

March 30, 2020

Jeffery Rivera
District Ranger, Wenatchee River Ranger District
600 Sherbourne
Leavenworth, WA, 98826

Submitted online at <https://cara.ecosystem-management.org/Public/CommentInput?Project=53981>

RE: Mission Ridge Ski and Board Resort Expansion Project #53981

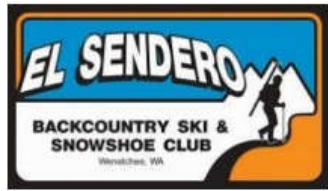
Dear District Ranger Rivera,

El Sendero Backcountry Ski and Snowshoe Club (El Sendero) is an all volunteer non-profit organization based in Wenatchee, founded in 2004. We represent winter backcountry recreationists and advocate for the creation, preservation, and management of non-motorized winter areas on public lands. We work to preserve backcountry areas for quiet human-powered use, promote winter backcountry safety and ethics, and cooperatively resolve conflicts among backcountry users. El Sendero is a grassroots member of Winter Wildlands Alliance. Winter Wildlands Alliance (WWA) is a national non-profit, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Formed in 2000, WWA has grown to include 33 grassroots groups in 15 states and has a collective membership exceeding 50,000.

We appreciate the opportunity to provide these comments regarding the Mission Ridge Expansion Project #53981. El Sendero submitted scoping comments in September 2018 on this project where we also outlined some of our concerns. Our organizations are firmly opposed to the proposal as it currently stands (Alternative 2) and ask that the Forest Service select ALternative 1 (No Action) and deny the application to amend the Mission Ridge Ski and Board Resort's (Mission Ridge) Special Use Permit (SUP).

I. ALTERNATIVE TWO WILL IRREVOCABLY HARM BACKCOUNTRY RECREATION OPPORTUNITIES

This development project will directly and adversely affect the established winter non-motorized recreation opportunities in the lands in and adjacent to the project area. The Mission Ridge Expansion Project: Draft Environmental Analysis (draft EA) fails to address these impacts and offers no mitigation measures to ensure consistency with the Forest Plan standards and guidelines addressing the need to provide "a well balanced array of recreation opportunities in accordance with resource capability and public demands and expectations". In addition, the Okanogan-Wenatchee National Forest (OWNF) desired conditions for land and resource management also envisions providing "more outdoor recreational opportunities in close proximity to local communities." This project not only fails to accomplish this, but would reduce the established undeveloped backcountry recreation opportunities currently available. This concern was pointed out in our September 2018 scoping comment yet the draft EA fails to address these concerns and provides no alternatives to the loss of uphill access for backcountry skiers in the outback area.

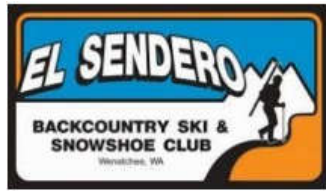


Human-powered snowsports are the fastest growing segment of winter recreation and include backcountry skiing, alpine touring, snowshoeing, cross-country skiing and split boarding (1-SIA 2017). The number of participants in undeveloped skiing, according to the Forest Service's (FS) own research, is projected to increase by 55% - 106% by 2060 (2-Cordell 2010). Washington ski resorts and backcountry touring operators say they're cashing in on more people looking to escape crowded ski resorts. Retail sales statistics demonstrate the rise in backcountry growth. Backcountry.com, a ski retailer based in Park City, Utah saw sales in backcountry gear grow from \$52 million in 2005 to \$139 million in 2007, an increase of 167 percent (3-Puget Sound Business Journal 2008). Rob Gibson, ski patrol director for The Summit at Snoqualmie estimates backcountry skiing around the Summit has tripled in the past five years. Rob believes access to the out-of-bounds terrain helps draw paying customers to the ski area (Puget Sound Business Journal 2008).

As the draft EA points out the "sense of place" is particularly strong at Mission Ridge. Mission Ridge is an important asset to the community of Wenatchee and Washington State but beyond the alpine ski slopes there are also many others seeking opportunities for recreation beyond the groomed slopes. The Clara Lake trail, Pipeline trail, and the Devil's Spur trail are the most heavily used and popular trails on FS lands close to Wenatchee in both winter and summer. These are premier trails for snowshoeing, dog walking, ski touring, trail running, mountain biking, and every other form of non-motorized recreation. The draft EA fails to address the impacts to these trails and offers no mitigation measures in the preferred Alternative 2 for the expected increase in the number of users wanting to access these trails. In addition, Alternative 2 does not address the overcrowding expected in available parking at the trailheads to these premier trails, nor are there provisions to require that Mission Ridge make parking available for those wanting to access these trails year-round. Mission Ridge is in clear violation of the terms of the SUP when it blocks access to its parking area. As specified in Terms and Conditions, item F - Area Access; the SUP states that "...the lands and waters covered by this permit shall remain open to the public for all lawful purposes". At the close of the ski season Mission Ridge places large cement barriers blocking and restricting access to the main parking lot and limiting the number of available parking spaces that the general public can use to access these popular trails thus forcing cars to park on the sides of the main access road (Squilchuck Road #711).

