



June 14, 2021

Via electronic transmission

USDA Forest Service
Rocky Mountain Regional Office
Attn: Objection Reviewing Officer
P.O. Box 18980
Golden, CO 80402
Email: SM.FS.r02admin-rev@usda.gov

**RE: Steamboat Ski & Resort Corporation Objection to the April 2021 Draft
Decision Notice for the SSRC Resort Improvements Project**

Dear Reviewing Officer:

Steamboat Ski & Resort Corporation (SSRC) respectfully submits this objection to the April 2021 Draft Decision Notice, Environmental Assessment, and Finding of No Significant Impact for the SSRC Resort Improvements Project (the "Project"). SSRC worked diligently with the Forest Service, Colorado Parks and Wildlife (CPW), and other stakeholders to develop a Project that will improve the quality of the world-class recreation opportunities within Steamboat Ski Resort's permitted ski area boundary while avoiding, minimizing, and mitigating possible adverse effects to the environment.

SSRC appreciates the Forest Service's thorough and thoughtful work on the Project. SSRC supports the proposed decision to approve the proposed action and the project-specific Forest Plan amendment. SSRC strongly agrees with the Forest Service's conclusion that the Project "will improve the experience of guests to the Forest within the SSRC SUP area," and "will not result in any unacceptable effects to NFS lands." *Id.* at 1, 3. SSRC submits this objection to request that the Forest Service clarify certain points in the Final Decision Notice (DN) and Environmental Assessment (EA). SSRC requests a meeting with the Reviewing Officer to discuss and resolve these issues.

SSRC seeks to resolve this objection, and any issues raised by any other objectors, in a collaborative way. SSRC requests an objection resolution meeting with the Reviewing Officer pursuant to 36 C.F.R. § 218.11, and requests the opportunity to participate in meetings held with other objectors.

I. Information Required by 36 C.F.R. §§ 218.8(d) and 218.9

SSRC has standing to submit this objection pursuant to 36 C.F.R. § 218.5(a). SSRC participated in the planning process, including by submitting written comments on the Notice of Proposed Action (NOPA). *See* Exhibit A. SSRC timely submits this objection within 45 days of publication of the legal notice in the Laramie Boomerang on April 28, 2021. SSRC provides the following information pursuant to 36 C.F.R. § 218.8:

Objector's Name and Address (36 CFR § 218.8(d)(1)):

Dave Hunter
Vice President of Mountain Operations
Steamboat Ski & Resort Corporation
2305 Mt. Werner Circle
SSRC Springs, CO 80487
(970) 871-5319

Name of Proposed Project, responsible official, and location (36 C.F.R. § 218.8(d)(4)):

Name of Proposed Project: Steamboat Resort Improvements Project
Responsible Official: Forest Supervisor Russell Bacon
Location: Medicine Bow-Routt National Forests and Thunder Basin
National Grassland, Hahns Peak/Bears Ears Ranger District

The issues raised in this objection are based on SSRC's prior written comments on the NOPA, *see* Exhibit A, or issues arising after the public comment period. 36 C.F.R. § 218.8(d)(6).

II. The Final DN should state clearly that the analysis and decision tiers to the 2018 Environmental Impact Statement and that all projects authorized in the 2018 Record of Decision, but not yet implemented, remain approved.

SSRC appreciates the Forest Service's statement that the EA "tiers to the analysis and decision presented in the *2018 Steamboat Ski Resort Final EIS* and *Record of Decision* (2018 FEIS/ROD)." EA at 1. The EA appropriately acknowledges in multiple places that the Project's environmental effects are within the scope of those analyzed and approved in the 2018 FEIS/ROD. *See* EA at 5, 6, 7, 21, 22, 39.

The Final DN should contain language similar to that in the EA and state clearly that as part of the rationale for the decision, and the agency's compliance with the National Environmental Policy Act, the EA tiers to and incorporates the analysis and rationale in the 2018 FEIS. The 2018 FEIS is only three years old and analyzed many environmental resources and project elements that are relevant or similar to the Forest Service's analysis and decision to

approve the Project. The Forest Service makes this point in the EA and should state this clearly in the Final DN.

