



Submitted Electronically

August 21, 2026

Brian Glaspell
Forest Supervisor
White River National Forest
c/o Sarah Strehle, Mountain Sports Permit Administrator
Dillon Ranger District
P.O. Box 620
Silverthorne, Colorado 80498
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**RE: Arapahoe Basin Ski Area's Comments on the Notice of Proposed Action
for the Arapahoe Basin 2026 Improvement Projects (Project #334175)**

Dear Supervisor Glaspell and Ms. Strehle:

Arapahoe Basin Ski Area ("A-Basin")¹ respectfully submits these comments on the Notice of Proposed Action ("NOPA"), dated July 22, 2026, for the Arapahoe Basin 2026 Improvement Projects (the "Project").

A-Basin commends the White River National Forest ("WRNF") and the Dillon Ranger District for their careful review of, and thoughtful engagement with, the Project during the pre-NOPA planning process. The Project represents a significant planning effort and capital investment by A-Basin in its continued efforts to provide the highest quality public recreation on the National Forest System ("NFS") lands it is entrusted to manage in partnership with the WRNF. As detailed below, the Project implements material components of A-Basin's accepted 2025 Master Development Plan ("MDP"), is consistent with the 2002 White River National Forest Land and Resource Management Plan ("WRNF

¹ Dundee Resort Development LLC is the holder of the special use permit for Arapahoe Basin Ski Area. This letter is submitted by A-Basin on behalf of itself and Dundee Resort Development LLC. A-Basin and Dundee Resort Development LLC have an interest in the Project as the owner and operator of A-Basin Ski Area. 7 C.F.R. § 1b.10(a)(5).

Forest Plan”) and the specific management direction for A-Basin’s special use permit (“SUP”) area, and has been carefully designed to avoid and minimize environmental effects.

A-Basin submits these specific written comments during the combined 30-day scoping and comment period for the NOPA. Because the WRNF does not anticipate providing an additional opportunity to submit written comments, see NOPA at 15, A-Basin offers these comprehensive comments now and intends, by doing so, to satisfy the requirements of 36 C.F.R. § 218.25 and to preserve its eligibility to participate in any subsequent objection process.

We appreciate you taking these comments under consideration. A-Basin 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 for the Project.

I. The Project is consistent with and helps achieve the winter recreation objectives in the 2002 White River National Forest Plan and the goals and objectives in A-Basin’s accepted Master Development Plan.

The Project implements the direction in the 2002 White River National Forest Plan for the management and development of the lands within A-Basin’s existing SUP area, and the five additional acres proposed to be included in A-Basin’s SUP for development of the Upper Upper Last Chance parking area.

A. The Project implements the direction in the 2002 White River National Forest Plan for Management Area 8.25.

A-Basin’s SUP area is dedicated for the long-term operation and development of a ski area under Management Area 8.25 – Ski Areas, Existing and Potential (“MA 8.25”). NOPA at 2; WRNF Forest Plan at 3-80–83. MA 8.25 purposefully dedicates WRNF lands, including those within the A-Basin SUP area, for the development and operation of ski areas “by the private sector to provide opportunities for intensively managed outdoor recreation activities during all seasons of the year.” WRNF Forest Plan at 3-80 (emphasis added); NOPA at 2. The Forest Service adopted MA 8.25 to foster the development and operation of ski-area terrain and facilities needed to accommodate the then-existing and projected increase in participation in skiing and snowboarding on the WRNF, and to ensure the existence of a mix of terrain that best meets customer preferences and ability levels – including the opportunity to provide a higher-quality experience by lowering skier densities.

WRNF Forest Plan ROD at 25. “Appropriate facilities” within the MA 8.25 “are those that are directly related to the operation and support of skiing activities.” WRNF Forest Plan at 3-80.

The Project and each of its components – expanded snowmaking, installation of Remote Avalanche Control Systems (“RACS”), and the parking and pedestrian-access improvements – carry forward this direction by enhancing the recreation opportunities for the public in a managed setting, under controlled conditions, on WRNF lands allocated for that purpose. The Project’s snowmaking, circulation, and parking improvements advance each of these objectives by improving the reliability and quality of the guest experience within and adjacent to A-Basin’s existing developed footprint.

