pass Study Area is allocated to a Management Area of 2L - Developed Recreation, which specifies that developed facilities such as ski areas, will be evident (USDA 1990a, IV-101). As described in the FEIS (Table 2.4-3), design measures would be applied to blend facilities with their surroundings. Tables 2.4-3 and 2.4-4 outline the BMPs that would be applied to prevent detrimental soil erosion and sedimentation. The view of the proposed expansion area from Mt Rainier and Goat Rocks Wilderness is considered to be a background view which, by definition, extends from 4 miles from the viewpoint to the horizon. Landscape visibility at this distance provides a softened background or a distant vista view that is more muted in detail; texture has disappeared and color has flattened. Alterations should be virtually indiscernible from that distance. Both the Goat Rocks Wilderness, which lies to the south, and the W.O.Douglas Wilderness, which lies to the north, will continue to be managed for a SIL of Very High (VQO of Preservation).

Erik Splawn

Hogback Basin Preservation Association

Comment

Details such as how many times the chairlift would cross the Pacific Crest Trail, how the upper terminals would impact the trail, and the visual impact of chairlift towers so close to the trail are not adequately discussed in the DEIS. How close development will be to the right of way of the Pacific Crest Trail is not adequately discussed. The integrity of this national scenic trail is being not only compromised but violated as well. Such a monumental change to this congressionally mandated scenic trail needs greater deliberation.

Response

As detailed in FEIS Section 3.11.3.6 and Section 3.15.3, the Basin chairlift crosses the PCNST once and four ski trail crossings occur within a quarter-mile stretch of the PCNST. Additionally, Viewpoint #3 was specifically chosen to analyze the visual effects of the proposed developments to the PCNST.

Kevin Kane

Comment

The Pacific Crest Trail scenic values must be protected as well as the trail itself. Have user numbers and potential affects on the trail been considered in your analysis.

Response

Refer to FEIS Section 3.11.3.6, which discusses impacts to the PCNST.

Mike Dawson

Pacific Crest Trail Association

Comment

Such fundamental alterations in the character of a landscape cannot be made and declared to meet an SIO of High or a VQO of Retention, because such modifications are deemed to be desirable. To be more specific, it is perfectly reasonable to decide that certain modifications of the existing landscape in Hogback Basin are desirable and to complete a plan revision that says in part that lands within the new SUP boundaries will otherwise meet an SIO of High based on the natural landscape form, but that development features and structures necessary for the provision of downhill ski opportunities will meet an SIO of Medium. This would allow sensitive development of a primarily natural setting for downhill ski recreation, while accepting certain out of character structures necessary for that use. It is not within the SMS system's guidelines to simply declare that modifications are acceptable and therefore the modifications meet an SIO of High.

Response

Refer to Illustration 3.15 FEIS1 from page H-17 of the SMS Handbook (USDA 1995), which provides a photograph showing the Pine Marten Lodge at Mt. Bachelor as an example of developed facilities that meet a VQO of retention and SIL of high (refer to SMS handbook page 2-4 - 'Frame of Reference'). By designing the facilities to blend into the natural landscape character, borrowing from the existing form, line, color and texture of that landscape, the visual contrast would be reduced as viewed from the PCNST. The FEIS has been clarified to better describe how the proposed facilities in Hogback Basin would meet a VQO of retention and an SIL of high (refer to FEIS Section 3.15 - Visual Resources). As per the SMS handbook and the forest plans, standards applied to VQO/SIL categories in the developed recreation allocation allow for a greater level of alteration.

Mike Dawson

Pacific Crest Trail Association

Comment

The fact of the matter is that none of these hypothetical developments, including the ski area expansion, will meet an SIO of High from the PCT if the structures involved are readily visible and recognizable from the Trail. That does not mean that the decision cannot be made to accept these impacts, but it does mean that the contention that all the alternatives meet an SIO of High from the PCT and are therefore all equally acceptable and desirable is completely false. To meet the demands of the EIS process, the relative impacts of alternatives on the visual and experiential values of the PCT must be assessed and considered. The present DEIS fails to accomplish this necessary task.

Response

Refer to the description of retention (VQO) in Table 3.15-2 of the FEIS, and the requirement to use SMS (refer to FEIS Section 3.15.1.1). Note that retention does not mean preservation. Rather, deviations may be present but must repeat the form, line, color and texture of the characteristic landscape in scale. It is important to recognize that the developed recreation allocations in both forest plans provide a set of visual standards that deviate from those commonly applied in other land use allocations. Specifically, they anticipate and allow for more alteration or development as integral to providing the developed recreation experience (refer to FEIS Section 3.13.2). The FEIS has been clarified to better describe how the proposed facilities in Hogback Basin would meet a VQO of retention and an SIL of high (refer to FEIS Section 3.15 - Visual Resources). Also, refer to FEIS Section 3.11.3.6, which provides a description of the visual and experiential effects of the scene from the PCNST.

Mike Dawson

Pacific Crest Trail Association

Comment

In the case of the application of SMS in this particular DEIS there is a particularly perverse logic. It says that we are assuming the implementation of a Forest Plan Amendment which allows the construction of various downhill ski related structures. It then assumes that since these structures are accepted that they meet an SIO of High/Preservation. As a result, the basis for determining the visual impacts of the alternatives is the presumption that the decision has already been made and accepted.

Response

The FEIS has been clarified to better describe how the proposed facilities in Hogback Basin would meet the existing VQO of retention and an SIL of high (refer to FEIS Section 3.15 - Visual Resources). Because Forest Plan standards for visual quality can be met, there is no need to consider a Forest Plan amendment for scenic objectives.

Mike Dawson

Pacific Crest Trail Association

Comment

We are specifically concerned with the inordinate impact of existing lift top terminals on the PCT experience. By working with a landscape architect, we feel that the impact of the existing facility could be substantially reduced by changing the shape, texture and color of what is presented to the back side of the mountain. In the long term, when these relatively antiquated facilities are replaced and upgraded, consideration should be given to the character, shape and placement of the facility so that impacts on PCT and Wilderness users meet an SIO of High based on a natural landscape character.

Response

The FEIS has been updated to include a new Mitigation Measure to provide visual mitigation in conjunction with replacement of existing facilities (refer to FEIS Table 2.4-2).

Regan Smith

Northwest Ecosystem Alliance

Comment

The Visual Resources Analysis does not disclose the visual impacts associated with above-ground powerlines, or the 10,000 gallon water tank for fire protection to be built at the mid-mountain lodge under Alternative 2 & 4.

Response

The FEIS has been updated to incorporate visual effects associated with utilities and the water tank (refer to Section 3.15.3). As noted, the utilities would be consistent with the desired future condition and with the prescribed VQO of retention. The FEIS has also been updated to specifically describe the nature of stream crossings (i.e., at ground surface elevation and constructed without trenching).

Harold W Heacock

Comment

In the scoping statement comment period on the proposed White Pass Ski Area expansion, I commented that consideration should be given to rerouting the Pacific Crest Trail through the expansion area to the summit ridge or to the East side of the ridge where it traverses the proposed development area. I still consider that this change is highly desirable in order to reduce the visual impact of the area development on the summer hiker.

Response

The FEIS includes Modified Alternative 4, which reroutes the PCNST as described by the commenter.

Ron Eng

The Moutaineers

Comment

The proposed alternatives would require moving the Pacific Crest Trail from its historic location that features wonderfully powerful views of Mount Rainier and the surrounding area, to a location that is merely adequate.

Response

The FEIS Section 3.15 - Visual Resources has been updated to describe that there would be a loss of the Mt Rainier view for the re-routed portion of the PCNST under Modified Alternative 4. There will be a reduced opportunity to view Mt. Rainier along this segment of the PCNST.

Mike Dawson

Pacific Crest Trail Association

Comment

During our field work we recommend that visibility of features in various alternatives be tested using a system of reverse visibility from the structures proposed. The resulting seen area indicates places on the PCT, for our purposes, where the structure could be seen. This analysis should have been completed for lift terminals, the lodge, lift cable support towers and other structures to determine the extent of impact. Simulations of the structures from representative viewing locations can then be used to assess relative impacts and their acceptability. This is all well established methodology using the terrain models applied in the DEIS, but was apparently not applied. Given the inadequate application of well accepted methods of analysis, I doubt that the agency has the information at hand to adequately assess the alternatives presented or to refine those alternatives so that they produce the best results for the public or the environment.

Response

The standard practice for both the SMS (USDA 1995) and the VMS viewshed analysis is used to assess the effects from the observer position/platforms and not from the area observed. The accepted practice for the Forest Service, as detailed in the SMS (USDA 1995, 4-2), is to evaluate landscape visibility in the context of the viewer.

Jan Brydsen

Comment

New ski lifts would just destroy the area. Clearcuts & roads would ruin the beauty of the scenery & a place for the variety of wildlife to live.

Response

There are no clearcuts proposed within the White Pass Study Area. Prescriptions for tree removal are described in FEIS Section 3.2.6 and for all Action Alternatives, the existing canopy openings would be used wherever possible. With the exception of Alternative 6, there are no roads proposed. Any vegetation removal associated with the project would consist of small group or individual tree cutting. Such activities would be designed to replicate or blend with the existing natural pattern.

Mark Lawler

Sierra Club Cascade Chapter

Comment

We also believe that ski area development should proceed without amending forest plans to weaken visual quality standards. The implication of such amendments is that ski area development will severely degrade views from the Crest Trail and from viewpoints and trails in the Goat Rocks and W. O. Douglas Wilderness Areas. We oppose various action alternatives' provisions to modify forest plans' visual quality standards.

Response

There is no proposed Forest Plan amendment to change the VQO standards, as described in FEIS Section 3.15 - Visual Resources. The proposed alternatives would meet the Forest Plan Standards and Guidelines for visual quality.

Mike Dawson

Pacific Crest Trail Association

Comment

The application of SMS within the DEIS is outside the standards established for the system by the agency in Agricultural Handbook 701, entitled Landscape Aesthetics - a Handbook for Scenery Management. The application of SMS is also outside standards for use as applied by the agency over a number of years in a wide variety of situations. We are primarily concerned with this matter because we look to SMS as a primary tool to guide management of the PCT experience. When a major project such as the one proposed in this DEIS moves forward based on flawed analysis and application, the standard for use of the system is damaged and it becomes less valuable.

Regan Smith

Northwest Ecosystem Alliance

Comment

The Forest Plan calls for Retention and Partial Retention VQO's in the area of the ski area expansions. This standard only and NOT the Scenery Management System should be used to address impacts associated with the expansion. Since the LRMP Revision has not yet occurred, the public has not yet had a chance to study and comment on use of SMS. Therefore it is not appropriate to use SMS in this DEIS. Impacts should be discussed under the VMS system only, and the SMS analysis should be eliminated from the DEIS.

Response

The FEIS has been corrected to eliminate the term "middle-ground partial retention". The Forest Plan provides direction to manage the entire area for retention (refer to FEIS Section 1.2.4). The FEIS has been

updated to better describe the Forest Service direction to utilize the SMS (USDA 1995), namely that "the chief...has asked each region to use this system as we work on new projects or initiate forest plan revisions." (Harrett and Nygren 1996). Refer to FEIS Section 3.15 - Visual Resources for further information of this correspondence. Additionally, all alternatives have been evaluated and described using both systems and the results are consistent in both.

Mike Dawson

Pacific Crest Trail Association

Comment

The first flaw is the use of very few stationary viewpoints to assess the visual impact of the alternatives. This is inadequate in any case, but to be specific as to the application to the Pacific Crest Trail, there is an attempt to make judgments concerning impacts on a low speed travelway based on three stationary viewpoints. It is therefore accepted practice to assess impact on a mobile viewer based on each alternative, seeking out areas of impact all along the travelway. There is no indication that this was accomplished in the assessment in the DEIS.

Mark Lawler

Sierra Club Cascade Chapter

Comment

The DEIS is also deficient in not using modern landscape planning tools to model visual impacts from along the entire Crest Trail, rather than picking out a few select points for an analysis.

Common Response

The FEIS has been updated to detail further the reasoning behind selecting the viewpoints analyzed in Section 3.15 - Visual Resources (refer to Section 3.15.2.3).

Glenda Phillips

Comment

The Pacific Crest Trail is not moved in Alternative 2 and moved in Alternative 4. Regardless whether it is moved or not moved, the greatest concern should be that the visual impacts of the ski lifts should be minimized and the current visual experience maintained.

Linda G Furney

Comment

Our son is five - my husband and I will hike the Pacific Crest Trail with him as he grows. Section by section, we will experience the solitude and majesty that is our creation - and this proposal will severely impinge on the integrity of the PCT as it winds its way through this scenic area.

Common Response

The DEIS and FEIS acknowledge that the Basin chairlift crosses the PCNST once and four ski trail crossings occur within a quarter mile stretch of the PCNST under Alternatives 2 and 6. (Refer to FEIS Section 3.11.3.6 and Section 3.15.3). Additionally, refer to the Mitigation Measures provided in FEIS Table 2.4-2, specifically MM19 and MM20. Modified Alternative 4 was developed to include a reroute of the PCNST around the proposed development and to protect the continuity of experience along the PCNST.

Ronald and Ceona Chitwood

Comment

I disagree with the necessity to re-route the PCNST because a view of the lift would "cause a break in the experience". To some, a view of the facilities would be a thing of pleasure (and a promise of future days of happiness) and not as offensive as a cell phone, a cigarette or a hundred other things humans can object to.

Robert F Sinclair

Comment

I was on the Pacific Crest Trail Advisory Council, 4 years ago, and we did not see the need to move the PCT away from ski areas. Our recommendation, at that time, is included in the minutes.

Common Response

Refer to FEIS Section 3.15 - Visual Resources, which discusses visual impacts to the PCNST. Alternatives 2 and 6 evaluate the effects to the PCNST at its present location, while Alternative 4 incorporates a reroute of the PCNST.

Mark Lemon

Comment

If the Hogback was developed as proposed in Alts 2, 4 and 6 the sight looking north from the Goat Rocks Wilderness and PCT would be spoiled and another road less mountain landscape lost.

Ron Eng

The Moutaineers

Comment

The Hog Back is visible from the trails in the Goat Rock Wilderness and from Mount Rainier National Park; it should appear wild, and not be full of poles, mud, construction and buildings. Alternatives 2, 4 and 6 will degrade the views of this wonderful wild roadless area and degrade the experience of visitors to the Goat Rock Wilderness and Mount Rainier National Park.

Common Response

As described in FEIS Section 3.14 - Inventoried Roadless Areas and Chapter 1 - Purpose of and Need for Action, the White Pass Study Area is allocated to a Management Area of 2L - Developed Recreation. The Developed Recreation prescription assumes that facilities will be evident, but will be designed to blend with the surrounding area: "Roads, buildings, ski lifts, tables, docks, and other physical facilities are evident, but design and construction will repeat the color, shape and lines of the surroundings (USDA 1990a, IV-101). The view of the proposed expansion area from Mt. Rainier, the William O. Douglas Wilderness, and Goat Rocks Wilderness is considered to be a background view which, by definition, extends from 4 miles from the viewpoint to the horizon. Landscape visibility at this distance provides a softened background or a distant vista view that is more muted in detail, texture has disappeared and color has flattened. In Section 3.15, View Point #6 describes that "background views consisting of peaks within Goat Rocks Wilderness, the Cascade Range to the north, and Mt. Rainier dominate views from Pigtail Peak. Views from View Point #6 meet the prescribed VQO of Retention which corresponds to an SIL of High." Both the Goat Rocks Wilderness, which lies to the south, and the W.O.Douglas Wilderness, which lies to the north, will continue to be managed for a SIL of Very High (VQO of Preservation).

