



September 20, 2024

Director, Ecosystem Management Coordination
USDA Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Dear USDA Forest Service:

Mountain Capital Partners (MCP) submits the following comments in response to the June 2024 Draft Environmental Impact Statement for the Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System. Please add these comments to the administrative record for the Draft EIS and the proposed amendments.

Mountain Capital Partners operates seven ski areas on multiple national forests across four Forest Service regions -- in partnership with the U.S. Forest Service (USFS). These resorts operate under special use permits issued for the purpose of providing four season recreation at our resorts. MCP's ski resorts are Purgatory in Colorado, Sipapu and Sandia Peak in New Mexico, Brian Head in Utah, Lee Canyon in Nevada, Arizona Snowbowl in Arizona, and Willamette Pass in Oregon.

Mountain Capital Partners has enjoyed a long, and productive partnership with the Forest Service in providing high quality recreation on public lands. MCP takes pride in its strong ties to local communities and its work to sustain the environment at all its resorts.

As your partner in recreation, we are very concerned about the proposal to amend all land management plans using the language contained in the DEIS and proposed old-growth amendments. This proposal effectively overlays old growth standards on our existing 40-year special use permits – and will significantly increase costs and impair our ability to manage and

operate our resorts on the national forests. We believe ski area permits should be exempt from the old growth amendments and treated just as they were in the national Roadless Area Conservation rule. In that rulemaking process, the rights of existing permit and lease holders was acknowledged by the agency and not negatively impacted by the roadless policy.

MCP will be significantly affected by the proposed Forest Plan amendments if standards 2.b and 2.c are not modified to effectively exempt our permitted resorts. Ski areas on national forests occupy a tiny fraction of the over 25.7 million acres affected by this policy, therefore excluding ski areas would have an insignificant effect on the intended outcome of old growth protection. Given this fact, MCP does not understand why it is necessary, or desirable, to include ski resorts as within the proposed old growth protection areas.

Our industry association, the National Ski Areas Association (NSAA) has provided comments on this proposal throughout the process and their comments on the agency's DEIS and proposal are attached. Their comments are much more detailed and specific, including suggested language changes to effectively exempt USFS permitted ski areas. MCP fully agrees and supports NSAA's position and suggested changes to the final policy. We believe they have done an outstanding job articulating the rationale for modifying the proposed forest plan standards.

MCP provides these comments to ensure that the USFS old-growth Forest Plan amendments are workable and honor the ski area's role in delivering the agency's public lands recreation program on our national forests. We believe our concerns, and those expressed in the attached NSAA letter, are reasonable and hope you make our proposed changes in the final EIS and plan amendments.

Respectfully,



JR Murray
Chief Planning Officer
Mountain Capital Partners

Attachments: NSAA Letter