The Project’s purpose and need confirms this consistency with the WRNF Forest Plan. The purpose of the proposed action is “to enhance the quality of the on-mountain experience at A-Basin by improving operational efficiency, guest arrival experience, employee safety, and the ski area’s ability to provide early-season terrain through additional snowmaking coverage.” NOPA at 2. The proposed action is needed to enhance snowmaking capabilities and expand early-season terrain; to effectively utilize A-Basin’s existing snowmaking system through improved skier circulation and on-mountain connectivity; to increase staff safety during avalanche mitigation through the installation of RACS; and to increase parking capacity and provide safe pedestrian access over US Highway 6. NOPA at 2–3. The purpose and need is derived from and mirrors the goals and objectives of A-Basin’s accepted 2025 MDP, which are “focused on enhancing the guest arrival experience, skier circulation, employee safety, and early-season terrain availability and operations.” NOPA at 2. The Forest Service’s acceptance of the 2025 MDP reflects the agency’s determination that the desired conditions and improvements the MDP identifies – which the Project now carries forward – are appropriate for A-Basin’s SUP area and consistent with the 2002 WRNF Forest Plan.

B. The proposed boundary adjustment for the Upper Upper Last Chance parking area implements the WRNF Forest Plan’s direction for MA 4.32.

The proposed development of the Upper Upper Last Chance parking area and associated SUP boundary adjustment are consistent with and implement the applicable direction in the WRNF Forest Plan.

The location of the proposed parking area is on Forest Service lands allocated to Management Area 4.32 – Dispersed Recreation, High Use – under the WRNF Forest Plan. NOPA at 6. Forest Service lands within MA 4.32 are managed for “recreational opportunities and scenic qualities in locations that attract high numbers of users.” Forest

WRNF Plan at 3-45; NOPA at 6. The Forest Plan “directs areas such as this to be incorporated into MA 8.25 as determined appropriate.” NOPA at 6; WRNF Forest Plan at 3-80 (MA 8.25 “includes existing resorts that have already been permitted and developed, as well as additional suitable terrain into which development is planned for the future.”). And the proposed boundary adjustment will ultimately not add acreage to A-Basin’s SUP area. Approximately five acres will be added to A-Basin’s SUP boundary for the parking expansion, offset by approximately five acres removed from the SUP boundary in Lower Montezuma Bowl. NOPA at 6.

II. The Project is thoughtfully planned and designed to avoid and minimize adverse environmental effects.

The Project design reflects a deliberate and collaborative process intended to avoid and minimize environmental effects. “Known resource issues within the project area have been addressed through the design/layout of the project, as well as project specific design criteria (PDC),” and “significant impacts are not anticipated.” NOPA at 7. A comprehensive set of General Design Criteria (“GDC”), PDCs, and best management practices (“BMPs”) will be applied to avoid and minimize any potential resource impacts from construction and operation of the Project. NOPA at 8–9 (Table 1). The preliminary resource findings summarized in the NOPA support the conclusion that the Project can be implemented without significant environmental effects.

A. A-Basin’s proposal to remove the withdrawal limitation on its snowmaking water diversions is supported by a twenty-year monitoring record demonstrating no measurable effects.

A-Basin’s proposal to remove the 25-percent withdrawal limitation on its snowmaking water diversions is supported by twenty years of monitoring demonstrating that A-Basin’s snowmaking diversions do not have a measurable effect on the environment. Removal of the limitation will allow A-Basin to expand snowmaking coverage to improve on-mountain connectivity and skier circulation and provide for expanded coverage to meet early-season demand. A-Basin’s snowmaking diversions would remain subject to bypass requirements to maintain instream flow and support the aquatic health of the river ecosystem.

A-Basin’s state-law water rights authorize diversion from the North Fork of the Snake River from September 1 to December 31 into a 5.5-acre-foot storage reservoir. A-Basin maintains a minimum bypass flow of 0.5 cubic feet per second (“cfs”) at the diversion, at all times. NOPA at 3. The bypass flow is increased to 1.0 cfs in October to protect spawning fish. *Id.*

The 1999 A-Basin MDP Environmental Impact Statement and Record of Decision (“1999 ROD”) further limited A-Basin’s water diversions to 25 percent of the streamflow in the North Fork of the Snake River. Removing the 25-percent limitation would allow A-Basin to expand snowmaking coverage within its existing state-law water rights while retaining the bypass-flow protections.

