

8/4/16

RE:

Arapahoe Basin Ski Area Projects

White River National Forest

680 Blue River Pkwy

PO Box 620

Silverthorne, CO 80498

# **Arapahoe Basin Ski Area Projects #41664**

To: Reviewing Officer, Dan Jiron,

Regional Forester, USDA Forest Service, Rocky Mountain Region

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Friends of Arapahoe Basin, submits this objection on behalf of the entire organization, with full support from all members. Through an intensive investigation of claims made by Arapahoe Basin and a small dedicated research team, we have compiled a list of objections, ambiguities, and falsities in the FEIS. Our information and research requires that the supervisors and approval committees take an immediate and more holistic view of the proposed expansion. We feel that greed of foreign investors has spurred increased visitation, overcrowding, decreased public safety and environmental regard. We wholeheartedly oppose the expansion of Arapahoe Basin into the area known as the "Beavers" and urge an adoption of the no action alternative.

Arapahoe Basin, owned by Canadian investment group Dream Unlimited Corp; is asking for the permission of United States Forest Service to permit destruction of their high alpine forest all in the name of profit. They claim that the improvements and expansion will be to "improve guest experience and skier safety". This is repeated numerous times throughout the DEIS. Each reason that is in support of the expansion however, inevitably increases size of property, number of visitors, profitability, and eventually a resort that mirrors every other monopoly owned resort in Summit County.

FEIS:

- A. SUMMARY OF THE PURPOSE OF AND NEED FOR THE PROPOSED ACTION The overall purpose of the proposed projects is to improve the guest experience and skier safety at the Arapahoe Basin Ski Area (A-Basin). **It is not anticipated that the proposal would elicit increases in peak day visitation.**

This expansion is proposed to keep up with recent visitation increases, an A-Basin representative commented that they average more than 400,000 visitors each year, and numbers are growing. It is clear that visitors are growing, and adding additional acreage will only add to this trend. Furthermore, adding in 4 season activities will also increase visits and guests. It will bring a far more diverse crowd to the ski area, and while diversity is good, larger population pool equals more bodies and more human impact on the area.

The addition of new terrain to A-Basin is unnecessary. They nearly doubled in size just a few years ago, with the addition of Montezuma Bowl. As of now A-Basin is 960 acres, with the addition of the proposed 492 acres in the "Beavers" A-Basin will have almost tripled in size in that past few years. With increase in size there will be obvious and undoubted increase in visitation and current infrastructure will not permit such growth. There were no plans to increase parking or bathrooms so how will additional traffic be handled? This pattern of growth is not sustainable.

A-Basin supposes (1-4 of FEIS) that they have a "deficit in expert terrain". Currently of the 960 acres 60% is considered advanced/expert, that is black diamond and double black diamond terrain. This does not appear to be a deficiency. Furthermore, the skiable terrain will only increase intermediate or "average" skier runs by 13 acres. The vast majority of the proposed expansion terrain is expert, 198 acres to be exact.

#### **FEIS: Terrain**

The Proposed Action would expand A-Basin's operational boundary by approximately 492 acres and would result in approximately 338 additional acres of skiable terrain in the Beavers area, including:

- Approximately 26 acres of terrain (**composed of 13 acres of intermediate** and 13 acres of advanced intermediate terrain) across two traditional trails (B-2 and B-4)
- Approximately 24 acres of expert skiing terrain on two tree skiing trails (B-1 and B-3)
- Approximately 91 acres of open bowl skiing in Beaver Bowl
- Approximately 45 acres of expert level skiable terrain in tree skiing areas A, B, and C
- Approximately 153 acres of expert level tree skiing terrain in the Steep Gullies

In Ch 2.3 of FEIS it was cited that between 2,300 and 16,600 skiers ride the “beavers” backcountry area annually. These numbers, while doubtful are nothing compared to the proposed 3 or 4 person high speed chairlift that will propel about 1800 people an hour up into the same zone. The impact that backcountry skiers now have on said terrain is literally a minor percentage compared to what the proposed expansion will bring. The below reference that is listed to determine the numbers of riders in the “beavers” cannot be found online, and methods are questionable.

Thompson, R.W. 2014. Environmental Baseline Skier Use of Backcountry Terrain Accessed Via Arapahoe Basin Ski Area, Dillon Ranger District, White River National Forest, Summit County, Colorado.

The reasons to object to this proposal #41664 are numerous and we feel many have been made clear through the public reading room. We agree with all statements made by Rocky Smith and his cohorts at Sierra Club. The environmental impacts that will result from the project are enormous. From the Lynx habitat, Boreal Toad, Big Horn Sheep, migratory birds, all are being marginalized in Summit County as the ski industry pushes harder and further into the wild forest. We must maintain their critical ecosystems. This expansion is only beneficial to the ski area if they can glade, remove rocky outcrops, and mechanically manage the current topography. Forest Service Manual 2343.14 states that you must not “require significant modifications to topography to facilitate construction”. How then will the average skier that A-Basin hopes to please be able to enjoy this terrain unless it is drastically modified and altered.

The original scoping process was introduced to the local community via 50 mailed letters to various residents. Of these 50 only 15 people commented. These comments shaped the DEIS we are reviewing now. We want to know who these people were and how they were chosen; how can the voices of only 15 random people truly illuminate the concerns of our community. Furthermore, the Legal Public Notice of Availability was published in the Glenwood Post, 3 counties away. This is deceptive and alludes to the fact that they do not appreciate or want to know how the local community feels about said expansion.

Least spoken of, but of utmost importance is the inability of Arapahoe Basin to expand further without plans to accommodate additional vehicles. Infrastructure, concessions, restrooms, parking all need to expand along with the acreage. None of this was proposed, never mentions in the draft EIS nor in the FEIS. This is extremely important as parking of current clientele is at a maximum, and has already spilled out on to the highway. Photos and video proving this are available upon request.

The Friends of Arapahoe Basin comprises many local Summit County residents. This letter was drafted on their behalf. A list of names and contact information can be provided (per 36CFR statute 218.8) upon request. Please listen to the words of the local population.

Sincerely,

Danny Ferrari

Colleen Merrick

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