1.0 PURPOSE OF AND NEED FOR ACTION

1.1 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws and regulations, the U.S. Forest Service (USFS) has prepared this Final Environmental Impact Statement (FEIS) to analyze the proposed White Pass Master Development Plan (MDP) that would replace the current but outdated MDP, and associated site-specific implementation of the MDP.

Located on both the Naches Ranger District of the Okanogan-Wenatchee National Forests (OWNF) and the Cowlitz Valley Ranger District of the Gifford Pinchot National Forest (GPNF), White Pass operates under a Special Use Permit (SUP) issued by the USFS. This permit encompasses approximately 805 acres and has a term extending until December 31, 2035.

This FEIS follows the format established by the Council on Environmental Quality (CEQ) (40 CFR, 1500-1508). It is designed to:

- Inform the public of the Proposed Action and the alternatives to the Proposed Action;
- Encourage and facilitate public involvement in decisions;
- Disclose the direct, indirect, and cumulative environmental effects of the Proposed Action and the alternatives to the Proposed Action; and
- Indicate any irreversible commitment of resources that could result from each alternative.

1.1.1 Background

White Pass Ski Area (White Pass) is situated in the Cascade Mountain Range of Washington State, approximately 55 miles west of Yakima, Washington and 20 miles east of Packwood, Washington (refer to Figure 1-1). White Pass Company currently operates the ski area under the guidance of the White Pass Master Plan (White Pass Company 1979) and the terms of the SUP issued to them by the USFS.

White Pass offers a range of recreation opportunities throughout the year. However, the resort is operated primarily as an alpine skiing operation and experiences the highest use during the winter months, with alpine skiing as the primary activity. Nordic (cross-country) skiing is also provided on 13.6 kilometers of

¹ The current Special Use Permit indicates that the permit area is 710 acres. However, GIS analysis indicates that the actual SUP area is approximately 805 acres. As a result of the NEPA process, of which this FEIS is a part, the acreage has been re-calculated based on the best available data.

² For the purposes of this FEIS, the terms "skiing" and "skier" refer to all snow sliding sports typically associated with ski area facilities, such as snowboarding, telemark skiing, cross-country, alpine skiing, etc. (refer to Chapter 7 – Glossary).

trails at White Pass. Lift-served backcountry skiing also occurs in the vicinity of the White Pass SUP area.³

White Pass primarily serves the day-use market, although it is one of two resorts in the Northwest with overnight lodging provided in condominium facilities near the base area and within a comfortable walking distance to the chairlifts.⁴ The condominium units are offered on a year-round basis.

Skier visits ranged from a low of 19,061 visits during the 2004-05 season, which had record low snowpack in the Pacific Northwest, to 142,570 during the 2001-02 season (a record season at White Pass). Over the last five years, White Pass has averaged 109,782 annual visits (PNSAA 2006a).

White Pass' local, regional, and destination market competition primarily includes Washington State areas such as Crystal Mountain, The Summit at Snoqualmie, Stevens Pass, Mission Ridge, Mount Baker, and Whistler/Blackcomb Resort in British Columbia. Oregon ski areas, including the Mount Hood ski areas and Mount Bachelor, also operate within White Pass' regional market. Within its local day skier market White Pass primarily competes with Mission Ridge, which also serves the Yakima market.

1.1.1.1 Washington Wilderness Act

In 1984, the Goat Rocks Wilderness and White Pass (indirectly) were included in the Washington Wilderness Act (PL 98-339). The purposes of the Act were to: 1) designate certain National Forest System Lands (NFSL) in the State of Washington as components of the National Wilderness Preservation System; and 2) insure that certain other NFSL in the State of Washington be available for non-wilderness multiple uses. Through the 1984 legislation, some 23,000 acres of land were added to the Goat Rocks Wilderness, and 800 acres of land were released from the designated wilderness area. The 800-acre area, known as Hogback Basin, is located southwest of the existing SUP area, and is currently under consideration for the expansion of White Pass Ski Area.

The 1990 GPNF Land and Resource Management Plan subsequently included the 800-acre Hogback Basin parcel in the White Pass Inventoried Roadless Area (IRA) as part of an update of the roadless area inventory that was required during the Forest planning process. In addition to the 800-acre parcel that had been removed from Wilderness, the White Pass IRA includes an additional 300 acres to the north (refer to Figure 1-2). At the same time the parcel was included in the roadless inventory, the White Pass

system to gain elevation.

⁴ Crystal Mountain also provides condominium lodging within

³ Backcountry skiers are those skiers that utilize the lift-served off-piste ski terrain in the White Pass vicinity. The term "off-piste" is used to describe 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. Lift-served backcountry skiing can be defined as skiing the off-piste terrain that is not directly serviced by a chairlift system, but is a short hike or traverse from the chairlift. Hike-to backcountry skiing involves hiking to remote off-piste terrain without the aid of a chairlift

⁴Crystal Mountain also provides condominium lodging within its SUP area. Together, White Pass and Crystal Mountain are the only United States ski areas that provide condominium lodging on National Forest System Lands.

Inventoried Roadless Area was also allocated by the GPNF Plan as a developed recreation management area.

Since passage of the Washington Wilderness Act of 1984, the USFS has made two previous attempts to issue Environmental Impact Statements (EIS) for ski area development in Hogback Basin. A Final EIS in 1990 evaluated the majority of the White Pass IRA, including Hogback Basin, for ski area expansion by the White Pass Company. The 1990 proposal included an expansion of approximately 1,100 acres, three lifts, associated ski trails, and a mid-mountain lodge. The 1990 Final EIS and Record of Decision (ROD) were withdrawn following a lawsuit. The second EIS in 1998 evaluated a considerably reduced proposal, which included an expansion of 300 acres, one chairlift, associated ski trails, a mid-mountain lodge and a mountain work road in the IRA. The 1998 final EIS and ROD were also the subject of a lawsuit and were remanded back to the USFS.

On July 7, 2005, the 1984 Congressional Delegation signed a letter addressed to the Secretary of Agriculture to clarify the Congressional intent with respect to the Hogback Basin (1984 Congressional Delegation 2005). The letter states:

"Congressional Intent

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.

Conclusion

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."

On January 31, 2007, Representative Brian Baird spoke before the US House of Representatives regarding the Washington Wilderness Act and the proposed expansion of the White Pass Ski Area (Baird 2007), which is provided below. Additionally, in his statement before the House, Rep. Baird referred to the 1984 Congressional Delegation letter (1984 Congressional Delegation 2005):

"The Washington State Wilderness Act of 1984 added over 23,000 acres of land to the Goat Rocks Wilderness Area and removed from wilderness designation 800 acres adjacent to the White Pass Ski Area as having 'significant potential for ski development' and urging the Secretary of Agriculture to 'utilize this potential, in accordance with applicable laws, rules and regulations.'

The GPNF Land and Resource Management Plan allocated the 800-acre area that Congress had withdrawn from the Wilderness Area back in 1984 to Developed Recreation in recognition of the intent of Congress. However, the LRMP concurrently inventoried as roadless the same 800-acre area.

It is well-understood that it was congressional intent to permit expansion of the White Pass Ski Area. I would like to submit for the record a letter signed by all living Members of the 1984 congressional delegation, stating that it was their intent to provide for the expansion of White Pass Ski Area. In a February 3, 2004 letter, the U.S. Department of Agriculture also confirmed this congressional intent, stating: 'We agree that the intent of Congress was clearly to allow for ski area development in the Hogback Basin.'

The Fiscal Year 2007 Interior Appropriations Bill that passed the House in May of last year included important information clarifying congressional intent to permit expansion of White Pass Ski Area. The language stated:

'The Committee notes that the Washington State Wilderness Act of 1984 removed from wilderness designation 800 acres of land adjacent to the White Pass Ski Area in Washington State for potential ski development. The Committee notes that the GPNF Land and Resource Management Plan allocated the 800-acre area as Developed Recreation to allow for ski area expansion, while concurrently inventorying the same land as roadless to reflect its current physical character. The Committee recognizes that it was the intent of Congress to permit ski area expansion into this 800-acre area and urges the Secretary of Agriculture, once the Environmental Impact Statement for the White Pass Ski Area's MDP is properly completed, to move forward expeditiously in approving the expansion plans in accordance with all applicable laws, rules, and regulations.'

Unfortunately, the Continuing Resolution that we are going to pass today does not include any report language, including the language clarifying congressional intent as it relates to White Pass Ski Area.

I wanted to bring this issue to the attention of my colleagues and highlight the fact that the House Appropriations Committee was prepared and willing to clarify congressional intent, and that the full House approved that clarification by voting for the Fiscal Year 2007 Interior Appropriations Bill in May. In keeping with this, I urge the Secretary of Agriculture to move forward expeditiously in approving the expansion plans in accordance with all applicable laws, rules, and regulations - once the Environmental Impact Statement is properly completed."

On March 20, 2007, Representative Norman Dicks spoke before the US House of Representatives regarding the Washington Wilderness Act and the proposed expansion of the White Pass Ski Area (Dicks 2007), which is provided below. Additionally, in his statement before the House, Rep. Dicks referred to the 1984 Congressional Delegation letter (1984 Congressional Delegation 2005):

"Madam Speaker, I rise today to discuss an issue that has occurred in my State over the past 23 years.

The White Pass Ski Area is located in the Cascade Mountain Range in the Gifford Pinchot and Wenatchee National Forests. White Pass is renowned as one of the best small ski areas in the Pacific Northwest and offers particular appeal to families. The area, which provides critical tourism revenue to the surrounding rural communities on both sides of the mountain range, is now looking to expand to provide greater opportunities to skiers in the Pacific Northwest.

Over two decades ago, we succeeded in passing through Congress the Washington State Wilderness Act of 1984. This legislation added over 23,000 acres of land to the Goat Rocks Wilderness Area and removed from wilderness designation 800 acres adjacent to the White Pass Ski Area as having 'significant potential for ski development' and urging the Secretary of Agriculture to 'utilize this potential, in accordance with applicable laws, rules and regulations'.

The Gifford Pinchot National Forest Land and Resource Management Plan allocated the 800-acre area that Congress had withdrawn from the Wilderness Area back in 1984 to Developed Recreation in recognition of the intent of Congress. However, the LRMP concurrently inventoried as roadless the same 800-acre area. The conflicting, confusing and uncertain status of the subject lands needs addressing, which is why I rise today.

I can say from first-hand experience that, at the time we passed the aforementioned Washington Wilderness Act of 1984, it was congressional intent to permit expansion of the White Pass Ski Area. I would like to submit for the record a letter signed by the 1984 congressional delegation stating that it was our intent to provide for the expansion of White Pass Ski Area. In a February 3, 2004 letter, the U.S. Department of Agriculture also confirmed this congressional intent, stating: 'We agree that the intent of Congress was clearly to allow for ski area development in the Hogback Basin.' In addition,

Congressman Baird, who represents the district where White Pass is located, submitted for the Record on January 31, 2007 a statement urging clarification and action on this Issue.

The Fiscal Year 2007 Interior Appropriations Bill that passed the House in May of last year included important information clarifying congressional intent to permit expansion of White Pass Ski Area. The language stated:

'The Committee notes that the Washington State Wilderness Act of 1984 removed from wilderness designation 800 acres of land adjacent to the White Pass Ski Area in Washington State for potential ski development. The Committee notes that the Gifford Pinchot National Forest Land and Resource Management Plan allocated the 800-acre area as Developed Recreation to allow for ski area expansion, while concurrently inventorying the same land as roadless to reflect its current physical character. The Committee recognizes that it was the intent of Congress to permit ski area expansion into this 800-acre area and urges the Secretary of Agriculture, once the Environmental Impact Statement for the White Pass Ski Area's Master Development Plan is properly completed, to move forward expeditiously in approving the expansion plans in accordance with all applicable laws, rules, and regulations.'