The Forest Service should also state clearly that all of the projects authorized by the 2018 ROD that are not yet implemented remain approved—including the approved Pioneer Ridge lift—unless a specific approved project is modified and approved through the current proposal, such as the extension of the Bashor Gondola into the Wild Blue Gondola and the scaled-down Burgess Creek Bridge. This clarification is necessary because Figure 2 in the EA omits the approved Pioneer Ridge lift.

III. The Final DN and EA should clarify the scope and applicability of Wildlife Standard 6 and the project-specific Forest Plan amendment for that Standard consistent with the 2018 FEIS/ROD.

The Final DN and EA should more clearly define the applicability of Forest Plan Threatened, Endangered, Sensitive Species, and Wildlife Standard 6 (“Wildlife Standard 6”), and the scope of the project-specific Forest Plan amendment about Wildlife Standard 6. The EA should include language that is consistent with the description of Wildlife Standard 6 and the project-specific Forest Plan amendment in the 2018 FEIS/ROD. Wildlife Standard 6 provides:

Protect known active and inactive raptor nest areas. **Extent of the protection will be based on proposed management activities, human activities existing before nest establishment, species, topography, vegetative cover, and other factors.**

A no-disturbance buffer around active nest sites will be required from nest-site selection to fledging (generally March through July). **Exceptions may occur when animals are adapted to human activity.**

EA at 15 (emphasis added).

The Draft DN approves a project-specific Forest Plan amendment that exempts the construction phase of the Project from Wildlife Standard 6. EA, Appendix A at 1. The Forest Plan amendment is necessary to ensure that the Project can be completed in a reasonable timeframe given the limited construction season. *Id.* at 1–2. The amendment does not apply to active goshawk nests. *Id.*

The Draft DN and EA both state that the amendment does “not apply to the operation or maintenance phase” of the Project. Draft DN at 2; EA at 15. This language has the potential to cause confusion and does not accurately state the scope and applicability of Wildlife Standard 6.

The confusion arises because the statements in the Draft DN and EA inaccurately suggest that Wildlife Standard 6 restricts operation and maintenance activities at Steamboat Ski Resort. That is not the case. The plain terms of Wildlife Standard 6 do not prohibit operation and maintenance of the Wild Blue Gondola, other Project components, or other existing and future operations at Steamboat Ski Resort because human activity occurred in these areas prior to nest establishment and the nesting raptors are adapted to these activities. The Forest Service made this point clear in the 2018 FEIS.

Appendix A to the EA acknowledges this point and explains that “[r]aptors, including goshawks, that nest in an area actively used by skiers and maintenance staff are likely adapted to

some level of human activity, which may include the intermittent operation of the gondola during spring and summer.” EA, Appendix A at 2. Wildlife Standard 6, accordingly, “would not prohibit limited use of the project area and project components (i.e., the proposed Wild Blue Gondola) during those times.” *Id.* This language is accurate and helpful, and it is consistent with the plain text of Wildlife Standard 6. But the language elsewhere in the EA and Draft DN has the potential to cause confusion and ambiguity as to how Wildlife Standard 6 and the project-specific amendment will apply to future operation and maintenance of the Project components, including the Wild Blue Gondola.

The Forest Plan amendment being proposed for adoption is identical to the Forest Plan amendment adopted by the Forest Service in the 2018 ROD. And it will apply to Project components approved as part of the 2018 ROD. EA at 7, 15. Appendix B to the 2018 FEIS clearly explained:

Existing and proposed SSRC winter operational activities that may occur in March and April, **such as operating ski lifts and grooming trails, are considered consistent with [Wildlife Standard 6] and may continue without a non-disturbance buffer as nesting raptors would be considered adapted to human activity.**

2018 FEIS, Appendix B at 15 (emphasis added).

The above language from the 2018 FEIS is consistent with the text of Wildlife Standard 6 because ski area operations within SSRC’s permit boundary have been ongoing for over five decades. It helps clarify the scope of Wildlife Standard 6 and its applicability to the operation and maintenance of the Wild Blue Gondola, other Project components, and existing and future operations at Steamboat Ski Resort. The Forest Service should clearly define the scope and applicability of Wildlife Standard 6 to operational activities at Steamboat Ski Resort in the Final DN and EA and ensure that Wildlife Standard 6 and the project-specific Forest Plan are implemented consistent with the identical Forest Plan amendment adopted in the 2018 ROD.

