

Beaver Creek, Breckenridge, & Vail Ski Area 7a,b



areas estimated to contain roads is merely an estimate, and upon additional public scrutiny and review, a greater portion of inventoried roadless areas may be determined to be roaded and exempt from the Proposed Rule.

b. Application of § 294.12 to Ski Areas

The prohibition in § 294.12 on the construction and reconstruction of roads in unroaded portions of inventoried roadless areas is of special concern to the Vail Resorts. Opening NFS lands to downhill skiing and snowboarding requires, in many instances, ski runs, ski trails, ski ways. (Ski ways are also known as catwalks.) The ski ways are primarily intended, designed, and used for recreation but also incidentally accommodate motor vehicles for maintenance and construction of ancillary facilities. The Forest Service should exclude present or future special use permit areas at existing ski areas on NFS lands from the operation of § 294.12 (and § 294.13) because ski runs, ski trails, and ski ways in those areas are not roads within the meaning of the Proposed Rule, but are used to provide important public benefits and significant amounts of recreation on small amounts of NFS lands. Millions of Americans enjoy recreation by skiing and snowboarding at four-season resorts like the Vail Resorts. The purpose and use of ski areas are consistent with and provided for by numerous legal authorities and policies including the Multiple-Use Sustained-Yield Act of 1960, the National Forest Ski Area Permit Act of 1986, and the Forest Service's Natural Resources Agenda. Ski runs, ski trails, and ski ways are used by individual skiers and snowboarders and over-the-snow machines such as snowcats and snowmobiles to provide access and to prepare snow surfaces. The Forest Service has stated that use of over-the-snow machines would not be prohibited by the Proposed Rule. DEIS at S-38. In the summer, motorized vehicles may access a ski trail or a ski way to maintain lifts and other facilities and for the construction of authorized ancillary facilities and other incidental uses.

Ski runs, ski trails, and ski ways are not open to or managed for unrestricted motor vehicle travel by the general public. Rather, they are carefully managed for downhill skiing, snowboarding, associated activities, access by snow cats and other vehicles, use by motor vehicles for maintenance and construction of ancillary facilities, and other incidental uses. Ski trails, ski runs, and ski ways are thus not roads in any customary sense and are not "motor vehicle travelways" within the definition of "road" in § 294.11 of the Proposed Rule. Consequently, we believe that the Forest Service clarify the Proposed Rule to avoid any ambiguity as to whether a ski run, ski trail, or ski way could be construed or interpreted to be a road for purposes of the Proposed Rule. They are akin to and managed as special recreation trails (which are excluded from the definition of "Road" under § 294.11 of Proposed Rule) that provide significant amounts of managed recreation without the uncontrolled, unmanaged motor vehicle access associated with roads. These areas are not managed as motor vehicle travelways; any motor vehicle use by snowcats and other vehicles for maintenance and construction of ancillary facilities is incidental to the primary use for managed winter and summer recreation and subject to prior review, approval, and mitigation.



May 9, 2000

Planning Team
White River National Forest
Post Office Box 948
Glenwood Springs, Colorado 81602-0948

Re: Proposed Land and Resources Management Plan
for the White River National Forest

Dear Forest Service Planning Team:

On behalf of Vail Resorts, Inc., the parent company of Vail (Mountain) Resort, Beaver Creek Resort, Breckenridge Resort, and Keystone Resort, we submit these comments on the draft environmental impact statement ("DEIS") and draft land and resources management plan ("LRMP") for the White River National Forest ("WRNF"). We also incorporate by reference as if fully set forth herein the separate comments submitted by Vail (Mountain) Resort, Beaver Creek Resort, Breckenridge Resort, and Keystone Resort. Please add these comments to the administrative record.

Vail Resorts would like to acknowledge the significant work devoted by the Forest Service to preparing the DEIS and LRMP and to the Forest Plan revision process. This is a challenging and demanding process given the tremendous natural and recreational resources found on the WRNF. We appreciate the additional time that the Forest Service provided for public review and comment, especially because the revised Forest Plan will guide management decisions on the WRNF for the next two decades.