Unfortunately, the FY07 Continuing Resolution did not include any report language; therefore the language clarifying congressional intent that passed this body last summer was not included in the CR.

I wanted to bring this issue to the attention of my colleagues and highlight the fact that the House Appropriations Committee was prepared and willing to clarify congressional intent, and that the full House approved that clarification by voting for the fiscal year 2007 Interior Appropriations Bill in May. In keeping with this, I urge the Secretary of Agriculture to move forward expeditiously in approving the expansion plans in accordance with all applicable laws, rules, and regulations – once the Environmental Impact Statement is properly completed."

1.1.1.2 Nordic /Snowshoe Trail System

The Nordic trail system at White Pass includes approximately 13.6 kilometers (8.5 miles) (including the Zig Zag trail) of groomed, double tracked trails with an 8-foot wide skating lane. The Nordic trails are located across US 12 from the alpine ski area, both within and outside of the existing SUP area (refer to Figure 1-3). The operation of these trails is authorized under the current SUP, which was amended to include the Nordic trail system in 1984. The 1984 amendment included a hand-drawn map, which provided the conceptual layout for the trail network prior to construction. In 1987, the trail system was

widened by approximately 2 meters. During the summer of 1999, White Pass constructed approximately 2.1 kilometers (1.3 miles) of additional Nordic trail on *Zig Zag*.

In addition to formal Nordic trails, White Pass offers a system of snowshoe trails. The trails consist of tree markers and wands placed in the vicinity of the existing Nordic trail system, with no disturbance to soils or vegetation. These trails have been in operation since 2000.

1.1.1.3 Current White Pass Master Development Plan

The current planning document for White Pass is *A Master Plan Program for White Pass*, *Washington* (Mel Borgersen and Associates 1979). This document was developed in 1979 to formulate the long-range plan for White Pass, based on the conditions in 1979. The plan evaluates an expansion of White Pass into Hogback Basin to the west and Miriam Basin to the south. This expansion would increase the capacity of the ski area from 3,112 skiers to 13,083 (as calculated in 1979) through the expansion of the SUP boundary, addition of three lifts in Hogback Basin, and the addition of two lifts in Miriam Basin. With the 1984 legislated expansion of the Goat Rocks Wilderness to include Miriam Basin, development to the south of White Pass was no longer feasible. However, as described above, White Pass has made attempts to develop the Hogback Basin area, as provided for in the 1979 Master Plan.

1.1.1.4 Previous White Pass Ski Area Facility Developments

Additional facilities, including a 180 seat expansion to the Day Lodge, construction of a half pipe, installation of two yurts, construction of a generator shed, placement of a propane tank, replacement of sewer line, construction of a manager's cabin and office, conversion of a restaurant into condominiums, replacement of the rope tow with a platter lift, and relocation of Chair #3 were approved between 1998 and 2003. All facilities have been completed except for the sewer line replacement. Approvals for these projects are on file in the project record. For purposes of this analysis, these projects are considered as part of the existing condition.

1.1.2 Purpose of and Need For Action

1.1.2.1 The Proposed Action

The White Pass Company has submitted a proposal to the USFS for authorization of a new, ten-year MDP to replace their existing, but outdated, 1979 document. White Pass Company has also requested that their SUP be amended to authorize site-specific implementation of the new MDP in Fiscal Year 2007. The Proposed Action, which is the White Pass proposal without modification, is depicted in Figure 2-2. It includes enlarging the White Pass SUP area to incorporate approximately 767 acres of Pigtail and Hogback Basin, two new chairlifts, 15 new trails covering approximately 70 acres and a mid-mountain day lodge. Previous plans for the development of Miriam Basin would be eliminated from the MDP.

Implementation of the Proposed Action would expand the alpine skiing opportunities at White Pass by increasing the Comfortable Carrying Capacity (CCC) from 2,670 to 4,250 skiers under the proposal (refer to Appendix B).⁵

Table 1-1 shows the existing and proposed capacities at White Pass. The specific improvements proposed in the White Pass MDP Proposal are outlined below.

Table 1-1: White Pass Existing and Proposed Capacities

Proposed Action Components	Existing	Proposed			
Alpine Ski Area Capacity (CCC)a	2,670	4,250			
USFS Special Use Permit Area (acres)	805 ^b	1,572			
Lifts					
Total Number of Lifts	5	7			
Chairlifts (aerial lifts)	4	6			
Surface Lifts	1	1			
Trails					
Number of Trails	37	52			
Formal Terrain (acres)	212.3	282.3			
Beginner	0.5	0.5			
Novice	1.4	1.4			
Low Intermediate	67.7	95.1			
Intermediate	80.9	80.9			
Advanced Intermediate	10.0	52.6			
Expert	51.7	51.7			
Night Skiing					
Number of Trails	2	2			
Available Terrain (acres)	26.5	26.5			
Snowmaking					
Number of Trails	1	1			
Terrain (acres)	7	7			
Nordic and Snowshoe Trails					
Total Nordic Trail Network excluding Zig Zag Trail (km)	11.55	11.55			
Zig Zag Nordic Trail	2.1 km trail not included in MDP. Trail operates under annual SUP.	Zig Zag trail not included in this MDP and USFS would no longer authorize after 2007, without adequate site- specific NEPA.			

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⁵ The Comfortable Carrying Capacity of a mountain resort is the number of skiers an entire resort can comfortably accommodate at any given time and still guarantee a pleasant recreation experience. A resort's CCC does not reflect the number of skiers on the mountain at one time. Generally, 70 to 85 percent of a mountain's total CCC would be active skiers, including those on the trails, riding lifts, and waiting in lift lines. The remaining 15 to 30 percent would be using guest service facilities or milling in areas near these facilities. Refer to Appendix B – Mountain Plan Specifications for additional information regarding CCC.

Table 1-1: White Pass Existing and Proposed Capacities

Proposed Action Components	Existing	Proposed			
Snowshoe Trails	Trails not included in MDP. Trail operates under annual SUP.	Snowshoe trails not included in this MDP and USFS would no longer authorize after 2007, without adequate sitespecific NEPA.			
Guest Services					
Ticket Booth Locations	1	1			
Mid Mountain Restaurant	No	Yes			
Total Restaurant Seats	1,168	1,318			
Parking					
Number of Parking Areas	6	6			
Parking Capacity (cars/busses)	1,100 / 9	1,100 / 9			
Parking on US 12	Yes	Yes			

^a CCC = Comfortable Carrying Capacity

Special Use Permit Boundary Expansion

The Proposed Action would add approximately 767 acres to the current SUP area. The northwestern portion of the Hogback Basin (approximately 33 acres) and the northern portion of the White Pass IRA would remain outside of the White Pass SUP area.

New Lifts and Terrain

Proposed as a bottom-drive, fixed grip quad chairlift, Chair 6 (*Basin*) would be approximately 3,500 feet in length, have a base terminal elevation of roughly 5,520 feet, and a top terminal elevation of approximately 6,170 feet. The chairlift would be developed in Pigtail Basin, a sub-basin of Hogback Basin, adjacent to the western boundary of the existing SUP area. As proposed, the *Basin* lift would follow a similar alignment as those evaluated in the 1990 and 1998 Final EISs. However, the length of the lift in the current proposal is 1,000 to 2,000 feet shorter than the previous proposals.

The proposed top-drive, detachable quad chairlift, Chair 7 (*Hogback Express*) would be approximately 4,000 feet in length, have a base terminal elevation of roughly 5,600 feet, and a top terminal elevation of approximately 6,470 feet. The chairlift would be developed in Hogback Basin. The *Hogback Express* would follow the alignment evaluated in the 1990 Final EIS, although the lift would be approximately 1,500 feet shorter than the previous proposal.

The White Pass proposal would result in the development of approximately 70 acres of designated skiing terrain within the proposed expansion area. Constituting an approximately 32 percent increase in skiable

^b The current Special Use Permit indicates that the permit area is 710 acres. However, GIS analysis indicates that the actual SUP area is approximately 805 acres. As a result of the NEPA process, of which this FEIS is a part, the acreage has been recalculated based on the best available data.

terrain, the proposed ski trails would combine with 212 acres of existing ski trails to provide approximately 282 acres of total designated terrain at White Pass. Approximately 21 acres of tree removal in the proposed expansion area would be required to connect the existing natural openings in the parkland/forest. In total, approximately 9 percent of the proposed expansion area would actually be developed (approximately 70 acres of terrain in the 767-acres expansion area).

Skier Support Facilities

A two-story mid-mountain lodge is proposed to be located on a slight ridgeline between the *Basin* and *Hogback Express* lifts. The lodge would be sited to provide skier services for those skiing in Hogback Basin without having to return to the base area. The mid-mountain lodge would occupy a building footprint of approximately 2,000 square feet. The lodge would seat 150 and provide a limited food service. It would include separate storage tanks for potable and fireflow water. Water would be transported to the storage tanks using a snowcat. Food and other supplies necessary for the operation of the lodge would also be transported by snowcat.

Gray water would be disposed of using a recirculating gravel filter (RGF) system comprised of two septic tanks and a drainfield, which would occupy approximately one-quarter acre. The mid-mountain lodge would include composting toilets located inside the building.

Construction and Maintenance of Ski Area Facilities in the Expansion Area

All transport of equipment or materials would be limited to helicopter transport, transport over the snow, or use of low-impact equipment over the ground, with a focus on minimizing the number of entries needed (refer to Table 2.4-1). No road construction would be required.⁶ Maintenance of lifts and buildings would include access over the snow during the spring and/or the use of all-terrain vehicles during the summer and fall.

Parking and Shuttles

Parking capacity at White Pass is a combination of 1,100 passenger vehicles and 9 buses or, based on 2.3 guests per vehicle and 40 per bus, a total of 2,890 visitors. As the market continues to grow, the existing parking is expected to fill to near capacity much more often and thus necessitate some changes in operation and planning. As a result, under the Proposed Action, White Pass Company would initiate a resort-wide shuttle service to the more distant, existing parking areas to reduce the need for additional parking lot construction closer to the lodge. The shuttles would consist of two 35-passenger, open air trailers (similar to the shuttle system operated by Crystal Mountain).

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⁶ Under FSM 7705, a road is defined as "A motor vehicle travelway over 50 inches wide, unless designated and managed as a trail."

Patrol/First-Aid Facilities

The Proposed Action includes the development of ski patrol storage facilities at the top terminals of the *Basin* and *Hogback Express* lifts. These facilities would be incorporated into the lift operator buildings. The proposed mid-mountain lodge would also include room for ski patrol personnel and storage.

Utilities

The installation of the proposed facilities would necessitate the installation of utilities to service the lifts and lodge. The Proposed Action would include the burial of power and communication lines from the bottom of the existing *Paradise* chairlift to the bottom terminal of the *Basin* lift, the lodge and top terminal of the *Hogback Express* lift, as well as an upgrade to the capacity of the existing power line.

White Pass would be required to upgrade the existing sewage treatment system by equalization and/or adding a drainfield. For equalization, White Pass would install storage tanks to hold wastewater during peak periods. One or more tanks, totaling approximately 8,000 to 15,000 gallons, would be installed underground in the previously disturbed area immediately west of the existing day lodge. If an upgrade of the drainfield was required, the upgrade would be installed near the existing drainfield and parking lot.

Forest Plan Amendment

The Proposed Action includes an amendment to the 1990 GPNF Land and Resource Management Plan. The Riparian Area Standards and Guidelines for Recreation currently specify that:

"Neither newly developed recreation sites nor expansions to existing sites will be located on the riparian influence area of Riparian Areas A, B, or C. Developed and dispersed recreation sites should be located at least 100 feet from the edges of lakes, streams, ponds, wet meadows, marshes and springs" (GP Forest Plan 1990, page IV-70).