70.0 Social and Economic Factors

Darrell Howe

Crystal Conservation Coalition

Comment

Describe how White Pass visitation will increase given the closest competitor Crystal Mt. Having recently received approval to accommodate 100's of thousands of new visits.

Response

The Forest Service is not required to compare ski areas in the evaluation of the need for improvements or in evaluating visitation patterns at individual resorts. Refer to the USDA Forest Service correspondence dated December 3, 2001, with file code 1950/2700, which states that "there is no legal basis to conduct a National level Programmatic Environmental Impact Statement (PEIS)." In summary, "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 of the type of effect 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, the EIS is not required to consider any potential competition at Crystal Mountain when evaluating a proposal at White Pass. The scope of this NEPA analysis is White Pass and its market.

In addition, as stated in Section 3.10.1, White Pass serves a local market that is primarily from Packwood, WA to Naches, WA. The FEIS acknowledges that a portion of the west slope provides skiers that would visit both Crystal Mountain and White Pass. Refer to FEIS Illustration 1-2 which depicts the annual skier visitation at White Pass, while Table 3.10-5 summarizes Washington State's skier visitation numbers for ski resorts, in thousands, from 1990 to 2006. Both illustrations suggest an increase in skier visitation numbers regionally, as well as at Crystal Mountain and White Pass. The analysis in the FEIS does not consider competition between Crystal Mountain and White Pass primarily because the visitation projections are based entirely on historic visitation data for White Pass. Therefore, any projected growth in visitation at White Pass is derived entirely from White Pass visitation over time, including any ongoing competition at Crystal Mountain.

Finally, as stated in Section 1.1.2.2 - The Purpose of and Need for Action, growth in visitation is ongoing at White Pass. The Purpose and Need includes needs that respond to this growth, rather than attempting to generating growth.

Larry Mitchem

Comment

With this year's dismal snow season, and the predictions for future warming, I question the financial viability of a larger ski area. What measures are in place if the expansion fails? Who would own the buildings? Are there provisions for the removal of the mid-mountain lodge and other structures in the event of bankruptcy?

Response

FEIS Section 3.10.2.3 has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the rise of skier visits nationally, regionally, and locally within the last decade. Additionally, discussions with White Pass Company 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 Illustrations 3.10-2 to 3.10-6. As a business enterprise, it is assumed that White Pass Company 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 White Pass Company'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 White Pass will implement all of the projects as outlined in the description of the selected alternative.

If White Pass defaults on their permit, they must remove improvements within a reasonable time upon permit termination or revocation, or the improvements become property of the United States and White Pass is still liable for removal and site restoration costs (Section VIII. Termination. -B, page 14). Also, they are expected to protect the land and U.S. property from damage, and are responsible for reimbursing the government for damages resulting from negligence or from activities within the permit. They must

carry liability insurance to cover this (Section X. - A). In addition: Under Section V. Liabilities - C. Damage to United States Property, "the holder shall exercise diligence in protecting from damage the land and property of the United States covered by and used in connection with this permit. The holder shall pay the United States the full cost of any damage resulting from negligence or activities occurring under the terms of this permit or under any law or regulation applicable to the national forests, whether caused by the holder, or by any agents or employees of the holder" (page 6). Section V. F. Insurance states that: "White Pass is required to carry \$200,000 of liability insurance for property damage arising out of the holder's activities under the permit including, but not limited to, occupancy or use of the land and construction, maintenance, and operation of the structures, facilities, or equipment authorized by this permit" (page 6). Section VI. J.: "Nonpayment. Failure of the holder to make timely payments, pay interest charges or any other charges when due, constitutes breach and shall be grounds for termination of this authorization. This permit terminates for nonpayment of any monies owed the United States when more than 90 days in arrears" (page 13).

Richard L. Curtis

Comment

One of the most compelling indicators of lack of growth is the data on the payments made to the Forest Service for annual permit fees based on the Adjusted Gross Receipts. They indicate that receipts even with increasing prices have largely remained flat and even decreased in the last 3 years. (1997-1998 \$42,766.57; 1998-1999 \$39,150.17; 1999-2000 \$49,948.07; 2000-2001 \$51,031.86; 2001-2002 \$67,629.65; 2002-2003 \$62,019.00; 2003-2004 \$64,398.72). This does not seem to support a need for expansion and certainly the 2004-2005 season will not help the argument. These fees are very low and appear to be a subsidy for the ski area. What are the expenses incurred by the Forest Service for the management and monitoring of the area? Does the government make or lose money from the ski area operation? Also what will the ski area pay for use of the additional land and what would the ski area have to pay for use of equivalent private lands?

Response

The permitted use of NFSL for Nordic and alpine ski areas (which includes the White Pass Ski Area) is governed by the National Forest Ski Area Permit Act of 1986 (16 U.S.C. 497b). The objectives of this Act are to:

- (a) provide a unified and modern permitting process for Nordic and alpine ski areas on national forest lands;
- (b) provide for ski area permits which more closely reflect the acreage and other physical requirements of modern ski area development; and

(c) provide a permit system which will be more commensurate with the long-term construction, financing, and operation needs of ski areas on NFSL (16 U.S.C. 497b, Section 2).

The Purpose and Need described in FEIS Section 1.1.2.2 provides information that suggests an increase in visitation and near capacity use at White Pass. As a result, part of the Purpose and Need addresses these historic growth trends. Growth is not a stated purpose of the proposal.

Funds are allocated each year for the overall administration of special uses within national forests. Forest Service expenses relative to the administration, management and monitoring of the uses and activities authorized under permits are charged to this account. However, because of the volume of work (there are hundreds of permits to administer on the Forest), there are not separate line items tracking the expenses associated with administration of each of these permits.

National forests are managed to provide a range of activities that involve both the use and protection of forest resources. The objectives for management of the existing White Pass Ski Area are defined in the 1990 Wenatchee National Forest Land and Resource Management Plan, which allocated this area to be a Developed Recreation management prescription. The goal of this prescription is to provide a variety of developed recreation opportunities for the public, including existing and potential downhill ski areas. The 1990 Gifford Pinchot Land and Resource Management Plan has a similar Developed Recreation prescription, which was applied to the proposed expansion area in Pigtail and Hogback Basins, as well as the portion of the existing ski area within the GPNF. Although these ski areas are, of necessity, operated by permittees such as White Pass Company, they provide a public benefit that otherwise could not be made available on public land.

The fee system established by the 1986 National Forest Ski Area Permit Act takes into account the fees charged for ski area use of private land in order to assure that ski area permit fees return a fair market value for the use of NFSL. Since the fees are revenue-based, any revenue increases that would occur as a result of expansion of the White Pass Ski Area into Pigtail and/or Hogback Basin would be reflected in the permit fees charged to White Pass Company. Their fees would increase proportional to their increase in revenue.

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.10.3.3 states the Forest Service objective is to meet public demand for recreation. Please delete this statement from the EIS unless there has been a demand analysis completed by the USFS. This false assumption of unfulfilled objectives lacks any basis in supportable data.

Response

Chapter 1 of the FEIS describes the goals and management prescriptions from the WNF Forest Plan and the GPNF Forest Plan for the land allocations of RE-1 and 2L (Developed Recreation), respectively. Specifically, the goal of the Gifford Pinchot Forest Plan is to provide for concentrated visitation by people seeking a convenient recreational experience through appropriately designed facilities. Section 3.10.3.3 of the FEIS has been updated to make specific reference to the WNF and GPNF Forest Plans.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-212 states the Action Alternatives will not significantly alter the local economic conditions. How can the following paragraphs claim reduced economic viability? The Study Area is not only the White Pass Company and under Cumulative Effects the suggestion of 'potential improvements' is only speculative. No economic development projects have been determined to be reasonably foreseeable as stated on page 3-213. Clearly define the analysis area in the EIS analysis.

Response

FEIS Section 3.10 - Social and Economic Factors has been updated to clarify that the alternative discussions refer directly to the economics of the White Pass Ski Area (refer to Section 3.10.3.4). FEIS Section 3.10.4 states that the local economics are not projected to have a significant impact on employment or visitor spending in the White Pass Study Area. As described in Section 3.10.1 of the DEIS and FEIS, the study area for social and economic factors is the US 12 corridor extending from Packwood (milepost 128) to the area immediately west of Yakima on the eastern border of Naches (milepost 191).

Erik Splawn

Hogback Basin Preservation Association

Comment

The FEIS should include an economic analysis using the updated skier visit data from 2004/05 ski season to show the real possibility of decreased skier visits at White Pass in the years to come. As last season demonstrated, it is just as likely that skier visits would fall, remain flat, or grow at a much lower rate in the future. This very real scenario should be vigorously studied. The analysis should at the least include a scenario that a poor season (as what occurred in 2004/05) would happen once during the next 10 years and another analysis that would show a poor season happening twice during the next 10 years.

Response

FEIS Section 3.10.2.3 - Skiing Trends has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the trends of skier visits nationally. Despite low visitation during the 2004-05 season, regionally and locally at White Pass, the next ski season was strong with both Oregon

and Washington exhibiting record or near record visitation. Additionally, FEIS Section 3.10 - Social and Economic Factors has been updated to incorporate the 2004-05 season in the break-even analyses.

Richard L. Curtis

Comment

The DEIS attempts to make a case for expansion on the basis of growth and crowding. However, I have rarely experienced crowding on the hill or long lift lines. This is especially true during most of the week when only some of the lifts are running due to lack of customers. It is therefore very difficult from an intuitive standpoint to justify doubling the size of the area. The ski area expansion should be limited to the actual historic skier demand, which is flat, and not based on efforts to create new demand.

Response

If White Pass was to cater only to weekday demand, weekend skier visitation experiences would suffer and not meet the Purpose and Need of improving the skier visitation experience. FEIS Section 3.11 - Recreation has been updated to clarify that "White Pass primarily serves the day-use market, which exhibits peak visitation on weekends and during holidays and low visitation during the weekdays." As a result, the White Pass market does not demand increased utilization during the week, and the facilities at White Pass must be designed to accommodate the peak visitation periods. Illustration 1-3 shows that White Pass exhibits an increasing trend of capacity or near capacity days. As described in the Purpose and Need (refer to Section 1.1.2.2) several components of the White Pass operation do not meet industry standards or market demand during peak visitation periods.

Tom Uniack

Washington Wilderness Coalition

Comment

The DEIS fails to discuss or analyze the economic or capacity benefits up upgrading the existing chair lifts to increase lift capacity. The economics of upgrading such facilities versus adding new lifts in a controversial area like the Hogback Basin should have been provided in the DEIS.

Response

In the FEIS, Alternative 13 was added to the evaluation (refer to Section 2.2) to analyze increased lift capacity within the existing SUP area. As stated in this discussion, this alternative was considered but eliminated for further discussion, as detailed in the rationale provided in Section 2.2.1.9.

Darrell Howe

Crystal Conservation Coalition

Comment

The Illustration 3.11-3 is an excellent representation of the stagnant market which lacks tangible demand for more alpine skiing facilities. The EIS process needs to show how the White Pass market from Washington State is NOT growing as implied in the narrative text.

Response

Refer to FEIS Chapter 1 and Section 3.10 - Social and Economic Factors, which have been updated to incorporate skier visitation for the 2004-05 and 2005-06 ski seasons nationally and for Washington State. Specifically, refer to Illustration 1-2 which depicts the annual skier visitation at White Pass, while Table 3.10-5 summarizes Washington State's skier visitation numbers for ski resorts, in thousands, from 1990 to 2006, and both suggest an increase in skier visitation numbers. Additionally, Washington State data suggests that White Pass accounts for 6 percent to 8 percent of total skier visits in the state (PNSAA, 2004). Regionally, skier visits are detailed as one of the top 3 recorded levels in the last 5 years.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-206 uses visits from the past 5 years only and Discusses Break Even points in a 5 year time frame. The life of the Plan is 10-15 years and therefore all analysis needs to be consistent.

Response

Refer to FEIS Section 3.10 - Social and Economic Factors, where the Break-Even Analyses have been updated to reflect 2006 costs for the proposed development. As stated in Section 3.10.3.4, the Break-Even Analysis is based on the cost and revenues associated with the operation five years after implementation. This is not a five-year timeframe, but a fixed point from which to evaluate costs and revenues. Additionally, the five-year window may be extrapolated (inferred or estimated by extending or projecting known information), as required.

Darrell Howe

Crystal Conservation Coalition

Comment

Under 3.10.3.5 Skiing Trends the statement in bold claiming White Pass would not be able to meet local demand is unsupported by any unbiased outside analysis of demand. Supply has steadily increased with visitations stagnant under most observations so Visitor Projections on Table 3.10-7 are merely speculation.

Response

Refer to FEIS Section 3.10.2.3, which describes skier visitation trends over the past five years. The FEIS has been updated to include visitation data for the 2004-05 and 2005-06 ski seasons and details the rise of skier visits nationally, regionally, and locally within the last decade. The updated visitation data was obtained from both the NSAA and PNSAA.

Illustrations 1-2 and 1-3 show that visitation at White Pass is on the rise with no increase in supply, and the number of operating days at or near capacity is also on the rise. Visitation projections include the assumptions stated in Appendix D.

Mark Lawler

Sierra Club Cascade Chapter

Comment

The Forest Service should examine the most suitable types of terrain available, through a cumulative impacts analysis that looks at the current and possible future skier terrain and skier markets at all ski areas in the state. Instead of doing this the Forest Service is relying on a White Pass DEIS that has focused narrowly on the skier "market" as claimed by the local ski area owners.

Response

Refer to the USDA, Forest Service correspondence dated December 3, 2001, with File Code 1950/2700, which states that "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand..... 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."

Darrell Howe

Crystal Conservation Coalition

Comment

Section 3.10 Social and Economic Factors uses a Study Area of the US Highway #12 corridor yet the analysis goes well beyond to include State trends and market conditions as far away as Colorado and Arizona. The analysis should focus on the study area only.

Response

Section 3.10 - Social and Economic Factors addresses impacts within the White Pass Study Area. In the Affected Environment discussion, Section 3.10 provides ski industry and population data at the state and national levels to provide context for the position of White Pass Ski Area.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-199 discusses population trends in a 'market area' but the Study Area is only a portion of 2 Counties. Population trends in Packwood and Naches should be quantified to show what occurred to these communities in the 1990's.

Response

Section 3.10.2.2 includes the best available information for population data in Packwood and Naches. The majority of this information is provided at the county level from the U.S. census. Section 3.10.2.2 and Section 3.10.2.3 provide more detailed information based on local economic studies. These studies provide the basis for the statements such as "young residents graduate from high school and leave the area in search of better economic opportunities".

