Re.: Comments on draft Environmental Assessment for the Mission Ski Resort Expansion Project #53981

SENT VIA EMAIL

April 10, 2020

Dear Forest Service:

On behalf of Conservation Northwest, please accept these comments on the draft Environmental Assessment (EA) for the Mission Ski Resort Expansion.

Conservation Northwest has a 30-year history of successfully leveraging funding and public support to protect, connect, and restore habitat and wildlife in the Pacific Northwest. We support efforts across the Okanogan-Wenatchee National Forest that restore forest and watershed resiliency where lacking, and ecological processes that maintain quality fish and wildlife habitat. Our success is owed in large part to our commitment to collaboratively work with managers, scientists, user groups, industry, recreationalists and other stakeholders to develop and implement durable restoration plans and projects; this includes our service on several Forest Health Collaboratives across the state.

Overall, Conservation Northwest supports scientifically-rigorous efforts that protect, connect and restore habitats key to our unique wildlife. Germane to this expansion project, we work with partners across the Forest ensure that plans :1) maintain large old trees; 2) maintain and improve aquatic habitat to ensure adequate stream structure, complexity and hydrologic function; 3) protect and enhance wildlife habitat, including that for Northern spotted owl (NSO), lynx and elk; and 4) streamline road and trail systems to satisfy ecological requirements and recreational and other needs.

The Mission Ridge ski expansion project seeks to add approximately 160 acres of public land to the ski resort’s special use-permit, which appears to include more lifts/downhill runs and Nordic trails on the Forest land (as described in Alternative 2). The build-out will also include development on adjacent private lands, including a Village, road and parking lot. Though only a limited number of acres of public land are proposed to be altered, a better description of the connected and cumulative effects from both the on mountain and base area development is warranted.

With regard to the Proposed Action, we support the attention to maintaining large old trees (“Trees over >20” diameter would not be cut.”) to the extent possible and see that the proposed road construction appears limited. However, we have concerns about possible impacts of the Village’s expected water use and snowmaking plans on the overall hydrologic function of the landscape because it is not clear where and how water needs will be met. We suggest that this be made transparent in this EA so that possible hydrologic effects on the public lands be discussed, considered and mitigated in a way that supports the ecological function and provides for wildlife of the landscape. In addition, an analysis/discussion of how these hydrologic effects might impact the underlying, landslide prone, geology would be valuable in informing the public and decision maker.  If snowmaking is a reasonably foreseeable future action, as described in the Master Development Plan, that should be considered too.

Furthermore, we see that the draft EA indicates: “The Forest Plan anticipated growth in the alpine ski industry, and subsequently, an increase in winter sports and snow-related recreation on the forest”. However, the 1990 Wenatchee Forest Plan is decades old and more recent data on actual and projected alpine skiing demand would be more meaningful. It is also unclear if summer use was anticipated yet it appears the proposed Village build-out and use of trails for warmer-weather activities (i.e. mountain biking etc.). This issue needs to be more explicitly and comprehensively addressed, in part because some seasonal wildlife use could be impacted (see below).

Secondly, we have concerns related to wildlife habitat for NSO, lynx and elk. Overall for all three species, we see that important contextual details regarding species demography, distribution and expected impact are absent in this Assessment. For NSO and lynx, it is reported that no individuals were observed, yet the habitat in the Assessment and Project area is suitable or potentially suitable habitat for each, albeit not critical (and peripheral for lynx and dispersal not NERF for NSO). Additional detail about how this suitable habitat fits in with the broader recovery plans for each species though would be useful to see in order to better understand impacts of adding increased human use of the area. For example, is it expected that the suitable habitat in the Project area will be made unsuitable by the human use in the Proposed Action? What percentage of total suitable habitat for each species would such a loss represent? If this habitat becomes unsuitable, how might this affect the probability of achieving broad recovery goals for each species, if at all? This kind of summary and synthesis would be useful to know.

With respect to the Colockum elk herd that uses the Assessment and Project area on a seasonal basis, much basic detail is missing with regard to the herd’s demography, habitat and security needs and mitigation action. We recognize a number of individuals of the public submitted comments on this draft EA with concern about the elk (as evident in the Reading Room for this project). Therefore, overall, we suggest that more attention, detail, consideration, mitigation and monitoring regarding the elk herd be developed in this Assessment. We see that “The proposed ski area expansion activities on federal lands within the Project Area would reduce elk habitat quality on approximately 272 acres while construction activities are occurring.” but cannot readily discern what percentage of the land seasonally used in the area by the elk herd this represents and if the herd will be able to still sustain itself or not if this acreage is not, albeit temporarily, available to them. More detail and context could be provided by attending to following questions, for example, in the EA: how large is this herd, when does it typically use the area, for how long and for what needs? How will the proposed human use impact each of these aspects? Is it expected that the elk will continue to use the area to the extent prior to the build-out and if they avoid the area, what are their other options? That is, what other options will the elk herd have to sustain itself and successfully reproduce/ care for calves, especially during the construction phase (and how long will that be)? As a consequence of this expansion, is it expected that elk condition, calving rate and success suffer and how/to what degree and how long? How will this affect the annual herd population growth rate? Could seasonal migration or movement be impaired and how/to what degree? How will such impacts be comprehensively mitigated and monitored? We see that “The Nordic trails would have a seasonal closure to protect elk calving habitat and to avoid erosion during wet conditions as needed”, and “Mission Ridge would work with the USFS and WDFW to implement seasonal closures, if necessary, as adaptive management, to protect elk calving sites in the area.”, and we would like to see more detail on the trigger for the closures, more information on when and how it is expected that this would occur.

Thank you for the opportunity to comment on this draft Environmental Assessment and for your consideration of our comments and suggestions.

Sincerely,

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