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Organization:

Title:

Comments: Dear District Ranger,

I have reviewed the Mission Ridge expansion plan and have several concerns regarding safety, access, and a negative impact on the recreational skiing experience at Mission Ridge.

Safety:

Given the location of the proposed development, any fire response will be multi jurisdictional in nature.

Responding agencies will include local rural fire departments, the Washington Department of Natural Resources (DNR), and the US Forest Service (USFS). All of these agencies adhere to the same safety standards. These standards place a priority on firefighter safety. Escape routes and Safety Zones are of foundational importance.

Considerations for escape routes include fuel type and density, topography including slope steepness and orientation, chimneys, box or narrow canyons, number of routes, and travel time to Safety Zones.

Safety zones will be of a size and nature to protect all firefighters in a worst case scenario. For perspective, the Mission Ridge parking lot is approximately 7.0 acres and is located in the narrowest portion of a box canyon (one way in one way out) above a 20% slope with a mature conifer forest below. The USFS 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. One may argue that the Mission Ridge parking lot qualifies as a Safety Zone. 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 no wind is a non-conservative assumption. It is important to emphasize that emergency planning is required to consider worst case situations. 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, USFS standards require a Safety Zone over twice the size of the existing parking lot. Additionally any fire response will have to drive over 5 miles on a narrow canyon road with slope angles exceeding 20% most of the way to escape. The Squilchuck drainage has already been designated a high fire risk area. The Forest Service should take into account the role it will play permitting infrastructure that will someday place firefighters in a potentially compromised safety situation.

Access to the public:

The Special Use Permit issued to the Mission Ridge Resort in 1984, which does not expire until 2038, 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, the current ski area management has treated the land more like private property with a gate to prevent motorized entry, a sign that indicates authorized entry only, and wide area closures and policies that limit or prevents 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 management practices by the ski area, it is reasonable to assume that if the proposed USFS land in section 30 is included in the SUP area, that the public would be excluded from using this piece of land in similar fashion as the current SUP area. The proposed area is currently used and enjoyed by the backcountry community, and will be felt as a loss when Mission Ridge restricts access and use of the area. The USFS should enforce the requirements of the Special Use Permit and return management of the land to recent past practices which allowed public use of the public land and roads. If the SUP area is expanded, the USFS needs to monitor the permit holder and require 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.

Negative impact on the recreational skiing experience at Mission Ridge:

On page 11 of the EA, under "Regulatory Framework: Management Direction and Guidance", The Wenatchee National Forest Land and Resource Management Plan (FLRMP) 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 Lake Clara 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 FLRMP. The recently created non-motorized winter recreation area in the Stemilt Basin will become largely useless with 4000 pillows located at the base of the skiing area. This increased population will impact trail use to Lake Clara as well, both by increased year round residential recreation, and by wintertime use of residents who chose not to ski in the ski area. More people skiing on the same terrain does not improve the recreational experience for skiers at Mission Ridge. The proposal is contradictory to the guidance of the FLRMP because it causes overuse.