The amendment would modify the Standards and Guidelines to allow for downhill ski trails and other ski area facilities to cross Riparian Reserves and/or riparian influence areas. Riparian influence areas are those areas within 25 feet on either side of a stream or waterway, and are included within the Riparian Reserves (USDA 1990a). This amendment would remain consistent with the Riparian Reserve Standards and Guidelines in the Northwest Forest Plan (USDA and USDI 1994). Specifically, the Standards and Guidelines for Recreation Use in Riparian Reserves (Item 2. under Planning and Inventory on page IV-70 of the GPNF Forest Plan) would be amended to read:

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⁷ The Ripairian Area Standards and Guidelines in the GPNF Forest Plan are more restrictive than the Northwest Forest Plan. These Standards and Guidelines would make it impossible to expand alpine or Nordic trails within the existing SUP area or develop any new facilities in Hogback Basin, since these would likely enter the riparian influence areas.

"Neither newly developed recreation sites nor expansions to existing sites will be located on the riparian influence area of Riparian Areas A, B or C, with the exception of specified ski area developments within the existing and expanded permitted area for the White Pass Ski Area. Within this permitted area, ski trails, chairlifts, buildings, utilities, and associated infrastructure may be allowed where avoidance of these features proves infeasible. With the exception of the described ski area facilities, developed and dispersed recreation sites should be located at least 100 feet from the edges of lakes, streams, ponds..."

1.1.2.2 The Purpose of and Need for Action

This section describes the underlying purpose and need for the Proposed Action, to which the USFS is responding. It can be thought of as the objectives for the project and the reasons why action is needed. It is the difference between the existing and desired conditions.

The overall purpose of the White Pass Expansion MDP is to respond to a request by the White Pass Company to develop and implement a new MDP that is consistent with the amended Forest Plan direction and that would allow expansion of alpine skiing facilities into Hogback Basin. The current 1979 MDP was approved prior to the passage of the 1984 Washington Wilderness Act, and consequently implementation of certain portions of the 1979 MDP would be inconsistent with current management direction. In addition, current facilities have created safety concerns related to parking and pedestrian use along US 12, boundary management concerns, and undesirable skier congestion on the ski slopes.

The lands within the current SUP area for the White Pass Ski Area were allocated in the 1990 Wenatchee National Forest (WNF) Land and Resource Management Plan (USDA 1990b) to RE-1, Developed Recreation and in the GPNF Land and Resource Management Plan (USDA 1990a) to 2L, 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 White Pass Company under a SUP issued by the USFS. The SUP enables the USFS to offer public recreational experiences at the ski area that otherwise would not be possible. In order to continue to provide this experience, the future and economic viability of the ski area, as well as safety to the public, is of concern to the USFS.

The focus of the request from White Pass Company is on improving the quality of terrain necessary for increased safety and more enjoyable skiing experience through improvements to parking, access, and circulation and dispersal of skiers on the slopes; through responsiveness to the market demand for more novice and advanced intermediate terrain; by expanding facilities to accommodate the increasing number

of skiers; and by improving early season skiing. The need for action is elaborated on in the following sections.

There is a need for improved parking, pedestrian access and traffic flow on US 12.

Approximately one-half of the parking capacity at White Pass is located along US 12, a major US highway. White Pass guests who park along the highway must walk along the highway to access the ski area facilities. The mix of cars and pedestrians along the US highway creates the potential for conflicts between traffic and cars/pedestrians. The parking lots at White Pass are located to the north of US 12, while the ski area facilities are south of the highway. White Pass guests who park in the parking lots must cross the highway to access the ski area, which exacerbates the potential conflict.

White Pass currently has one portal, where guests arriving from the parking areas purchase lift tickets and access the lifts. During the morning arrival period, the base area becomes overcrowded, particularly on weekends and holidays.

There is a need for increased safety on the ski slopes.

Improved Circulation and Dispersal

The terrain at White Pass is generally characterized as low intermediate to intermediate on both the lower mountain and the upper mountain. However, the middle mountain is bisected by a steep cliff-band, which is passable to expert skiers only. As a result, the cliff-band separates the low to moderate level terrain, causing poor circulation for all but expert skiers who can negotiate the cliffband. In order to address this circulation issue, White Pass Company has developed the existing Holiday trail, which allows intermediate level and higher skiers to traverse around the cliff-band. Similarly, the existing Cascade trail provides a cat track for intermediate and higher level skiers to descend from the upper mountain to the lower mountain. The Main Street cat track provides a cat track that is mostly intermediate level, but contains an expert level pitch across the cliff band.

While these cat tracks allow non-expert skiers to negotiate the cliffline, the majority of skiers at White Pass (i.e., novice to intermediate skiers) are required to negotiate the long traverses over the cliffline, resulting in unacceptably high skier densities on these trails. In addition, expert trails such as Hourglass, Cascade Cliff and Waterfall cross over these cat tracks. At these intersections, skiers of all ability levels may be found in unacceptably high densities, particularly during the mid-day lunch time and afternoon closing time. This situation results in skier conflicts and potential safety concerns along these trails.

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

Match to Market Demand - Novice and Advanced Intermediate Terrain

As shown in Illustration 1-1, White Pass exhibits a deficit of terrain for novice and advanced intermediate skiers when compared to the normal "bell curve" exhibited by the skier market. There is sufficient novice terrain to provide for 1 percent of the White Pass capacity while the skier market reflects 15 percent as the desired percentage for novice skiers (refer to Appendix B). In addition, White Pass currently exhibits advanced intermediate terrain to support 3 percent of its capacity, yet the skier market indicates that 15 percent of the skiers demand terrain of this ability level (refer to Appendix B). This shortage of novice and advanced intermediate terrain compels skiers of this ability level to ski on terrain that is below their skill level, or to negotiate terrain that is too advanced for their skill level. Because of this, there is a need to increase the proportion of both novice and advanced intermediate terrain at White Pass.

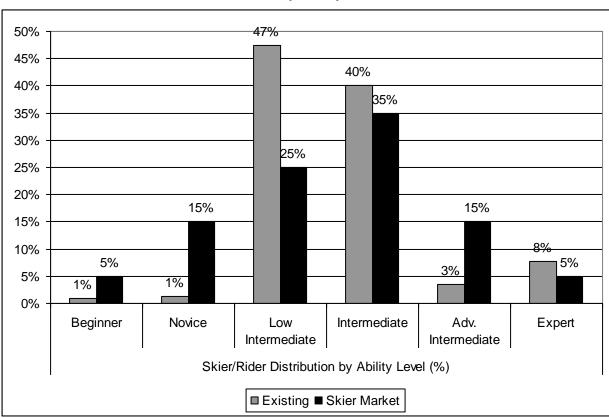


Illustration 1-1: Terrain Distribution by Ability Level at White Pass

Source: SE Group (refer to Appendix B)

Expanded Facilities to Meet Increased Demand

Prior to 1998, White Pass exhibited visitation ranging from 80,000 to 90,000 annual visits (PNSAA 2004). During the 1997-98 ski season, White Pass exhibited over 103,000 visits. Since that time, annual visitation has been increasing, as demonstrated by the ten-year average of 108,620 annual visits and a five-year average of 109,782 visits (PNSAA 2006a). Illustration 1-2 presents the growth in annual visitation at White Pass between the 1994-95 season and the 2005-06 season. The steady growth in demand for alpine skiing at White Pass has resulted in larger crowds, longer lift line wait times, and more crowded slope conditions. With an existing CCC of 2,670, White Pass has observed an increase in the number of days at or near capacity, as is shown in Illustration 1-3. In response to the growth in business, during the summer of 2003, White Pass expanded the capacity of the day lodge by 180 seats in an effort to meet the current demand.

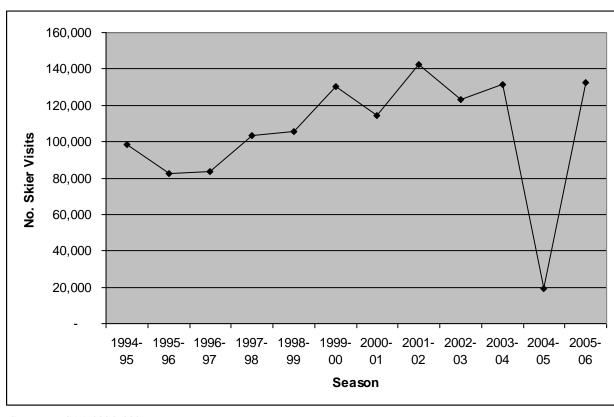


Illustration 1-2: Annual Skier Visitation at White Pass (1994 – 2006)

Source: PNSAA 2004; 2006

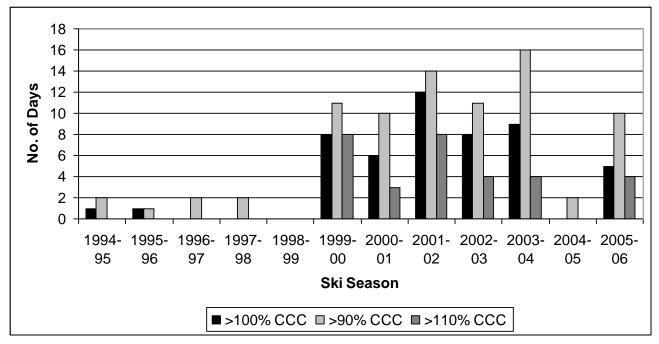


Illustration 1-3: Near-Capacity Visitation at White Pass (1994 – 2006)

White Pass Company 2006

With national visitation on the rise after a relatively flat period during the 1990s, and with the Pacific Northwest meeting or exceeding visitation records in the early 2000s (PNSAA 2004; NSAA 2004; NSAA 2006), continued growth in demand for skiing at White Pass is expected. Because the current ski area facilities have become overcrowded on peak days (i.e., weekends and holidays), White Pass has a need for additional facilities to better serve the current and anticipated growth in demand.

Improved Early Season Skiing

From mid-November through mid-January, snow cover on the key novice to advanced terrain at White Pass is often limited, particularly below the 5,000-foot elevation during normal conditions and at all elevations in low snow years. Egress capacity from the base of the *Paradise* chairlift can be restricted by low snowfall due to the lower elevation of the Main Street egress. The inability to provide adequate, skiable access to base area facilities during the early portion of the ski season limits the ability of White Pass to open during times when the upper mountain has sufficient snow, typically by Thanksgiving. When the lower terrain does open, snow cover remains comparatively low, which reduces the recreational experience of the White Pass skier.

There is a need for full integration of current Nordic and snowshoe operations into the MDP and SUP.

In 1984, the White Pass SUP was amended to include Nordic operations on a conceptual trail system, defined on a hand-drawn map. In 1999, the Zig Zag Nordic trail was constructed, but not included in the SUP. The field-fit trails have been located with Global Positioning System (GPS) equipment and the current SUP has been updated to include the location of all previously-authorized Nordic trails (refer to Figure 1-3). The current SUP and Master Plan do not include the Zig Zag trail.⁸

Beginning in the year 2000, White Pass has offered a system of snowshoe trails in the vicinity of the Nordic trail system. The snowshoe trails consist of tree markers with no disturbance to vegetation or soils. The current SUP and Master Plan do not include the snowshoe trail system.⁹

1.2 LAWS, REGULATIONS, AND MANAGEMENT DIRECTION

In evaluating and deciding upon the White Pass Expansion proposal, the USFS is required to ensure that the proposal is consistent with applicable laws, regulations and Forest Plan management direction for the project area. A variety of laws and regulations address the agency's cooperation with private industry to provide needed recreational facilities, including downhill ski areas, on suitable NFSL. The major laws include the Organic Administrative Act of 1897, the Weeks Act of 1911, the Multiple-Use Sustained Yield Act of 1960, the Forest and Rangeland Renewable Resources Planning Act of 1974, the National Forest Management Act of 1976, and the National Forest Ski Area Permit Act of 1986. The USFS is authorized to provide recreational opportunities on NFS lands funded through private enterprise (16 USC 497).