Today, almost every alpine ski manufacturer has a backcountry or alpine touring option, many ski brands now have a super lightweight option in bindings, boots and skis. Many people just want to escape the ski resort and the \$100 lift ticket prices and the \$600 season pass. But economics isn't the entire story - the growth in backcountry recreation is less about finances and more about the "sense of place". Backcountry skiers are seeking a different experience from developed skiing, it's about a different passion. They are looking to expand their recreational opportunities. They want to go a little farther. They want to see what lies beyond the ridge you see from the base area, and they want to go there under their own power. These users vary, from the hardcore endurance skimo racers, to the people who simply enjoy the quiet solitude of the winter backcountry.

Beginning in March 2013, El Sendero participated with the Washington State Department of Natural Resources (DNR), the Washington Department of Fish and Wildlife (WDFW), and many local public stakeholders to complete in **January 2015** the Naneum Ridge to Columbia River Recreation and Access plan (Naneum plan). The Naneum plan vision was to "...offer distinct and diverse outdoor recreation



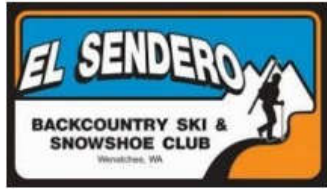
opportunities within the overall fabric of recreation in Washington". The final Naneum plan identified establishing a winter non-motorized area trail system, among other projects, as "Phase 1" in the implementation and priorities for projects. This area was identified to include state lands in various sections South and East and adjacent to the Mission Ridge ski area and section 23 surrounding Clara Lake (4-Naneum plan 2105).

Beginning in March 2016, El Sendero participated in a second site specific recreation planning process along with many local stakeholders, including Mission Ridge, Chelan County, DNR and WDFW that was completed and adopted in **October 2019**. The Stemilt-Squilchuck Recreation Plan (Stemilt Plan) adopted parts of the Naneum plan and finalized and identified a winter non-motorized area in parts of sections 36, 31, 29, 20, and 16; these public lands are also South and East and adjacent to the Mission Ridge ski area including section 23, surrounding Clara Lake (5-Stemilt-Squilchuck Recreation Plan 2019).

This history is important in understanding that the Stemilt-Squilchuck basin lands adjacent to the proposed development are **established backcountry recreation areas** approved and designated by two distinct **public processes** over the last seven years. A significant effort by Washington State, private, and public stakeholders has gone into gaining the protections currently designated in these areas which border the proposed development. The draft EA fails to mention the recent public processes that established these recreation areas, and worse, offers no recognition nor mitigation measures for the impacts to these areas. These areas were established under the authority of DNR and WDFW; rather than work against these established plans, the draft EA should coordinate with these two existing recreation plans. Alternative 2 will clearly impact and irrevocably harm these established, recognized, and heavily used backcountry recreation areas adjacent to Mission Ridge by reducing and eliminating areas that provide an alternative to alpine skiing such as snowshoeing and backcountry skiing, and by overcrowding the remaining areas. For this reason alone, Alternative 2 should be rejected.

II. THE PROPOSED ROAD RIGHT-OF-WAY DOES NOT MEET THE CRITERIA FOR FOREST SERVICE APPROVAL

The Forest Service must provide a clear and defensible justification for granting a right-of-way for the new access road crossing National Forest Section 24. Page 12 of the Draft Environmental Analysis discusses Forest Service Policy FSM2700 which guides the Forest Service in determining when to grant rights-of-ways across National Forest Land. The policy indicates that access should be granted when there is currently no access to the private property and when it is not possible to gain access across non-federal land. There are existing roads that access the development property on section 19 from adjacent sections 18 and 20, neither of which are federally owned. Therefore, the trigger condition that would advise the USFS to allow access to private land across National Forest is not met. The Agency should require project proponents to use alternative roads that do not cross Forest Service lands to access the development property.



