



November 4, 2019

Martie Schramm, District Ranger  
USFS Mt-Baker Snoqualmie District  
902 SE North Bend Way  
North Bend, WA 98045  
Cc: Brian McNeill

**Re: The Summit at Snoqualmie's Mountain Bike Park Project (56920)**

Dear District Ranger Schramm,

The undersigned conservation and recreation organizations as well as recreation industry businesses and community representatives collectively support the proposed trail building and permitting of lift-serviced mountain bike operations at The Summit at Snoqualmie (The Summit).

Ski areas are becoming synonymous with mountain biking during their "off-season" summer months. In 2011, Congress passed the Ski Area Recreational Opportunity Enhancement Act, which authorized ski area permittees to provide other seasonal or year-round natural resource-based recreational activities and associated facilities (in addition to skiing and other snow-sports) on National Forest system land subject to a ski area permits, including mountain bike terrain parks and trails.

As ski resort communities are increasingly affected by unpredictable snowpack and worry about climate change impacts to their winter operations, many are looking to their alternative options in the off-season. According to the National Ski Areas Association, more than 40% of all ski resorts now offer summer operations, most of them including lift serviced mountain bike operations as their most reliable off-season revenue source. Nationally, 162 ski resorts now offer trails open to mountain biking in the summer, including 101 with gravity fed, lift-operated trail systems. More and more ski resorts are seeing the power of summer mountain bike tourism. Our own neighboring states and Province offer 7 mountain bike ride parks in Idaho, 2 in Oregon, and 6 in British Columbia. Washington's ski resorts lag in offering lift-serviced mountain bike trails, with only one mountain bike park at Stevens Pass.

Mountain biking is a fast-growing sport. Mountain bike sales are now growing faster than road bikes, according to Bicycle Retailer's August 2019 issue. In 2017, mountain bike sales were \$577.5 million, up 3 percent over the prior year, while the \$412.8 million road bike category declined by 12 percent. Resorts across the globe have been offering lift-served mountain biking for over a decade. While there is always some form of opposition, there is increasing support for summer operations at ski resorts and a growing awareness of the positive economic, recreation, and tourism benefits that lift-serviced mountain bike operations bring to resort communities.

The growing success of mountain bike parks in the PNW shows that these parks are in demand and operate as viable economic enterprises. A mountain bike park at The Summit would help meet demand for lift-served mountain biking along the I-5 and I-90 corridors and would likely capture a portion of the Washington and Oregon market that currently travels to Whistler for this experience. Development and operation of a mountain bike park at The Summit will also sponsor economic activity outside of the bike park, as businesses in the greater Snoqualmie Pass area will benefit from more year-round revenue, including food and beverage, equipment rentals, lodging and retail.

### **Project Description & Design Considerations**

The Summit proposes to construct new mountain bike trails on National Forest System Lands (NFS) to be served by the Silver Fir chairlift. The new trails are designed to operate as a downhill mountain bike park, and blend with already existing mountain bike trails to improve the summer recreation experience at the Pass. The bike park includes hand-built single-track as well as machine-built wider "flow" trails, to provide a variety of user experiences and difficulty levels to suit riders of all abilities.

The proposed bike park includes trails on both public and private lands. The proposal includes 6.3 miles of new trails on NFS land and 1.5 miles of trails on private lands at Summit Central, for a total of 7.8 miles of new mountain bike trails. On NFS land, the new trails disturb approximately 3.1 acres. On private lands, the disturbance involves 0.7 acres. This totals to 3.8 acres of total disturbance, well within the limits of a Categorical Exclusion.

The Summit has worked with Evergreen Mountain Bike Alliance (Evergreen) to layout conceptual trail alignments that are designed to avoid streams, wetlands, and sensitive habitat, as documented in the Summit at Snoqualmie Master Plan EIS. The trail alignment does not impact hiking and equestrian use on the PCT, as it does not extend to Summit West.

All proposed new mountain bike trails include grade reversals, drain dips, sediment traps, and other methods of drainage control to help ensure that the trail surfaces do not erode and to prevent sediment mobilization away from the trails. Construction activities are expected to include the use of small machinery, such as a small excavator, and hand crews to clear and grub the trail. Construction equipment, fuels, spill response materials and erosion control materials will be staged in disturbed areas, outside of riparian reserves. Staging areas include the Silver Fir base area, the Summit Central base area, the top and bottom terminals of Silver Fir Express and Summit Central Express, and other existing open areas.