Vail Resorts supports the Forest Service's commitment to protecting fish and wildlife, vegetation, air quality, water quality, and other important Forest resources. We consider ourselves stewards of the natural environment and the public lands that we have been entrusted to manage and are committed to providing high quality recreation in an environmentally sustainable way. People enjoy recreating at our four resorts because of the outstanding natural resources, high quality recreation, and beautiful settings. The Forest Service should ensure that the environmental resources of the WRNF are maintained and protected during the planning period.

In making its planning decisions for the WRNF, the Forest Service should take into account the importance of recreation at the four Vail Resorts and other White River ski areas. We provide a significant amount of recreation on a limited amount of public land under controlled conditions that are designed to minimize or avoid environmental impacts. For example, in 1997, the Vail Resorts hosted about 55% of the total recreation visits to the WRNF on about 1% of the WRNF. DEIS at 3-275, 3-305, 3-308. Together with the other White River ski areas, the Vail Resorts have played a positive and

It is important to recognize that our 8.25 recommendations *reduce* the total 1B allocations at the four Vail Resorts by about 4,600 acres. Of course, designating an area as Management Area 8.25 does not approve any terrain expansion or ski operations. Before a ski area expansion and ski operations may occur on lands designated 8.25, the Forest Service must undertake a full site-specific environmental review and determination of purpose and need under the National Environmental Policy Act.

At Vail Mountain, the addition of Blue Sky Basin has satisfied Vail's terrain needs for the next five to ten years. The Forest Service's visitation projections, however, forecast 432,000 additional skiers at Vail by 2010. This shows that there may be a need for additional terrain in the latter part of the planning period. The Forest Service has suggested that South Game Creek would supply additional intermediate and expert terrain to help meet forecasted demand over the next twenty years. South Game Creek experiences significant winter and summer recreational use today and could easily be integrated into existing terrain and infrastructure. Accordingly, Vail recommends that the Forest Service designate Management Area 8.25 as depicted in the Management Area Map for Alternative C.

At Beaver Creek, the most pressing planning need is the need for additional terrain and capacity on the west side of the resort to meet the needs of guests and accommodate the projected growth in visitation during the planning period. With the opening of Bachelor Gulch Village and Arrowhead Village, increasing numbers of skiers and snowboarders access the west side of Beaver Creek. There is no level 2 through 4 beginner terrain at Bachelor Gulch and Arrowhead and existing terrain is limited. At the 2.2% compound annual growth rate projected by the Forest Service for winter recreation demand in Eagle County, an additional 218,000 skier and snowboarder visits could occur at Beaver Creek by 2010. By that time, visitation will crowd existing terrain and facilities and the limited terrain on west side of the resort will be overwhelmed.

To preserve the ability to maintain high quality recreation at Beaver Creek over the next twenty years, Beaver Creek recommends that the Forest Service retain McCoy Park and Mud Springs in Management Area 8.25. McCoy Park is the site of an existing nordic ski area managed by Vail Resorts and offers outstanding beginner terrain that is presently absent on the west side of the resort. Within McCoy Park, we see the potential to create a world class recreation center that provides for beginner skiing and snowboarding opportunities carefully integrated with an expanded nordic and snowshoe center. Mud Springs offers a reserve of sustained fall line intermediate ski terrain with deep snows and favorable northwestern exposure. Both McCoy Park and Mud Springs are contiguous to Bachelor Gulch and Arrowhead and could be easily integrated into existing terrain and infrastructure at the resort.

The most urgent planning issue at Breckenridge is the need for additional terrain, capacity, and facilities to accommodate existing guests and meet the projected growth in demand and visitation in the coming years. Breckenridge is the most heavily used resort in the United States as shown by the record visitation in the 1999-2000 season by 1.420 million skiers and snowboarders. In March 2000 alone, Breckenridge hosted 369,000