III. REMEDIATION IS REQUIRED ON THE CURRENT TEMPORARY ROAD

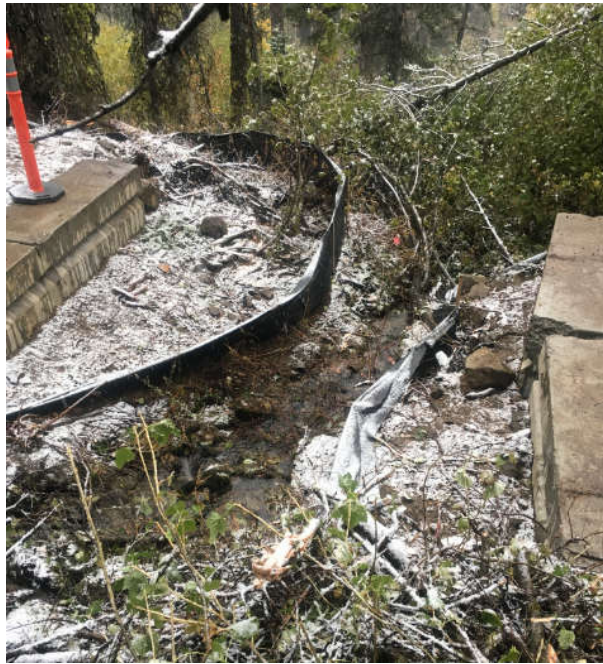
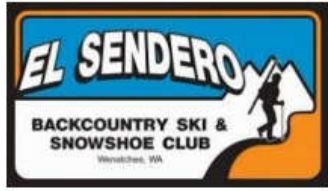
Mission Ridge constructed a temporary road in 2018 under Categorical Exclusion. As part of the Categorical Exclusion, WDFW issued a Determination of Nonsignificance (DNS) which listed several mitigating conditions. Several of these conditions were violated during road construction. Specific condition violations include the following:

The temporary road violated DNS restrictions on environmental disturbance and damage

The actual ground disturbance resulting from temporary road construction exceeds one acre. The side cast extended up to 200 feet below the road, as depicted in the image below.



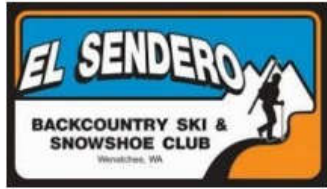
A conservative calculation of 0.67 miles x 50 foot average disturbance leads to approximately 4 acres of disturbance from this temporary road. This is four times the threshold allowed by the DNS. The DNS also required that two temporary bridges be placed at stream crossings. Bridges were not built. The image below shows a seasonal stream crossing where the DNS required bridge construction, and where a bridge was not built.



Finally, the DNS required that trees greater than 8 inches diameter not be removed. Trees greater than 8 inches were removed, as pictured in the image below.

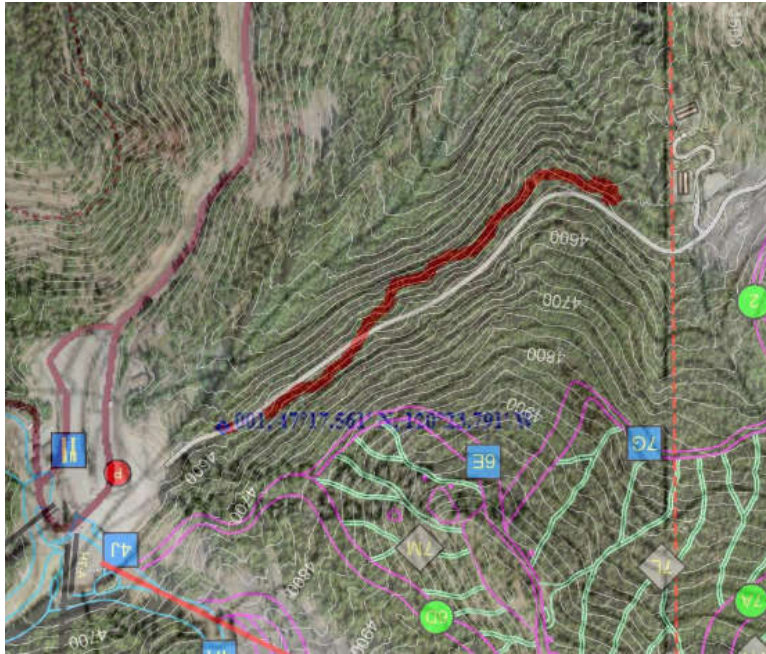


Given these violations of the DNS conditions, New Mission, LCC should be required to close and rehabilitate the temporary road and the USFS should not grant approval for a right-of-way and permanent road.