The 1999 ROD mandated a five-year monitoring plan to measure impacts to fish and insect populations, streamflow levels, stream chemistry, and stream morphology. NOPA at 3. A-Basin not only completed the required five years of monitoring, but collected fish population data for an additional fifteen years – creating a comprehensive two-decade record of the effects of its snowmaking diversions on the health of the river. *Id.* That monitoring “demonstrates that A-Basin’s snowmaking diversions have not impacted the measured environmental characteristics” in the North Fork of the Snake River. *Id.*; see also NOPA at 10, 13 (snowmaking diversions have occurred since 1999 “with no measurable effects to stream condition under existing permit conditions”).

This uncommonly long empirical record provides a compelling, site-specific basis for the Environmental Assessment (“EA”) to conclude that the proposed removal of the withdrawal limitation will not result in significant effects to aquatic resources.

III. A-Basin requests coordination on the additional PDCs and BMPs to be developed after technical reporting.

The NOPA contemplates that “[f]ollowing the finalization of resource specific technical reporting, additional PDC and BMPs will be incorporated into the EA.” NOPA at 8. Because A-Basin is required to implement, and fund through cost recovery, the PDCs, BMPs, revegetation, restoration, monitoring, and mitigation measures identified for the Project, see NOPA at 8–9 (Table 1), A-Basin respectfully requests the opportunity to review and coordinate with the Forest Service on any additional PDCs and BMPs before they are finalized in the EA, so that those measures are practicable, effective, and appropriately calibrated to the resource findings.

A. The ongoing hydrologic and boreal toad analyses should be implemented and interpreted in light of the existing monitoring record.

A-Basin supports the Forest Service’s proposal to conduct additional studies and analysis to determine whether a hydrologic connection exists between the North Fork Snake River and the boreal toad pond complex downstream from A-Basin’s diversion point, and to establish monitoring parameters, PDC, mitigation measures, and post-implementation monitoring for the Project. NOPA at 10; Hydrology Study Plan.

A-Basin respectfully requests that any assessment of effects to boreal toad be grounded in the actual field and hydrologic data rather than conservative default assumptions, and that any additional mitigation or design measures be tailored to, and proportionate to, demonstrated effects. A-Basin looks forward to cooperating with the Forest Service on this effort.

IV. The No-Action Alternative will not provide additional recreation benefits for the public, fails to address identified needs at the ski area, and would avoid only minimal environmental effects.

The Project is needed to resolve limited parking and peak-period congestion, improve snowmaking coverage that does not reliably support early-season access, and enhance employee-safety and operational concerns tied to avalanche mitigation. The No-Action Alternative “reflects a continuation of existing management practices without changes, additions, or upgrades,” under which “[n]o new facilities or recreational opportunities would be approved.” NOPA at 7.

The No-Action Alternative would perpetuate the operational constraints and limitations identified in the MDP and fail to meet the Project’s purpose and need. See 7 C.F.R. 1b.11(42) (Reasonable alternatives must be “technically and economically feasible, meet the purpose and need for the proposal, and, where applicable, meet the goals of the applicant.”). Further, no action would avoid only minimal environmental effects. The Project area lies within an existing, highly developed ski-area SUP allocated to MA 8.25 under the Forest Plan. The majority of Project work will occur in previously disturbed areas such as existing roads and ski trails. The NOPA’s preliminary analysis anticipates no significant impacts. NOPA at 3, 7, 10–14. Avoiding these modest environmental effects should not outweigh the substantial public-recreation, guest-experience, and employee- and public-safety benefits the Project would provide.

A-Basin thanks the Forest Service for its careful review of the Project and for the collaborative process that produced the Proposed Action. The Project is consistent with the 2002 WRNF Forest Plan, implements A-Basin’s accepted Master Development Plan, and will deliver meaningful public recreation and safety benefits on National Forest System lands, all while incorporating carefully designed environmental protections.

A-Basin 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. A-Basin respectfully requests the Forest Service authorize the Project as proposed in the NOPA and proceed with the appropriate level of NEPA analysis without delay.

Sincerely,

A handwritten signature in black ink, appearing to read 'ALH', is positioned above a horizontal line.

Alan Henceroth
President and Chief Operating Officer
Arapahoe Basin Ski Area