With two exceptions, the National Forest Ski Area Permit Act of 1986 (16 USC 497) is the exclusive authority to authorize alpine and Nordic ski areas to occupy and conduct activities on NFSL (USFS Manual 2721.61c). Under the Act, a ski area is defined as:

"A site and attendant facilities expressly developed to accommodate alpine or Nordic skiing and from which the preponderance of revenue is generated by the sale of lift tickets and fees for ski rentals, for skiing instruction and trail passes for the use of permittee-maintained ski trails. A ski area may also include ancillary facilities directly related to the operation and support of skiing activities."

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. Refer to Chapter II, Section 2.2.2.6 for further discussion.

⁸ The DEIS describes that under all Action Alternatives, the continued operation of the existing *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. Refer to Chapter II, Section 2.2.2.6 for further discussion.

⁹ The DEIS describes that under all Action Alternatives, the continued operation of the existing snowshoe trails

Skiing is an important component of the recreational opportunities offered on NFSL. USFS policy also encourages year-round recreation opportunities at ski areas to serve the public, provide economic stability to local communities, and promote economic commercial ventures. *The Recreation Agenda* (USDA 2000a) details the USFS role in increasing outdoor recreation on NFSL through partnerships with other public and private entities (e.g., state agencies, the ski industry, and non-profit organizations).

1.2.1 Tiering to Previous NEPA Analyses

This EIS tiers to previous higher level NEPA analyses and decisions, which have provided direction for management of lands within the GPNF and OWNF.

1.2.1.1 1990 Land and Resource Management Plan FEIS for Wenatchee National Forest

In 1990, the Land and Resource Management Plan FEIS for the WNF (USDA 1990e) was published. This document presented the results of an environmental analysis of alternative strategies for future management of the land and resources of the WNF. In this analysis, the long-term estimates of Forest resources and environmental conditions were considered, and the selected alternative was developed into the Land and Resource Management Plan for the WNF (USDA 1990b).

1.2.1.2 1990 Land and Resource Management Plan FEIS for GPNF

The FEIS for the GPNF Land and Resource Management Plan was published in 1990 (USDA 1990f). This document evaluated alternatives for the management of NFSL and resources in the Forest, including the inventory of Hogback Basin as part of the White Pass IRA. The selected alternative resulted in the current Land and Resource Management Plan for the GPNF (USDA 1990a).

1.2.1.3 1994 FSEIS and Record of Decision for Amendments to USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl

In 1994, the Record of Decision for Amendments to USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl (USDA and USDI 1994), was published (i.e., the Northwest Forest Plan). The Northwest Forest Plan provides oversight for all National Forest Lands in Washington, Oregon, and Northern California within the range of the Northern Spotted Owl and amended all the Forest Plans to include statutory basis for ecosystem management, land allocations, standards and guidelines, and applications of the decision. The key elements of the Northwest Forest Plan are the system of reserves, the Aquatic Conservation Strategy, and various standards and guidelines affecting each of seven different land allocations.

1.2.1.4 2004 FSEIS and Record of Decision Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests within the Range of the Northern Spotted Owl

In 2004, the Record of Decision Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests within the Range of the Northern Spotted Owl (USDA and USDI 2004a) was published. This ROD clarified the proper spatial and temporal scale for evaluating progress towards attainment of Aquatic Conservation Strategy (ACS) objectives by stating that fifth-field watershed and larger scales, as well as long-term time frames, are appropriate for evaluating progress towards ACS attainment. This ROD also clarified that a project-level finding of consistency with ACS objectives is neither possible nor required. Instead, project-level impacts within Riparian Reserves are to be evaluated in terms of the effect of the project on the important physical and biological components (i.e., the existing condition) of the fifth field watershed in which the project occurs. The emphasis is on the maintenance or restoration of the fifth field watershed over the long-term.

1.2.1.5 2004 FSEIS and Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl¹⁰

In 2004, the Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl (USDA and USDI 2004b) was published. This ROD amends the Northwest Forest Plan by removing the Survey and Manage Mitigation Measure Standards and Guidelines from the Northwest Forest Plan.

This ROD determined that conservation of rare and little known species on National Forest System lands would rely on other elements of the NWFP and the USFS Sensitive Species Policies. The ROD also determined that 152 of the 296 Survey and Manage species are eligible for inclusion in Special Status Species Programs (including the Sensitive Species Program). With respect to surveys already completed

On August 1, 2005, the United States District Court, Western District of Washington issued a decision in response to a lawsuit regarding the 2004 Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl. This decision found three deficiencies with the 2004 ROD and directed the USFS to follow the guidelines in the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines. In response to the 2005 decision, the USFS has prepared a Draft Supplemental Environmental Impact Statement to correct the deficiencies identified by the court in the 2004 ROD. At the time of this document, a DSEIS has been prepared and released for public comment. It is expected that publication of the ROD will occur after the White Pass Expansion Proposal ROD is released. Therefore, this FEIS includes an analysis of Survey and Manage species per the 2001 ROD requirements.

at the time of issuance of the 2004 ROD, it specified that no additional survey work was required for projects that fully complied with the former Survey and Manage standards and guidelines.

On January 9, 2006, the 2004 ROD to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in USFS and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl (2004 ROD) was vacated and management direction for Survey and Manage species was reinstated pursuant to the 2001 Record of Decision for management of these species.

1.2.1.6 2001 FSEIS and Record of Decision for Amendments to Survey and Manage Protection Buffer, and other Mitigation Measures Standards and Guidelines

In 2001 the Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (USDA and USDI 2001) was published. This ROD amended the Northwest Forest Plan to retain the major elements of Survey and Manage, but restructured them for clarity. The ROD also described criteria and processes for changing species assignments in the future, and removed 72 species in all or part of their range because new information indicated they were secure or didn't meet the criteria for Survey and Manage species.

1.2.1.7 2005 Record of Decision for Preventing and Managing Invasive Plants – Pacific Northwest Region – Invasive Plant Program.

This decision adds invasive plant management direction to all national Forest land and Resource Management Plans in the Pacific Northwest Region. The management direction includes invasive plant prevention, treatment, and restoration standards and is intended to help achieve stated desired future conditions, goals, and objectives associated with invasive species management (refer to USFS 2005; Standards 1,2,3,6,7,12 and 13). The management direction is expected to result in decreased rates of spread of invasive plants.

1.2.2 Forest Plan Management Direction

The White Pass Ski Area SUP boundary lies within two National Forests: the Wenatchee portion of the OWNF and the GPNF. While the majority of the SUP area is within the GPNF, the OWNF administers the permit. However, differing land allocations between the GPNF and the WNF plans must be addressed in this EIS in order to ensure that all standards and guidelines are met for the Proposed Action and alternatives evaluated in this EIS.

1.2.2.1 Wenatchee National Forest Land and Resource Management Plan

The 1990 WNF Land and Resource Management Plan (USDA 1990b) guides natural resource management activities and establishes management standards and guidelines for the Wenatchee portion of the OWNF.

The eastern portion of the White Pass SUP area contains a mix of land allocations under the Wenatchee Forest Plan, as amended (USDA 1990b; USDA and USDI 1994) (refer to Figure 1-2 and Figure 3-43). These land allocations and pertinent management direction are listed and described below. For more detailed descriptions of the standards, and guidelines associated with each allocation, refer to the Forest Plan, as amended.

- Administratively Withdrawn/RE-1 Developed Recreation
- Riparian Reserves

1.2.2.2 Gifford Pinchot National Forest Land and Resource Management Plan

The GPNF Land and Resource Management Plan (USDA 1990a) acts as a guide for all natural resource management activities and establishes management Standards/Guidelines for the GPNF.

The western portion of the White Pass SUP area and proposed expansion area also contains a mix of land allocations under the Gifford Pinchot Forest Plan, as Amended (USDA 1990a; USDA and USDI 1994). These land allocations and pertinent management direction are listed and described below. For more detailed descriptions of the standards and guidelines associated with each allocation, refer to the Forest Plan, as amended.

- Administratively Withdrawn/2L Developed Recreation
- Riparian Reserves

The western portion of the existing SUP area lies partially within the Clear Fork Cowlitz River Watershed, a Tier II Key Watershed. Under the Forest Plan, as amended, Key Watersheds overlay the land allocations, and are one of the four components of the ACS (USDA and USDI 1994) (refer to Section 1.2.2.5).

1.2.2.3 Administratively Withdrawn Areas (AWA)

As described in the Northwest Forest Plan (USDA and USDI 1994), administratively withdrawn lands are those identified in current forest plans and include recreation and visual areas, backcountry, and other areas where management emphasis precludes timber harvest. Only those existing forest plan standards and guidelines that are in conflict with the standards and guidelines of those in the AWA are potentially replaced. In those cases where a conflict does occur and the existing forest plan direction is more restrictive or provides greater benefits to late-successional forest-related species, the existing plan standards and guidelines would continue. For the purposes of this FEIS, the Administratively Withdrawn allocation includes the existing White Pass SUP boundary (805 acres, allocated to RE-1 and 2L), and the entire White Pass Inventoried Roadless Area in Hogback Basin, including the 767 acre proposed expansion area and 330 acres to the north and northwest.

Wenatchee National Forest RE-1 (Developed Recreation)

Under the Wenatchee Forest Plan, the goal of RE-1 (Developed Recreation) is to:

"Provide Developed Recreation in an Urban to Semi-primitive Recreation Opportunity Spectrum (ROS) setting" (WNF Forest Plan at IV-159).

The RE-1 management prescription is described as follows:

"This prescription is applicable to existing and potential developed recreation sites within the full spectrum of ROS settings. The areas allocated to this allocation include only the specific site on which development takes place. This prescription is also applicable to existing and potential Alpine (downhill) ski areas including trails, tows or lift facilities, shelters, lodges, services and parking lots. Associated developments such as skating rinks, toboggan trails, etc. may also be present. Potential sites allocated to this prescription will be managed to protect or enhance the future values and conditions desired" (WNF Forest Plan at IV-159).

Gifford Pinchot National Forest 2L (Developed Recreation)

Under the Gifford Pinchot Forest Plan, the goal of 2L is:

"Readily accessible, appropriately-designed facilities will provide for concentrated visitation by people seeking a convenient recreational experience" (GP Forest Plan at IV-101).

The lands where Management Prescription 2L is applied are as follows:

"Developed recreation sites are usually close to water bodies, berry fields, and other areas of scenic or special interest. Except for winter recreation areas, they are usually located on relatively flat land with slopes of less than 10 percent. Soils and vegetation must be able to absorb heavy use. Camp and picnic grounds, ski areas, recreation residences, viewpoints, boat launches, and other facilities may be accommodated." (GP Forest Plan at IV-101).

1.2.2.4 Riparian Reserves

Riparian Reserves are lands along all streams, wetlands, ponds, lakes, and unstable and potentially unstable areas (USDA and USDI 1994), as further defined below. Riparian Reserves are one of the four components of the Aquatic Conservation Strategy. The Riparian Reserve allocation includes those portions of watersheds where riparian-dependent resources receive the primary emphasis. Specifically:

"Riparian Reserves include those portions of a watershed directly coupled to streams and rivers, that is, the portions of a watershed required for maintaining hydrologic, geomorphic, and ecologic processes that directly affect standing and flowing water bodies such as lakes and ponds, wetlands, streams, stream processes, and fish habitats" (USDA and USDI 1994, B12-13).

Generally, activities that retard or prevent attainment of the ACS objectives are either prohibited or regulated within the Riparian Reserves.

The widths of the Riparian Reserves for the streams, wetlands, and lakes within the White Pass Study Area were determined by consulting the *Northwest Forest Plan* (USDA and USDI 1994), the GPNF *Land and Resource Management Plan – Amendment 11* (USDA and USDI 1995a), the *Clear Fork Watershed Assessment* (USDA 1998a), and the *Upper Tieton Watershed Assessment* (USDA 1998b). The Riparian Reserve widths assigned to the streams, wetlands, and lakes in the White Pass Study Area are presented in Table 3.3-4 (refer to Section 3.3 – Watershed Resources, for a detailed discussion of Riparian Reserve widths).

