



April 16, 2015

Mr. Scott Armentrout
Forest Supervisor
Grand Mesa, Uncompahgre, and Gunnison National Forests

RE: Crested Butte Mountain Resort – Proposed Teo Drainage and Summer Use Improvements

Dear Supervisor Armentrout,

In 2013, Crested Butte Mountain Resort (CBMR) submitted a Master Development Plan (MDP) that was subsequently accepted by the U.S. Forest Service. Among other things, our accepted 2013 MDP includes plans for lift service and developed terrain in the Teo Park and Drainage and an associated adjustment of our special use permit (SUP) boundary, realignment of the North Face Lift, additional snowmaking, and summer recreation improvements. Consistent with acceptance of our 2013 MDP, CBMR formally proposes site-specific review and analysis of these projects under the National Environmental Policy Act (NEPA), which are described in more detail below.

A terrain distribution analysis performed for the 2013 MDP (pages 53 – 55) identified a deficiency of *developed* intermediate/advanced terrain compared with CBMR's skier and rider market. It also noted a slight deficit of *developed* expert terrain.¹ The 2013 MDP identifies Teo Park and Drainage area (outside of, and adjacent to, our existing SUP boundary) as offering ideal intermediate/advanced and expert skiing terrain. The 2013 MDP also identifies a need to enhance summer recreation activities in order to meet ever-increasing guest demands. Other projects, including snowmaking and the North Face Lift realignment, aim to meet the expectations of guests by improving facilities and providing opportunities distinctive to CBMR.

Each of the projects identified in this proposal are designed to address these issues in a way that is *uniquely Crested Butte* and aligns with our vision of providing a "true, meaningful, and distinctive mountain experience offered by few North American mountain resorts."

PURPOSE FOR THE PROPOSAL

The 1991 GMUG National Forests Amended Land and Resource Management Plan (Forest Plan) states that the demand for downhill skiing can be met by expansion of existing sites.² CBMR's need for additional intermediate terrain has been well-established for years. Additionally, the management prescription for the SUP area (1B – Downhill Skiing and Winter Sports) calls for the provision of

¹ This fact is often overlooked, due to the abundance and quality of alternate, backcountry style terrain at CBMR; however, during periods of low snow or poor snow conditions, it is important to have sufficient developed terrain for expert guests.

² USDA Forest Service, 1991. Grand Mesa, Uncompahgre, and Gunnison National Forests Amended Land and Resource Management Plan. p. II-75.

activities for year-round recreational use.³ CBMR believes that projects contained in this proposal align well with Forest Plan direction and would improve the recreation experience provided on the GMUG.

Since its inception in 1961, CBMR has provided a first-class resort experience for guests, and has established itself as an authentic and unique resort, offering a distinctive experience not often found in the ski industry. While CBMR has been rated as one of the most challenging ski areas in the country, we lack sufficient intermediate and advanced ability level terrain with consistently comfortable pitches that are suitable for the majority of skiers in our market. CBMR has also seen the demand for summer activities increase over the past several years, resulting in an opportunity to address guests' preferences for activities that introduce them to their National Forests in a truly distinctive way.

Currently, our intermediate and advanced ability level guests utilize terrain in the Paradise Express and East River Express pods on northern portions of the mountain. While this terrain is well-used and provides a quality skiing experience, after a couple of days of skiing, our guests generally begin to desire additional terrain. On peak weekends and holidays, this terrain can become overcrowded. The Teo Park and Drainage areas would provide an additional terrain pod for intermediate and advanced skiers looking for a new experience. Realigning North Face Lift would also relieve pressure from the Paradise Express and, along with enhanced snowmaking coverage, will enable better circulation of guests to both the existing and proposed terrain.

Mountain biking trails at CBMR have gained in popularity in recent years and demand is as high as ever for additional diversity, connections, and trail options. In order to continue meeting the demands of guests and to provide opportunities for exploration of the National Forest, CBMR needs to continue developing additional summer trail opportunities that offer variety and excitement, with a focus on beginner and intermediate ability level trails, as guest preferences have shifted in that direction over the past several years. Other uses that encourage exploration will also be important to the continued success of CBMR's summer recreation offerings.

This proposal is consistent with the Statement of Goals and Objectives included in Chapter 1 of the accepted 2013 MDP, which include:

- Creating additional terrain variety/diversity.
- Increasing the total amount of developed/undeveloped terrain and ski pods, with an emphasis on intermediate and advanced skiers to increase the length of stay of destination guests so that CBMR can remain competitive as a destination resort.
- Providing an expanded offering of additional recreational activities for year-round utilization of the facilities, with a focus on summer activities.
- Continuing to increase the quality of the facilities to meet the ever-increasing expectations of the local, regional, and destination skier markets.