The temporary road violated location requirements

The road was not built within the proposed corridor. The image below shows the proposed corridor in white overlain by a GPS track of the actual road which is shown in red.

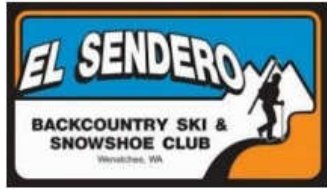


It is unclear if the Forest Service supervised the construction of this road in any manner, but the road clearly does not satisfy the conditions under which it was allowed. Therefore, the Agency must require immediate and full restoration of the temporary access road. If the Forest Service chooses to grant a right-of-way after the temporary road has been restored, it must provide assurance to the public that future development proposed by the applicant on Forest Service lands will be constructed in compliance with the permit requirements. To ensure that requirements are met, any approval of potential new development must be accompanied by strong measures to protect the environment and penalties if compliance with these measures is not achieved.

IV. ALTERNATIVE TWO INADEQUATELY ADDRESSES WILDFIRE RISK

The development proposed in Alternative 2 - a village with 900 family residences and almost 4,000 beds - will exponentially increase the number of people living in and playing in this fire-prone area and greatly amplify not just the development's risk but the wildfire risk to the larger community down valley. Despite this risk, Section 3.28 of the Draft EA does not adequately address wildfire hazard and the Proposed Action does not contain adequate measures to mitigate and address the very real danger of wildfire. Indeed, in their application to Chelan County, the project developer has requested exemptions to critical fire safety codes.

Given the location of the proposed development, any fire response will be multi-jurisdictional in nature. Responding agencies will include local rural fire departments, DNR, and the Forest Service. All of these agencies adhere to the same safety standards, which place a priority on firefighter safety. Firefighter



safety requires that escape routes and safety zones are of foundational importance. In determining whether an area provides acceptable escape routes, firefighters must consider fuel type and density, topography, number of potential escape routes, and travel time to safety zones. The Forest Service sets standards that require a safety zone of a size and nature that the crew of firefighters could find safety without the use of a fire shelter or other special equipment. The Squilchuck drainage is designated a high fire risk area.

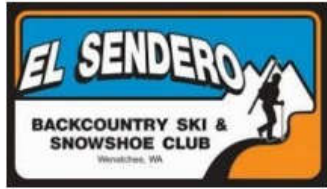
One may argue that the Mission Ridge parking lot qualifies as a safety zone. It is approximately 7 acres in size and it may satisfy the initial calculation of required size for a safety zone which assumes flat ground, no wind, and radiant heat only. However, the Mission Ridge parking lot is not located on flat ground, and is often windy. Furthermore, it is located in the narrowest portion of a box canyon with only one way in or out along a narrow canyon road. The parking lot is above a 20% slope with a mature conifer forest below. For a minimal fire response crew (one engine) to be safe in the Mission Ridge Parking lot, with an upslope wind of 10 mph and 100-foot flame lengths, Forest Service standards require a safety zone over twice the size of the existing parking lot.

In considering whether to select the Proposed Action and permit the requested infrastructure, the Forest Service must consider how this decision will affect the need for, and safety of, future firefighters. Given the deficiencies of the Proposed Action, the exceptions to fire codes that the developer has requested from the County, and the inescapable fact that the proposed development will put human life and safety at risk, the Forest Service must select Alternative 1.

V. THE DRAFT EA DOES NOT SUFFICIENTLY ADDRESS WATER ISSUES

Section 3.21 of the EA insufficiently addresses water issues. In 2007, the Chelan County Natural Resources department developed a Watershed Plan and a Water Quantity Assessment following a watershed inventory assessment for the Squilchuck and Stemilt drainages. The Water Quantity Assessment concluded that on an average year irrigation demand exceeds runoff with a water balance deficit of 550 acre feet on an average year and 12,690 acre feet in a dry/warm year (6-Chelan County 2007). The developers behind this Mission Ridge expansion have stated that they intend to draw water from deep aquifers to supply the resort. However, given that the aquifer and surface water in this drainage are connected, what the developer is actually proposing is to take water from downstream rights holders. Unless the developer can prove this assertion to be false, the Forest Service must select Alternative 1.

Furthermore, in plans submitted to the county, the developer has requested a lower than average fire flow for summer fire protection of the village. This is one of the exemptions to fire code discussed in Section IV. Given that this development is subject to high fire danger, it should be held to greater-than-average fire flow. The Forest Service should require that any alternatives considered in the Final EA (other than No Action) be contingent on non-partial, independent hydrology tests proving that the development's water usage will not take or cause harm to down-valley users holding senior water rights.



