



November 23, 2021

Submitted Electronically

Chad Stewart
Forest Supervisor
Grand Mesa, Uncompahgre and Gunnison National Forests
c/o Samantha Staley, Forest Planner
2250 South Main Street
Delta, CO 81416

**Re: Crested Butte Mountain Resort's Comments on the GMUG Draft
Revised Land Management Plan**

Dear Supervisor Stewart and Ms. Staley:

Crested Butte Mountain Resort (CBMR) respectfully submits these comments on the Draft Revised Land Management Plan for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests. CBMR appreciates the extensive amount of work and public outreach involved in preparing the Draft Forest Plan and commends the Forest Service for reaching this important milestone.

CBMR respectfully requests that the Forest Service take the following comments under consideration.

1. CBMR does not oppose the proposed revision to the Snodgrass management designation.

Two of the four proposed alternatives, including the Forest Service's preferred alternative (Alternative B), will revise the management designation for the Snodgrass unit of CBMR from the Mountain Resort Management Area (MA 4.1) to the General Forest Management Area (MA 5).

The decision to revise the management-area designation for Snodgrass is significant for CBMR. Snodgrass has been designated as appropriate for developed skiing in the GMUG Forest Plan for almost four decades and it has been included in CBMR's special use permit boundary since 1982.

CBMR understands and appreciates the value of Snodgrass to the local community. CBMR values its partnership with the community and with the Forest Service and does not oppose the Forest Service's proposal to revise the management-area designation for Snodgrass in the revised Forest Plan.

2. The Forest Service should designate Snodgrass as Rural under the Recreation Opportunity Spectrum.

CBMR has supported the community's use of Snodgrass through periodic grooming of the service road to the summit of Snodgrass Mountain. This provides the Crested Butte recreation community with enhanced access to Snodgrass for cross-country skiing and fat biking in the winter.



This is a significant value that helps increase public access and use of the Forest Service lands on Snodgrass.

The Forest Service should retain the ability for the Crested Butte community to conduct grooming operations on Snodgrass by adopting the proposal to designate Snodgrass as Rural under the Recreation Opportunity Spectrum.

3. The Forest Service should clarify the scope of the Mountain Resort Management Area Guidelines.

The Draft Forest Plan reduces and simplifies the management designations that exist under the current plan. Areas previously designated as Downhill Skiing and Winter Sports Management Area (MA 1B) will be designated as Mountain Resort Management Area (MA 4.1) under the Draft Forest Plan. This includes the lands within the CBMR special use permit boundary.

CBMR supports the establishment of the new Mountain Resorts Management Area. CBMR agrees that lands subject to MA 4.1 should be managed to “primarily provide for skiing and other snow sports . . . other seasonal or year-round natural-resource-based recreational activities (e.g., hiking, mountain biking, and sightseeing).”¹

The Draft Forest Plan contains two proposed Guidelines that potentially conflict with desired management objectives for the Mountain Resort Management Area. Mountain Resort Guideline 7 provides that resort “special features (e.g., mountain bike trails, terrain parks, mountain coasters, or challenge courses) should be located within or near previously developed portions of the permit area.” Mountain Resort Guideline 9 states that “mountain resort infrastructure associated with other seasonal or year-round recreational activities should require limited permanent structures.”²

CBMR agrees with the intent of both these guidelines: to promote strategic and thoughtful development of the permit area that helps sustain ecological values while meeting the primary purpose of the resort area to provide high-quality public recreation on the National Forest System lands within the permit boundary. The guidelines should not be interpreted, however, to restrict or prohibit the master development planning process, future analysis under the National Environmental Policy Act (NEPA), or development allowed by the Ski Area Recreational Opportunity Enhancement Act (SAROE). (SAROE).

Guidelines 7 and 9 both contain language that could be read to arbitrarily limit development of new facilities at CBMR. The language in Guideline 9, for example, that permanent infrastructure should be “limited” could be misapplied to preclude development of infrastructure proposed to support recreational activities at CBMR. This interpretation would be inconsistent with SAROE and the Forest Service directives implementing that Act.

¹ Draft Forest Plan at 97 (MA-DC-MTR-01).

² Draft Forest Plan at 98 (MA-GDL-MTR-07 and MA-GDL-MTR-09).



SAROEА authorized the Forest Service to permit “seasonal or year-round natural resource-based recreational activities and associated facilities . . . on National Forest System land subject to a ski area permit.”³ The Forest Service Manual encourages permittees and the Forest Service to locate new recreation facilities “within the portions of the ski area that are developed or that will be developed pursuant to the master development plan,” to “the extent practicable.”⁴ The Manual similarly encourages permittees and the Forest Service to utilize existing snow sports facilities for new recreation uses and states that these uses should “not require extensive new support facilities.”⁵ The language in proposed Guidelines 7 and 9 should be interpreted consistent with SAROEА and the Forest Service directives, which encourage development of new seasonal and year-round recreation uses subject to reasonable limitations where practicable.

CBMR operates under a long-term special use permit for ski area development and operation. All future plans for development at the resort should be analyzed consistent with the provisions of the ski area special use permit, CBMR’s accepted master development plan, SAROEА, and the GMUG Forest Plan.

Please clarify that: (1) the GMUG will follow the master development plan, project proposal, and NEPA processes identified in CBMR’s special use permit in making decisions about facilities, infrastructure, and activities at CBMR and that Guidelines 7 and 9 do not preempt or override these processes; and (2) the GMUG will interpret Guidelines 7 and 9 consistent with SAROEА and the Forest Service’s implementing directives under SAROEА.

4. The Forest Service should designate all areas at CBMR approved for expansion as Management Area 4.1.

The Forest Service approved CBMR’s proposed expansion into the Teocalli drainage in May 2019.⁶ Concurrent with the expansion approval, the Forest Service amended the Forest Plan to designate 500 acres in the Teocalli drainage as Downhill Skiing and Winter Sports Management Area (MA 1B) and adjusted the CBMR special use permit boundary to include these lands.⁷

The no-action alternative (Alternative A) is the existing Forest Plan. Alternative A appears to erroneously depict the Teocalli drainage lands as Management Areas 2A and 6B, not MA 4.1. This is a mistake because it overlooks the 2019 Forest Plan amendment. The no-action alternative in the final Environmental Impact Statement (EIS) should identify the Teocalli drainage lands as MA 4.1.

In each of the action alternatives in the final EIS, and in the draft and final Record of Decision, the Forest Service should carry forward the Forest Plan amendment approved in the May 2019 Record of Decision and designate all areas within CBMR’s existing permit boundary (excluding Snodgrass) and

³ 16 U.S.C. § 497b(c)(1).

⁴ FSM 2343.14(1)(c).

⁵ FSM 2343.14(1)(g) (emphasis added).

⁶ U.S. Forest Service, Crested Butte Mountain Resort Ski Area Projects Record of Decision (May 2019).

⁷ *Id.* at 2, Figure 1.



all areas that have been approved for expansion, including the Teocalli drainage lands, under the Mountain Resort Management Area (MA 4.1).

CBMR appreciates the effort and outreach associated with the Draft Forest Plan. Thank you for taking these comments under consideration as part of the planning process.

Sincerely,

A handwritten signature in black ink that reads "Tara Schoedinger". The signature is written in a cursive, flowing style.

Tara Schoedinger
Vice President & General Manager
Crested Butte Mountain Resort