Darrell Howe

Crystal Conservation Coalition

Comment

In the Significant Issues section 1.5.2.7 there needs to be a quantitative analysis of the economics of the White Pass Company itself. The "Issue" needs to be removed from this study or the financial condition of the proponent full disclosed. The Proposed Action has the potential to "Positively" effect the economics as well as "Negatively" as suggested on Page 1-29. Are the Illustrations in Section 3.10 the only financial risk assessment being made? Are these figures supported with documentation? Should we assume current expenses to be \$2 million a year? What's the ROI? How will the current season 2004-2005 effect the proposal? Has any attempt been made to analyze proposals to reduce the fixed costs associated with White Pass Operations?

Response

Section 3.10.3.4 provides a Break-Even Analysis of the No Action Alternative (Alternative 1). The scope of this NEPA analysis does not require more detailed analysis of the business decisions of White Pass Company. Rather, the issue relates to the ability of White Pass to remain a successful business venture providing recreation on the National Forest under permit from the U.S. Forest Service, consistent with the Forest Plan goals and direction. The FEIS has been updated to incorporate the 2004-05 season and the BEA has been updated with 2006 costs. As a business enterprise, it is assumed that White Pass Company 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 White Pass financial status or changes in skier demand, however, the intent is to complete all of the approved projects.

Darrell Howe

Crystal Conservation Coalition

Comment

Please quantify and indicate how many skiers would actually quit the sport if White Pass failed to expand as stated on page 3-223. This is simply conjecture and is not supported with data.

Response

Section 3.11.3.1 of the FEIS has been updated to detail that 41 percent of scoping letters indicated that the public is frustrated with the current crowding at White Pass, and would look at other options without an expansion at White Pass. This data was provided in scoping letters associated with this NEPA process.

Regan Smith

Northwest Ecosystem Alliance

Comment

None of the alternatives matches the Skier Market demand exactly, and there is a real skew between the different categories. What would make sense is to add up the deviation of actual terrain from skier demand and see which Alternative has the least deviation and comes most close to meeting Skier Demand.

Response

Such an analysis would be appropriate if the Purpose and Need was to match the terrain distribution with the skier market demand. FEIS Section 1.1.2.2 describes six specific Purpose and Needs for the Proposed Action: improved circulation and dispersal, match to market demand (particularly novice and advanced intermediate terrain), expand facilities to meet increased demand, improved early season skiing and full integration of Nordic and snowshoe operations into the MDP. As a result, the alternatives evaluated in the EIS were developed to address needs other than terrain distribution alone.

Darrell Howe

Crystal Conservation Coalition

Comment

Given a life span of 10-15 years for the MDP, the analysis should use a 10 year time-frame as a minimum in the analysis. This means the past 10 years as well as the future. To generate trend assumptions.

Response

The FEIS utilizes a wide range of data sources in order to develop the assumptions and trends in the analysis. For example, population growth projections provided in Table 3.10-4 are based on 2002 projections for the period 2005-2015. The FEIS has been updated to include skier visitation for the past 12 years (refer to 3.10 FEIS2). This data is best available data.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to adequately discuss the operational period of the proposed chairlifts in the Hogback Basin. It is stated on page 122 of the DEIS that "the operational period of the proposed chairlift [is 10 to 20 years]". If this is true, then the Break Even Analysis under Capital Investments and Returns should be recalculated to include the increased costs of replacing the proposed chairlifts every 10 years. The EIS should also discuss the added costs both environmentally, and economically of replacing the proposed chairlifts on a 10 year cycle.

Response

The functional life of a chairlift may be up to 50 years. The FEIS has been updated to removed the erroneous reference of the functional life of a chairlift being 10-20 years. The break-even analysis accounts for a five-year window and some alternatives add significant semi-variable and variable expenses due in part to increased wages and salaries associated with new lifts. The maintenance of chairlifts has been incorporated as part of the semi-variable costs. The five-year window may be extrapolated, as required (inferred or estimated by extending or projecting known information into the future).

Darrell Howe

Crystal Conservation Coalition

Comment

The economics of upgrading existing facilities should be reviewed in the EIS process given the underlying desire to "use common sense" as described on Page 2-1.

Response

The replacement of existing chairlifts is based on various factors including the economics of upgrading lifts versus adding new lifts. The additional factors considered in the analysis includes the design life, visitation, maintenance requirements of the specific lift, the comfortable carrying capacity, the density of skiers, circulation of visitors and various other factors. Alternative 9 is included in the analysis as a viable means of improving the existing White Pass Ski Area, the economics of which are discussed in Section 3.10. In addition to Alternative 9, Section 2.2.1 identifies Alternative 5 and 13, both of which address upgrading the existing ski area, but these alternatives were eliminated from detailed analysis based on the rationale provided in Section 2.2.1.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-212 discusses an 'excitement period' after which visitor counts will once again stagnate. Is this sound use of irreplaceable resources and former Wilderness lands? The expansion project becomes a stepping stone for future speculation with greater and greater fixed costs to be recovered.

Response

Visitation projections include the assumptions stated in Appendix D. These assumptions do not include stagnation after the excitement period. Rather, visitation projections include a growth rate of 1 percent which is approximately half of the projected population growth rate.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-206 mentions increases in lift ticket prices will help to offset capital expenditures. Please quantify the extent of cost increases to the average visitor given the Annual per capita income in the Study Area is only \$16,000 per year.

Response

White Pass Company ticket prices are a business decision and are based on a wide variety of factors including visitation, revenue per skier visit, capital investments and returns, climate, and various other business decisions that are outside the scope of this analysis. While ticket prices are outside the scope of the analysis, Appendix D of the FEIS has been updated to include the assumptions regarding revenue per skier visit.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS describes how other ski areas, including "Crystal Mountain, Alpentel and Mission Ridge are expanding" in the context of backcountry skiing availability, but does not mention how these expansions might impact demand at White Pass. The FEIS should include a description of how increased capacity in the state will impact demand for an expansion at White Pass due to the increased competition from nearby ski resorts.

Response

White Pass' location between Olympia and Vancouver, WA (west on US 12), and Yakima (east on US 12), makes it an easy choice for day skiers within this market. Within its local market, White Pass

primarily competes with Mission Ridge, which also serves the Yakima market. As described in Section 3.10.2.3, White Pass accounted for 6-8 percent of Washington's total skier visits (PNSAA 2004). Refer to the Action Alternative break-even analysis illustrations in Section 3.10.3.4 for further details associated with the forecasted visitation projections. Additionally, refer to the USDA, Forest Service correspondence dated December 3, 2001, with File Code 1950/2700, which specifies that "capacity analysis is best suited to local, site-specific analysis; taking into account such information as demand....."

Dennis Hadaller

Lewis County Commissioners

Comment

Increased trail connectivity could potentially increase year round visitors to White Pass, which would benefit Packwood businesses as well. Many businesses in former timber towns, like Packwood, are increasingly dependent upon tourism to make ends meet. Expansion at White Pass has the potential to provide a more reliable tourist based economy for local business people and spark rural entrepreneurship.

Response

Within the FEIS, Section 3.11.2.1 provides details of the Action Alternatives regarding trail connectivity (and skier circulation). Additionally, Section 3.10.3 discusses the economic effects of the Action Alternatives and the economy of the White Pass Study Area.

75.0 Transportation

Darrell Howe

Crystal Conservation Coalition

Comment

Roads as defined earlier are just over 50 inches wide. Please describe the extent of temporary roadways within the Study Area which fit this description. Table 3.12-1 fails to identify any temporary roadbeds or roadways on the north-side of US 12.

Response

As defined in the DEIS (refer to the footnote on page 1-6 of the DEIS), a road is "a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail". Additionally, Chapter 2 of the FEIS has been updated to incorporate the approximate width of any proposed permanent roadway (relevant for Alternative 6). No temporary roads are proposed under any of the alternatives.

Glenda Phillips

Comment

On pages 3-24 through 3-243, a comparison is made on the parking facilities and pedestrian safety issues. Both alternative 2 and 4 increase the lack of available parking, and increased the concern for pedestrian safety. Once the existing and proposed facilities are at capacity, cars will parking further away on the shoulders of US 12, with pedestrians walking greater distances along the highway. The shuttle bus suggestion wasn't developed beyond an after thought better solutions need to be developed.

Response

As required by CEQ regulations, the EIS analyzes a range of alternatives, disclosing the impacts of each, including increased parking problems and potential vehicle/shuttle conflicts. For example, Alternative 2 (the original proposal from White Pass Company) in the DEIS did not include new or expanded parking lots while Alternatives 4, 6 and 9 did include varying levels of parking. The DEIS and FEIS describe the effects of each alternative, including the potential for vehicle/pedestrian conflicts along US 12 (refer to Section 3.11 - Recreation and 3.12 - Transportation). Alternative 4 has been modified in the FEIS (and now referred to as Modified Alternative 4) to include a 7-acre parking lot capable of parking 946 additional vehicles, which would be sufficient to remove all parking from US 12. Section 2.2.2 of the FEIS has been updated to include a discussion of the consideration of a shuttle system from Packwood to Naches, including the rationale for its elimination from detailed analysis.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS makes it clear that the decision-maker may choose any combination of proposed activities analyzed in the EIS. For this reason, we would like to suggest that certain activities be analyzed in isolation, specifically the parking lot proposal. The 2.5 acre parking lot provides the bulk of soil compaction in the Alternatives which contain this proposed activity, but nowhere is there a quantification of its impacts alone. How many acres of grading are associated with the parking lot, what type of soils will it be built on, etc.

Response

Refer to FEIS Section 3.2 - Geology and Soils and associated figures which specify, by alternative, the surface area of land proposed for impervious surfacing and the types of soils they would be built upon. The FEIS has been updated to better display that the parking lot under Modified Alternative 4 and Alternatives 6 and 9 would be the single largest effect on soils (see Section 3.2 - Geology and Soils).

Darrell Howe

Crystal Conservation Coalition

Comment

Section 1.5.2.9 indicates a shuttle trailer system will move visitors. The Crystal Mountain referenced trailers are unlicensed and fail to meet State Highway standards for public transportation. Explain how these will be modified or "feasible" for use on US 12.

Response

Section 3.12.3.2 of the FEIS acknowledges that "approval from WSDOT and the Washington State Patrol would be required to implement the shuttle program." Thus, any such trailer shuttle would have to be designed to be consistent with state standards and laws. The FEIS includes a range of alternatives with varying transportation options, including the shuttle service with no additional parking (Alternative 2), some additional parking (Alternatives 6 and 9) and sufficient parking to remove cars from US Highway 12 (Modified Alternative 4). Modified Alternative 4 and Alternatives 6 and 9 do not propose the use of a shuttle service.

Darrell Howe

Crystal Conservation Coalition

Comment

Please explain the concept of "metering" traffic on US #12 per page 3-240. Would this mean the roadway segment at White Pass would result in a failing LOS during parking?

Response

The meaning of this statement is that parking, rather than ski capacity, would limit the visitation at White Pass and any resulting traffic increases. FEIS Section 3.12.2.1 has been revised to provide greater clarity.

Darrell Howe

Crystal Conservation Coalition

Comment

Has there been any traffic data collected in the Study Area? Page 3-238 states the closest data collected was 25 miles east of White Pass. What types of supporting information has been gathered for an accurate analysis of transportation? Were the Peak Hour Volumes actually measured at the Pass?

Response

Transportation was not identified as a significant issue during scoping, therefore no traffic data was collected specifically for the White Pass Study Area as part of environmental analysis for the DEIS. The background Level of Service (LOS) and Average Daily Traffic (ADT) provided in the US Highway 12 Corridor Charette (USDI and NPS 2002) assumes an expansion of the White Pass Ski Area. Section

3.12.2.1 of the FEIS has been updated to better display that the background ADT and LOS include the expansion. FEIS Section 3.12.2.1 has also been updated to include best available data from WSDOT's actual and estimated average daily traffic volumes from 2002-2005. Specifically, Section 3.12.2.1 of the FEIS incorporates Illustration 3.12 FEIS1, which depicts WSDOT's ADT counts and estimated Daily Traffic Volumes for 2002, 2003, 2004, and 2005.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The DEIS does not address the issue of traffic to and from White Pass, the road is treacherous with several sharp bends in both directions. What is the accident rate now and what is the expected impact of increased usage at White Pass?

Response

Transportation was not identified as a significant issue during scoping, therefore traffic was not analyzed in detail in the DEIS. However, in response to concerns regarding traffic safety issues expressed following the release of the DEIS, additional volume and collision data has been included in FEIS Section 3.12.2.1 and depicted in Illustration 3.12 FEIS2 and Illustration 3.12 FEIS3. The FEIS has also been updated to include more discussion about the effects of the Action Alternatives on traffic safety, background and seasonal distribution of the peak days, and particularly parking and pedestrian access.

Erik Splawn

Hogback Basin Preservation Association

Comment

The addition of slow moving open air trailers without seat restraints crossing, stopping and operating at slow speeds along US 12 brings up serious safety concerns and would add to the congestion of traffic flow, not improve the flow on US 12.

Erik Splawn

Hogback Basin Preservation Association

Comment

There is no discussion as to increased congestion and safety issues with shuttle trailers and increased traffic on US 12.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

Having a shuttle bus executing U-turns on Hwy 12 would appear to increase the risk of an accident.

Common Response

FEIS Section 3.12.3.2 acknowledges the potential safety concerns relating to shuttle trailer use along US 12.

80.0 Utilities

Parker Holden

Comment

One suggestion on Plan 4 - The well/waterline item does not make sense. It will increase environmental damage & is very expensive.

Due to the head, at least 1 relay station will be required - this means a tank and a building - if a water line is used. A broken line will cause erosion. A well involves a drill rig - meaning a road & there is no data on ground water at that elevation.

Response

As stated in Section 2.3.4.5 - Utilities in the DEIS, Alternative 4 includes the installation of a water supply line or a well, to address this issue. In the FEIS, Modified Alternative 4 includes that same water supply proposal. Section 3.13 - Utilities and Infrastructure and Section 3.3 - Watershed Resources of the FEIS have been updated to clarify the requirements for construction of the well. There are two options proposed to provide a water supply to the mid-mountain lodge, namely construction of a waterline or well. If it is determined that the proposed waterline is unfeasible, an on-site well would be drilled to provide a water supply for the proposed mid-mountain lodge. The well would be located upslope of the mid-mountain lodge, within the 50-foot building envelope surrounding the lodge. Drawdown requirements are described by each Action Alternative within Section 3.13 - Utilities and Infrastructure. DEIS and FEIS Section 3.3.3.5 describes that if the well was to be built, the overall projected water demand for Modified Alternative 4 would be the same as under the trenched waterline, but the domestic water demand for the mid-mountain lodge would come from the groundwater well. The groundwater withdrawal would be approximately 450 gallons/day for potable use by the guests of the mid-mountain lodge. The localized soil moisture and flow regime impacts from the proposed groundwater withdrawal is not expected to be measurable due to the low volume of the withdrawal and surface disposal of grey water through a septic drainfield. Very minimal information is available for groundwater and wells within and in the vicinity of the White Pass Study Area. Washington Department of Ecology's Environmental

Information Management System (<http://www.ecy.wa.gov/eim/>) database provides information on ground water and wells, and FEIS section 3.3.2.4-Water Quality has been updated with the available well data. To minimize any potential effects to the expansion area where the proposed well would be constructed, groundwater monitoring and other requirements would be considered a separate action under NEPA (a tiered action) and therefore would be analyzed during the implementation phase of the project. Additionally, compact drill rigs can be transported by helicopter, and do not require road construction. Specifically, the design and engineering requirements of the well construction would be undertaken during the implementation phase of the project.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS should discuss the impacts of trenching in more detail. How deep are the trenches, how much excavation is required, are separate trenches required for waterlines, power lines, septic lines, etc.?