VI. VIOLATIONS SHOULD DISQUALIFY MISSION RIDGE FROM CONSIDERATION OF ANY EXTENSION TO THEIR SUP

The current SUP was issued to Mission Ridge in 1984 and does not expire until 2038. This SUP is for non-exclusive use of the land by the ski area and specifically requires that the land remain open to the public for all lawful purposes. However, current ski area management has treated the permit area like private property with a gate to prevent entry, a sign that indicates authorized entry only, and wide area closures and policies that limit or prevent use of the land by the public. Specific to the backcountry community, the ski area's restrictive uphill policy is in direct violation of the SUP terms and conditions article F which states "...remain open for all legal purposes".

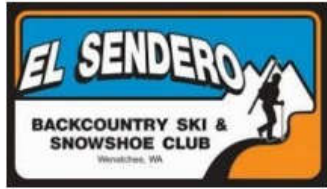
Based on current and past management practices by the ski area, it is clear that public access for recreation would be severely restricted, and in some cases prohibited in the expanded SUP area. The Forest Service land in section 30 is currently used and enjoyed by the backcountry community, and there will be a clear loss of recreational opportunities when Mission Ridge restricts access and use of the area. Alternative 2 proposes to eliminate the current "Outback" uphill route and does not adequately offer an alternative for a replacement uphill route within the current SUP area. Mission Ridge should be required to follow the SUP which mandates public use and access to these lands and roads. The Forest Service must ensure that "...the lands and waters covered by this permit shall remain open to the public for all lawful purposes" as stated in the Special Use Permit.

VII. THE PROPOSED ACTION WILL LEAD TO OVERUSE OF FOREST SERVICE LANDS

On page 11 of the EA, under "Regulatory Framework: Management Direction and Guidance", the Wenatchee National Forest Land and Resource Management Plan states: "New recreation sites should be constructed where demand is high and overuse problems are occurring at existing sites." The allure of the existing ski area and the adjacent backcountry areas in the Clara Lake Basin and the Stemilt Basin is exactly that the area is not overcrowded like other ski areas in Washington state. This plan will create an overcrowded recreation area in direct contrast to the goal of the guidance of the forest plan. The recently established non-motorized winter recreation area in the Stemilt Basin will become largely useless when a massive resort is developed at the base of the skiing area. This increased population will impact trail use to Clara Lake, the Pipeline trail, and Devil's Gulch trail as well, both by increased year-round residential recreation.

Although this development is described as a ski area expansion, the proposed new lifts will add about 20 acres of beginner terrain to the resort's mix but do not meaningfully increase the lift-served intermediate or advanced terrain. Rather than provide any substantive increase in skiable terrain, the proposed "village" with a 4,000 bed base would more than double the skier traffic on the hill. 'Expansion' is not an accurate word for a project that doubles the skier density within the same acreage.

The proposed action does not accurately promote the desired goals of the 2003 Environmental Analysis that the Forest Service approved to guide future endeavors that would best serve the skiers on the public lands making up the Mission Ridge Permit Area. The 2003 EA stated that the highest priorities for Mission Ridge skiers were upgraded lifts, expanded lift-serve terrain, and improved snow conditions

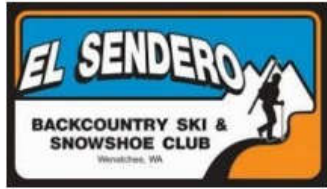


through more snowmaking. The proposed 'expansion' under consideration today does not address any of these issues. More people skiing on the same terrain does not improve the recreational experience for skiers at Mission Ridge, it simply makes the ski area more crowded.

The Proposed Action will also significantly, and negatively, impact parking - a key aspect of any visitor's recreational experience. Parking for other types of winter recreation is already in short supply in the Mission Ridge parking lot. Snowshoers and backcountry skiers wanting to visit Clara Lake often cannot find a place to park on weekends. This issue will only become more problematic when a sizable percentage of people living in the village want to ski or snowshoe to Clara Lake. Further, the proposed plans show the end of the Mission Ridge Road and the beginning of the new road, but does not indicate how the two sections will be connected through the existing parking lot. It appears likely that the road will continue through the lower parking lot which will effectively displace the current parking allocated to trail users. Section 3.25 of the draft EA does not adequately address provisions that will be made to increase parking (and keep that parking available) for other wintertime users wanting to visit popular destinations like Clara Lake or the Stemilt Basin, which are both popular among snowshoers and backcountry skiers. For many years the Forest Service has worked with the local community - through the Stemilt Partnership and with the Stemilt-Squilchuck Community - to try to manage overuse and parking issues. And, for many years, curtailing the wrong type of development has been the solution to overuse. Alternative 2 reverses course, encouraging overuse and associated problems in this area.