SSRC requests that the Forest Service clarify the statements on page 15 of the EA and page 2 of the Draft DN to state that the Forest Plan amendment does not apply to the operation or maintenance phase of the Project “because Wildlife Standard 6 does not prohibit these activities.”

SSRC also request that the Forest Service add the following language to Appendix A to the EA, which is consistent with the description of the Forest Plan amendment in the 2018 FEIS:

Existing and proposed SSRC operational activities, including operation of and maintenance of the Wild Blue Gondola during spring and summer, are considered consistent with Wildlife Standard 6 and may continue without a non-disturbance buffer as nesting raptors would be considered adapted to human activity.

IV. The Forest Service should clarify the condition in Appendix B limiting construction activities in mapped elk production areas.

To minimize potential effects on elk calving, Appendix B of the EA prohibits construction activities in mapped elk production areas between May 15 and June 30. EA, Appendix B at 2. Appendix B states:

To minimize impacts to elk, construction activities would not be permitted between May 15 and June 30 in currently available mapped elk production areas. If changes to the timing are needed by SSRC, **then it will be agreed upon by SSRC, Forest Service, and CPW** for the following projects: Beaver Creek pumphouse and infiltration gallery, expanded Rendezvous water tank, Potable Water Option A, Potable Water Option B, Sewer/Electric Option A, Sundial grading/blasting, Sundown Express chairlift corridor, Priest Creek chairlift corridor, Fish Creek egress, Sunshine lower terminal maze area, and snowmaking pipeline.

Id. (emphasis added).

SSRC requests that the Forest Service clarify in the Final EA that the Forest Service has the exclusive authority to waive the timing stipulation for the Project components listed in Appendix B.

The EA, and the Biological Evaluation (BE) supporting the EA, both note that while certain portions Steamboat Ski Resort's permitted ski area boundary are mapped as elk production range, "surveys during the calving season in 2017 and 2018 did not detect the presence of any calving activity." EA at 32; BE at 40. The BE also indicates it is difficult to predict the location of elk calving in a given spring. BE at 40. For this reason, it is necessary that the timing stipulation in Appendix B provide SSRC and the Forest Service sufficient flexibility to account for construction activities necessary to keep the Project on schedule and to account for a lack of calving elk in a given area.

SSRC welcomes CPW's role as a consulting agency in the decision on whether to waive the timing stipulation for elk production areas. SSRC values its cooperative relationship with CPW. SSRC does not think, however, that CPW should be provided a decisionmaker role on the Forest Service lands within Steamboat Ski Resort's permitted ski area boundary. The decision whether to waive any of the conditions in Appendix B, including the timing stipulation for elk production areas, lies exclusively with the Forest Service. The current language in Appendix B improperly delegates Forest Service decision making authority to CPW.

SSRC requests that the Forest Service revise the language for the elk production condition in Appendix B to clarify this point and to state that:

If changes to the timing are needed by SSRC, then it will be agreed upon by SSRC and the Forest Service, in consultation with CPW, for the following projects: Beaver Creek pumphouse and infiltration gallery, expanded Rendezvous water tank, Potable Water Option A, Potable Water Option B, Sewer/Electric Option A, Sundial grading/blasting, Sundown Express chairlift corridor, Priest

Creek chairlift corridor, Fish Creek egress, Sunshine lower terminal maze area, and snowmaking pipeline.

V. The Forest Service should clarify the post-construction condition requiring continual communication with CPW and the Forest Service.

Appendix B states that following construction “SSRC will continually communicate with CPW and the Forest Service to monitor any increases in big game pressure and human-big game conflicts as a result of the project.” EA, Appendix B at 5. The requirement to “continually” communicate with the Forest Service and CPW is ambiguous and potentially imposes an impractical condition on SSRC.

