

June 12, 2024

Submitted Electronically to fs.usda.gov/goto/WPRprojects

Mr. Monte Williams
Arapaho and Roosevelt National Forests
c/o Matt Loscalzo, Project Manager/Mountain Resort Team Lead
2150 Centre Avenue, Building E
Fort Collins, CO 80526

**RE: Winter Park Resort's Comments on Notice for the 2025 Winter Park Resort Project
2025 EA # 66200**

Dear Forest Supervisor Williams:

Intrawest/Winter Park Operations Corporation ("WPR") respectfully submits these comments on the Arapaho and Roosevelt National Forests' Notice and Opportunity to Comment ("Notice") on the Winter Park Resort Project 2025 EA # 66200 (the "Project").¹ The Project and the aggregate elements of it are critical to WPR and Winter Park Resort (the "Resort"). There is a significant need for the Project to improve and enhance guest experience at the Resort, and help the Resort continue to provide high-quality public recreation on the public lands within the Resort's Forest Service special use permit as it has for over 80 years.

WPR appreciates this opportunity to comment and looks forward to working cooperatively with the Forest Service during preparation of the Environmental Assessment, the decision and objection process, and subsequent construction and implementation of the Project. Please add these comments to the administrative record.

1. The Project is necessary to continue the Resort's 80-year history of providing high-quality public recreation.

The Forest Service first authorized ski area operations on the Forest Service lands within the Resort's special use permit area on January 2, 1940. For over 80 years, the Resort and the Forest Service have cooperatively partnered to manage the public lands and recreation infrastructure within the Resort's special use permit to promote world-class skiing and four-season recreation for public visitors. The Project will continue and carry forward this legacy by proposing, and ultimately implementing, actions that will enable the Resort to offer premium ski,

¹ Intrawest/Winter Park Operations Corporation operates Winter Park Resort under a Forest Service approved lease with the special use permit holder, Winter Park Recreational Association.

snowboard, and all-season activities for those who seek adventure, freedom, and self-growth in the great outdoors.

The Project makes the Resort better. The Project includes improvements within, not outside, the Resort's existing special use permit area. The elements of the Project are needed to meet existing and future recreational needs and objectives, and provide enhancements, improvements, infrastructure and other actions to provide high quality four-season recreation at the Resort. The Project components emphasize the following objectives:

Optimize the utilization and operational efficiency of existing mountain infrastructure.

Balance lift and trail capacities wherever possible to optimize the guest experience.

Provide maximum capacity for minimum capital and operating costs.

Provide base staging facilities in balance with mountain access and capacity requirements.

Continue to improve the quality of the facilities to meet the expectations of destination skiers and the Colorado front range market.

Upgrade the beginner facilities and terrain to maintain the Resort's excellent reputation for family skiing and meet demands of increasing ski school participation and a growing population of skiers and riders new to the sport.

The Project components and objectives are consistent with the Resort's storied history. The individual and collective components are necessary to provide high-quality recreation on the public lands WPR and the Resort are entrusted to manage in partnership with the Forest Service.

2. The Project implements and is consistent with the Arapaho and Roosevelt Forest Plan.

The Resort's permit area is located within the Winter Park Geographic Area and allocated to Management Area 8.22 under the Arapaho and Roosevelt Forest Plan. The Forest Plan direction for Management Area 8.22 is to manage existing ski areas, including the Resort, "to provide for skiing and related recreational uses." Forest Plan at 384. The specific management direction for the Resort is for continued management as a "premier, four-season resort," including by authorizing "development and use that is compatible with the environment." Forest Plan at 319.

The Project and its specific components achieve these objectives. The Project proposes the replacement of existing facilities, development of limited new facilities, and the upgrade and expansion of infrastructure and terrain within the already developed portions of the Resort special use permit. The Project is consistent with Management Area 8.22, and is consistent with other elements of the Forest Plan.

3. Project elements are necessary to improve and upgrade the Resort.

The Project has multiple components, including actions at Discovery Park, Cooper Creek, and Vasquez Ridge, and involving snowmaking infrastructure, trail improvements, lift replacement and upgrades, vegetation management, and other actions. The Project includes four main categories.