VIII. THE PROPOSED ACTION IGNORES THE ADMINISTRATIVELY WITHDRAWN AREAS DEVELOPED UNDER THE NORTHWEST FOREST PLAN

There are Administratively Withdrawn Areas (ADMWD) located both south and west of the proposed development (sections 24 and 30). Designated under the Northwest Forest Plan (NWFP), these areas have been previously identified by the Forest Service as valuable for recreation, visual, and backcountry use. The proposed action will degrade all three of the stated values in both of these ADMWD areas. Additionally, the draft EA fails to mention the 25,217 acre Devil's Gulch Inventoried Roadless Area (IRA) adjacent to section 27 in the current SUP and the headwaters for Mission Creek. The draft EA ignores the possible impacts to the Devil's Gulch IRA which have yet to undergo a thorough analysis and review for wilderness designation. Visually, the night sky will be polluted by light, and the development will be visible from all points north and east, including from Highway 2 near Quincy. The premier and most easily accessible trails close to Wenatchee on Forest Service land are the Clara Lake trail network and the Pipeline and Devil's Gulch trail network. Recreational enjoyment of this trail will be damaged if a community of several thousand people is developed near the trailhead. Backcountry skiing is currently available and enjoyable in the two basins adjacent to the ski area. One of those basins will become side-country (lift accessible) to the proposed development and the other will lose value as a destination due to the crowding from the proposed development. Additionally, road building and development in the areas adjacent to ADMWD areas will invite weeds including invasive weeds. The Forest Service needs to adhere to its own management directives for the ADMWD areas and the Devil's Gulch IRA as laid out in the NWFP, and the Forest Plan before allowing private development to degrade the value of these ADMWD areas and Roadless Area.



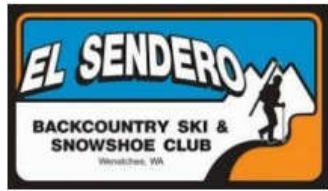
IX. THE PROPOSED ACTION IGNORES WASHINGTON DEPARTMENT OF FISH AND WILDLIFE MANDATE FOR SECTION 20

The current SUP includes lands owned by both the Department of Natural Resources (DNR) and Washington Department of Fish and Wildlife (WDFW) but managed by the USFS. This cooperative management agreement should require the USFS in the draft EA to address the WDFW land in sections 20 and 22. The draft EA neither mentions nor offers mitigation measures affecting section 20 and 22 which were recently purchased by WDFW using US Fish and Wildlife Service S6 grant funds. Lands acquired under the federal Cooperative Endangered Species Conservation Fund Habitat Land Acquisition and Recovery Land Acquisition grants (S6 grants) are specifically for the protection of habitats supporting federally listed endangered and threatened species and their recovery.

Section 3.30 of the draft EA identifies an “Assessment Area” which provides habitat, or potential habitat, for four federally listed wildlife species: Canada lynx (*Lynx canadensis*), grizzly bear (*Ursus arctos*), gray wolf (*Canis lupus*), and northern spotted owl (*Strix occidentalis caurina*). The draft EA fails to mention that gray wolves use the Naneum-Colockum area and ignore the likelihood of an established wolf pack using this Assessment Area. In addition, as recently as 2017 northern spotted owls occupied the south Naneum area habitat. The section 20 and 22 lands purchased by WDFW with S6 funds are required to be managed in perpetuity for the benefit of the species for which the lands were purchased; these lands were purchased to protect gray wolves and northern spotted owls. The draft EA fails to evaluate, as required by the expectations of the USFWS S6 grant funds used to purchase sections 20 and 22, the adverse effects of the proposed development. The Forest Service has neither addressed the adverse effects nor offered any conservation or mitigation measures or restrictions on activities that will occur as a result of allowing the massive development project to proceed as proposed in Alternative 2. Specifically the draft EA must specify mitigation measures for activities from the development such as:

- Unauthorized motor vehicles in winter and summer
- Minimizing/eliminating artificial light and noise
- Control and eradication of non-native and invasive vegetation
- Monitoring of property conditions, management, and enforcement
- Trash dumping and clean-up
- Undeveloped target shooting
- Increased human disturbance

This is not a comprehensive list by any means. Given the high potential of adverse effects that the development will have on these special S6 lands the Forest Service should deny the request for expansion of the Mission Ridge SUP area.



