



KEYSTONE

May 9, 2000

W12882

Box 38 Keystone, CO 80435

PHONE (970) 496-2316

FAX (970) 496-4080

Planning Team
White River National Forest
P.O. Box 948
Glenwood Springs, Colorado 81602-0948

Re: Comment Package

This comment package contains:

1. Cover letter from John W. Rutter, Senior Vice President and Chief Operating Officer of Keystone Resort.
- 2. Comments on the White River National Forest Plan.
3. Maps of the Keystone Permit and surrounding area .
4. Photographs of Independence Mountain.
5. 1-Economic Effects of Management for Alternative D.
6. 1-Report on the White River National Forest Ski Area and Ski Area Trends...
7. 1-Review of Lynx Behavior and Ecology...

Thank you,

J. Boyd Mitchell
Keystone Resor

that are no more crowded than the present high utilization levels, the Forest Service estimates that White River ski areas will need to increase annual capacity appropriately. Specifically, the Forest Service has determined that White River ski areas need to increase practical annual capacity from 9.22 million skiers to about 10.3 million skiers by 2010. DEIS at 3-306. Capacity increases must occur through terrain expansions and appropriate additions of lifts, trails, infrastructure, lodges, parking, and base area facilities. And because the Forest Service expects visitation to increase most rapidly at ski areas in Summit and Eagle Counties, the need for additional capacity will be greatest in those counties.

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D. Local Economic Ties to the White River Ski Areas

Four of the nine counties in which the WRNF is located have significant social and economic ties to skiing on the WRNF – Eagle, Pitkin, Summit, and Garfield. The economies of communities such as Breckenridge, Silverthorne, Glenwood Springs, Eagle, Avon, Vail, Minturn, and Frisco are driven by tourism and recreation on the WRNF. Skiing is the dominant economic activity on the WRNF. DEIS at 3-484. According to the Forest Service, spending associated with skiing provides for 94% or 31,996 of 33,943 WRNF-related jobs and 78% or \$579,181,417 of \$737,547,525 WRNF-derived income. *Id.* Jobs associated with national forest activities provide nearly a third of jobs in the area and 27% of the labor income. The WRNF contributes more to the local economy than any other national forest in the Rocky Mountain Region of the Forest Service. *Id.*

II. A Revised Alternative C Best Accommodates Environmental Protection and Recreation

Given the tremendous environmental and recreational resources on the WRNF, a revised Alternative C appears to be the best choice among the alternatives identified in the DEIS because, in the Forest Service's words, "[i]t represents a balance of recreational uses with ecological conditions." DEIS at 2-8. As explained below, Alternative C should be revised to incorporate the specific recommendations of Keystone and the White River ski areas.

Alternative C's commitment to ecosystem protection is significant. Alternative C seeks to maintain populations of all wildlife species well above minimum population viability levels, and would include habitat improvement projects for threatened, endangered, and sensitive species. Alternative C would also improve watershed conditions and provide wildlife habitat. DEIS at 2-8.

Alternative C also "acknowledges the need to provide a range of recreational opportunities to serve forest customers and local communities while maintaining forest ecosystems." DEIS at 2-8. A revised Alternative C would not meet all current and projected demands for recreation but would meet a reasonable amount. For example, Alternative C allocates some terrain outside existing permit boundaries at White River ski areas to Management Area 8.25 Four Season Resorts. This does not approve a terrain expansion in such areas. It permits White River ski areas to make proposals to

lifts, and reducing the scope of base area development. Vail Resort incorporated numerous lynx conservation measures at Blue Sky Basin. The Colorado Division of Wildlife's response to these mitigation measures has been favorable.

Moreover, the United States Fish and Wildlife Service determined in its decision to list the Canada lynx as threatened under the Endangered Species Act that naturally occurring lynx in Colorado "may be extirpated," that lynx habitat in Colorado is naturally fragmented, and that such habitat is not critical to the persistence of lynx in the United States. 65 Fed. Reg. 16,052, 16,059, 16,061 (Mar. 24, 2000). The Service did not identify the Independence Mountain area as critical lynx habitat.

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Further, evidence from Canada shows that lynx and ski areas can and do coexist. Nicholas A. Roe and Kim G. Poole authored the attached January 2000 report titled *A Review of Lynx Behaviour and Ecology and its Application to Ski Area Planning and Management* ("Lynx Report"). The Lynx Report, which is hereby incorporated into our comments as if fully set forth herein, is based on the collection and analysis of lynx-related data from 11 Canadian ski areas as well as a comprehensive review of existing scientific literature on lynx. Based on this review and analysis, Roe and Poole concluded:

- Lynx are shown in the scientific literature to display a high degree of tolerance of human activities;
- Lynx co-exist with winter and summer recreation at Lake Louise and Nakiska Ski Resorts in the Rocky Mountains of Alberta;
- Lynx are adaptable to ski area operations and readily cross open areas at ski areas.
- There is no evidence that snow compacted by ski area activities, or other means, allows access to lynx habitats by lynx competitors to the detriment of lynx;
- There is no evidence to conclude that snowmaking, grooming, and other nighttime ski area operations cause significant impacts to lynx.

See Lynx Report at iii – v (attached). We would hope and expect that the Forest Service will respond to the specific observations about the adaptability of lynx to ski area operations in the Lynx Report. Based on the Lynx Report and the Service's listing decision, it would be entirely premature to exclude Independence Mountain from Management Area 8.25 based on the lynx considerations. These considerations are best addressed in a site specific NEPA process based on the best available information.

By retaining Independence Mountain in Management Area 8.25 as depicted on the attached map, the Forest Service would retain the flexibility to consider site specific proposals to accommodate the 312,000 additional skiers expected to visit Keystone and the additional 1.3 million skiers and snowboarders expected to visit Summit County ski areas by 2010. DEIS at 3-334. This would also take into account the present need at Keystone for additional terrain, facilities, capacity, and adventure skiing terrain. In short, retaining Independence Mountain in Management Area 8.25 gives the Forest Service the