³ Ibid. p. III-93.

ELEMENTS OF THE PROPOSAL

This proposal consists of various lift, terrain, snowmaking, and summer use improvements. As mentioned above, the development of lift-served skiing terrain in the Teo Drainage would require an SUP boundary adjustment. All of the proposed projects are depicted on the attached figures.

SUP Boundary Adjustment

The development of lift-served skiing terrain in the Teo Drainage area would require an approximately 500-acre SUP boundary adjustment. According to the 1991 GMUG Forest Plan, this proposed boundary adjustment would be located in areas identified as management prescription 2A – Semi-Primitive Motorized Recreation (approximately 100 acres), and 6B – Livestock Grazing, Maintain Forage Composition (approximately 400 acres).

Terrain

The Teo Park and Drainage areas are located on the northeastern side of Mt. Crested Butte. A portion of the area is already skied—the *Teo 1 and 2* bowls. While Teo Park is located completely within CBMR's existing SUP boundary, the Teo Drainage area is beyond SUP area. The entirety of this area is characterized by rugged terrain and mixed forest types. Portions of the Teo Drainage area are used for hunting in the fall, but overall, the area is seldom accessed. Our goal for this proposal is to provide a unique skiing experience to our guests that includes additional intermediate/advanced terrain. Our design protects valley viewsheds and minimizes impacts to the East River Valley floor.

Additional lift-served ski terrain would be developed in the Teo Park and Drainage area, served by two proposed chairlifts—Teo Park and Teo Drainage. Developed ski terrain would total approximately 69 acres across 5 intermediate-level trails and one advanced-level trail. A key piece of this proposal is maintaining the unique feel that guests have come to appreciate about CBMR. Rather than traditional developed intermediate trails, which are cleared of trees from edge to edge, these trails would be *groomable glades*. The concept behind *groomable glades* is to provide a backcountry-like experience for intermediate ability level guests within the ski area boundaries. The trails will take advantage of the setting, including natural forest and rock features, and provide a unique skiing experience not currently offered to intermediate skiers at CBMR.

In addition to developed trails, approximately 29 acres of distinct advanced and expert glades are proposed on both flanks of the Teo Drainage. These glades would be accessible from *Teo Bowl* (to the south) and the top of the proposed Teo Park and North Face lifts (to the north). Where practical, these glades would be located in areas where natural glades already exist in order to minimize tree clearing. For these glades, approximately 50 percent of trees would be removed within 100 feet of centerlines. Attempts would be made to remove dead and dying trees first, in order to address skier safety, operational concerns, and forest health.

Additionally, glading in the Teo Park area as well in areas between and surrounding the developed trails in the Teo Drainage area, would occur (see attached *Proposed Winter Upgrades* figure). Selective tree removal in these areas would supplement the naturally-gladed terrain that currently exists. Therefore, while developed trails and distinct glades would account for nearly 100 acres of terrain, approximately 400 acres of additional terrain would become lift-served (including *Teo 1 and 2* bowls). Thus, with the installation of two lifts, over 500 acres of both developed and undeveloped intermediate and advanced terrain will become lift-served.

Developed trails and glades in Teo Park and Drainage would require approximately 88 acres of vegetation removal. Limited spot grading would be expected to occur, on an as needed basis, to improve skier circulation and to eliminate obstacles. As mentioned above, the creation of *groomable gladed* trails would not only provide a unique guest experience, but would lessen the amount of vegetation removal required.

No snowmaking is proposed in the Teo Drainage area, as prevailing winds and weather patterns provide sufficient snow coverage throughout the season. In fact, snow coverage in Teo Drainage often exceeds that of the rest of the resort.

Access to the new terrain would be possible via two routes.

- From the top of the High Lift, advanced and expert ability level guests would be able to traverse across the ridge above *Teo 1 and 2* bowls on a proposed groomed skiway, to access the gladed terrain on the southern side of the drainage. Limited spot grading may be necessary along this skiway. Because the glades on the southern flank of the Teo Drainage would not be able to be repeat-skied, they would be expected to hold quality snow for longer periods of time. Guests would also be able to ride the Teo Park Lift after skiing *Teo 1 and 2* bowls, eliminating the need to hike out of these areas.
- From the top of the realigned North Face Lift, intermediate ability level guests would be able to follow trails to the bottom of Teo Park Lift, or continue down to the bottom of Teo Drainage Lift. Advanced and expert ability level guests would be able to follow the ridge separating *Spellbound Bowl* and the Teo Drainage and access gladed terrain on the northern flank of the drainage.