SSRC, the Forest Service, and CPW have a documented record of collaboration. SSRC and CPW have worked cooperatively over the last few years to develop and implement a comprehensive moose management plan that includes GPS tracking and monitoring by CPW, education of ski area personnel regarding how to recognize an agitated or defensive moose, prescribed responses to moose in the ski area, conflict prevention, and reporting. The proposed condition requiring SSRC to *continually* communicate with CPW and the Forest Service suggests that SSRC’s past communication with CPW has been inadequate. And it imposes an impractical, potentially impossible, and unnecessary requirement on SSRC. SSRC request that the Forest Service revise the post-construction condition in Appendix B to acknowledge the proven record of communication and collaboration between SSRC, CPW, and the Forest Service and remove any potential ambiguity over the obligation imposed by the condition. To accomplish this, SSRC request that the Forest Service revise the condition as follows:

SSRC will continue to ~~continually~~-communicate with CPW and the Forest Service to monitor any increases in big game pressure and human-big game conflicts as a result of the project.

SSRC values its relationship with CPW and the Forest Service and intends to continue to work as a committed partner in minimizing potential effects to wildlife with Steamboat Ski Resort’s permitted ski area boundary.

VI. Proposed Revision to Drainage Management Plan Requirement

Appendix B requires that SSRC develop a drainage management plan “in consultation with the City of Steamboat.” EA, Appendix B at 1. SSRC understands that the Project will implicate drainage control on lands at the bottom of Steamboat Ski Resort subject to the City’s jurisdiction. SSRC wants to ensure, however, that the Forest Service is the sole entity with authority over the plan components being developed for, and implemented on, Forest Service lands. This is necessary to avoid the potential for conflicting requirements.

SSRC requests that the Forest Service make the following revision concerning the obligation to develop the drainage management plan in consultation with the City:

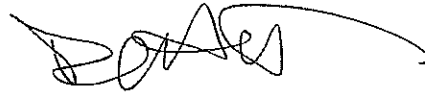
In collaboration with Forest Service staff, create a drainage management plan covering all of Steamboat. This detailed plan would describe existing and proposed drainage features and areas of excess erosion, and their connections to the existing drainage system. Any drainage issues observed and listed in this plan

would be prioritized for treatment in order to mitigate changes in hydrology, attenuate flows, reduce erosion, and maintain stream health. SSRC will provide a copy of the final plan to the City of Steamboat for purposes of actions that affect lands subject to City jurisdiction. ~~This plan shall developed in consultation with the City of Steamboat and The drainage management plan~~ shall be updated as needed, but not less often than every five years.

SSRC appreciates the cooperative relationship it has with the City of Steamboat and intends to continue to work collaboratively with the City to ensure that development at Steamboat Ski Resort benefits the City, SSRC, and the public.

SSRC appreciates the efforts of the Forest Service in preparing the detailed analysis in the EA and the thorough and thoughtful Draft DN. Thank you for considering this objection. SSRC requests and looks forward to an objection resolution meeting with the Reviewing Officer, and requests the opportunity to participate in objection resolutions meetings held with other objectors

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Hunter", written over a horizontal line.

Dave Hunter
Vice President -- Mountain Operations
Steamboat Ski & Resort Corporation

cc: Russell Bacon, Forest Supervisor
Erica Dickerman, Project Leader

EXHIBIT A



Via electronic transmission

August 6, 2020

Russell Bacon
Forest Supervisor
c/o Erica Dickerman – edickerman@fs.fed.us
Project Leader
Medicine Bow-Routt National Forests
& Thunder Basin National Grassland
2468 Jackson Street
Laramie, WY 82070

RE: Comments of Steamboat Ski & Resort Corporation on the Steamboat Improvement Project Notice of Proposed Action

Dear Forest Supervisor Bacon:

Steamboat Ski & Resort Corporation (Steamboat) respectfully submits these comments on the Medicine Bow-Routt National Forests and Thunder Basin National Grassland (MBRTB) Notice of Proposed Action (NOPA) for the Steamboat Improvement Project. Steamboat has worked diligently to develop a Project that will improve the quality of the world-class recreation opportunities within Steamboat's permitted ski area boundary while avoiding, minimizing, and mitigating possible adverse effects to the environment. Steamboat looks forward to working with the Forest Service during the review and implementation of the Project.