Response

As explained in Section 2.3.1.6 and listed in Table 2.3.1-2, ground disturbance including trenching, spoils, staged equipment, etc. related to utility trenching will be contained within the 15-foot wide corridor. The depth of the trenches would be determined during final engineering design, however the disturbance corridor would be limited to 15 feet, based on the analysis in this EIS.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain why a separate communications and/or power lines with associated trenching is needed in Alternative #2 to the bottom terminal of the proposed Hogback Express. Communication lines can adequately run overhead along the liftline for lift operations. Is there some other project not identified in the proposal needing separate power? Would it be less impact to the upper basin to have this lift a bottom drive?

Response

Communications lines along the lifts would be aerial, while communications between pods would be buried along with power utility. Unlike communications cable and low-voltage electric lines required for lift control systems that can be run overhead, lift motors require high-voltage three-phase power that must be run underground. The final engineering design for the Hogback Express chairlift has not been finalized for this analysis. While it may be possible to install the detachable chairlift without buried power to the lower terminal, this analysis assumes that it would be necessary in order to evaluate the worst case. There would be no other power requirements at the bottom terminal site.

Darrell Howe

Crystal Conservation Coalition

Comment

The 3-255 states Wastewater and waterlines would be installed 'in the roadway'. Would this require a separate access road parallel to the existing for installation or would the roadway be 25+ feet wide to accommodate the equipment and lines? Have these widened corridors been adequately quantified and evaluated in the EIS process for ground disturbance?

Response

Construction of proposed trenched water, wastewater, power and communications utility lines following existing roadway corridors would not require separate utility corridors, although the individual utility trenches would follow separation requirements. The clearing required for utilities following the roadways would not exceed those listed in Table 2.3.1-2, which specifies a 15-foot disturbance corridor for utility installation. The roadways are adequate to accommodate both the trenching and the equipment during utilities installation. Refer to Section 3.2.3.2 - Soil Erosion of the FEIS for a discussion of soil impacts from utility trenching.

Darrell Howe

Crystal Conservation Coalition

Comment

Alternative-1 No Action Figure 2-1 fails to identify existing utilities such as communication and power. This omission makes evaluation of Alternatives difficult and skews the analysis towards proposed expansion efforts.

Darrell Howe

Crystal Conservation Coalition

Comment

Where are the powerlines located for the facilities on Pigtail Peak? Where is the existing trenched power for the Paradise Lift?

Response

Figure 2-1 has been updated to include all known utility locations.

Darrell Howe

Crystal Conservation Coalition

Comment

The EIS process needs to indicate what the separation requirements would be for utilities being placed in the same trenching. Wastewater and domestic drinking water lines would require separate trenches. How wide would the clearing limits be for these utility trenches? Would there be crossing of water and wastelined?

Response

In numerous locations, such as section 3.13.3.4, the DEIS identifies the utility separation requirements, including 15-foot horizontal separation of wastewater and domestic water lines. As listed in Table 2.3.1-2, clearing limits for utility trenches are analyzed in the FEIS as a 15 foot disturbance corridor, which includes the trench, staging areas, spoils storage, and any other associated disturbance. In cases where water and wastewater lines would run parallel, but separate, it is expected that the 15-foot construction corridor includes both trenches. The final design of the utility installation, including any water/wastewater crossings, would be subject to state and local utility regulations, such as separation standards.

Erik Splawn

Hogback Basin Preservation Association

Comment

Is the soil in the proposed drain field area in the Hogback Basin suitable for a drain field?

Response

Soils in Hogback Basin are classified as Group 4 soils, described in Appendix F as deep, well-drained volcanic soils. Suitability of the soils for drainfield installation is discussed in Section 3.13.3.2, which states that "the soils in the vicinity of the proposed lodge would provide excellent treatment and disposal of wastewater".

Glenda Phillips

Comment

The mid mountain lodge would receive fresh water either by hauling a tank by snow-cat (Alternative 2) or running a water line/drilling a well (Alternative 4). Of the two options the permanent water line/drilling a well would have the greatest impact in the beginning, but over time the advantages of this option would be realized. It would have the least impacts over time.

Response

Thank you for the input on potable water. As required by NEPA, all possible methods of achieving the purpose and need have been addressed, including piping, well drilling and tank transport. Selection of the

specific method is an operational issue that will take place subsequent to NEPA-mandated environmental review.

Charles Isley

Benton Rural Electric Association

Comment

Section 3.13.2.3 Power on Page 3-248. The first sentence of that paragraph states that electrical power is provided by Benton REA with a capacity of 2,970 kW. While there is a transformer capacity of 2,970 kW, the existing line is not capable of delivering more than 1550 kW to the summit. Expansion will require rebuilding of the power line into the area.

Response

The DEIS indicates that the powerline would need to be upgraded to accommodate the increased capacity. The FEIS has been updated to further clarify that both the conductor size and the transformer would need to be increased.

Darrell Howe

Crystal Conservation Coalition

Comment

Page 3-251 describes the water needs at the proposed lodge. Snow machine equipment will be accessing the lodge on a nightly basis for grooming, supplies and trash removal. Could it not easily supply water without having a dedicated machine and operator as indicated? Costs would be considerably less if existing equipment and operators are used versus drilling and maintenance of a new well.

Response

The description of the Alternative 2 water system, including the use of a snowcat to deliver water to the mid-mountain lodge, is based upon White Pass Company's proposal. Whether or not the snowcat would be a dedicated machine is an operational and health consideration that is outside the scope of this analysis.

Darrell Howe

Crystal Conservation Coalition

Comment

The WATER section on page 3-258 describes trenching for lines to be a minimum of 8 feet deep. Will the trench be over-excavated and stepped down as required for worker safety given this depth? Where will the spoils be placed during installation? How much blasting would be required to move rock from the trench? Again describe how this trenching would NOT impact vegetation.

Response

The design of utilities trenches is a specific detail of project implementation that will take place subsequent to review of the alternatives under NEPA, as regulated by worker health and safety regulations. Excavation spoils will be stockpiled on-site within the 15-foot wide clearing corridor as listed in Table 2.3.1-2. Although utility lines would generally be located within cleared ski trails or roads, there is no assumption stated in the EIS that vegetation would not be affected. Rather, grading for utilities is analyzed against the existing landcover type and the acreage of disturbance for the 15-foot corridor is included in vegetation removal and grading calculations for each alternative.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

The wastewater systems at White Pass deserve greater attention than they receive in the DEIS: On page 2-18 "The current wastewater management system at White Pass meets or exceeds all site and health requirements." No basis for the statement is given or even a reference to who might have evaluated the wastewater systems. The size of the systems are such that they should be covered by State Wastewater discharge permits from Ecology - Ecology has never issued a permit for either facility.

Response

The existing wastewater treatment system at White Pass was designed to handle 12,000 GPD and are therefore under the jurisdiction of the Yakima Department of Health. The Department of Health maintains records on White Pass, as does the US Forest Service. Details regarding wastewater system design were summarized in an engineering report dated September 3, 1981 and summarized in a letter from White Pass Company to the Department of Ecology (McCarthy 2005). The FEIS has been updated to clarify the relevant design of the wastewater treatment system for the ski area as detailed in the aforementioned letters. The operation and maintenance of the wastewater treatment systems requires White Pass to be in compliance with State and Federal laws and regulations. Wastewater treatment systems with capacities of less than 14,500 GPD, such as the current system at White Pass, are regulated by local Health Departments (in this case, Lewis County), while larger wastewater treatment systems fall under the jurisdiction of the Washington State Department of Ecology (Kennedy, pers. comm.). Compliance with applicable laws and regulations is currently being met and is expected to continue into the foreseeable future.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

A more complete assessment of the wastewater systems needs to be completed, what permits have been issued for the wastewater systems? Why haven't the agreed upon repairs been completed? What is the

impact of not completing the repairs? Septic systems are best suited to steady usage, the variation in flows during cold weather (and with long lines to the drain fields) and the extreme variation through the year are likely to result in degraded performance. An assessment of the performance of both septic systems is needed since the drainfields are adjacent to streams of the highest water quality classification in Washington State.

Response

The FEIS has been updated to include a summary of the wastewater capacity and operational history based on a letter from White Pass Company to the Department of Ecology (McCarthy 2005). This letter represents the best available information concerning wastewater treatment at White Pass.

Richard Benson

WA Department of Health

Comment

We sometimes allow new facilities to connect to an existing system with engineering justification, but it is likely this ambitious expansion will require construction of one or more new sewage systems which must be permitted by the agency with jurisdiction, based on the design flows. I recommend the owner be required to obtain approval (from appropriate agency) for new sewage facilities to serve the expansion and complete repair of the sewer line as a condition of final project approval.

Response

The overall design capacity of the wastewater treatment system at White Pass is 12,000 GPD and is therefore under the jurisdiction of the Yakima Department of Health. FEIS Section 3.13 - Utilities and Infrastructure has been updated to indicate that the current average peak flow is approximately 9,200 GPD, which is below the current overall design capacity of the ski area wastewater treatment system. Following resort expansion, the limiting factor for capacity would be temporary storage, not treatment. Additional storage tanks and/or a drainfield are proposed to handle excess wastewater volumes during periods of peak usage, such as weekends.

Darrell Howe

Crystal Conservation Coalition

Comment

On page 3-255 there is a 15' separation of lines described. Would these be installed at the same time? What is the phasing of construction and will multiple seasons be required to install and revegetate these corridors?

Response

The phasing of construction activities would be dictated by function over the two-year construction period. All required construction activities would be analyzed to determine activities that are dependent and independent of each other and a schedule of works would be proposed. Utility work is typically one of the first construction actions following snowmelt. For purposes of this analysis, it is assumed that all utilities would be installed during the two-year construction period and that revegetation would occur after construction.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS fails to discuss the problems associated with Alternative 2, 4, and 6. What are the problems associated with transporting large quantities of fresh water in sub-zero temperatures to the mid-mountain lodge. If a well is an option, where would this be located? How would it be dug?

Response

The transportation of water using storage tanks and snowcats under Alternative 2 is based on the White Pass Company proposal. Concerns with whether the water would freeze in sub-zero weather is an operational issue to be addressed by White Pass if or when such a proposal is approved. Note that the proposed water supply in Modified Alternative 4 would be via either a water supply line or a well. Alternative 6 would provide water via a supply line. As discussed in section 3.13.3.3, "the well would be located upslope of the mid-mountain lodge, within the 50-foot building envelope surrounding the lodge". The FEIS has been updated to clarify that site approval would be obtained from the Lewis County Department of Health, as per WAC 173-160. The well would be located upslope of the mid-mountain lodge, within the 50-foot building envelope surrounding the lodge and drawdown requirements are described by each Action Alternative within Section 3.13 - Utilities. FEIS Section 3.3.3.5 states that if the well was to be built, the overall projected water demand for Modified Alternative 4 would be the same as under the trenched waterline, but the domestic water demand for the mid-mountain lodge would come from the groundwater well. The well would be drilled.

Darrell Howe

Crystal Conservation Coalition

Comment

Wastewater line and Water line from the Alternative 6 mid-mountain Lodge on page 3-255 need to be fully analyzed for ground disturbing impacts given 8' deep trenching and separation requirements on the existing ski trail. Bare soils with areas of detrimental conditions and water quality impacts would increase and should be shown on mapping and in tables.

Response

These utilities are analyzed as grading over a 15-foot wide corridor, consistent with the assumptions listed in Table 2.3.1-2. The related impacts to soils are analyzed in Section 3.2 - Geology and Soils and listed in Table 3.2-3. As described in this table, footnote "a", "grading" includes the utility trenching. Figure 2-7 in the DEIS did not depict the wastewater line, which was an inadvertent omission. The FEIS has been updated to include the wastewater line in parallel with the water line.

Darrell Howe

Crystal Conservation Coalition

Comment

Please explain the rectangular shaped existing drain field - Developed landcover area at the east end of the SUP shown on Figure 3-15. Does it have associated access roadway or utility corridors? What type of stream crossing occurs?

Response

Utility connections to the existing drainfield are mapped on the utility figures, including Figures 2-5 and 2-7. Figure 2-1 has been updated to include all known utility locations. The wastewater line to this drainfield includes a trenched/aerial crossing.

90.0 Land Use

Erik Splawn

Hogback Basin Preservation Association

Comment

Alternative 2, 4, and 6 are contrary to the Northwest Forest Plan because they would necessitate building roads and structures within inventoried road less areas in Key watersheds.

Response

Alternative 2 and Modified Alternative 4 do not include the construction of new roads. The FEIS acknowledges that Alternative 6 includes a road in a Tier 2 Key Watershed and an Inventoried Roadless Area. As stated in Section 2.3.5.5 - Utilities and Infrastructure, the construction of a road under Alternative 6 within the White Pass IRA and Tier 2 Key Watershed would require a determination of consistency with the Northwest Forest Plan by the Regional Executive Interagency Committee.

Regan Smith

Northwest Ecosystem Alliance

Comment

Please also describe how "additional protection" is afforded RIAs when a Forest Plan Amendment is proposed to exempt these protections from the White Pass Ski Expansion area.

Response

As described in FEIS Section 2.4, many Mitigation Measures and design criteria are designed to help protect riparian areas, which may include Riparian Reserves or RIAs.

Regan Smith

Northwest Ecosystem Alliance

Comment

It is not entirely clear to us what the land allocations under the Northwest Forest Plan are within the proposed expansion area. The DEIS references the Administratively Withdrawn allocation under the GP LRMP, but it is not totally clear that the NWFP designation is also an Administratively Withdrawn Area. Additionally, Figure 3-28 identifies the Riparian Reserve and watershed boundaries within the proposed expansion area, but does not disclose the overlying land allocation. Please clarify.

Response

As the proposed expansion area lies within the Gifford Pinchot National Forest (GPNF), it also has a land allocation of Administratively Withdrawn - Management Area 2L (Developed Recreation) under the GPNF Forest Plan. Within this allocation, the term "Administratively Withdrawn" refers specifically to the Northwest Forest Plan allocation, whereas the term 2L refers to the Gifford Pinchot allocation. The Northwest Forest Plan amended the Gifford Pinchot Forest Plan, resulting in the allocations described in Chapter 1 and Section 3.14 - Inventoried Roadless Areas. DEIS Figure 3-28 discloses the forest plan allocations without the administratively withdrawn designation. FEIS Figure 3-43 has been updated to include the Administratively Withdrawn and Congressionally Reserved Northwest Forest Plan designations.

Regan Smith

Northwest Ecosystem Alliance

Comment

Please explain why a Forest Plan Amendment would not be required under Alternative 9, since Riparian Reserve construction is required in this alternative as well.

Response

DEIS Section 2.3.1.1 - Forest Plan Amendment, erroneously reported that Alternative 9 would not requiring the Forest Plan Amendment. The FEIS has been updated to correct this error. FEIS Section 2.3.1.1 - Forest Plan Amendment indicates that all Action Alternatives would require the amendment.