1.2.2.5 Tier II Key Watershed

According to the Northwest Forest Plan (USDA and USDI 1994), all federally-administered lands within the range of the northern spotted owl are designated by land allocations, and are overlaid by one of the three watershed categories: Tier 1 Key Watersheds, Tier II Key Watersheds, or non-Key Watersheds. Key Watersheds are one of the four components of the Aquatic Conservation Strategy. Key Watersheds are "a system of large refugia comprising watersheds that are crucial to at-risk fish species and stocks and provide high water quality" (USDA and USDI 1994, B-12). Key Watersheds are divided into two categories: Tier 1 Key Watersheds directly contribute to conservation of at-risk anadromous salmonids, bull trout, and resident fish; Tier II Key Watersheds may not contain at-risk fish stocks, but they are important sources of high quality water. "Key Watersheds with high quality conditions will serve as anchors for the potential recovery of depressed stocks. Those of lower quality habitat have a high potential for restoration and will become future sources of high quality habitat with the implementation of a comprehensive restoration program" (USDA and USDI 1994, B-18). The Hogback Basin area is situated within the Clear Fork Watershed, which has been identified as a Tier II Key Watershed (refer to Section 3.3 – Watershed Resources).

1.2.3 Selected Forest Plan Management Direction

Within the context of the 1994 amendments to the Forest Plans (i.e., Administratively Withdrawn Areas, Tier II Key Watershed, and Riparian Reserve), the Forest Plans provide resource-specific management direction for the NFSL within the ski area. Selected direction addressing Riparian Reserves and

Developed Recreation, particularly as applicable to proposed development at White Pass, is described in Appendix A.

1.2.4 Visual Resources

Visual Resources Management System

In 1974, the USFS prepared a Visual Resources Management System (VMS) (USFS 1974) to determine Visual Quality Objectives (VQOs) for each management area allocated under the Forest Plans. VQOs help define how the landscape would be managed and provide guidelines for acceptable modifications within an area. In the WNF and GPNF Plans, White Pass is allocated to RE-1 and 2L, respectively. These allocations prescribe VQOs of foreground retention to the area under consideration for ski area expansion at White Pass.¹¹

Scenery Management System

In 1995 an updated landscape management system - the Scenery Management System (SMS) – was introduced by the USFS as a response to substantial advances in research and technology, as well as a significant increase in demand for high quality scenery. The SMS was developed to eventually replace the VMS; its principles and premises are based not only on research findings but on over 20 years experience with implementing the VMS. In October 1996, the manual, *Landscape Aesthetics: a Handbook for Scenery Management* (USDA 1995) was released to more effectively and efficiently integrate scenic values and landscape aesthetics in Forest Plans, and incorporate human values into ecosystem management. National direction has been given to incorporate, as applicable, the methods and philosophy of the SMS with each new planning project. The Handbook was accompanied by direction from the USFS's Washington Office to "begin using the concepts and terms contained in this Handbook as you work on new projects or initiate forest plan revisions" (USDA 1995). Subsequent correspondence further directed the USFS to utilize and adopt the SMS and its concepts (refer to USDA 1996, 1997, 1998e).

Full adoption of the SMS is to occur as each National Forest revises its land and resource management plan. Direction for scenery management would be contained within forest plan goals, objectives, standards, and guidelines. For Forests not currently undergoing the forest plan revision process, or for those requiring extensive time for revision, application of the SMS would occur at the sub-forest or project level.

The Gifford Pinchot and Wenatchee Forest Plans predate the 1995 SMS and therefore the SMS has not been formally integrated into management direction in these plans. Until the Forest Plans are revised,

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¹¹ *Retention* permits landscape modifications that are not visually evident to the casual Forest visitor, and which may only repeat natural characteristics of the landscape (line, form, texture, color). Changes in their qualities of size, amount, intensity, direction, pattern, etc. should not be evident.

both the VMS and SMS will be utilized for inventorying, evaluating, and managing scenic resources on the Forest.¹²

1.2.5 The Recreation Agenda

The primary goal of *The Recreation Agenda* (USDA 2000a) is to provide quality recreation opportunities on NFSL in an ecologically sustainable manner. One of the purposes of this initiative is to promote local economic diversity by encouraging travel and tourism opportunities in collaboration with professionals in the private sector. Ski areas operated by the private sector provide a wide range of winter and summer outdoor recreation opportunities that can contribute to shaping local economies.

1.2.6 National Forest Ski Area Permit Act

The USFS may provide recreational opportunities on NFSL funded through private enterprise. Special Use Permits are to be administered for privately operated recreation uses that serve the public, promote public health and safety, and protect the environment (16 USC 497). The *National Forest Ski Area Permit Act* (16 USC 497b; USFS Manual 2700-92-13) authorizes the issuance of ski area permits by the USFS for "the use and occupancy of suitable NFSL for Nordic and alpine skiing operations and purposes." The act further states that a SUP "shall encompass such acreage as the USFS determines sufficient and appropriate to accommodate the permittee's needs for ski operations and appropriate ancillary facilities."

1.2.7 <u>National Trails System Act of 1968 (Pacific Crest National Scenic Trail)</u>

The Pacific Crest National Scenic Trail (PCNST) is designated as part of the National Trails System. Section 7(a) of the National Trails System Act of 1968 established the relationship between the trail and the management of adjacent land:

"Management and development of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for that specific area in order to ensure continued benefits from the land" (National Trails System Act – P.L. 90-543).

The selected management alternative in the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail* (USDA 1982) clarifies the relationship between the trail and management of adjacent lands and is consistent with Section 7(a) of the National Trails System Act of 1968. Specifically pertaining to National Forest lands, the selected alternative states:

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¹² Because the Forest Plan revision process for WNF and GPNF has not yet been completed as of the publication of this FEIS, revised Forest and Management Area standards and guidelines utilizing the SMS have not been formally established. However, correspondence from various sources have directed the USFS to utilize and adopt the SMS and its concepts (refer to USDA, 1995, USDA, 1996; USDA, 1997 and USDA, 1998e). Consequently, the visual analysis for this analysis utilizes standards and guidelines of both the old VMS and new SMS to describe the existing landscape and evaluate the range of alternatives' effects on the landscape.

"The entire landscape and its scenic quality are important to the purposes of the Pacific Crest National Scenic Trail. Viewing and understanding resource management and other cultural activities are considered to be part of the normal character of the trail. The management of various resources will give due consideration to the existence of the trail and trail users within the multiple-use concept" (USDA 1982, 17).

Management guidelines for public lands adjacent to the PCNST are also discussed in the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail*. The management plan specifically states:

"Within federal lands outside National Parks and Wilderness (57 percent of the trail) the trail must co-exist in harmony with all other resource uses and activities of the land as determined through the land management planning process. The trail will cross a mosaic of areas differing in primary management emphasis. This could be grazing, key wildlife habitat, special interest such as scenic or geologic, *developed recreation*, unroaded recreation, research, natural, or intensive timber management. Viewing and understanding this array of resources and management is one of the primary recreation opportunities to be made available over these portions of trail. The agencies should look at this as an opportunity to explain the multiple-use concept...some resource activities may occur immediately adjacent to or across the trail, the agencies will protect the integrity of the trail proper by modifying management practices as needed. Timely construction of and signing of temporary locations to avoid other resource activities...will do much to mitigate any negative feelings" (USDA 1982, 22; italics added).

Other management direction in the Act applicable to the PCNST in this area is the statement that:

"In the event of conflicts between the trail (PCNST) or its use, and the legislated purpose or planned objectives for these areas (i.e., developed recreation), the legislated purposes or area objectives will prevail" (USDA 1982, 22).

1.2.8 Other Analysis Incorporated into the FEIS

This Final EIS also refers to White Pass planning documents and numerous technical studies. Separate documents are available for review at the Naches Ranger District. Information from these documents is incorporated by reference into this Final EIS as it applies to the Proposed Action and alternatives. A brief description of key documents is provided below.

1.2.8.1 Resource Analyses and Assessments Incorporated by Reference

Clear Fork Watershed Analysis

The Clear Fork Watershed Analysis (USDA 1998a) is designed to describe the biophysical processes and interactions that operate on the landscape at the watershed scale. As a component of the ACS, the purpose of the analysis is to provide a scientific understanding of the ecological processes that can be used to guide the future management activities within the Clear Fork Cowlitz watershed. Since the Clear Fork Cowlitz is a Key Watershed, this analysis is required before initiating resource management activities, such as the ski area expansion, within the watershed (USDA and USDI 1994, B-20).

Upper Tieton Watershed Analysis

The Upper Tieton Watershed Analysis (USDA 1998b) was also developed to meet the direction of the Northwest Forest Plan. The analysis addresses accelerating concerns regarding the decline of fisheries resources and protection and improvement of aquatic and riparian ecosystems in the Upper Tieton watershed.

Executive Order 13112 and Region 6 Policy for Invasive Plant Prevention

Executive Order 13112 (1999) and Regional policy (USFS 2004a) directs that federal agencies identify those actions that may affect the status of invasive species, and not authorize, fund, or carry out actions likely to cause or promote the introduction or spread of invasive species. As part of this, the USFS is to consider how its activities and those of its permittees, cooperators, and public uses can potentially cause or promote the introduction and spread of invasive plants. Where potential risks are identified, the USFS is required to take feasible and prudent action to minimize those risks.

In addition, each National Forest is to develop local Invasive Plant Prevention Practices. On the OWNF, this prevention strategy is outlined in *Okanogan and Wenatchee National Forests Weed Management and Prevention Strategy and Best Management Practices* (USFS 2002b). On the GPNF, the prevention strategy is outlined in the GPNF Forest Plan (USDA 1990a). The Regional policy also requires that environmental analysis for ground disturbing activities assess invasive plant populations in the project areas; analyze the potential risks of the activities to introduce, favor establishment, or spread invasive plants; and incorporate prevention practices and follow-up inspections into the project design if needed.

1.3 DECISION FRAMEWORK

The USFS decision will be documented in a ROD signed by the Forest Supervisors of the Okanogan-Wenatchee and GPNFs, who may elect to accept and authorize the *Proposed Action* or alternative actions analyzed in this EIS, or adopt the No Action Alternative. The Forest Supervisors will decide the elements of the selected alternative to be permitted for development. The Forest Supervisors could approve all, part, or none of each element of the Proposed Action or 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 would not be revisited once it is made, unless an approved project is substantially changed, as determined by the Deciding Officer.

1.4 SCOPE OF THE PROPOSED ACTION

This Final EIS analyzes the effects of adopting and implementing a new MDP, for new and expanded winter facilities at White Pass, as described in this chapter. Five alternative plans for further development of the White Pass Ski Area are analyzed, including a No Action Alternative. If an Action Alternative is selected, it would serve as the basis for a new MDP for the White Pass Company, to be approved by the USFS prior to implementation of any actions analyzed in this FEIS. The MDP will guide development of the ski resort for the next 10 to 15 years.

The scope of this Final EIS is limited to the project components analyzed in the range of alternatives. The geographic area within which the project components would be located is defined as the Project Area. However, the scope of the environmental analysis (White Pass Study Area and/or Analysis Area) varies according to the resource topic assessed.

This Final EIS is not a decision document. Its primary purpose is to disclose the environmental consequences that could occur through implementation of the alternatives under consideration. As previously described, a ROD would subsequently document the USFS' decision of authorization. In addition, various local, state, and other federal decisions and/or permits are also required prior to implementation of any actions (refer to Section 1.7). Therefore, the ROD is one of several decisions required to implement any actions.