Steamboat appreciates the opportunity to comment on the Project and requests that the Forest Service add these comments to the administrative record.

I. The Project represents a significant investment that will enhance the guest experience at Steamboat.

The Project consists of four main project components: terrain and road improvements; lift network improvements; Sunshine Peak snowmaking; and Sunshine Restaurant. The proposed facilities and enhancements have all been accepted by the Forest Service as part of Steamboat's 2019 Master Development Plan Amendment (MDPA) and 2015 updated Snowmaking Master Plan. Collectively, the Project represents an integral step in achieving the cooperative goals of Steamboat and the Forest Service to provide long-

term, high-quality winter recreation opportunities on the permitted National Forest System (NFS) lands at Steamboat.

Please clarify in the EA that the Project will not expand Steamboat's ski area special use permit boundary. All of the lands involved are within Steamboat's existing ski area special use permit boundary and the lands are designated as Management Area 8.22 for skiing in the 1998 Routt National Forest Plan. The Project will implement, and is fully consistent with, the Forest Plan Management Area 8.22 direction for those same lands.

The Project represents a significant capital investment on behalf of Steamboat and Alterra Mountain Company that will benefit the communities and economies of Steamboat Springs, Routt County, and Colorado. Colorado's recreation-based economy has been particularly hard hit by the ongoing COVID-19 pandemic. The Project demonstrates Steamboat's commitment to the long-term viability of Steamboat Ski Resort as a world-class ski destination, and Alterra Mountain Company and Steamboat's commitment to the health and sustainability of the local and regional economies during these unprecedented times.

II. The lift improvements, including the Wild Blue Gondola, provide needed improvements in access and circulation for all guests, especially beginner and intermediate skiers.

The EA should state that an objective of the proposed lift improvement projects is to provide better access to the existing beginner and intermediate terrain and associated facilities on the top of Sunshine Peak and for the proposed Bashor Bowl beginner area. By using one lift instead of two, which will help to enhance skier flow, separate different types of skiers and create enhanced and less challenging circulation for those skiers, the Project will reduce current congestion and enhance access issues for all levels of skiers.

The Forest Service previously approved the construction of the Bashor Gondola through an environmental impact statement (EIS) and record of decision (ROD) in 2018. The alignment for the lower portion of the Wild Blue Gondola will follow a similar alignment as that approved for the Bashor Gondola in the 2018 ROD. The effects associated with this portion of the lift were thoroughly analyzed and approved in the 2018 EIS/ROD and should be incorporated into the Forest Service's environmental assessment (EA) for the Project by tiering to the 2018 EIS. The mid-station for the Wild Blue Gondola will also be located in approximately the same location as the previously analyzed and approved top terminal for the Bashor Gondola.

The proposed Wild Blue Gondola will extend to the top of Sunshine Peak near the top terminal of the Sundown Express chairlift and ski patrol headquarters. In conjunction with the construction of the Wild Blue Gondola, Steamboat is also proposing to decommission the existing Priest Creek chairlift and upgrade the Sundown Express from a high-speed detachable quad to a high-speed six-person capacity lift. The Wild Blue Gondola, and the increased capacity of Sundown Express, will provide a needed update to Steamboat's lift system by removing the 50-year old Priest Creek chairlift and upgrading the aging Sundown express. Construction of the Wild Blue Gondola will

increase Steamboat's out-of-base lift capacity to 10,000 people per hour, significantly reducing base-area congestion issues at peak times. The strategic placement of the top terminal of the Gondola near the top terminal of the Sundown Express will allow for beginner and intermediate skiers to download using the Wild Blue Gondola from the top of Sunshine Peak at the end of the day, as opposed to having to exit the Sunshine Bowl area in a considerably more complicated way depending on their location. This will also reduce congestion at the Elkhead lift toward the end of the day when skiers, especially novices and low intermediates, are eager to return to the base area. Collectively, these lift improvement projects will better distribute skiers, reduce congestion, and allow guests to access the existing low intermediate and beginner terrain in the Sunshine Peak lift pod. These improvements will enhance the guest experience for an important and growing component of Steamboat's clientele.