Tom Uniack

Washington Wilderness Coalition

Comment

The DEIS makes no effort to indicate how much of the White Pass Inventoried Roadless area would have its wilderness potential reduced. Instead the document simply writes off the entire 1,200-acre IRA.

Response

FEIS Section 3.14 - Inventoried Roadless Areas describes the effects to IRAs, including an indication of the percentage of the IRA that would be affected by development under each alternative, thus describing the percentage of the IRA that would be removed from wilderness eligibility.

Regan Smith

Northwest Ecosystem Alliance

Comment

All functions, including sediment filtration, LWD input, and floodwater storage should be analyzed at the Riparian Reserve level, as required by the Northwest Forest Plan.

Response

FEIS Section 3.3.2.3 - Riparian Zones states that: "due to the differences in functional riparian zones and designated riparian zones, this analysis utilizes Riparian Reserve boundaries for analysis of upland functions, and the RIA boundaries for analysis of riparian functions. The upland forest communities located within Riparian Reserves are analyzed in order to characterize the following functions: LWD recruitment potential, stream and wetland shading potential, and overall land cover patterns. The RIAs are used to analyze particular riparian functions that occur only at that scale. These riparian functions include sediment filtration, stream bank stability, floodwater storage, LWD input to streams, stream channel shade, and stabilizing stream banks via root structure." Additionally, refer to Section 3.3.3.3 for a discussion of the direct or indirect impacts to Riparian Reserves and RIAs from construction activities for each Action Alternative. RIAs are located inside Riparian Reserves therefore all functions are evaluated in Riparian Reserves.

Erik Splawn

Hogback Basin Preservation Association

Comment

Finally, the DEIS fails to adequately discuss the effect of human and machine noise and air pollution, increased human entry, and disruption of wildlife in the Goat Rocks Wilderness Area and adjacent roadless areas due to the proposed action.

Response

Refer to FEIS Section 3.16 - Noise for a discussion of noise impacts in the Goat Rocks Wilderness under each Action Alternative. Refer to Section 3.8 - Air Quality for a description of air quality/pollution impacts for each Action Alternative. Refer to Section 3.11 - Recreation, which describes impacts of the alternatives to the wilderness experience. Additionally, Section 3.15 - Visual Resources describes the effects to landscape character and sense of place in Hogback Basin and along the wilderness boundary. Refer to Section 3.14 - Inventoried Roadless Areas for a discussion of impacts to adjacent Inventoried Roadless Areas and Wilderness Areas under each Action Alternative.

Tom Uniack

Washington Wilderness Coalition

Comment

Furthermore, the Roadless Rule prohibits logging except of generally small diameter trees to reduce the risk of unnaturally large or intense wildfires. Alternatives 2, 4 & 6 all call for timber cutting associated with the development of proposed ski runs in the White Pass inventoried Roadless Area. Such logging clearly violates this provision of the Roadless Rule, given that fire prevention is not relevant to the purpose of these activities.

Response

The FEIS has been updated to include more discussion regarding the Roadless Conservation Rule. Specifically, FEIS Section 3.14 - Inventoried Roadless Areas incorporates text from the roadless rule which indicates that development could take place in an IRA and outside a SUP area provided that no road is required and that tree removal is not undertaken as a "timber harvest". Tree removal for the construction of ski trails in the Pigtail and Hogback Basin expansion area would be incidental to the construction of the ski area facilities, as opposed to the harvest of trees specifically for the purposes of a timber sale.

Erik Splawn

Hogback Basin Preservation Association

Comment

On page 51 of the DEIS the author misstates the Congressional record:

The sentence from which the author withdrew the quote "significant potential for ski development" appeared 20 years ago in a committee report, and these words were never enacted into any statute or law. The quote "significant potential for ski development" does not differentiate between Alpine or Nordic Ski development. This quote and the authors misstatement of the Congressional record has no legal effect and is highly misleading and should be stricken from the EIS.

Response

The quote the commenter refers to (i.e., "significant potential for ski development"), is referenced in both the DEIS and FEIS as a quote from Senate Report 98-461, May 1984. FEIS Section 1.1.1.1 has been updated to include additional clarification from the 1984 Congressional Delegation. Specifically, "the need for administrative action with respect to the White Pass Ski Area expansion project is evident from the 40-year history of expansion attempts. Maintaining this area in a non-developed recreation status is not consistent with the intent of Congress. Over the past 21 years, various actions have continually frustrated the intent of Congress to allow for the potential expansion of White Pass Ski Area. In order to prevent the failure of a third attempt to resolve the expansion need, White Pass is committed to complete another NEPA analysis. Based on findings from the analysis, we the undersigned strongly urge the current Washington Congressional delegation and the Secretary of Agriculture to provide a vehicle for the White Pass Company to expand into Hogback Basin without further delay and the threat of costly appeals and judicial reviews" (1984 Congressional Delegation, 2005).

Erik Splawn

Hogback Basin Preservation Association

Comment

There is no discussion in the DEIS concerning the inconsistency of Alternatives 2, 4, and 6 with the Northwest Forest Plan as it pertains to road building in Tier 1 Key watersheds in road less areas. Since the location of roads, structures, ski trails, clearings and grading are not forthcoming in DEIS, no reasonable discussion is presented as to the consistency or inconsistency with the Northwest Forest Plan, Gifford Pinchot National Forest Plan or other relevant plans or regulations.

Response

The White Pass Study Area is not located within any Tier 1 Key Watershed, it is instead located in a Tier 2 Key Watershed. As stated in FEIS Section 2.3.5.5 - Utilities and Infrastructure, the construction of a road under Alternative 6 within the White Pass IRA and Tier 2 Key Watershed would require a determination of consistency with the Northwest Forest Plan by the Regional Executive Interagency Committee. Alternative 2 and Modified Alternative 4 would not include any road construction, and therefore would not warrant a discussion about how road building would or would no be consistent with the Northwest Forest Plan. FEIS Chapter 2 and associated figures clearly outline the roads, structures, ski trails and grading associated with the Action Alternatives. Analysis of the alternatives in regard to the

Northwest Forest Plan and the Gifford Pinchot Forest Plan is contained in Section 3.7 - Aquatic Conservation Strategy, as well as Section 3.14 - Inventoried Roadless Areas.

Tom Uniack

Washington Wilderness Coalition

Comment

There is also little or no site specific information on the impacts to individual roadless areas. Past court decisions, particularly in the Ninth Circuit, have underscored the need for site-specific environmental analysis of proposed logging and other activities in roadless areas.

Response

This FEIS documents the site-specific environmental analysis for the White Pass Master Development Proposal, which includes ski area development in the White Pass IRA.

Sanjeev Mehrotra

Julia Paulsen

Nathan Rice

Peter Smart

Heather Grube

Tess Thyer

Joe Simpson

Peggy Printz

Sharon Cody

Robert Triggs

Jennifer Johnson

Allison Mclean

Matthew Thyer

Paul Kennard

Eric Wilborn

Comment

Development of the White Pass Inventoried Roadless Area is unacceptable. Over 2.2 million Americans support full protection of our nation's remaining roadless areas. In Washington state, 81,762 residents commented on the Roadless Rule, and a recent Ridder/Braden poll found 72% of Washingtonians support full protection of our state's roadless areas.

Common Response

The FEIS has been updated to include the current status of Inventoried Roadless Areas. Refer to Section 1.1.1.1 - Washington Wilderness Act, Section 3.14 - Inventoried Roadless Areas and Section 3.11 - Recreation for information regarding the White Pass Inventoried Roadless Area, its removal from wilderness, and Congressional intent.

Elizabeth Winder

Comment

Hogback is protected from road building and timber harvest under the Roadless Area Conservation Rule. It is already enjoyed as a recreation area which is used by a public that values the silence and solitude of the wilderness and it would be good to know that some day it would be protected for future lovers of the wilderness, our descendants, by the Wilderness Act.

Jim Scarborough

Olympic Forest Coalition

Comment

It is particularly perplexing to us that the Forest Service has seen fit to launch this misguided project while the legal status of IRAs remains in legal limbo. Court decisions are still pending on the original 2001 Roadless Area Conservation Rule, while the Bush administration has initiated (but not yet completed) a revised version of this same rule. Retaining the public's trust is presumably still a priority for the Forest Service, yet the suspicious timing of this project suggests that the agency and White Pass Company are utilizing the present uncertainties of IRA management constraints as a means to maneuver this reprehensible and likely illegal proposal through NEPA hurdles.

Mark Lawler

Sierra Club Cascade Chapter

Comment

We also believe that expansion outside the existing permit area would violate the Jan. 2001 roadless area conservation rule, because that rule applies to inventoried roadless areas outside of ski area special use permit areas.

Tom Uniack

Washington Wilderness Coalition

Comment

Roads cannot be built on national forest roadless areas to expand ski areas unless such expansion has been approved prior to the publication of the Rule in the federal Register (January 12, 2001) [FEIS Vol 1, 3-226]. Because the White Pass ski expansion is being contemplated within the current EIS process, such expansion would not be permitted under the Roadless Area Conservation Rule.

Jeff Maki

Comment

The Hogback Basin is protected from road building and timber harvest under the Roadless Area Conservation Rule ---please, this rule must not be violated!

Sue Thompson

Comment

Hogback Basin is protected from road building and timber harvest under the Roadless Area Conservation Rule and it is a unique backcountry winter recreation area with outstanding wilderness scenery and solitude.

Ananthaswami Rajagopal

Fred M Rhoades

Kathleen Mahan

David Matthews

Amanda Coleman

Chris Prowell

Pete Schnebele

Don Gale

Joanne Fyvie

Linda G Furney

Roth Rose

Ryan Liddell

Shannon W van Oppen

Jeffrey Froome

Shannon Markley

Sara Ijadi

Janel Fox

Jack Tull

John Butler

Fran Lebowitz

Ela Pettis

Andrea Dossett

Mr. and Mrs. RJ Stonewall

Jen Westenber

James McRoberts

Patricia Shannon-Garve

Howard Rose

Leeon Aller MD

Lynn Ledgerwood

David and Deborah Luxem

Judy Willman

Donald T Brubeck

Chris Crites

Comment

As a roadless area the Hogback Basin is protected from road building and timber harvest under the Roadless Area Conservation Rule.

Common Response

The FEIS has been updated to include the current status of Inventoried Roadless Areas. As described in Section 3.14 - Inventoried Roadless Areas, the status of IRAs has changed many times in the recent past.

Under the various Roadless Rules and Interim Directives, the removal of trees incidental to other management activities (i.e., ski trail clearing) is not considered "timber harvest". The FEIS includes four alternatives that include no road building and one alternative that includes a road in the IRA to address this issue. Therefore the Action Alternatives that do not include road construction in the White Pass IRA are compatible with the Roadless Conservation Rule and the numerous iterations of Roadless Area Management in the recent past. In addition, the FEIS has been updated to include more discussion regarding the Roadless Conservation Rule. Specifically, FEIS Section 3.14.2 incorporates text from the roadless rule FEIS, which indicates that development could take place in an IRA and outside a SUP area provided that no road is required and that tree removal is not undertaken as a timber harvest (i.e., cutting trees specifically for the purpose of selling them on the market). Refer to Section 1.1.1.1 - Washington Wilderness Act and Section 3.14 - Inventoried Roadless Areas for information regarding the White Pass Inventoried Roadless Area, its removal from wilderness, and Congressional intent.

Mark Lawler

Sierra Club Cascade Chapter

Comment

We opposed expansion into Hogback Basin (including Pigtail Basin) even before the roadless area conservation rule and would continue to oppose such expansion today. We see no way to adequately mitigate for the severe and permanent environmental impacts caused by development of ski lifts, roads, access "trails" for vehicles, lift towers, power lines, clearcuts and tree removal for ski runs, and a mid-mountain lodge/restaurant. Any of these would also permanently alter its roadless nature and render it unprotected by the roadless area conservation and would, further, render it unsuitable for addition to the National Wilderness Preservation System.

David Matthews

Comment

Developing this area would eliminate its potential for being protected as wilderness under the Wilderness Act in the future.

Sue Thompson

Comment

Furthermore, developing this area would eliminate its potential for being protected as wilderness under the Wilderness Act some day.

Ananthaswami Rajagopal

Kathleen Mahan

Jeff Maki

Amanda Coleman

Chris Prowell

Pete Schnebele

Don Gale

Joanne Fyvie

Linda G Furney

Fred M Rhoades

Roth Rose

Ryan Liddell

Shannon W van Oppen

Jeffrey Froome

Shannon Markley

Sara Ijadi

Andrew Keller

Janel Fox

Jack Tull

John Butler

Ela Pettis

Andrea Dossett

Mr. and Mrs. RJ Stonewall

Jen Westenberg

James McRoberts

Patricia Shannon-Garve

Howard Rose

Leeon Aller MD

Lynn Ledgerwood

Chris Crites

David and Deborah Luxem

Judy Willman

Mark Dawson

Donald T Brubeck

Comment

Developing this area would eliminate its potential for being protected as wilderness under the Wilderness Act some day.

Kristin Tremoulet

Comment

Any area that is roadless, like the White Pass Roadless Area, has potential to be permanently protected as Wilderness. Currently, that area is protected under the Roadless Area Conservation Rule. Any development in this roadless area would ruin its chance to receive permanent protection.

Common Response

As described in FEIS Section 3.14 - Inventoried Roadless Areas, the White Pass Inventoried Roadless Area was removed from the Goat Rocks Wilderness by the 1984 Washington Wilderness Act. Refer to Section 3.14.4 - Environmental Consequences for discussion of impact to IRAs and possible wilderness designation under each alternative. The FEIS acknowledges the potential loss of wilderness designation for the Pigtail and Hogback Basin area under the expansion alternatives (refer to Section 3.14 - Inventoried Roadless Areas).

Regan Smith

Northwest Ecosystem Alliance

Comment

Furthermore, the DEIS should quantify the number of entries that are expected over this 50" motorized trail. The DEIS simply states (p.2-13 and elsewhere) that ground equipment entries will be minimized. What does that mean - 10 trips a day with a bulldozer? Two trips a month with an ATV? In light of economic realities, please describe how the Ski Resort will be required to "minimize" ground entries.

Regan Smith

Northwest Ecosystem Alliance

Comment

The assertion that a trail accessed by ATV's and large construction machinery does not qualify as a road because it is less than 50 inches wide is disingenuous. This ground access will be a motor vehicle travelway, and the difference of 1 inch does little to change the impacts and legal questions associated with roads in Inventoried Roadless Areas. The Soil Compaction from Equipment Operation report in Appendix F addresses the effort to create mitigation measures that disguise the creation of a de facto road (1st paragraph). The DEIS should frankly discuss the probability of the margin of error exceeding 1" and turning the 50" motor vehicle access trail into a 51" motor vehicle access road, since in this case the only difference between the road and trail is 1 inch. The DEIS states that a small crane or boom truck is required to be transported to the construction site. What are the average widths of this type of machinery? How can the DEIS qualify the difference between a 50" motorway and a 51" motorway ecologically? How does the 50" motorway trail meet the intent of avoiding roadways in Inventoried Roadless Areas as required by the GP LRMP - Amendment 11 and the Roadless Forest Conservation Rule?

