



May 31, 2020

Mr. Scott Fitzwilliams
White River National Forest
c/o Sam Massman, Project Leader
Dillon Ranger District
PO Box 620
Silverthorne, CO 80498

**RE: Keystone Resort's Comments on the Bergman Bowl Enhancement Projects
Notice of Proposed Action**

Dear Scott,

Keystone Resort respectfully submits these comments on the White River National Forest's Notice of Proposed Action ("NOPA") for the Bergman Bowl Enhancements Projects (the "Project"). Keystone commends the Forest Service for its work in reviewing the Project, and thanks the Forest Service for this opportunity to comment. Keystone looks forward to working cooperatively with the Forest Service during the review and subsequent construction and implementation of the Project. Please add these comments to the administrative record.

Prior to receipt of the NOPA, Keystone Resort conducted significant outreach and information sharing about the Project, including meeting with community homeowners and master associations in Keystone, the Colorado Department of Transportation, Colorado Parks and Wildlife, Summit County Government staff, the Summit County Board of County Commissioners, and other community leaders and stakeholders. Keystone Resort is committed to a collaborative partnership with our community and the Project will continue to build on that commitment.

Specifically, the Project is a meaningful capital investment that will have direct and indirect benefits to the entire community, illustrating Keystone's commitment to the economic and social recovery of Summit County during these unprecedented times. The Project will make Keystone more attractive as a family friendly destination resort, which in turn will promote economic activity across Summit County.

1. The Project is consistent with and achieves the winter recreation objectives of the White River Forest Plan.

The Project is an important milestone for Keystone Resort and is consistent with and helps achieve the winter recreation objectives of the White River Forest Plan. Keystone first identified the desire and need to provide lift-served skiing in Bergman and Erickson Bowls in Keystone's written comments submitted prior to the Forest Service's adoption in 2002 of the White River National Forest Plan. The Forest Service agreed. It allocated Bergman, Erickson,



and Independence Bowls to Keystone’s special use permit and to Management Area 8.25 for lift-served skiing in the 2002 Forest Plan. The Forest Service explained on page 25 of the Forest Plan Record of Decision that the specific lands it included in the special use permit for Keystone (and at other Summit County ski areas) were intended to provide “a sufficient number of acres . . . that are most responsive to the effects of an increased population and demand” and that the “mix of terrain allocated is intended to provide the types of terrain that best meet customer preferences and ability levels, and other qualitative or physical needs,” including “the opportunity to provide a higher quality experience by lowering skier densities.”

Consistent with that Forest Plan decision, Keystone identified lift-served skiing to access terrain in Bergman and Erickson Bowls in its 2009 Master Development Plan (“MDP”). Keystone’s MDP described high-quality winter recreation in Bergman and Erickson Bowls as envisioned in the Forest Plan. The MDP notes that the natural topography of the alpine terrain in Bergman and Erickson Bowls is particularly suited for intermediate and novice lift-served skiing. The purpose is also to provide lift access to the advanced terrain in Erickson Bowl. The MDP notes that lift-served skiing in this location will help disperse skiers across an increased amount of terrain, reduce congestion, and more effectively circulate skiers between Dercum Mountain, North Peak, and the Outback.

The Forest accepted the MDP, including the concept of lift-served skiing proposed now in the Project.

Since Keystone first identified a need for the Project in 2002, and subsequently included it in its 2009 MDP, Keystone has worked diligently to formulate and fine tune the Project proposal, including by soliciting and incorporating the recommendations of resource specialists. The aim was to formulate a project design that improves the quality and range of the winter recreation experience while avoiding, minimizing, and mitigating possible adverse impacts to the natural environment.

2. The Project will provide an enhanced guest experience on National Forest System Lands.

The purpose of the Bergman Bowl Project is to disperse skiers and provide novice and intermediate skiers at Keystone with increased access to high-alpine terrain. The Project will also help effectively circulate skiers between Dercum Mountain, North Peak, and the Outback. The Project will allow Keystone to continue to provide high-quality winter recreation on terrain in Keystone’s special use permit that is consistent with the expectations of Keystone’s present and future guests.