X. THE DRAFT EA FAILS TO TAKE INTO CONSIDERATION THE EFFECTS OF CLIMATE CHANGE

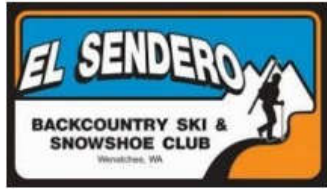
The United Nations' Intergovernmental Panel on Climate Change's (IPCC) Special Report on the Ocean and Cryosphere in a Changing Climate (SROCC) was approved at the IPCC's 51st Session (IPCC-51) in September 2019 in Monaco. The SROCC's approved summary for policymakers (SPM) was released on September 25, 2019. The 1,300-page report by 104 authors and editors representing 36 countries referred to 6,981 publications. In their SPM, the report said that, since 1970, the "global ocean has warmed unabated" and "has taken up more than 90% of the excess heat in the climate system." The rate of ocean warming has "more than doubled" since 1993. Marine heatwaves are increasing in intensity and since 1982, they have "very likely doubled in frequency". Surface acidification has increased as the oceans absorb more CO₂. Ocean deoxygenation "has occurred from the surface to 1,000 m (3,300 ft)." The SPM listed specific areas of concern where climate change is impacting our planet, those are:

1. Rising sea levels
2. Ocean deoxygenation
3. Melting glaciers
4. Melting ice sheets
5. Arctic sea ice decline
6. Global marine animal biomass and fish catch decline
7. Snow and lake ice cover decline
8. Thawing permafrost
9. Low-lying islands and coasts inundation.

The report also detailed threats to mountain tourism, including alpine skiing. "At the end of the century," if humans continue to emit greenhouse gases unabated, "snow reliability is projected to be unviable for most ski resorts under current operating practices in North America, the European Alps, Scandinavia and Japan..." Clearly the snowsports industry faces uncertainty, increased fire hazard, water shortages, and flat to declining participation in its future. The IPCC report adds to the growing list of science that shows a bleak future facing alpine ski resorts on a warming planet. Ski season lengths could shrink by 50% by 2050 and 80% by 2090 in the United States, according to the 2017 report "Projected Climate Change Impacts on Skiing and Snowmobiling: a case study of the United States." Given the litany of dire warnings issued by hundreds of scientists around the world the New York Times headlined a recent September 25 article with "We're All in Big Trouble."

The Forest Service's National Roadmap for Responding to Climate Change mandates that the agency address, "**climate change in planning and analysis, discussing how a range of uncertain future climate conditions might affect the expected consequences of proposed activities.**" The Draft EA fails to address how Alternative 2 will mitigate for increased fire hazard, decreased water supply, inability to make snow, and projected declines in skiable days.

There is no question that climate change is impacting Eastern Washington. Our new normal includes less snow, hotter summers, and longer fire seasons as compared to just a couple of decades ago. Ski resorts have been hit hard by the changing climate - after all, a business that depends on snow will inevitably

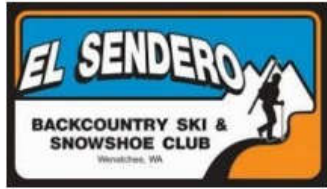


suffer when snow is in short supply. Snowmaking, for example, is crucial to Mission Ridge, allowing them to open before most of the other ski areas and the important Thanksgiving holiday period. But you can't blow snow when it's warm. Snowmaking requires energy to run equipment, significant water resources, and sub-freezing temperatures. Unfortunately, within the next twenty years, the number of days at or below freezing in some of the most popular ski towns in the U.S. will decline by weeks or even a month (7-Climate Impact Report, 2018).

The alpine ski industry has been constricting for decades, with the number of resorts in the United States declining to 460 from about 700 in the 1980's. For this reason many ski resorts are shifting their focus to real estate - the allure of living in the mountains persists regardless of season or snowfall. From a business perspective, we understand why Tamarack Saddle, LLC is seeking to get into the real estate business. But, to pitch this project as an improvement to the skiers experience, as a "ski area expansion" is misleading and wrong. In deciding which Alternative to select, the Forest Service must discuss and consider how the development scenarios fit into and would be affected by projected changes in temperature, precipitation, and vegetation and how these changes will, in turn, impact fire hazard, water availability, and ecosystem health. The EA must also consider how a resort with a year-round population in the thousands will affect downstream water availability and fire hazard in the wildland urban interface under future climate projections. Finally, the EA must recognize and discuss how climate change is projected to impact the ski season, and what this may mean for the future of skiing at Mission Ridge.