Common Response

As described in Section 2.3.1.6 - Construction, a road is defined as "a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail" according to the Forest Service Manual 7705. On this basis, there is a 1-inch difference between a road and a "non-road" under the commenter's example. Mitigation Measure MM11 in FEIS Table 2.4-2 has been updated to include a limitation on the number of trips over any given area of equipment operation. Mitigation Measure MM11 specifies that equipment would operate over the snow or over slash with the objective of creating no discernable travel corridor on the ground surface. Therefore, equipment over 50 inches wide would not create a defined travel corridor on the ground and no road would be required. For example the use of tracked equipment such as a groomer or track hoe to construct the lift and trails would take place without the need for a dedicated road, regardless of its width. During construction, the operation of machinery to construct charlifts, the lodge, utilities or other infrastructure would include the movement of construction equipment within the approved areas of construction. The construction equipment would not be acting as a motor vehicle (conveying passengers from one place to another) and it would be moving across the terrain as part of a construction project, as opposed to traveling along a travelway to go from one place to another. Operationally, the 50-inch limitation will require that access to the facilities be limited to over-the-snow access via snowcat, ATV or other such vehicle that operates on a travelway less than 50 inches wide. Ecologically, the effects of construction equipment on the environment does not consider the difference between a 50-inch and a 51-inch motorway. Rather, the analysis in Chapter 3 evaluates the physical effects of equipment operation on soils, vegetation, and biological resources.

Tom Uniack

Washington Wilderness Coalition

Comment

The DEIS fails to analyze the impacts of the proposed development on the roadless character of the area in question. Instead, it inappropriately makes a relative analysis to existing Wilderness lands nearby.

This type of analysis is not only incorrect but fails to adequately identify the impacts to the roadless character of the area from the proposed development. This type of comparison confuses the question at issue - which isn't to compare the existing roadless areas with the quality of recreational opportunity offered by nearby wilderness but to compare the individual roadless area before and after the proposed changes.

Tom Uniack

Washington Wilderness Coalition

Comment

The DEIS contains inadequate information about the environmental values of, and does not adequately analyze the impacts on the inventoried roadless areas in which proposed development would occur - particularly with respect to the Goat Rocks Adjacent and William O Douglas Adjacent Inventoried Roadless Areas.

The discussion of the affected environment and environmental consequences for Inventoried Roadless Areas is limited to a very generalized and binary discussion of effects on "wilderness character."

Common Response

As described in FEIS Section 3.14 - Inventoried Roadless Areas, effects to both the Goat Rocks Adjacent and William O. Douglas Adjacent Inventoried Roadless Area are disclosed (refer to Section 3.14.5). In the DEIS, Section 3.14 - Land Designation and Use, specifically discussed the distinguishing characteristics for IRAs used in the evaluation of impacts, as described in the Forest Service Handbook and Roadless Area Review and Evaluation II process. None of these characteristics discussed refers to "wilderness character". Rather these characteristics include challenging experiences, historic and scientific study, manageability and boundaries, natural integrity, natural appearance, opportunities for solitude, opportunities for primitive recreation, special ecological features, and special places. In the FEIS, these characteristics are described for the Goat Rocks Adjacent and the William O Douglas Adjacent IRAs, as well as the White Pass IRA. In the FEIS, Section 3.14 - Inventoried Roadless Areas articulates the effects to each of these roadless areas, including an assessment of the IRA's qualification as potential Wilderness.

Ronald and Ceona Chitwood

Comment

In the years since then the DEIS have acknowledged the land trade but never used it as a compensation factor when considering the merits of Ski Area Expansion Proposals. My view has always been that the failure of the Forest Service to consider the 1984 Act in total has made this a flawed process. The designation of the 23,000 acres should not have been complete until the regulatory impediments to Ski Area Expansion were removed.

Jerry and Carol Bryant

Comment

It is our understanding that the 1984 Washington Wilderness Act removed 800 acres for ski development at White Pass in exchange for 23,000 acres of wilderness. The acres set aside for wilderness were immediately included into the wilderness system. However, we are disappointed that the skiing public has been waiting over 20 years (and is still waiting) for the agreed upon increase in developed ski terrain.

John Callahan

Washington Fly Fishing Club

Comment

This acreage was designated for the expansion of White Pass with the passage of the 1984 Wilderness bill and so it is time to move along.

Kline Wilson

Comment

This expansion has been proposed and debated for almost 40 years. The site plans granted for the White Pass permit in the early 1960's showed lift facilities to the top of Hogback. The Wilderness Boundary Adjustment was made with the intention of allowing lift access to the top of Hogback. That Adjustment was beneficial to the Goat Rocks Wilderness area because it add much more terrain than it took away.

Harold W Heacock

Comment

At the time of the wilderness boundary relocation it was clearly stated that the intent of the legislation was in part intended to permit the expansion of the ski area into the Basin. The proposed expansion of the ski area is in keeping with that legislative history.

Common Response

FEIS Section 1.1.1.1 - Washington Wilderness Act, Section 3.14 - Inventoried Roadless Areas and Section 3.11 - Recreation include discussions about the removal of the White Pass IRA from Wilderness.

Phelps Freeborn

WA Native Plant Society WA State Department of Ecology

Comment

Why should the changes to the protections offered to riparian zones be changed? Is there new knowledge, or is it purely for the economic benefit of the White Pass Ski company?

Regan Smith

Northwest Ecosystem Alliance

Comment

Please include discussion in the FEIS citing the administrative and/or legal authority that allows you to arbitrarily disregard direction under the Northwest Forest Plan.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS fails to disclose the rationale for how an amendment totally exempting construction activities in riparian areas across 1600 acres is non-significant. Furthermore, this Forest Plan amendment requires approval from the Regional Office, as directed by Amendment 11 which states "Plan amendments that propose to significantly reduce protection for late-successional or old-growth forest related species, or reduce protection for aquatic ecosystems, are subject to review by the Regional Ecosystem Office to determine if the objectives of this plan are significantly adversely affected" (Amendment 11, p. 4-1) [emphasis added]. Because "significance" is a subjective term, Forest Service regulations state that one consideration in determining whether a proposed action will significantly affect the quality of the human environment is ' [t]he degree to which the effects on the quality of human environment are likely to be controversial.' 40.1508.27(b)(d). A Forest Plan amendment that allows construction in riparian areas and calls it insignificant is controversial. The FEIS should address this issue in detail.

Common Response

The referenced Forest Plan Amendment would amend the Gifford Pinchot Forest Plan only, and address an inconsistency in this Forest Plan as outlined in Footnote 7, in Chapter 1 of the DEIS. The amendment would not amend any portion of the Northwest Forest Plan as it relates to the Gifford Pinchot Forest Plan. In fact, the Standards and Guidelines from the Northwest Forest Plan, including the Riparian Reserve Standard and Guidelines, would still apply to any development in Pigtail and Hogback Basins.

Darrell Howe

Crystal Conservation Coalition

Comment

Explain how the GPNF Land and Resource Plan can be disregarded and amended by this proposal. Clearly the development of recreation sites in Riparian areas is not allowed. As stated on Page 1-31. Should not the modification of the GPNF Plan be addressed in a separate document and planning process? The width of riparian areas needs to be clearly defined since the GPNF Plan states developed recreation sites "should be located at least 100 feet from the edges". Are riparian influence areas 25 feet? The proposed action will require violation of the Land and Resource Plan.

Erik Splawn

Hogback Basin Preservation Association

Comment

The DEIS states on a foot note on page 28 regarding the GPNF Plan "As written, these standards and guidelines would make it impossible to develop any alpine or Nordic trails in the Hogback Basin." This statement is misleading. Simple Nordic trails are not inconsistent with the GPNF Plan. A thorough discussion of HOW to comply with the GPNF, instead of how NOT to comply with the plan is required in the DEIS. There are other alternatives besides the no action alternative that would comply with the GPNF and NWF Plans including the expansion within the current ski area, and a Nordic trail system in the Hogback Basin.

Regan Smith

Northwest Ecosystem Alliance

Comment

The DEIS claims that this amendment would be fully consistent with the Aquatic Conservation Strategy particularly and the Northwest Forest Plan generally, and that this analysis would be discussed in Chapter 3, Section 3.7 (p. 2-12). However, there is no discussion of the consistency of this amendment with the NWFP or the ACS in Section 3.7. The DEIS should disclose how the proposed amendment complies with the Northwest Forest Plan which states that "complying with the Aquatic Conservation Strategy objectives means that an agency must manage the riparian-dependent resources to maintain the existing condition or implement actions to restore conditions" (NWFP, B-10).

Common Response

As written in the GPNF Forest Plan, the RIA Standard and Guideline specifically excludes developed recreation sites on the RIAs, while the Forest Plan Allocation -2L - Developed Recreation indicates that the existing SUP area and Hogback Basin are to be managed for developed recreation. The existing Paradise chairlift and trails include developed recreation facilities that cross over the RIA. Additionally,

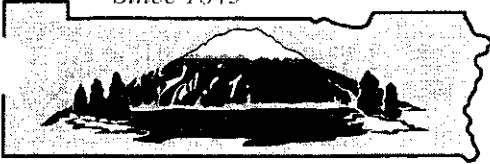
the existing access to the Hogback Basin area (which is outside the existing White Pass Special Use Permit area) from the SUP area, includes a ski trail that crosses over the RIA. This access trail was not constructed by White Pass and is the result of skiers leaving the SUP area to access Pigtail and Hogback Basins. Similarly, any future development in the Hogback Basin or near the Paradise chairlift would require ski lifts and trails that cross over RIAs, regardless of whether any tree removal is required. Based on this inconsistency, neither the existing nor the proposed recreational facilities would be consistent with the RIA Standard and Guideline, whereas the Management Allocation specifically allows such development. The proposed amendment would retain the Standard and Guidelines from the Northwest Forest Plan including the Riparian Reserves Standards and Guidelines. As a result, FEIS Section 3.7 addresses all Riparian Reserves in a consistent manner regardless of RIAs.

2.2 GOVERNMENT AGENCIES AND INDIAN TRIBE LETTERS

01.0 - SUPPORT ✓

LEWIS COUNTY COMMISSIONERS

Since 1845



Lewis County, Washington

LEWIS COUNTY COURTHOUSE
351 NW NORTH STREET
CHEHALIS, WA 98532-1900
(360) 740-1120 • FAX: (360) 740-1475
TDD: (360) 740-1480

ERIC JOHNSON
First District

RICHARD GRAHAM
Second District

DENNIS HADALLER
Third District

Larry M. Keeton
Chief of Staff

Sheila Unger
Administrative Coordinator

January 5, 2005

Handwritten: #0009

Randall Shepard, District Ranger
Naches Ranger District
10237 U.S. Highway 12
Naches, WA 98937

Dear Mr. Shepard:

This letter is written in response to the DEIS for the proposed expansion of the White Pass Ski Area. The Lewis County Board of Commissioners is strongly in favor of the proposal, which has minimal environmental impact to the federal wilderness area, provides public benefit, and assists with local economic development.

Compared with previous proposals, the alternatives in the DEIS provide minimal impact to the surrounding environment. We support the effort to not build new roads in the road less area, which minimizes impacts to key habitat and wildlife areas and preserves the designated road less area. Likewise, the clearing and grading in the project area has been carefully planned to reduce environmental impact and keep the ski area as natural as possible, while still maintaining necessary safety standards for recreational use. The planned mitigation for construction impacts also provides excellent levels of protection.

With adequate attention to environmental concerns there are numerous public benefits of expansion to the White Pass Ski Area. Public access to recreational opportunities will be increased year round, with proposed trails providing better access to the wilderness areas for hikers, bird watchers and outdoor enthusiasts of all kinds. A longer ski season and a higher quality ski experience, created by the alternatives that favor higher altitude ski opportunities for the typical user, an intermediate level skier, will draw more visitors during the winter season. Use of this area for public recreation and access to federal wilderness is an important and an appropriate use of our national public resource lands.

In addition to the public benefits, the potential economic impacts of such an expansion are likely to be positive for Lewis County communities along Highway 12, especially for the gateway community of Packwood. A greater number of visitors and a longer ski season at White Pass will provide a longer and more profitable winter tourist season for Packwood businesses such as equipment rental, restaurants, motels, gift shops, gas stations and the

grocery store. The alternatives that include a planned shuttle service from nearby communities would also encourage visitors to stop and spend their time and money in Packwood. Increased trail connectivity could potentially increase year round visitors to White Pass, which would benefit Packwood businesses as well. Many businesses in former timber towns, like Packwood, are increasingly dependent upon tourism to make ends meet. Expansion at White Pass has the potential to provide a more reliable tourist based economy for local business people and spark rural entrepreneurship.

↑

70.1-5

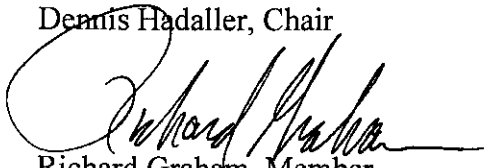
Expansion of the White Pass Ski Area is a key issue for Lewis County and we appreciate your efforts in this matter.

Sincerely,

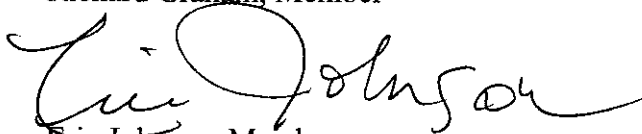
THE LEWIS COUNTY BOARD OF COMMISSIONERS



Dennis Hadaller, Chair



Richard Graham, Member



Eric Johnson, Member

BOCC:elc

Darrell G Myers
10703 Whitman Ave N
Seattle, WA 98133

Randall Shepard, District Ranger
Naches Ranger District
10237 U.S Highway 12
Naches, WA 98937

010-5

0042

Dear Ranger Shepard,

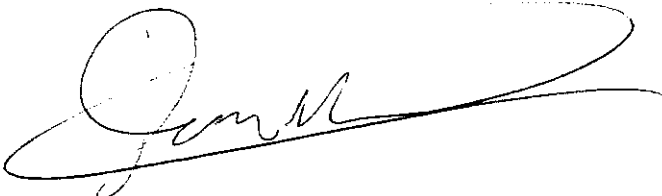
I recently completed a review of the White Pass ski area expansion in the Wenatchee and Gifford Pinchot National Forests on the CD-ROM that was sent to me.

04.16.5 [I strongly urge the passage of the proposal Alternative 4] [It not only expands the ski area but it also alters the Pacific Crest Trail so one does not have to hike under the chair lift during the summer season.] S-02.0
The amount of forest area to be altered or cleared would be a slight increase over the Alternative 2. The other proposals are not worthy of any support or further research, as they do little for the ski resort.

Once again I urge the Forest Service and the White Pass ski area to pursue the Alternative 4. This will not only preserve the wilderness integrity of this beautiful part of Washington; it will also help boost the local economies that have been wracked by mill closings, job loss and double-digit unemployment for years.