Please note in the EA that Steamboat does not currently have any plans for organized summer activities at the top of the proposed Wild Blue Gondola, other than potentially for weddings and special events. Steamboat does not have any plans, at this time, to utilize the Wild Blue Gondola as an access point to induce developed or dispersed summer recreation within Steamboat's ski area boundary. Nor does Steamboat have current plans to allow the summit of the Wild Blue Gondola to be used as an access point for, or to promote, mountain biking, hiking, or other recreation outside the ski area boundary.

III. The Sunshine Peak improvements will improve the quality of the skiing experience and on-mountain guest services.

There are currently no dining or restroom facilities at the top of Sunshine Peak. The EA should state that the proposed Sunshine Restaurant will provide much needed facilities and enhance the guest experience at Steamboat. Providing skiers with restaurant and restroom access at the top of Sunshine Peak will complement the proposed lift improvements by allowing beginner and low-intermediate skiers to more effectively circulate between the gondola and the Sunshine Express lift. Skiers will be able to avoid having to travel to other areas of the resort, such as Rendezvous Lodge, which is a long run for those skiers and is only accessible to novice skiers via South Peak lift. This will increase the ability and comfort of guests using Sunshine Bowl and will, in turn, reduce congestion in other areas of the mountain and on other lifts.

The EA should state that there is a need for additional snowmaking in the Sunshine pod to effectively utilize this terrain throughout the winter season, and to provide dependable snow conditions during early season and low snow seasons, as the terrain is expected to get more use by novice and low-intermediate skiers than it does today for the access and comfort reasons stated. Steamboat currently relies on a minimum of 40" of natural snow to open key terrain in the Sunshine terrain pod. This can sometimes delay or prevent opening this terrain by the beginning of the busy holiday tourist season. Adding snowmaking to this area on key trails will provide greater certainty that Steamboat can open this terrain for these skiers by the holidays. The EA should note that the additional

water withdrawals associated with the increased snowmaking coverage are within Steamboat's allotment of appropriated water rights.

IV. The Fish Creek terrain projects will add permitted terrain into Steamboat's operational boundary with minimal effects.

The Fish Creek Canyon terrain is currently within Steamboat's special use permit boundary, but outside its current operational boundary. Steamboat is proposing to incorporate the terrain in Fish Creek Canyon into its operational boundary and develop a skier egress trail and small bridge to facilitate a more effective and efficient path out of this terrain. Including Fish Creek Canyon within the operational boundary will allow Steamboat to incorporate this terrain into its patrolled terrain network, better manage skier access and egress, and provide for more effective ski patrol access.

The EA should note that Fish Creek Canyon, like the Pioneer Ridge terrain, is heavily used now. As described in Steamboat's 2019 MDP, existing backcountry and side-country access, and use of the Fish Creek area of Pioneer Ridge from the existing Steamboat lift network, has become increasingly popular. That has resulted in additional responses by ski patrol due to use by skiers unfamiliar with the terrain and unfamiliar with the egress, neither of which can currently be marked or signed. As a result, skiers lacking adequate abilities to ski beyond the operational boundary must frequently be rescued by ski patrol and/or Search & Rescue. There is a very real need for well-defined exit routes and easier ski patrol response access in this area. Incorporating Fish Creek Canyon into Steamboat's operational boundary will also allow Steamboat to add needed signage in this area.

There is also a need for additional undeveloped expert terrain with features not currently present within Steamboat's operational area. Incorporating Fish Creek Canyon into the operational boundary will provide this and complement the previously approved, but not yet built, Pioneer Ridge lift that will ultimately help facilitate greater access to the Fish Creek area and further separate various levels of skiers.

Steamboat is not proposing any terrain modifications or trail construction within Fish Creek Canyon. The only activities and effects associated with the incorporation of Fish Creek Canyon into the operational boundary are hazard tree removal, development of an egress snow trail, and construction of a small bridge to cross Burgess Creek.