Specific functions of the Final EIS include:

- Provide site-specific environmental analysis for those activities and facilities proposed in the range of alternatives;
- Describe, analyze, and disclose the various biological, physical, social, and economic impacts that proposed activities and facilities would generate both on and off NFS lands;
- Identify, where possible, the indirect and cumulative effects of the range of alternatives;
- Indicate mitigating measures which may be used to avoid or reduce impacts; and
- Provide a comprehensive, reliable document for review and evaluation by interested public agencies, groups, and individuals and for use by decision-makers as a basis for a decision.

1.5 SCOPING, SIGNIFICANT ISSUES, AND PUBLIC PARTICIPATION

The following sections present a description of the scoping process for the White Pass Expansion Proposal, a summary of the public participation efforts, and the significant issues used to focus the scope of the EIS. Section 1.5.1 outlines the scoping and public participation process to date and Section 1.6 presents a discussion of government consultation, including Tribal Government Consultation, and interagency coordination.

1.5.1 Scoping Process and Public Participation

Scoping is an integral part of the environmental analysis. Scoping includes refining the Proposed Action, identifying the preliminary issues and inviting the participation of interested and affected persons. The results of scoping are used to 1) refine the issues; and 2) explore alternatives to the Proposed Action and their potential effects.

The Draft EIS was developed with extensive public participation. A revised Notice of Intent was published in the Federal Register on October 21, 2002. On November 10, 2003 the USFS sent a scoping letter to approximately 800 people on the USFS existing mailing lists. People who had participated in previous analyses for the ski area and those requesting to be included in the scoping process provided the basis for this list. News releases were published at this time as well. Public meetings were held at the Naches Ranger Station on November 20, 2003, the Morton Community Center on November 25, 2003, and in Packwood on December 10, 2003. These meetings had four purposes: 1) provide information about the White Pass Expansion Proposal to the public, 2) brief the public on the process used to develop the White Pass Expansion Proposal, 3) allow the public to ask questions to the USFS regarding the White Pass Expansion Proposal and the environmental analysis process, and 4) to gather public input for issues and alternative development. At the close of the scoping period on January 5, 2004, 746 written responses had been received.

On December 23, 2004, the Draft EIS was released to the public. A total of 52 hardcopies and 43 CDs were mailed to the public and the DEIS was posted on the USFS website. The comment period closed on February 22, 2004. In response to the DEIS, a total of 358 comment letters were received (refer to Volume 3 – Response to Comments).

1.5.1.1 Public Scoping and Interdisciplinary Team Issues

The scoping issues in Table 1-2 are based upon comments received from the public and agencies during the scoping process. Concurrent with public comments on the scoping mailer, the IDT developed internal issues. The issues and suggested alternatives identified in these comments have been condensed and consolidated, with a focus on those that address potential effects of implementing the Proposed Action. Table 1-2 also provides the reader with the location of relevant discussion and analysis in the Final EIS.

Table 1-2: Public Scoping/IDT Issues

Resource Area	Statement	Public Issue	IDT Issue	Location in FEIS
Watershed Resources	The Proposed Action will potentially fail to meet the Aquatic Conservation Strategy Objectives.	X	X	Issue carried forward - refer to Section 3.7 – Aquatic Conservation Strategy.
	The Proposed Action should demonstrate compliance with the Gifford Pinchot LRMP Riparian Influence Area Standards and Guidelines.		X	Issue carried into Significant Issues – refer to Section 3.3 – Watershed Resources and Section 3.14 – Inventoried Roadless Areas in the FEIS
	The Proposed Action should disclose and analyze all watershed resources that are designated as Riparian Reserves and demonstrate how these areas will be managed.		X	Issue carried into Significant Issues – refer to Section 3.3 – Watershed Resource.
	Clearing and grading associated with the Proposed Action will potentially influence watershed drainage functions, including water yield and water quality.	X	X	Issue carried into Significant Issues – refer to Section 3.3 – Watershed Resource.
	The DEIS should disclose impacts to wetland, stream and floodplain characteristics.	X	X	Issue carried into Significant Issues – refer to Section 3.3 – Watershed Resource.
Geology/Soils	The Proposed Action will potentially result in impacts to soils through the use of heavy machinery, tree removal, grading, and the use of explosives.	X	X	Issue carried into Significant Issues – refer to Section 3.2 – Geology and Soils.
	The DEIS should disclose impacts to soils through compaction from the operation of machinery without roads.	X	X	Issue carried into Significant Issues – refer to Section 3.2 – Geology and Soils.
Visual	The Proposed Action, through construction of chair lift terminals, towers, and lodge facilities, will impact the views to persons utilizing the Pacific Crest National Scenic Trail.	X	X	Issue carried into Significant Issues – refer to Section 3.15 – Visual Resources.
Wildlife	The DEIS should disclose any impacts to all threatened, endangered, sensitive, management indicator, and survey and manage wildlife species which may be present within the SUP area.	X	X	Issue carried forward as law, regulation, or policy. Refer to Section 3.6 – Wildlife.

Table 1-2: Public Scoping/IDT Issues

Resource Area	Statement	Public Issue	IDT Issue	Location in FEIS
Vegetation	The DEIS should disclose any impacts to all threatened, endangered, sensitive, management indicator, and survey and manage vegetation species which may be present within the SUP area.	Х	X	Issue carried forward as law, regulation, or policy. Refer to Section 3.5 – Vegetation.
Heritage	The DEIS should disclose potential effects to identified or as yet unidentified cultural properties, such as the historic Cascade Crest Trail.		X	Issue carried into Significant Issues – refer to Section 3.9 – Heritage Resources.
	The DEIS should disclose potential effects to Yakama spiritual values associated with high points along Hogback Ridge.	X	X	Issue carried into Significant Issues – refer to Section 3.9 – Heritage Resources.
	The Proposed Action has the potential to affect other tribal values associated with White Pass.	X	X	Issue carried into Significant Issues – refer to Section 3.9 – Heritage Resources.
Recreation	The Proposed Action will potentially result in alleviation of dangerously overcrowded conditions.	Х	X	Issue carried into Significant Issues – refer to Section 3.11 – Recreation.
	The Proposed Action will potentially result in the loss of backcountry skiing opportunities.	X	X	Issue carried into Significant Issues – refer to Section 3.11 – Recreation.
	The DEIS should disclose the effects to Pacific Crest Trail users, including the break in experience due to a lift crossing the trail.	X	X	Issue carried into Significant Issues – refer to Section 3.11 – Recreation.
	The Proposed Action will provide easier access to areas with high avalanche potential.	X	X	Issue carried into Significant Issues – refer to Section 3.11 – Recreation.
	The DEIS should consider the impacts of the Proposed Action on the wilderness character of the adjacent Goat Rocks Wilderness Area	X	X	Issue carried into Significant Issues – refer to Section 3.11 - Recreation.
	The Proposed Action has the potential to increase the amount of low-intermediate terrain, which White Pass already has in surplus.		X	Issue carried into Significant Issues – refer to Section 3.11 – Recreation.
Fisheries	The DEIS should disclose any impacts to all threatened, endangered, sensitive, management indicator, and survey and manage aquatic species which may be present within the SUP area.		X	Issue carried forward as law, regulation, or policy. Refer to Section 3.4 – Fisheries.

Table 1-2: Public Scoping/IDT Issues

Resource Area	Statement	Public Issue	IDT Issue	Location in FEIS
Roadless	The DEIS should state the current status of the Roadless Area Conservation Rule and demonstrate that the Proposed Action complies with the guidelines outlined in that rule.	X	X	Issue carried into Significant Issues – refer to Section 3.14- Inventoried Roadless Area and Section 3.15 – Visual Resources.
	The DEIS should disclose the effects to Inventoried Roadless Areas, including the potential loss of wilderness potential.	X	X	Issue carried into Significant Issues – refer to Section 3.14- Inventoried Roadless Area and Section 3.15 – Visual Resources.
Socio- Economics	The DEIS should address all impacts to the surrounding communities that would result from implementation of the Proposed Action.	X		Issue carried into Significant Issues – refer to Section 3.10 – Social and Economic Factors.
	The DEIS should detail all costs of the analysis of the Proposed Action to the taxpayer.	X		USFS preparation cost information is not required under NEPA Overall costs are tabulated through the USFS accounting system on file at the Supervisor's office.
Air Quality	The DEIS should disclose impacts to air quality, including attainment of air quality standards.	Х	X	Issue carried forward as law, regulation, or policy. Refer to Section 3.8 – Air Quality.
Noise	The Proposed Action has the potential to increase noise in the White Pass vicinity	X	X	Issue carried forward as law, regulation, or policy. Refer to Section 3.16 – Noise.
Transportation	The Proposed Action has the potential to exceed the parking capacity at White Pass and to exacerbate the potential for conflicts between pedestrians and highway traffic on US 12.	X	X	Issue carried forward into Significant Issues – refer to Section 3.12 – Transportation.

1.5.2 <u>Significant Issues</u>

NEPA requires federal agencies to focus analysis and documentation on the significant issues related to a Proposed Action. The significant issues serve primarily as the basis for developing and comparing alternatives, prescribing Mitigation Measures, and analyzing effects. They were developed considering the comments of interested and affected agencies, Tribes, organizations, individuals, field reconnaissance, agency resource maps and Interdisciplinary Team review of the proposal. The significant issues were

approved by the responsible officials. Note that while this Final EIS focuses on these significant issues, all issues identified through scoping were considered in the various resource analyses.

The following issue statements include some background discussion, and the indicators, or key measures that will be used in comparing how the alternatives address each issue.

1.5.2.1 Terrain Distribution

<u>Issue</u>: The terrain in the proposed expansion area includes low-intermediate level terrain to advanced-intermediate level terrain, while low-intermediate terrain is already in abundance at White Pass. The proposed development has the potential to increase the amount of low-intermediate terrain, which White Pass already has in surplus. The increase in low intermediate terrain would not be a desired objective, however the lift and trail alignments that are required to access the Hogback Basin area (advanced intermediate terrain) results in increased low intermediate terrain.

<u>Background</u>: The majority of terrain at White Pass is low-intermediate and intermediate (refer to Illustration 1-1). The development of the *Basin* chairlift has the potential to increase the acreage of low-intermediate terrain and the Hogback Express chairlift has the potential to increase advanced-intermediate terrain.

Indicators: Narrative/graphic description of terrain distribution by ability level.

1.5.2.2 Soil Compaction

<u>Issue</u>: The operation of heavy machinery for the construction of chairlifts, trails, the lodge, and associated infrastructure has the potential to compact soils, particularly with no roads proposed for equipment travelways.

<u>Background</u>: The soils in the proposed expansion area are in a natural condition, with no evidence of man-induced disturbance. Soil productivity in Pigtail and Hogback Basins is currently limited by extensive snowpack, which limits the ability of soils to produce vegetation. By operating machinery, such as trackhoes and bulldozers over the unprotected soil, soils could become compacted. Soil compaction would further reduce soil productivity and potentially increase runoff.

<u>Indicators</u>: Description of the effects of the alternatives on soil compaction and literature review of the number of passes required to compact soils. Comparison of the effects of equipment operation on native soils to operation over a roadway. Evaluation of Mitigation Measures required to prevent soil compaction.

1.5.2.3 Water and Watershed Resources

<u>Issue</u>: The Proposed Action has the potential to affect the function of Riparian Reserves within the existing and proposed SUP areas.

<u>Background</u>: The Riparian Reserves within the existing SUP area have been altered through natural processes (e.g., hydrology, freezing-thawing) as well as management influences (e.g., logging and ski area development). Other than areas permanently altered through ski area development and past timber harvest activity, most riparian areas in the existing SUP area are recovering their natural function. In the proposed SUP expansion, Riparian Reserves have been altered through natural processes and are functioning naturally. The proposed ski trails, lodge and parking lot development may affect the amount and functionality of these Riparian Reserves.