Thank You,

Darrell G Myers



CC: White Pass Ski Area

01.0-N



**Yakima Regional
Clean Air Authority**

Six South 2nd Street, Suite 1016, Yakima, WA 98901

(509) 834-2050 • Fax: (509) 834-2060

web site: <http://www.co.yakima.wa.us/cleanair>

February 1, 2005

#0090

Mr. Randall Shepard, District Ranger
USDA - Forest Service
Naches Ranger District
10237 U. S. Highway 12
Naches, WA 98937

Dear Mr. Shepard,

We have reviewed the Executive Summary for the White Pass Expansion Master Development Plan Proposal Draft Environmental Impact Statement. We believe your determination in Table ES - 2 that none of the alternatives will exceed or contribute to an exceedance of the particulate matter or carbon monoxide national ambient air quality standards is correct, so we do not favor the selection of any specific alternative. However, we do have the following concerns about air quality during the construction phase of the selected alternative:

02.0-N

Debris Clearing - Considering the limited access for most of the ski lifts, runs, and development sites, there appears to be a need for burning clearing debris. To minimize the impact of the smoke from these fires, they need to be regulated by the Department of Natural Resources under the Smoke Management Plan. In addition the contractor doing the burning will need to verify the daily burn status by either calling the Authority or visiting our website.

45.0-N

Construction Dust - Transported construction dust can be a nuisance or a safety hazard particularly close to Hwy. 12. Therefore, contractors doing earth moving work will be required to obtain either a project or a general dust control plan from the Authority that identifies how they plan to reduce or mitigate fugitive dust emission and who will be the contractor representatives on the project.

45.0-N

Toxic air pollutants are known or probable carcinogens, and monitoring and emissions inventories for toxic air pollutants in Seattle and Portland have shown that the single greatest source of these pollutants is the exhaust from diesel engines. We have two concerns about the operation of the ski area that are related to diesel engine emissions, but they may be outside of the scope of the DEIS.

Ski Bus Idling - Extended idling of diesel bus engines in parking areas to keep the bus warm for the driver and / or the passengers can produce localized high levels of toxic air

02.1-N

pollutants both inside the bus and in the parking lot. This can be effectively prevented by providing a heated driver waiting area for the drivers who are not skiers.

Diesel Power Electric Generators - Primary or auxiliary diesel powered electric generators may be subject to new source review to assure compliance with the air quality laws. To determine if a specific generator requires a new source review, please contact Hasan Tahat, Senior Engineer, at this office.

The jurisdiction of the Authority is limited to Yakima County, so the portion of the ski area in Lewis County is under the jurisdiction of the Southwest Clean Air Authority (SWCAA) for the administration of the air quality laws. The SWCAA contact is:

Robert D. Elliott, Executive Director
Southwest Clean Air Agency
11815 NE 99th St., Suite 1294
Vancouver, WA 98682-2394

Thank you for the opportunity to comment on this DEIS. If you have any questions about the comments, please contact Charlie Stansel at this office.

Sincerely,



Les Ornelas
Air Pollution Control Officer

cc: Bob Elliott, SWCAA
Hasan Tahat, YRCAA
Cheryl Menard, YRCAA



"Allison O'Brien"
<reapn@mindspring.com>
m>

02/07/2005 11:53 AM
Please respond to reapn

To: comments-pacificnorthwest-wenatchee-naches@fs.fed.us
cc: "Preston" <reopn@mindspring.com>, "Mandy"
<reapn@mindspring.com>

Subject: The Department of the Interior's Comments on the DEIS for the White
Pass Expansion #0101

Attached please find the Department of the Interior's comments on the subject project.

Thank you,
Allison

Allison O'Brien
Regional Environmental Assistant
United States Department of the Interior
500 NE Multnomah St., Ste. 356
Portland, Oregon 97232
Phone: (503) 231-6157
Fax: (503) 231-2361



ER05_15_DEIS_NC.doc No virus found in this outgoing message.
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Version: 7.0.300 / Virus Database: 265.8.6 - Release Date: 2/7/2005

OIG -
NEUTRAL

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

IN REPLY REFER TO
ER05/015

Electronically Filed

February 7, 2005

Mr. Randall Shepard
Naches District Ranger
Naches Ranger Station
10237 U.S. Highway 12
Naches, Washington 98937

Re: COMMENTS – Review of Draft Environmental Impact Statement for the White Pass Expansion, Master Plan Development Plan, Okanogan-Wenatchee National Forests and Gifford Pinchot National Forest, Yakima and Lewis Counties, Washington

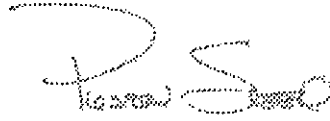
Dear Mr. Shepard:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for the White Pass Expansion, Master Plan Development Plan, Okanogan-Wenatchee National Forests and Gifford Pinchot National Forest, Yakima and Lewis Counties, Washington. The Department does not have any comments to offer.

N-
02.0

We appreciate the opportunity to comment

Sincerely,

A handwritten signature in black ink, appearing to read "Preston A. Sleeper". The signature is stylized and cursive.

Preston A. Sleeper
Regional Environmental Officer

#0212

01.0-0



20 February 2005

Randall Shepard
Naches Ranger District
Wenatchee National Forest
Highway 12
Naches, Washington

Dear Mr. Shepard:

Subject: DEIS for proposed expansion of the White Pass Ski Area

Thank you for the opportunity to comment on the proposed expansion of the ski area at White Pass. We have several concerns which we are requesting be considered in the decision on whether or how to proceed with the proposal.

The expansion as proposed requires reversing a decision by the Forest Service to protect riparian habitat. We do not believe that the proponents of the expansion have made a compelling case to "change the rules". In particular, the proposal is predicated upon solving several problems and we see no evidence that the proposal will resolve several of them:

1) Parking is marginal in quantity and creates dangerous conflicts between traffic and skiers:

- parking on both sides of Hwy 12 through White Pass will not be eliminated
- having a shuttle bus executing U-turns on Hwy 12 would appear to increase the risk of an accident

75.2-0

2) Traffic patterns on the ski area involve expert runs crossing trails used by skiers of lesser ability and the difficulty for skiers of less than expert skill to cross the cliff band

- none of the conflicts between crossing trails appear to have been removed
- access to the expansion area will increase the use of trails such as Main Street, which has a very difficult drop (resulting in the trail being classed as expert level), to return to the main lodge from the expansion area

62.6-0

3) The lack of early (or late) season snow in the vicinity of the lodge will still limit the season, the expansion area may be high enough to be skiable early in the season but access will still be limited by the area near the lodge

10.4-0

The nordic skiing area is mostly outside of the SUP and within the W.O. Douglas Adjacent IRA (why is the IRA not shown on map 1-3) including the Dog Lake, Dark Meadows, Corral and Deer Creek Loops plus the Biathlon loop. All of these are in addition to the ZigZag, which is listed as "unauthorized" in table 2-6.1, none of the others appear to have been mentioned by name in the proposal. Requiring a pass from the White Pass Ski company to cross this area seems to be an unfair blockage to accessing the Pacific Crest Trail to the north, which is a pleasant cross country ski tour once the meadows around Sand Lake are reached.

05.12-N

The wastewater systems at White Pass deserve greater attention than they receive in the DEIS: On page 2-18 "The current wastewater management system at white Pass meets or exceeds all site and health requirements." No basis for the statement is given or even a reference to who might have evaluated the wastewater systems. The size of the systems are such that they should be covered by State Wastewater discharge permits from Ecology - Ecology has never issued a permit for either facility.] On page 1-3, it is noted that replacement of the sewer line has not been completed. In 1993 (I believe that is the correct year), a complaint was received of raw sewage discharging to Leech Lake and documented, that is after the upgrade completed during 1991-1992. The chemical analyses of Leech Lake included in table 3.3-8 are old (1990) and indicative of a lake of a relatively high trophic status (high phosphorus, dissolved oxygen below saturation). The abundance of emergent plants and the periphytic algae growing on them in recent years are consistent with an elevated trophic status, especially in comparison to Deer and Sand Lake a mile or so to the north in a similar setting (except for the human activity adjacent to Leech Lake)]

80.3-0

20.2-0

The existing ski trails are quite broad for the most part, while the trails proposed for the expansion into Hogback Basin are shown as narrow (and over top of the existing drainages). The vegetation has been completely altered (a brief survey near the lodge in the summer of 2004 found none of the species present in the nearby woods on the ski slopes) and no topsoil remaining. The discussion of the existing conditions did not note this or explain how and why the native species were eliminated along with the top soil or why this would not occur in the new development.] The DEIS stated that erosion on the existing ski trails was minimal, without describing how this was evaluated and whether regrading to eliminate the worst gulying would have influenced this assessment - the lack of top soil would seem to indicate severe erosion, please clarify]

25.6-0

20.4-0

The discussion of weeds in the DEIS was restricted to noxious weeds, this is excessively narrow. The thrust of the noxious weed list is primarily agricultural impact, therefore the list is grossly incomplete for a discussion of high elevation, forested terrain. It is also incorrect, there conspicuous concentrations of weeds (including noxious weeds) in White Pass. The ones I am most familiar with are at the east end of the parking area and at the trailhead for the PCST headed north from Leech Lake, which may be and are outside of the SUP. These infestations should not have been ignored. With wilderness areas and inventoried roadless areas (potential wilderness) so close, any weeds are of concern!]

25.3-0

The DEIS does not address the issue of traffic to and from White Pass, the road is treacherous with several sharp bends in both directions. What is the accident rate now and what is the expected impact of increased usage at White Pass? Will increased usage at White Pass lead to greater use of chemicals for clearing snow and ice off the road? Rock salt is being used on Hwy 12 this year (I noticed it near Windy Point) despite the DoT web page which indicates that rock salt is being used on only two trial areas - neither of which is Hwy 12 or 410 (also receiving rock salt in 2004).]

75.1-0

03.0-0

In summary, we find the DEIS incomplete in many regards, some major. Given the lack of demonstration that the expansion will address the issues raised in the "Purpose and Need", we believe that the expansion is not justified and should not proceed. If it does proceed we believe the Final Environmental Impact Statement should address the following issues:

Why should the changes to the protections offered to riparian zones be changed? Is there new knowledge, or is it purely for the economic benefit of the White Pass Ski company?

90.7-0

The discussion of weeds needs to be expanded to include all non-native species found in the vicinity of White Pass, not just within the SUP and not just on the list of noxious weeds.

Leech Lake appears to have an elevated trophic status as a result of the developments around White Pass, including failed wastewater systems. The trophic status of Leech Lake needs to be reviewed in the context of the "natural" conditions and the impact of the development assessed. A more complete assessment of the wastewater systems needs to be completed, what permits have been issued for the wastewater systems? Why haven't the agreed upon repairs been completed? What is the impact of not completing the repairs? Septic systems are best suited to steady usage, the variation in flows during cold weather (and with long lines to the drain fields) and the extreme variation through the year are likely to result in degraded performance. An assessment of the performance of both septic systems is needed since the drainfields are adjacent to streams of the highest water quality classification in Washington State.

03.0-0

80.3-0

The nordic ski trails need to be addressed in a comprehensive fashion. The DEIS suggests that their status will be resolved, but the SUP boundary is not adjusted on the maps for any of the alternatives. The construction of the trails removed the native vegetation, leaving a relatively barren path (fortunately the slopes are gentle and the canopy is largely intact) in an Inventoried Roadless Area, why was this allowed or allowed to continue?


0-62.7

~~63/6/0
5/1~~

Given the history of non-performance by the White Pass Ski company (e.g. construction of nordic ski trails without authorization, failure to replace the sewer as agreed) and the avoidance of complete discussions of issues (e.g. weeds in addition to those on the noxious weed list, problems with the wastewater systems, impact of the current development on Leech Lake), what guarantees are there that any approvals will be followed correctly. For example, if the old runs are wide, what is to guarantee that the new ones won't also be as wide? They are targeted for the same class of skiers.

Thank you for your consideration of these concerns. We hope to see them addressed if there is a final EIS.

Sincerely,


Phelps Freeborn
3409 Taylor Way
Yakima, Washington



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue
 Seattle, WA 98101

01.0-N
 #0225

FACSIMILE TRANSMITTAL
OFFICE OF ECOSYSTEMS, TRIBAL & PUBLIC AFFAIRS
NEPA REVIEW UNIT
FAX NUMBER: (206) 553-6984

TO:	Randy Shepard, District Ranger
PHONE NUMBER:	509-653-1400
LOCATION:	Naches Ranger District, Naches, WA
FAX NUMBER:	509-653-2638
PAGES (INCLUDING THIS SHEET):	07

FROM: Tomoaki Arai
 1200 Sixth Avenue
 Seattle, WA 98101-1128
 (206) 553-8516

Comments: White Pass Expansion Project Comment Letter



010-N

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 18, 2005

Reply To
Attn Of: ETPA-088

Ref: 02-012-AFS

Randall Shepard, District Ranger
Naches Ranger District
10237 U.S. Highway 12
Naches, WA 98937

Dear Mr. Shepard:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **White Pass Expansion Project** (CEQ No. 040590) 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, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The draft EIS examines four action alternatives and the no-action alternative. Alternative 1, the no-action alternative, would continue operation of the existing ski area facility and continue with existing management activities. All action alternatives would include the approval by the Forest Service of a new Master Development Plan to be submitted by White Pass Ski Company. Alternative 2, the proposed action, would include development of new ski areas including the construction of two new ski lifts, ski trails and a mid-mountain lodge in the Hogback Basin. The Proposed Action would expand the Special Use Permit (SUP) boundary from current 805 acres to 1,572 acres. Alternative 4 is similar to Alternative 2 but includes the construction of a 2.5-acre parking lot. Alternative 6 includes the expansion into the Hogback Basin but with one new ski lifts and associated ski trails. Under this alternative, the total SUP boundary would be expanded to 1,087 acres. Alternative 9 includes a new ski lift and associated ski trails within the existing SUP boundary. No expansion into the Hogback Basin would occur under this alternative.

We have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the draft EIS based on the preferred alternative. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

2

Alternative 2 through 6 would satisfy the early season demand by providing ski runs at high elevations but the overcrowded conditions at the existing trails are unlikely to be improved. In addition, Alternative 2 and 4 have high potential for habitat fragmentation since the Hogback region connects the Goat Rocks Wilderness Area, which may provide forage/dispersion for the Northern Spotted Owl. Alternative 6 has the least amount of environmental impacts with the potential to meet the purpose and need. Alternative 9 would meet the terrain distribution needs of the ski area but not meet the early season demands. It would include the highest amount of tree removal and high potential of soil erosion.

The detailed comments are enclosed. Our comments include the following topics:

- Sediment and Soil Erosion
- Water Resources
- Skier Visitation Analysis
- Skier Circulation and Safety Issues
- Lift Alignment
- Habitat Connectivity
- Noxious Weeds
- Monitoring

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Tomoaki Arai at (206) 553-8516 or Denise Clark at (206) 553-8414.

Sincerely,



Christine Reichgott, Manager
NEPA Review Unit

Enclosures

EPA COMMENTS ON WHITE PASS SKI AREA EXPANSION DRAFT EIS

Riparian Buffer Widths

N - 40.1 [We recommend that the final EIS explain the relationship of Riparian Influence areas and the Northwest Forest Plan's (NWFP's) aquatic conservation strategy recommendations for riparian buffer widths. The NWFP aquatic conservation strategy and the Interior Columbian River Basin Ecosystem Management Plan recommends the use of PACFISH Riparian Habitat Conservation Areas (RHCA). The summary of finding for the Interior Columbia Basin finds that interim RHCA's in the range of anadromous fishes and bull trout are prescribed at 300 foot minimum width for fish-bearing streams to maintain stream function and prevent sediment inputs from nonchannelized sources.]