To exit the new terrain, guests would ride the Teo Park Lift to the top of the existing North Face surface lift to access *Rachel's* and *Shep's Chute*, into *Paradise Bowl*.

In the spirit of “adaptive management,” we are open to working with the Forest Service to determine the most appropriate options for removing trees in the Teo Park area (in proximity to the existing *Teo 2 Egress* catwalk). At this point, we propose that trees would be skidded to a landing area, and taken off-site via truck. Trees removed in the Teo Drainage area would be flown via helicopter to the East River Drainage and taken off-site via truck. A designated timber staging area near the bottom of the proposed Teo Drainage Lift would double as a future evacuation zone for the new trail pods. Additionally, a flight path has been identified (see the attached figure) and will be further developed in coordination with the Forest Service.

CBMR plans to retain large trees in proposed trails as part of the *groomable gladed* skiing experience. To limit the amount of disturbance from transporting trees off-site, small-diameter trees would be lopped and scattered, where possible.

Lifts

This proposal includes two new chairlifts (Teo Park and Teo Drainage) and one lift replacement (North Face). The Teo Park and Teo Drainage lifts would provide access to new developed ski terrain and glades in the Teo Park portion of the CBMR SUP area, as well as in the adjusted SUP boundary.

The Teo Park Lift would be a fixed-grip triple chairlift serving Teo Park and providing an egress from Teo Drainage. The lift would have a slope length of approximately 3,050 feet and a vertical rise of just

over 500 feet. The lift's capacity is proposed to be 1,200 people per hour (pph). Construction of the lift would require approximately 4 acres of vegetation clearing and less than 3 acres of grading. The lift would provide access to a variety of terrain, including intermediate trails in Teo Park, advanced and expert trails and glades on the northern side of Teo Park, and *North Face*, *Spellbound*, *Phoenix*, and *Third Bowl*. The Teo Park Lift would be a top-drive lift, with power coming from the existing source at the top terminal of the North Face surface lift (or, potentially, we may need to bring power up the *Schofield Road*).

The Teo Drainage Lift would either be a fixed-grip or high-speed detachable chairlift and would serve the lower portions of the adjusted SUP boundary. This lift would have a slope length of nearly 6,000 feet, a vertical rise of approximately 1,625 feet, and a capacity of approximately 1,200 pph. Construction of the lift would require approximately 10 acres of vegetation clearing and less than 3 acres of grading. The lift would provide access to 3 intermediate trails and 3 advanced/expert glades, and would provide egress from numerous north-facing glades. The Teo Drainage Lift would also be a top-drive lift. Power would be buried in a proposed road originating from the existing *Schofield Road* ski trail, which would also serve as a service road in snow-free months (see *Construction, Maintenance, and Utility Access*, below).

The North Face Lift would be realigned and upgraded from a surface lift to a fixed-grip triple, with a slope length of 4,300 feet, a vertical rise of nearly 1,450 feet, and a capacity of 1,800 pph. Construction of the lift would require approximately 3.5 acres of vegetation clearing and less than 3 acres of grading. The realigned North Face Lift would provide enhanced access and connectivity from northern portions of CBMR. The lift's bottom terminal would be located near the intersection of the *Daisy* and *Upper Treasury* trails. The lift's top terminal would be located near the top terminal of the existing North Face surface lift.

Circulation across the resort would improve with the realigned North Face Lift. It would allow for additional repeat-skiing opportunities for intermediates and would also relieve pressure on the Paradise Express by providing a second access option from the East River area to the upper mountain.

Trees removed for lift construction would be taken off-site as described above under *Terrain*.

Snowmaking

As described in the 2013 MDP, the 2008 Mountain Improvements Plan (MIP) listed 32 acres of snowmaking coverage on trails that did not actually have snowmaking. As a result of this finding, and in accordance with recent discussions with Forest Service staff, CBMR intends to use this 32 acres of snowmaking "credit" without having to build a water storage pond. As such, approximately 32 acres of additional snowmaking is proposed on *Championship*, *Black Eagle*, *Lower Gallowich*, *Rachel's*, and *Shep's Chute*. This additional snowmaking will provide adequate early and late season coverage, as well as sufficient coverage during low-snow years.

Proposed snowmaking would require that air, water, and power lines be buried in these trails. The exact location of these lines will be determined as design is finalized. However, it is known that these lines will connect with existing snowmaking infrastructure efficiently, so as to limit ground disturbance and costs.

Construction, Maintenance, and Utility Access

Construction and maintenance access to the top of the proposed Teo Park and realigned North Face lifts would be provided by the existing snowcat road which follows the *Schofield Road* ski trail.