Keystone is a premiere ski and snowboard resort in Colorado. Keystone offers a diverse terrain network that appeals to skiers and riders of all levels, making it a top destination for families, destination visitors, and local Front Range skiers. Over the past two decades, industry trends and guest survey results indicate a desire among intermediate skiers and riders for more diverse terrain offerings that include access to less-developed terrain, e.g., open bowls, glades,



high alpine terrain, and other natural features that provide an inbounds, “off-piste” or “big mountain” experience. The Project offers that type of exciting terrain, which is limited at Keystone. The Project will provide intermediate and novice skiers with lift access to alpine terrain within Keystone’s special use permit.

The Project is consistent with the goals and objectives identified in Keystone’s 2009 MDP, and is consistent with the Forest Service’s decision in the Forest Plan to allocate this terrain to Management Area 8.25 for lift-served skiing for this purpose.

3. The Project design minimizes and avoids adverse effects.

The topography of Bergman Bowl is naturally suited to novice and intermediate skiers and riders. This will allow Keystone to provide guests of different ability levels with access to high-alpine, less-developed terrain, typically reserved for advanced and expert skiers, with only minimal terrain modifications.

Keystone specifically designed the Project to avoid and minimize impacts to wetlands, wildlife, and other resources. This includes minimizing the need for grading and limiting direct impacts to wetlands. The Project will have limited to no impacts to lynx habitat, will maintain lynx habitat connectivity, and is consistent with the *All SI Standard* for lynx habitat in the Forest Plan. The NOPA also identifies additional Project Design Criteria, best management practices, and other mitigation efforts that will be required before, during, and after construction. Through the Project design and mitigation efforts identified in the NOPA, it is expected that the Project will result in no significant impacts to environmental resources, including wetlands and wildlife.

Providing lift access to Bergman Bowl will also not expand skiing into completely new terrain. The Project area has been part of Keystone’s operational terrain and has seen consistent skier use since 2003. And the Project does not contain any proposed summer uses, aside from continuing the existing summer operation at the Outpost Restaurant, so it will not result in any new seasonal use in the area.

The Forest Service first approved snowcat skiing in Bergman and Erickson Bowls in 2003. Since that time, Keystone has continued to offer snowcat skiing through Keystone Adventure Tours (“KAT”) and the area is also open to hike-to skiing access. The KAT snowcat program serves between 200 and 400 skiers per week and between 25 and 50 guests hike into Bergman Bowl each day depending on weather and snow conditions. Keystone ski patrol conducts avalanche mitigation work and regularly patrols the area. As noted in the NOPA, Bergman and Erickson Bowl currently see “consistent skier traffic and human presence” throughout the ski season. The Project will provide intermediate guests with the increased ability to experience this unique, high-alpine environment that is already a part of Keystone’s existing ski terrain, thereby enhancing their winter recreation experience on public lands.



The Project will not result in the loss of either short-term or long-term access to ski terrain. Keystone will continue to provide hike-to ski access and will operate the KAT snowcat program in Bergman and Erickson Bowls during completion of the Project. Snowcat and hike-to skiing will continue in Independence Bowl after completion of the Project.

4. The no-action alternative would prevent only minimal environmental impact and result in no upgrade to the recreation experience.

The NOPA demonstrates that because of the existing condition of the Project area, thoughtful planning, and the implementation of Project Design Criteria, the Project will result in only minimal environmental impact. Comparatively, the Project will have an outsized positive impact on the winter recreation experience at Keystone.

As noted in the NOPA, under the no-action alternative the Forest Service would not authorize the Project. Current operations at the resort would continue without changes, additions, or upgrades, and no new recreational opportunities would be provided. The Forest Service Handbook provides that “the effects of not taking action should provide a compelling reason for taking action.” FSH 1909.15 § 41.22. That is the case here. A decision not to authorize the Project would not improve the lift-served winter recreation experience in Bergman and Erickson Bowls, and would not provide lift access to alpine terrain for novice and intermediate skiers in those areas. Approving the Project will allow more guests to experience high quality winter recreation on their public lands with only minimal environmental effects.

Keystone thanks the Forest Service in advance for its work preparing the environmental assessment and looks forward to continuing to work cooperatively with the Forest Service and other stakeholders. Keystone urges the Forest Service to adopt the Project in its current form.

Sincerely,

Jody Church
Jody Church

Vice President & General Manager
Keystone Resort