<u>Indicators</u>: Description of the effects of the alternatives on the following Riparian Reserve characteristics, including: (1) changes in the composition of vegetation within Riparian Reserves and the Riparian Influence Area, (2) changes in large woody debris (LWD) currently within stream channels as well as LWD recruitment potential, (3) changes in stream shading, and (4) fragmentation and associated impacts on riparian dependent species (abundance and diversity).

<u>Issue</u>: The Proposed Action has the potential to impact wetland, stream channel and floodplain characteristics, as well as water yield and quality in a Tier II Key Watershed.

<u>Background</u>: The *White Pass Stream and Wetland Delineation Report* (SE Group 2004) documented the existence of an extensive network of ephemeral and intermittent streams and wetlands in the existing and proposed SUP areas. Within the existing ski area, many of these streams and wetlands have been altered due to ski area construction and operations. In the proposed expansion area, the network of streams and wetlands are functioning under natural processes. The construction, operation and maintenance of the proposed facilities have the potential to alter natural watershed processes and flowpaths, and/or introduce nutrients or contaminants into the system.

<u>Indicators</u>: Description of physical effects on the length of bank erosion, channel geometry (width/depth ratio, etc.), changes in discharge, LWD recruitment potential, instream LWD, condition of riparian vegetation, substrate composition, floodplain connectivity, and types and extent of floodplain modifications. Discussion of the construction, operation and maintenance effects on temperature, sediment, contaminants and nutrients from wastewater treatment.

<u>Issue</u>: The 1990 GPNF Land and Resource Management Plan does not allow development or expansion of "recreation sites" in the Riparian Influence Area (RIA), and the plan specifies that development of such facilities "should" be no closer than 100 feet from streams, ponds, wet meadows, marshes and springs. The Proposed Action would place ski lifts, trails and other ski area infrastructure within the RIA, resulting in an inconsistency with the GPNF Plan riparian standards and guidelines.

<u>Background</u>: The 1990 GPNF Land and Resource Management Plan Riparian Area Standards and Guidelines for Recreation currently specify that:

"Neither newly developed recreation sites nor expansions to existing sites will be located on the riparian influence area of Riparian Areas A, B, or C. Developed and dispersed recreation sites should be located at least 100 feet from the edges of lakes, streams, ponds, wet meadows, marshes and springs" (GP Forest Plan 1990, page IV-70).

Riparian influence areas are those areas within 25 feet on either side of a stream or waterway, and are included within the Riparian Reserves. SE Group (2004) has delineated streams and wetlands throughout the proposed expansion area, and within the existing ski area. The expansion area was allocated to Developed Recreation in the 1990 GPNF Land and Resource Management Plan; however, the development of ski area facilities in the expansion area could be considered an expansion of an "existing recreation site", and would not be consistent with the riparian area standard. The proposed ski lift lines and trails would be required to cross over the RIA, either with or without removal of vegetation. The Proposed Action would also require construction of facilities within 100 feet of streams and wetlands.

<u>Indicators</u>: Disclosure of the area of RIA along streams to be affected by development and comparison to Riparian Reserve impacts. Evaluation of consistency with riparian area standards in the 1990 GPNF Land and Resource Management Plan. Description of of the effects of any forest plan amendments that would be required to implement the proposed expansion.

1.5.2.4 Heritage

<u>Issue</u>: The proposed development has the potential to affect heritage resources, including the Cascade Crest Trail, Traditional Cultural Properties and treaty rights and resources.

<u>Background</u>: The Yakama Nation has expressed concern about expansion in the White Pass area because of its heritage value. Hogback and Pigtail Basins are at the western edge of the lands ceded by the Yakama Indians in an 1855 treaty. It is also within the traditional territory of the Taidnapam, or upper Cowlitz tribes. No formal treaty for these lands was ever consummated by the upper Cowlitz. Use of the Goat Rocks area by the

Taidnapam was reported by Jacobs (1934). American Indian use of the area for religious and root gathering activities may continue today.

The PCNST was built on portions of the Cascade Crest Scenic Trail, which may be an eligible historic resource. The segment of the Cascade Crest Trail in the vicinity of White Pass Ski Area and Hogback Basin has yet to be evaluated as a contributing or noncontributing element of this potentially National Register eligible historic trail system. The proposed development has the potential to affect the physical characteristics of the trail, resulting in a potentially adverse effect to the resource, if it is determined to be a contributing segment.

<u>Indicators</u>: Description of information gathered through tribal consultation, resource surveys and/or ethnographic surveys along with narrative description of effects of projects on heritage resources, including the Cascade Crest Trail, Traditional Cultural Properties and treaty rights and resources.

1.5.2.5 Recreation

<u>Issue</u>: The Proposed Action has the potential to negatively affect the existing dispersed recreation use in Hogback and Pigtail Basins and to increase the cumulative loss of backcountry recreation terrain in the southern Cascades of Washington State.

<u>Background</u>: Hogback and Pigtail Basins are currently used by dispersed winter recreationists (snowshoers, backcountry skiers, etc.). The basins also provide access to other areas used by dispersed winter recreation users.

<u>Indicators</u>: Narrative description of effects on dispersed recreation and estimated increase of skiers in the areas.

<u>Issue</u>: The proposed development has the potential to cause a break in experience for PCNST users due to the placement of lifts and trails near, or across the PCNST.

<u>Background</u>: The PCNST traverses through the proposed expansion area, which currently exhibits an undeveloped character, and provides a quality backcountry experience to PCNST users. The addition of chairlifts and trails in Pigtail and Hogback Basins has the potential to introduce visual impacts in the immediate foreground, including crossing the PCNST. The Pacific Crest Trail Association (PCTA) and other PCNST users have voiced concern over the break in experience that would result from a chairlift crossing over the PCNST. The PCTA has indicated that the association would prefer an expansion with no lift crossing over the trail, with lift top terminals not readily apparent in the immediate

foreground, and potentially including a re-route of the PCNST to a suitable location (PCTA, pers. comm.).

<u>Indicators</u>: Evaluation of the crossings over the PCNST (lifts and trails) and disclosure of the proposed ski area facilities in the immediate foreground along the segments of the PCNST that traverse the expansion area.

<u>Issue</u>: The Proposed Action could provide easier access to un-patrolled areas with a higher avalanche potential than Hogback or Pigtail Basins.

<u>Background</u>: Hogback and Pigtail Basins, with a relatively low avalanche hazard, are currently used by dispersed winter recreationists. The development of ski area facilities has the potential to provide lift-served access to higher elevation terrain adjacent to Miriam Basin, which has a comparatively high avalanche hazard. Displacement of the existing back country skiing in the Hogback and Pigtail Basins could increase pressure for backcountry skiing on the more dangerous terrain.

<u>Indicators</u>: Discussion of the proximity of lift terminals to areas with high avalanche hazard. Discussion of the displacement of existing backcountry use in the expansion area. Evaluation of Mitigation Measures and other Management Requirements that reduce or minimize the increased access to more dangerous terrain.

<u>Issue</u>: The proposed Action has the potential to increase winter use of Miriam Basin in the Goat Rocks Wilderness, adjacent to the White Pass Ski Area, potentially affecting the Wilderness character.

<u>Background</u>: Development in Hogback Basin would displace the current dispersed recreation use in the area. These users would likely move to the adjacent Miriam Basin for backcountry skiing. White Pass skiers riding the new lifts in Hogback Basin could also enter into the Wilderness.

<u>Indicators</u>: Narrative description of the potential for increased pressure on the wilderness, including comparison to existing metrics from Wilderness standards. Evaluation of Mitigation Measures and other Management Requirements that are intended to reduce impacts on Wilderness.

1.5.2.6 Visual Resources

<u>Issue</u>: The Proposed Action has the potential to affect the scenic quality of the White Pass area, including Hogback Basin, from key vantage points, including the PCNST and US 12.

<u>Background</u>: The construction of ski area facilities requires removal of vegetation, installation of lifts, and construction of buildings in an otherwise natural area. Development may be perceived by the visitor in terms of changes in the form, line, color and texture of the forest background (Maekawa 1987; USFS 1974). In dense forest, the visitor easily identifies small changes in the vegetative cover, while in open subalpine glade areas, major changes in vegetation cover must occur before drastically altering the scenery texture. Visitors may also notice structures such as chairlifts and buildings unless efforts are made to blend them into the surrounding landscape. Non-recreational viewers, whose observations are often made from key viewpoints along major highways, are also affected by impacts of developed recreation on scenery.

Ski trails have traditionally created large open areas through forest lands as can be seen with respect to the present ski trails from US 12 at White Pass. Most often these large openings are needed to permit skiing in areas of dense timber. At higher elevations in the Cascades, including Hogback Basin, overstory vegetation develops along "stringers" with open glades in between the stringers.

<u>Indicators</u>: Narrative description of the effects of development on meeting the VQO of retention in the existing and proposed SUP areas, and relation to the SMS.

1.5.2.7 Social and Economic Factors

<u>Issue</u>: The proposed ski area expansion must be an economically viable project that responds to public demand. The Proposed Action has the potential to negatively affect the economics of nearby communities if the expansion is not financially successful.

<u>Background</u>: The economic viability of a ski area development project is determined by the additional number of skiers and increased revenue expected as a result of the project compared to the cost of the expansion. Since the capital cost of additional ski area facilities in the expansion area would be paid by revenue from lift tickets, restaurant sales and other ski area offerings, prices at White Pass would be affected as a reflection of future overhead cost including insurance and services. These price increases could discourage skier use of the White Pass Ski Area, resulting in an overall economic loss to the ski area and nearby communities.

White Pass Ski Area sponsors visitor spending both at the ski area (e.g., lift tickets, food and beverage, rentals) and in nearby communities (e.g., food and beverage, ski equipment and apparel, rentals). White Pass Ski Area provides full and part-time, seasonal and non-seasonal employment to local residents. Numerous economic development strategies and other planning documents have been prepared, or are under preparation by other

governmental agencies for Lewis County, Packwood, and US 12, that assume the presence of a viable ski area at White Pass. A proposal that is not economically viable could result in loss of an important developed winter recreation use on NFSL, with substantial impacts to the dependent communities as well.

<u>Indicators</u>: Narrative evaluation of the potential viability of the ski operation relative to capital costs and skier spending. Narrative relating the Proposed Action to the 2002 Comprehensive Economic Development Strategy for Cowlitz and Lewis Counties and the 2003 Comprehensive Economic Development Strategy, the Lewis County Economic Assessment, and other ongoing studies, such as the pre-marketing profile of east Lewis County communities, the growth and infrastructure assessment for the community of Packwood, the scenic byway planning on US 12, and the feasibility study for the now vacant Packwood Ranger Station. Assessment of the potential for disproportionate impacts to low income or minority populations. Development of a breakeven analysis to disclose the economic viability of the proposed action.

1.5.2.8 Inventoried Roadless Areas

<u>Issue</u>: The Proposed Action has the potential to affect the roadless character of the White Pass Inventoried Roadless Area.

Background: Eight hundred acres were removed from the Goat Rocks Wilderness by the 1984 Washington Wilderness Act (PL 98-339) specifically for study to utilize its "significant potential for ski development." (Senate Report 98-461). The 1990 Gifford Pinchot Forest Plan inventoried as roadless the 800 acres that Congress had withdrawn from Wilderness in 1984 as part of a directed update of the roadless areas conducted during Forest Plan development. This inventory also acknowledged the exclusion of the 800-acre parcel from Wilderness "to provide for possible expansion of the White Pass Ski Area (USDA 1990a, C-181)." As a result, the GPNF plan allocated this area to a Developed Recreation land allocation with the objective of ski area development. However, development of ski area facilities within the proposed expansion area may alter the roadless character of a portion of the White Pass Inventoried Roadless Area, including its potential eligibility for wilderness designation.

<u>Indicators</u>: Narrative description of the effects to the roadless character of Hogback Basin, including wilderness potential. Narrative description of the effects as they relate to the intent of Congress in the 1984 Washington Wilderness Act. Evaluation of the consistency of the SUP boundary expansion with land allocations.