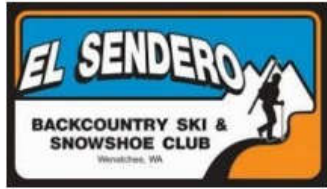
In summary we request that the Forest take the following actions:

1. The Forest Service should deny Tamarack Saddle, LLC's request for an access road across Forest Service land on section 24. The proposed road right-of-way does not meet the criteria for Forest Service approval and remediation is required on the current temporary road. The proposed access is out of compliance and the trigger condition that would advise the Forest Service to allow access to private land across National Forest is not met.
2. The Forest Service should deny the request to add the northwest quarter- section of section 30 into the Mission Ridge Special Use Permit. It will irrevocably harm backcountry recreation opportunities and will lead to overuse of Forest Service lands. This quarter-section does not add substantively to the resort's skiable acreage. The ski area has dodged the objective of the 2003 Environmental Analysis recommending an increase in skiable acreage, and this quarter-section is currently used by backcountry skiers to access the newly created non-motorized winter recreation area in the Stemilt Basin. Alternative 2 will clearly impact and irrevocably harm these established, recognized, and heavily used backcountry recreation areas adjacent to Mission Ridge by reducing and eliminating areas that provide an alternative to alpine skiing such as snowshoeing and backcountry skiing, and by overcrowding the remaining areas.
3. Select Alternative 1 (no action) to address wildfire risk and response. The Draft EA does not adequately address wildfire hazard and Alternative 2 does not contain adequate measures to mitigate and address the very real danger of wildfire. Given the deficiencies of Alternative 2, the exceptions to fire codes that the developer has requested from the County, and the fact that the



proposed development will put human life and safety at risk, the Forest Service must select Alternative 1.

4. The Forest Service should require that any alternatives considered in the Final EA (other than No Action) be contingent on non-partial, independent hydrology tests proving that the development's water usage will not take or cause harm to down-valley users holding senior water rights and that it is sustainable for the period of the SUP.
5. Amend the SUP to require that Mission Ridge work cooperatively in partnership with other recreation groups and stakeholders who use the public lands within and adjacent to the SUP. Recognizing that the SUP area of Mission Ridge commands the majority of easily available skiing terrain close to Wenatchee, and is a major hub for summer recreation Mission Ridge should be required to ensure adequate public access and parking for all lawful recreation activities.
6. Deny Alternative 2 because it ignores the Forest Service's own management guidelines for the Administratively Withdrawn Areas and the Devil's Gulch IRA. These areas have been previously identified by the Forest Service as valuable for recreation, visual, and backcountry use. The proposed action will degrade all three of the stated values in both of these areas.
7. Deny Alternative 2 because of the adverse impacts that will occur in section 20. The Forest Service and WDFW have a cooperative management agreement for lands in the SUP and proposed expanded SUP. Because of this agreement, allowing the proposed development and expansion of the Mission Ridge SUP will render the WDFW in violation of the management guidelines under which it purchased sections 20 and 22 using USFWS S6 grant funds.
8. Deny Alternative 2 for lack of climate change and sustainability analysis. The draft EA fails to take into consideration the effects of climate change and the sustainability of the proposed Alternative 2. The Forest Service's National Roadmap for Responding to Climate Change mandates that the agency address climate change in planning and analysis, discussing how a range of uncertain future climate conditions might affect the expected consequences of proposed activities; the draft EA fails to perform this required analysis.



Our organizations appreciate the opportunity to provide comments on this project. Many of our members will be directly impacted by the proposed resort expansion. Please keep us informed of future developments and decisions concerning this project.

Thank you for considering our comments.

Gus Bekker
President
El Sendero Backcountry Ski and Snowshoe Club
PO Box 5622
Wenatchee, WA 98807-5622
gwbekker@gmail.com

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771
heisen@winterwildlands.org

1. Snowsports Industries of America, 2017 industry insights study.
2. Cordell, Ken. Outdoor recreation trends and futures: a technical document supporting the Forest Service 2010 RPA Assessment.
3. Puget Sound Business Journal, February 2008.
4. Naneum Ridge to Columbia River Recreation and Access Plan, January 2015.
5. Stemilt-Squilchuck Recreation Plan, October 2019.
6. Chelan County WRIA 40A Watershed Plan, 2007 planning document.
7. Climate Impact Lab, February 2018.