Approximately 450 feet of this road would be rerouted/improved to address erosion concerns and allow for timber removal. Construction, maintenance, and utility access to the top terminal of the Teo Drainage Lift would be provided by a proposed service road that would leave the *Schofield Road* ski trail at the *Paradise Bowl* saddle, and contour through lower portions of *Teo Bowl* (see figure). The proposed road would be approximately 2,300 feet in length and would require approximately 1.2 acres of vegetation clearing and 1.5 acres of grading. Utility lines would be buried in this road to provide power to the Teo Drainage Lift.

Construction, maintenance, and utility access to the bottom terminal of the proposed North Face Lift would utilize existing service roads between the bottom of the Paradise Express and the top of the East River Express.

Summer Recreation

The enactment of the Ski Area Recreational Opportunity Enhancement Act of 2011 (SAROE) provides authority for mountain resorts operating on National Forest System (NFS) lands to offer an expanded range of outdoor recreation activities in order to further opportunities for the public, allow year-round utilization of existing resort facilities, and stimulate job creation and economic growth within local communities. CBMR believes the summer components of this proposal, including enhanced mountain biking trail offerings and multi-use trails are fully consistent with both the spirit and letter of this important legislation.

The following summer recreation projects are built upon the goal of offering an enhanced appreciation of the natural environment and natural resource-based recreation in guests to the GMUG. Both of the projects have been designed to harmonize with, and benefit from, the natural setting of the NFS lands within our SUP area. We also believe that these projects fit well into the developed recreation setting that is offered within our SUP area.

Mountain Biking Trails

Approximately 15 miles of multi-use and mountain biking trails are proposed within the existing SUP area (and extending on to private lands in the base area). These trails, or larger pods within which trails could be located, were identified in the 2013 MDP. They aim to expand on the success of CBMR's existing summer trail network by maximizing opportunities around the Red Lady Express and Silver Queen Express, which are the two chairlifts that operate in the summer.

Over the past several years, we have experienced a growth in the number of beginner and intermediate mountain bikers using our trails. As our market demographic expands in age and ability level, we are seeking to provide more variety, along with opportunities for learning progression. Providing more trail options and connections will allow users to disperse across the trail network and will offer a vast array of ascending/descending possibilities. The designated use of proposed trails seeks to minimize user conflicts and maintain connectivity by continuing to allow for two-way traffic on trails located on the exterior of the network, and downhill traffic on trails on the interior of the network.

We plan to construct trails by hand as well as with the assistance of machines, with hand-built methods being used in sensitive areas to minimize erosion concerns, and to provide different user experiences. Trails will generally be between 24 and 48 inches wide, with some variation depending on the type of trail (downhill versus cross-country), steepness of the terrain, intended user group, and proximity to streams and water bodies. As always, our construction methods will follow accepted Forest Service guidelines to shed water, prevent erosion, and provide for a quality experience for multiple user groups.

Proposed mountain biking trails are shown on the attached *Proposed Summer Upgrades* figure. Trail alignments are approximate and will be fully developed in the field, in response to local topography and in consultation with Forest Service staff. It is our desire to develop a trail network that does not compromise the integrity of the natural environment and provides a high-quality experience for guests.

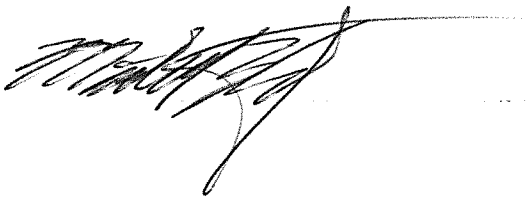
CONCLUSION

Discussions with staff at the GMUG and Gunnison Ranger District regarding what type of analysis is appropriate for addressing these projects has been ongoing. As we have discussed, upon review of this letter, and the proposal contained herein, the Forest Service will make a determination as to whether to analyze potential impacts of this project in an Environmental Assessment or an Environmental Impact Statement. Due to the resource surveys required and the amount of time it will take to prepare either of these analyses, we would appreciate beginning the public scoping process for this project as soon as possible.

We are prepared to make the services of a third-party contractor available to the GMUG to assist in this forthcoming analysis. We understand that a Memorandum of Understanding and Cost Recovery Agreement will be necessary prior to initiating the NEPA process.

We look forward to working with you and your staff on this project.

Sincerely,



Michael Kraatz
Vice President/General Manager
Crested Butte Mountain Resort

CC: John Murphy, Gunnison District Ranger
John Sale, Crested Butte Mountain Resort