The EA should tier to the 2018 EIS because the Forest Service analyzed the environmental effects associated with the proposed action (including hazard tree removal) and similar actions in the Fish Creek Canyon area of Pioneer Ridge in that document. The currently proposed Burgess Creek bridge represents a modified version of the bridge analyzed and approved in the 2018 EIS/ROD that will be smaller in scale and result in less impact to the environment than the bridge approved in the 2018 EIS/ROD.

V. The Forest Service analyzed many of the potential effects of the Project in the 2018 EIS/ROD.

The Forest Service should make clear in the EA that it is tiered to the thorough environmental analysis in the 2018 EIS/ROD. As noted above, the 2018 EIS/ROD analyzed many of the environmental effects associated with the proposed Project. These include potential wetlands effects, raptors and other wildlife issues, hazard tree removal, and other issues and resources. The Forest Service's EA for the Project should incorporate and tier to the analysis of those effects in the 2018 EIS. *See* 40 C.F.R. § 1501.11 (encouraging agencies to tier to issues analyzed in prior environmental analyses "when it would eliminate repetitive discussions of the same issues, focus on the actual issues ripe for decision, and exclude from consideration issues already decided").

Steamboat requests that the Forest Service clarify that the EA tiers to, and incorporates by reference, the existing environmental analysis in the 2018 EIS. Steamboat also requests that the Forest Service clarify that all projects approved in the 2018 ROD that are not yet implemented remain authorized (such as the approved Pioneer Ridge lift) unless a specific approved project is modified and approved through the current proposal, such as the extension of the Bashor Gondola into the Wild Blue Gondola and the scaled-down Burgess Creek Bridge.

1. Wetlands

The proposed Project may have potential, indirect effects to wetlands. The Forest Service previously analyzed many of these effects in the 2018 EIS/ROD when it analyzed the construction of the Bashor Gondola and development of the new Pioneer Ridge area, including glading and hazard tree removal, ski trail construction, and construction of the Pioneer Ridge chairlift.

The Forest Service should incorporate and tier to the analysis of potential wetland effects in the Project EA.

2. Wildlife

The Project will not result in any adverse effects to threatened, endangered, or sensitive species. The Forest Service thoroughly analyzed potential effects to wildlife in the 2018 EIS/ROD. This included an analysis of raptors that may be present through construction and implementation of the Project. In the 2018 EIS/ROD, the Forest Service also directed Steamboat to develop a moose management plan in coordination with Colorado Parks and Wildlife (CPW). The EA should note that Steamboat and CPW have since developed and begun implementing this plan, which includes GPS tracking and monitoring by CPW, education of ski area personnel regarding how to recognize an agitated or defensive moose, prescribed responses to moose in the ski area, conflict prevention, and reporting.

The Forest Service should incorporate and tier to the analysis in the 2018 EIS of potential wildlife effects in the Project EA.

VI. Steamboat intends to work cooperatively with the Forest Service to minimize any potential effects through the incorporation of Project Design Criteria and Best Management Practices.

Any potential effects from the Project that have not been previously analyzed will be avoided, minimized, and mitigated through project design criteria and best management practices. The NOPA includes a proposed list of project design criteria (PDC) to reduce potential effects associated with the Project. As noted by the Forest Service, ski area operators—including Steamboat—are experienced in using PDCs “to prevent or decrease potential resource impacts,” and they “are effective methods that can be planned in advance and adapted to site conditions, as needed.” Steamboat intends to work cooperatively with the Forest Service to implement any necessary PDCs to avoid, minimize, and mitigate potential adverse effects from the Project.

Steamboat values its partnership with the Forest Service in providing world-class public skiing and public recreation on NFS lands under conditions that protect the environment. Steamboat thanks the Forest Service in advance for its work preparing the EA and looks forward to continuing to work cooperatively with the Forest Service to design, construct, and implement the Project. Steamboat appreciates the opportunity to comment and urges the Forest Service to adopt the Project in its current form, incorporating the requested adjustments set forth above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Hunter', with a large, sweeping flourish extending from the end of the signature.

Dave Hunter
Vice President of Mountain Operations
Steamboat Ski & Resort Corporation