Snowmaking. The Project includes needed upgrades to existing snowmaking infrastructure and an expansion of snowmaking coverage supported by WPR's existing water rights. The majority of the Resort's snowmaking system was installed in the late 1970s and is in need of upgrade. The new infrastructure will allow WPR to optimize and effectively provide snowmaking coverage throughout the Winter Park, Mary Jane, Cooper Creek, and Vasquez Ridge zones utilizing WPR's existing snowmaking water rights. The new and expanded snowmaking, and associated snowmaking infrastructure, are essential to the Resort's ability to provide high quality snow conditions throughout the Resort on existing and proposed ski terrain. These actions are critical to the Resort's ability to operate, especially during early season, snow droughts, and during low snow periods.

Discovery Park Learning Center. The Project will create a dedicated on-mountain learning center in the Discovery Park area. This will address current inefficiencies created by having the Resort's learning areas split between Sorenson Park and Discovery Park, improve guest circulation, and bring all ski school and beginning skiers up to an area where a complete range of suitable lifts, trails, and facilities exist. Replacement of the Gemini Express with a 10-person gondola will reduce congestion on busy days at the Winter Park base area, and enhance guest experience, particularly beginners, in accessing the Discovery Park Learning Center. Three new surface conveyors will replace two existing conveyor lifts. The Project proposes grading to support the new conveyors and 12 acres of ideal beginner terrain. The new 16,000 square foot ski school building at the top of the 10-person gondola will provide necessary and welcoming support facilities. Overall, the Discovery Park elements of the Project will enable the Resort to introduce families, children, novice skiers and others to winter recreation in a welcoming and unintimidating environment in a beautiful setting, with appropriate support infrastructure, all on public lands under managed conditions that protect the environment.

Trail Improvements. The Project includes new beginner trails in the Cooper Creek area and trail improvements in Mary Jane and Parsenn Bowl. The Cooper Creek ski trails would create connectivity from the modified top terminal location for the new Cooper Creek South chairlift and add additional trails, within the alignment of the new chairlift, to support the Winter Park Competition Center's training programs. The trail improvements in Mary Jane and Parsenn Bowl will increase skier circulation, and support grooming activities. The Project includes needed hazard tree removal in the Jelly Roll glades area of Vasquez Cirque.

Infrastructure Development. The Project includes replacing the existing Sundance Chili Hut located at the top of Vasquez Ridge with a new restaurant with sanitary sewer connection. The Project further includes a new Cooper Creek South chairlift to replace the existing Looking

Glass chairlift, and the replacement, upgrade, and installation of chairlifts and conveyors to support development of the Discovery Park Learning Center. Each of one these infrastructure improvements is strategically designed and located to enhance the Resort's connectivity and circulation within existing disturbed areas as much as possible.

The Project and its individual components minimize new disturbance and impacts while effectively implementing upgrades to enhance the guest experience. The cumulative elements of the Project are critical, and needed, to provide high quality recreation at the Resort.

4. The Project thoughtfully minimizes and avoids environmental effects.

WPR has worked diligently and thoughtfully to design the Project to minimize and avoid environmental effects. The Project was not developed overnight; it is over five years in the making. WPR first proposed the Project in May 2019. Following the initial submission, WPR submitted an amended Master Development Plan, which the Forest Service accepted in 2022 following multiple versions, revisions, and reviews, and a public open house. The Forest Service has conducted multiple field visits as part of its initial screening and requested information on design criteria and resource values.

The Project reflects, and benefits from, the thoughtful planning process that produced it. The Project components are located within the developed area of the Resort, inside the existing special use permit. Resource considerations, such as wetlands, wildlife, fisheries, vegetation, and cultural resources, are already incorporated into the Project design. And WPR is committed to incorporating appropriate best management practices, design features, and monitoring to ensure the Project minimizes and avoids environmental effects.

The Project includes some, but not all, elements of the Resort's accepted Master Development Plan. WPR and the Resort will implement the elements of the Project approved at the conclusion of the Forest Service's decision on the Environmental Assessment even if the Forest Service does not authorize the remaining elements of the Master Development Plan.

WPR 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.

Sincerely,



Sky Foulkes
President/COO