### **Economic Benefits**

Mountain bikers and other summer trail users help resorts and resort communities sustain a year-round economy by improving visitation in traditionally slow summer months. Unlike other tourism activities that tend to draw one-time uses, such as zip lines and peak gondola rides, mountain bike operations draw returning customers and season pass holders which offer a stable and reliable revenue source.

Economic benefits of this project include the following:

- Provide more stable year-round revenue and jobs at the Summit of Snoqualmie.
- Increase local tourism at the Pass and neighboring towns of North Bend, Cle Elum and Snoqualmie, including increasing “stay-cations” as this project will draw local residents who currently drive to Idaho, Oregon, Whistler, and Stevens Pass to get a lift-serviced downhill experience.
- Increased bicycle sales within the state, as ski resort operations typically draw family-wide participation at all skill levels.
- Increased financial sustainability for The Summit due to diversifying portfolio of services and events that extend beyond the winter snow season, including summer bike rental operations and downhill race events.
- On average, summer visitors spend less than half of what winter visitors spend (\$148 per day vs. \$350 per day) but represent the lion’s share of total annual visits (60% vs. 40%).
- Increased local revenue in the adventure tourism market, restaurants, and other ancillary businesses such as grocery and services.

### **Environmental Design and Construction Considerations**

The design process for this project included ecological impact reviews to ensure the best possible rider experience while protecting natural resources. Most trails are located within already disturbed ski area runs, where environmental impact is expected to be little to none. All trails are located within the current ski resort special permit area. No Wilderness or lands outside of the current permit area are affected by this proposal.

Nearly all proposed new trails on USFS land are designed to follow old road grades, existing trails, and power lines. The design team aligned the trails to avoid stream crossings and sensitive habitat as much as possible. None of the proposed trails related are built in an environment that would be considered environmentally pristine.

The primary trail design challenge consists of routing the green trail at a grade that meets the needs of beginner riders and offers a user experience that allows the rider to connect to nature. Due to the steep terrain at the Summit of Snoqualmie, the design team did not find a way to accomplish this in 100% previously disturbed terrain. The beginner trail requires access into the more natural area west of the Silver Fir Lift.

We understand that a portion of the proposed project lies within the Snoqualmie Pass AMA critical area for wildlife connectivity, and that this corridor will continue to be important for wildlife due to development pressures and climate change. Habitat linkage and undeveloped habitat deserve protections from encroachment and recreation impacts from increased summer use, and we encourage USFS staff to thoroughly evaluate this during the environmental assessment for this project. We also encourage evaluation of habitat and/or environmental restoration and mitigation opportunities within the immediate vicinity of the project area.

There are no stream crossings that require structures. As part of the initial scoping notice, exact stream crossing details are not yet known. Final trail alignments will be approved by USFS staff prior to construction. The proposed green trail alignment crosses a few tributary seasonal streams that were found through environmental analysis, which will require crossings following standard USFS practices. Upon initial review, these crossings consist of culverts only, no bridges are identified at this time. Stream

crossings on the blue trail, located within an existing cleared ski slope, require bridges or culverts, and some have existing culverts already.

Overall, the current proposed design maximizes the use of already impacted areas and existing trails lift corridors, ski corridors and power lines, to stay within the existing ski resort footprint. Again, the exception to this is the green trail, which extends to the powerlines and back to accomplish desired beginner grades and a rewarding and sustainable user experience to ensure return visits and bike park success.

Over the past three decades, Evergreen has honed its skills to build trails sustainably, ensuring minimal to no sedimentation impact to streams. Evergreen has passed trail quality audits in FSC certified forests, and understands how to build tread, corners and features to hold up with heavy use and through weather events. Evergreen is committed to developing the proposed new trail systems using best possible sustainable and construction practices to best protect the Pass' wildlife habitat and ecological resources.

The undersigned support the Summit of Snoqualmie in its plans to design evaluate, and operate a mountain bike park, upon thorough environmental review and analysis of environmental impact and mitigation considerations. We thank you and your staff for assisting in making this project possible for residents of the Pass, the Puget Sound, the Upper Yakima Basin, and beyond!

Sincerely,

Yvonne Kraus  
Executive Director  
Evergreen Mountain Bike Alliance

Eric Brown  
Trail Director  
Whatcom County Mountain Bike Coalition

Megan Birzell  
Washington State Director  
The Wilderness Society

Luke Talbott  
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