N - 50.0 [The NWFP Aquatic Conservation Strategy requires a watershed analysis in Key Watersheds, for roadless areas in non-Key watersheds, and riparian reserves prior to determining how proposed land management activities meet Aquatic Conservation Strategy Objectives. We recommend that the final EIS explain how this project would comply with the NWFP Standards and Guidelines for recreation related management activities in riparian reserves.]

Sediment

N - 20.8
N - 20.9 [We are concerned about the potential increased erosion on steep slopes and highly erodible soils and subsequent water quality degradation downstream. The Upper Tieton River is important habitat for char and bull trout and the Clear Fork Cowlitz River currently supports salmon and trout spawning, core rearing and migration. There is also the potential that ski area construction could adversely affect the flow regime, and subsequently wetlands and surface water within the project area during low flow situations in the drought season.] EPA recommends that the U.S. Forest Service (USFS) conduct modeling to quantify potential sediment yields to streams in and downstream of the project using the Watershed Erosion Prediction Project soil erosion model (WEPP) or similar model. This would provide a basis from which to compare alternatives for potential water quality impacts. The final EIS should then compare short term and long term sediment yield that would occur from implementing each alternative.]

N - 15.2 [The draft EIS states that impacts on soil resources would not be significant due to the small scale of the proposed actions, the implementation of mitigation measures, and the use of sediment control Best Management Practices (BMPs). However, it is difficult to evaluate whether the proposed BMPs are sufficient unless it is shown how BMPs are applied and performed at a specific location. The final EIS should provide further explanation of BMPs to verify their sufficiency to minimize the potential soil impacts.]

Skier Visits

N-62.1
 [There are some uncertainties in the estimation of future skier visitation. The draft EIS states that there is a need for expanded facilities to meet increased demand. According to the draft EIS, the number of skiers visiting White Pass has been growing over the last ten years and continued growth in demand for skiing at White Pass is expected. Under all alternatives, skier visitation growth is expected at a rate of 1 % annually due to projected population growth in the market area (Appendix D). However, the draft EIS also states that Oregon and Washington skier visits have been steady and skier visits can vary depending on weather conditions (Section 3.11.2.1).]

N-62.1
 [Under action alternatives, an increase in skier visitation is expected due to the interest in the new development. To estimate the increase, the draft EIS uses the Comfortable Carrying Capacity (CCC) of each action alternative. The 40,000 annual increase in skier visits estimated to occur under Alternative 2 and 4 is derived from the statement in the draft EIS that near capacity visitation would occur approximately 25 times. While we understand the idea that the excitement generated by the expansion would trigger an increase in skier visitation, the draft EIS appears to lack clear explanation to support its analysis of visitation predictions. For instance, why is near capacity visitation estimated to occur 25 times? Would the initial increase due to the excitement generated by the expansion continue in the future?]

The estimation of future skier visitation is an important element to evaluate whether there is a public need/demand for this expansion. While the current high demand shown in the draft EIS (e.g. Illustration 1-3) may support an expansion of the ski area, without such information it is difficult to evaluate the appropriate level of expansion.

Skier Circulation

N-61.8
 [Section 1.1.2.2 states that poor circulation caused by the steep cliff-band in the middle mountain results in unacceptably high skier densities on some trails (e.g. *Holiday* and *Cascade Trucks*) and safety concerns. We are concerned that Alternative 2, 4 and 6 would increase safety concerns on these trails. Under these alternatives, additional improvements would be made to the existing egress trails so that more skiers would potentially use the trails. The draft EIS predicts that higher skier conjunction on the egress trails would be mitigated by the proposed Mid-Mountain Lodge and a staggered closing time. However, the draft EIS does not demonstrate how many skiers would utilize the Mid-Mountain Lodge and, thus, how effectively skier densities would be reduced. In addition, we remain concerned about the effectiveness of the staggered closing time. The final EIS should clarify the model used to assess the skier densities.]

O512-N
 [Chapter 2 provides tables of proposed trails under each alternative. However, it is difficult to understand how these trails would affect skier circulation without knowing the locations of them. In order to help readers to assess skier circulation under each action alternative, the final EIS should provide a map of proposed trails.]

Lift and Trail Alignment

N-61.2
Overall impacts on watershed resources, particularly wetlands and riparian reserves, would be lower under Alternative 2 than under Alternative 4. However, Section 3.6.3.1 states that this is due to the fact that Alternative 4 includes a parking lot construction. Under Alternative 4, the top terminal of the Basin chairlift would be located to avoid wetlands and development near the Wilderness boundary. While this makes the Comfortable Carrying Capacity (CCC) under Alternative 4 slightly lower than that under Alternative 2, there appears no difference in predicted skier visitations under the two alternatives (Appendix D).

N-05.1
Although the draft EIS states that the potential impacts on wetlands would be minimized through implementation of the proposed mitigation measures, avoidance of impacts is preferable than minimization to the maximum extent practicable. Based on information presented in the draft EIS, EPA recommends that Alternative 2 (Preferred Alternative) incorporate lifts and trails design described under Alternative 4.

Habitat Connectivity

N-30.6
The draft EIS does not adequately describe the potential affects of each alternative on habitat connectivity. In particular, the loss of forest and creation of vegetation breaks have the potential to alter habitat used by elk, deer and mountain goat. The final EIS should include a more detailed discussion of the affect of each alternative on habitat connectivity for wildlife that are present and potential forage and inhabit this area.

Leech Lake

N-20.2
The water quality data in Table 3.3-8 includes ortho-Phosphorus levels that appear to be elevated and dissolved oxygen levels that appears to be lower than what would be expected for the recorded water temperatures. We recommend that the final EIS explain these discrepancies.

Noxious Weeds

N-25.3
The draft EIS states that noxious weed surveys have not found the existence of noxious weeds in the study area, except for the Highway 12 corridor. However, the final EIS should include survey data for areas near the base area day lodge. It should discuss the potential spread of noxious weeds that may result from construction of the mid-mountain lodge, proposed new parking lot under Alternative 4 and potential new road construction under Alternative 6.

Monitoring

N-05.9
Section 2.5 discusses monitoring but rather in general terms. The draft EIS repeatedly concludes proposed mitigation measures would minimize the potential impacts (see above). The final EIS should include a more detailed discussion of monitoring to show a commitment to ensure that effects are kept to the predicted minimal level.

**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.

01.0 - N



"Gruber, John"
<GruberJ@wsdot.wa.gov>

02/22/2005 02:48 PM

To: "comments-pacificnorthwest-wenatchee-naches@fs.fed.us"
<comments-pacificnorthwest-wenatchee-naches@fs.fed.us>
cc: "Holmstrom, Rick" <HolmstR@wsdot.wa.gov>, "Barsness, Jeff"
<barsnej@wsdot.wa.gov>

Subject: WSDOT South Central Region Comments for White Pass Ski Area
Expansion DEIS #0324

Attached below are the WSDOT's South Central Region comments regarding the Draft EIS for the proposed White Pass Ski Area expansion. These comments are in addition to any comments WSDOT's Southwest Region may have. The proposal is in WSDOT's Southwest Region. A signed original is being sent via postal mail.

-John Gruber
WSDOT South Central Region Planning

<<USFS_White Pass Ski Exp_DEIS.doc>>



USFS_White Pass Ski Exp_DEIS.doc

February 22, 2005

Naches Ranger District
10237 U.S. Highway 12
Naches, Washington 98937-9254

Attention: Randall Shepard, District Ranger

Subject: White Pass Expansion Project (767 Acres); White Pass Ski Company
Master Development Plan Proposal; Draft Environmental Impact Statement
US 12, MP 166 – 172, (Tieton Dam to Rimrock Retreat vicinity)

We have reviewed the proposed project and have the following comments.

This proposal is adjacent to U.S. Highway 12 with WSDOT's Southwest Region. US 12 west of the Wildcat Creek Bridge (milepost 165.98 in the vicinity of the Tieton Dam) is in the Southwest Region. East of the Wildcat Creek Bridge is in the South Central Region. A significant number of the people using the White Pass Ski area can be expected from the east. The following comments are for the WSDOT South Central Region, and are in addition to any comments the Southwest Region may have.

1. The WSDOT South Central Region has the following projects that may effect the proposal:
 - a) US 12, Tieton River West Crossing bridge replacement project (MP 176.63 – 176.67). Scheduled ad date in summer 2007.
 - b) US 12, Tieton River Vicinity – Unstable Slope slope stabilization project (MP 176.68 – 176.78). Scheduled ad date in summer 2007.
 - c) US 12, Tieton River East Crossing bridge replacement project (MP 177.13 – 177.16). Scheduled ad date in summer 2007.
2. All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit.
3. Any outdoor advertising or motorist signing considered for this project will need to comply with state criteria. This would include any signs for parking lots that shuttle people to the pass. Please contact Rick Gifford of the WSDOT South Central Regional Office at (509) 577-1985 for specifics.

Mr. Randall Shepard, Naches Ranger District – White Pass Ski Expansion DEIS
February 22, 2005
Page 2

Thank you for the opportunity to review and comment on this proposal. If you have any questions concerning our comments, please contact me at (509) 577-1631.

Sincerely,

Scott Golbek, P.E.
Acting Regional Planning Engineer

by: Rick Holmstrom, Development Services Supervisor

SG: rh/jjg

cc: File #30, SR 12 (2004)
Rick Gifford, Traffic Engineer
Don Wherry, South Central Region
Jeff Barsness, WSDOT – Southwest Region

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010-N ✓



"Benson, Richard"
<Richard.Benson@DOH.WA.GOV>
02/23/2005 10:32 AM

To: "Freeborn, W. Phelps" <WFRE461@ECY.WA.GOV>
cc: "Frye, Richard J." <RFY461@ECY.WA.GOV>, "El-Aarag, Mamdouh" <Mamdouh.El-Aarag@DOH.WA.GOV>, "comments-pacificnorthwest-wenatchee-naches@fs.fed.us" <comments-pacificnorthwest-wenatchee-naches@fs.fed.us>
Subject: RE: White Pass Ski area: #0337

Thanks Phelps:

The owner might argue they have more capacity, but the bottom line is the DOH-approved peak daily capacity for the "northside" system is 12,000 GPD. The 9,000 GPD figure was provided by the owner and represents average daily flows calculated over the duration of the ski season. The actual peak day flows are likely much higher. The capacity of the southside system (16,500 GPD) was estimated by the owner years ago using old design criteria. We don't know what it's condition is. There's no record of a permit and it's unlikely that system meets modern code or would be considered adequate to accept any additional flows (but that's your call since it appears to be with Ecology jurisdiction).

We sometimes allow new facilities to connect to an existing system with engineering justification, but its likely this ambitious expansion will require construction of one or more new sewage systems which must be permitted by the agency with jurisdiction, based on the design flows. I recommend the owner be required to obtain approval (from appropriate agency) for new sewage facilities to serve the expansion and complete repair of the sewer line as a condition of final project approval. Thanks for bringing this to our attention Phelps....Richard Benson

803-N

Richard M. Benson, P.E.
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richard.benson@doh.wa.gov
<http://www.doh.wa.gov/ehp/ts/WW/Loss/default.htm>
Public Health - Always Working for a Safer and Healthier Washington

From: Freeborn, W. Phelps [<mailto:WFRE461@ECY.WA.GOV>]
Sent: Wednesday, February 23, 2005 9:19 AM
To: Benson, Richard; El-Aarag, Mamdouh
Cc: Frye, Richard J.
Subject: FW: White Pass Ski area:

Mr. Benson and El-Aaraq,

Thank you for the information you have provided us.

The DEIS for the proposed expansion of the White Pass Ski Area can be seen at

<http://www.fs.fed.us/r6/wenatchee/planning/white-pass/index.html> - comments were due 23 February 2005

I estimated the 25,000 gal/day capacity for the north side system from a flow value and percent of capacity in the report. The DEIS reports that the system was repaired in 1991-1992. Chris Coffin was working for the Yakima Health District in 1993 and investigated a report of a discharge of sewage to Leech Lake, and confirmed there was a problem. The DEIS indicated that a replacement of a sewer line (see page 1-3) was part of the improvements approved in the past 5 years, but not completed. I found no further details on the repair or whether the leak found in 1993 has been corrected. A discussion of current loadings and "performance" is on page 2-18.

The expansion, if the preferred alternative is approved, would increase usage by 50%, plus add new facilities (e.g. a lodge somewhere south of the current lodge - so that skiers in the expansion area would not have to return to the highway area). There is the potential for small septic systems "on the mountain" under some alternatives. Until we know which option has been approved, it doesn't seem worth worrying about design capacity, except to let White Pass Ski Company know that they will have to file engineering reports with Ecology and Health (if they don't expand across the regulatory threshold) before proceeding with any expansion to the wastewater systems and that a proper assessment of current and projected loadings will be needed (the DEIS reported peak day flows around 9,000, were your flows annual average or peak day?).

It sounds like we (Ecology) need to get them to apply for a permit for the system on the south side and DoH will retain the a permit for the north side system. We will review responsibilities again once the impacts of the proposed expansion are clearer.

thanks again

phelps freeborn

-----Original Message-----

From: Benson, Richard
Sent: Tuesday, February 22, 2005 5:51 PM
To: Frye, Richard J.; Freeborn, W. Phelps
Cc: El-Aarag, Mamdouh
Subject: White Pass Ski area:

Gentleman,

Reviewing the White Pass file carefully there is correspondence that indicates the "Southside" system (serves the day lodge) is served by an existing septic tank/drainfield system with an estimated capacity of 16,500 GPD. DOH has not

received any complaints on that system. It was never approved by this office and we don't have any plans to permit it. It is within Ecology jurisdiction. We entered it into our database just for tracking purposes. There is a note in the file indicating they have septic tank capacity of 24,000 gallons (not to be confused with drainfield capacity and be aware this pertains to the un-permitted Southside system).

DOH did issue a repair permit for the Northside system in 1991. We approved a recirculating gravel filter and pressurized subsurface drainfield with an approved capacity of 12,000 GPD. Their annual maintenance reports indicate flows to that system are running approximately 9,000 GPD. We don't have any information to indicate a design capacity of 25,000 GPD. There may be other systems at the site we are not aware of. We don't have any information about any "above ground portion" of that system. We don't permit anything on the surface, that would be Ecology jurisdiction, as is the 16,500 GPD Southside system. Also, I didn't see any information in the file about a sewer line that needs to be repaired. If that's connected to the Northside system let us know and we'll follow up.

I haven't seen the DEIS Phelps referred to and don't know what they are proposing in the way of expansion, or how they propose to manage any sewage generated by the improvements. If they do anything that might increase flows the Northside system we'd like to know about that and would need to approve it. We'd have to verify they have existing capacity or approve an expansion of the sewage system (assuming total flow is within our jurisdiction). If they are proposing improvements to be served by the Southside system I suggest Ecology reviews that, since it appears that system is within your jurisdiction.

Does this answer all your questions? Let me know, thanks....Richard Benson

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