1.5.2.9 Parking and Pedestrian Access

<u>Issue</u>: At peak times, parking at the White Pass Ski Area is congested and White Pass guests must walk along or across US 12 to access the ski area facilities. The Proposed Action has the potential to exceed the parking capacity at White Pass and to exacerbate the potential for conflicts between pedestrians and highway traffic on US 12.

<u>Background</u>: The current parking capacity at White Pass includes a combination of 1,100 passenger vehicles and 9 buses for a total of 2,890 visitors. With increasing visitation at White Pass, the existing parking lots and areas along US 12 will fill to capacity (or above capacity) more often.

<u>Indicators</u>: Narrative description of parking capacities and alternative strategies for addressing parking at White Pass. Evaluation of Mitigation Measures and other Management Requirements that are intended to reduce the impact on US 12 traffic and pedestrian access.

1.6 GOVERNMENT AND INTERAGENCY COORDINATION

1.6.1 Tribal Government Consultation

The federal government has a permanent legal obligation to American Indian tribes, which comes from commitments made by the United States in treaties, executive orders, and agreements. For the USFS, trust responsibilities are essentially those duties that relate to the reserved rights and privileges of federally recognized Indian tribes as found in treaties, executive orders, laws, and court decisions that apply to the National Forests and grasslands. For USFS activities, the trust responsibilities are defined primarily by the authorities listed in FSM 1563.01 and by treaties that apply to specific areas of the NFSL. Treaty rights on NFSL are interpreted and applied by the court.

As part of the NEPA process, the USFS is required to conduct Government-to-Government consultation with all federally recognized Indian Tribes that could be affected by the proposed project. The USFS consultation process for cultural and heritage resources is designed to comply with Section 106 of the National Historic Preservation Act, the American Indian Religious Freedom Act, the Native American Graves Protection and Repatriation Act, and the Archaeological Resources Protection Act. Based on information from the Indian Claims Commission findings and on the BIA interpretation of the district court's specified findings in <u>United States v. Washington</u> on Tribes' usual and accustomed fishing places, regarding tribal territorial boundaries at the time of treaty negotiations in the 1850s, the Yakama Nation was identified as an affected Tribe. Based on ethnographically documented tribal distributions (Bouchard et al. 1998), the Cowlitz Tribe was also identified as an affected Tribe that would have knowledge of, and interest in, the project area. Although the Federally-recognized Cowlitz Tribe are not party to any treaty

with the United States, the Cowlitz have historically used the Hogback Basin area, and could be affected by development in this area.

In 1997, Members of the Yakama Nation expressed concerns that the cultural and spiritual values of the area are more than actual sites and any additional use and disturbance is of concern. USFS officials met with the Yakama Nation cultural committee in 1997 and 1998. On March 17, 1998, the Deciding Officer met with the Yakama Nation Cultural Program Manager and three Tribal Council Members. In the March 17 meeting, the Yakama Cultural Program Manager gave an explanation of how errors were made in the past in determining the boundary of the lands ceded to the Yakama in the Treaty and how this affects the way the USFS needs to view the Yakama cultural interests in the lands around White Pass. One Yakama Councilman said there are sacred areas of concern to him in the area of the expansion proposal. In addition, the Cultural Program Manager told of Kamiakin's use of the Goat Rocks, Hogback Basin, and other areas to the north and west of White Pass. He also told of the sacred nature of the high points along Hogback Ridge, following the line that is now the boundary of the Goat Rocks Wilderness. He expressed concern about protecting these high points now and in the future. Other concerns expressed by the Yakama Cultural Program Manager in the March 17 meeting were how more people accessing the expansion area would treat the land, the possible increase in litter, parking lot runoff and its affect on water quality and fisheries, and safety of people accessing the backcountry. USFS officials again met with the Yakama Nation cultural committee representative on July 23, 2004. No new concerns about the expansion proposal were raised.

A USFS line officer and staff met with officials of the Cowlitz Tribe on March 30, 2004. Concerns about the proposal expressed included the displacement of back country skiers and impacts to Wilderness due to easier access (increased visitation, sanitation and litter, public safety), a desire to monitor ground disturbance to protect any unidentified archaeological sites, building of roads in roadless areas, water use and cycling, effects to natural resources if ski trails were salted in the spring, and expressed support of shuttle services to deal with highway traffic over road expansion (to minimize environmental impact and allow for potential economic benefits to nearby communities such as Packwood). Tribal members also indicated general support for roaded access to public recreation areas such as White Pass.

During the development of the FEIS, the Naches District Ranger met with representatives of the Confederated Tribes and Bands of the Yakama Nation natural and cultural resources staffs to describe the Preferred Alternative and solicit their comments. Subsequently, the Deputy Director, Division of Natural Resources submitted written comments in a letter dated October 6, 2006. The letter formally documented oral comments expressed during the meeting. There was general disappointment that the Preferred Alternative included expansion of the White Pass Ski Area into the Pigtail and Hogback Basins with a number of specific concerns cited, including:

• The significant cultural importance of the expansion area to the Yakama people.

- The economic viability of the ski area, particularly related to the uncertainty of sufficient snow pack and the expenses involved with expansion.
- Provisions for rehabilitating or restoring developed areas should the ski area cease to be viable.
- The effects of increased human activity on wildlife (harassment) and water quality (erosion, sediment and pollutants).
- The effects of improved access to and use of the adjoining Goat Rocks Wilderness.

<u>1.6.2</u> <u>Interagency Coordination and Consultation</u>

Under NEPA regulations, any agency, other than the lead agency, that has jurisdiction or special expertise relative to a Proposed Action may be a cooperating agency in the NEPA process, at the request of the lead agency. Any such agency may also request to be designated as a cooperating agency. The USFS did not make any such requests of agencies for this FEIS.

The U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration – Fisheries (NOAA Fisheries) have participated in the White Pass process in their regulatory role under the Endangered Species Act (ESA).

1.6.2.1 U.S. Fish and Wildlife Service

The USFWS has ESA jurisdiction over non-marine fish, wildlife and plant species, such as the northern spotted owl, Canada lynx, and marbled murrelet, among others, that are listed or proposed for listing as threatened or endangered under the ESA. The USFS must consult with USFWS on any project that affects species listed or proposed for listing under USFWS jurisdiction.

The USFWS has been involved in reviewing activities and technical contributions as well as participating in ESA functions. USFWS participation includes, but is not limited to the following specific activities:

- Participation in IDT trips and IDT meetings;
- Providing technical advice on any field surveys for listed species, and on data collection and analysis for subjects within USFWS expertise;
- Reviewing the Biological Assessment prepared by the USFS on the Preferred Alternative, and providing a Letter of Concurrence/Biological Opinion in response.

Consultation on the Selected Alternative was conducted with the USFWS in accordance with Section 7 of the ESA. A Biological Assessment (USFS and USFWS 2006a) was prepared to describe the effects of the Selected Alternative on ESA-listed wildlife species and submitted to the USFWS for formal consultation

on September 8, 2006. On November 9, 2006, USFWS provided a Biological Opinion (USFWS 2006-F-W0310) stating that the White Pass Ski Area Expansion is "not likely to jeopardize the continued existence of northern spotted owl and is not likely to destroy or adversely modify designated critical habitat". The USFWS concurred with the USFS determination that the Selected Alternative may affect, but is not likely to adversely affect gray wolf, and that there would be no effect to Canada lynx, grizzly bear, bald eagle, or marbled murrelet (refer to Appendix N - Biological Assessment).

Surveys were conducted for Proposed, Endangered, Threatened, and Sensitive (PETS) plant species in the White Pass Study Area between 1987 and 2004 (refer to Section 3.5.2.3). The list of species suspected to occur within the project area are listed in Table 3.5-3 of the FEIS. None of these species were located during the numerous botanical surveys completed at White Pass. As a result, no impacts to known or previously documented PETS plant species are expected to occur (refer to Section 3.5.3.2 and Appendix G – Vegetation Technical Report and Biological Evaluation).

1.6.2.2 NOAA Fisheries

NOAA Fisheries has ESA jurisdiction over marine species, including anadromous fish. Several threatened anadromous fish species can be found in areas downstream of White Pass. The Biological Evaluation for fish (refer to Appendix I) determined that there would be no effect to listed marine fish species as a result of the Action Alternatives. Therefore, no formal consultation with NOAA fisheries is required.

1.7 PERMITS, APPROVAL, AND CONSULTATION REQUIRED

Many federal, state, and county laws and regulations affect development, land use, and operation of White Pass. White Pass is currently under a SUP from the WNF, which authorizes the occupancy and use of the NFS lands. White Pass is required by its SUP to comply with all present and future state and local laws, ordinances, and regulations applicable to the area of its operations to the extent that they are not in conflict with federal law or policy. The USFS assumes no responsibility for enforcing laws, regulations, or ordinances that are under the jurisdiction of other governmental agencies. White Pass must obtain all other required permits during design, development, and prior to expansion. Permits that may be required, among others, are outlined in Table 1-3.

Table 1-3: Summary of Permits, Approvals, and Consultation for the White Pass Expansion Proposal

Agency	Action/Regulation	Description of Permit/Action
Federal:		
U.S. Army Corps of Engineers	USACE Permit under Section 404 of the Clean Water Act (USC 1344)	Authorization for discharge of dredged/fill material into wetlands and other waters of the U.S.
Environmental Protection Agency	Clean Air Act, as amended, 42 USC Section 7410-762 (PL 95-604, PL 95-95) Federal Water Pollution Control Act, as amended by the Clean Water Act (USC 1344) Safe Drinking Water Act, 452 USC Section 300F-300J-10 (PL 93-523)	Provide review and comments on the federal action. Provide information and technical assistance in the environmental analysis.
U. S. Fish and Wildlife Service	Section 7 Consultation and Biological Opinion	Protection of Threatened and Endangered Species.
National Oceanic and Atmospheric Administration	USACE Section 404 Permit Consultation Section 7 Consultation and Biological Opinion	Consultation under the Fish and Wildlife Coordination Act. Protection of Threatened and Endangered Species.
State:		
Washington Department of Ecology	Water Quality Certification (Clean Water Act Section 401) National Pollution Discharge Elimination System Permit. Permit to Withdraw or Divert Surface or Ground Water	State approval to USACE for discharge to surface waters Stormwater Permit for stormwater discharges at construction sites. Authorize withdrawal of surface or groundwater.
Washington Department of Health	Permit to upgrade on-site sewage system under Chapter 90.48 RCW and 173-240 WAC requirements.	Authorize upgrade of on-site sewage system with design flows, at any common point, between 3,500 gallons per day and 14,500 gallons per day.
Washington State Department of Ecology	Notice of Intent	Notification of well drilling
Washington Department of Fish and Wildlife	Hydraulic Project Approval	Authorize development activities within waters of the U.S.
Washington State Office of Archaeology and Historic Preservation	Section 106 of the National Historic Preservation Act	Determination of effects to Cultural/ethnic resources.
Washington State Department of Transportation	Approval of Highway access.	Authorize the new access point along US 12 for the parking lot.
Local:		
Yakima/Lewis County Code Compliance	Building Permit	Authorize construction of buildings, wastewater treatment facilities.

Table 1-3: Summary of Permits, Approvals, and Consultation for the White Pass Expansion Proposal

Agency	Action/Regulation	Description of Permit/Action
Yakima/Lewis Health District Code Compliance	Public Water Supplies	Authorize public water supply use by local (or state) health officials.
Yakima Regional Clean Air Authority	Dust Control Plan approval (WSR 00-08-007)	Prevent and reduce fugitive dust emissions from construction activities.
Lewis County Department of Environmental Health	Water well Notice of Intent (as per WAC 173-160) and Drinking Water Operating Permits (as required by WAC 246-294)	Authorize construction of well and use of ground water as public water supply.
Benton REA	Power Supply Capacity	Upgrades to power supply to provide additional capacity to support expanded facilities.