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Kevin Wright, Forest Supervisor
c/o Matt Loscalzo, Project Manager
Dixie National Forest
820 N. Main Street
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Dear Supervisor Wright,

BlueRibbon Coalition (BRC) submits these comments on the Draft Environmental Impact Statement (DEIS) for the Brian Head Resort Expansion Project, Project No. 292353, on the Cedar City Ranger District of the Dixie National Forest. BRC is a national 501(c)(3) nonprofit that has defended access to public lands since 1987 through litigation, advocacy, and awareness. Our members ride snowmobiles, OHVs, and mountain bikes, and they hike, hunt, camp, ride horses, and photograph wildlife on National Forest System lands. BRC members and supporters have concrete, definite, and immediate plans to continue those activities. BRC also supports comments from other individuals and organizations that advocate for motorized use and increased recreation access.

BRC does not oppose the resort expansion. BRC opposes the loss of the Dry Lakes snowmobile route. Alternatives 2 and 3 remove that route and replace it with a reroute through Brian Head Town that does not provide reasonable or high value access to the backcountry. Alternative 4 keeps the route only by dropping the Navajo Ridge to Dry Lakes Pod. The DEIS does not analyze an alternative that allows the expansion and keeps a connected snowmobile route. BRC proposes one, and asks the Forest Service to carry the following into the Final EIS and decision:

- Develop and analyze in detail an additional action alternative that includes the Navajo Ridge to Dry Lakes Pod and adopts BRC's proposed reroute away from Brian Head Town to the Dry Lakes area.
- Analyze the effects of Alternatives 2 and 3 on snowmobile access, including the nine road crossings the town reroute requires and the daily volume of snowmobile traffic that would use it.
- Disclose how riders would reach the backcountry beyond Brian Head if the Dry Lakes route is removed, and the capacity of the Cedar Breaks National Monument trailhead for trucks and trailers.
- Disclose the effect of each alternative on the permitted commercial snowmobile operation that uses the route today.
- Write the approved snowmobile route into the decision as a designated route, so that it cannot be closed later without further analysis and public involvement.
- Analyze the cumulative effects of the resort's full planned buildout, including the displacement of existing snowmobile use, on recreation in the Brian Head area.
- Require the resort, through a mitigation measure and a special use permit condition, to bear the cost of marking, separating, and maintaining the approved route.
- Estimate the snowmobile visitation, visitor spending, jobs, labor income, and recreation value that each alternative gains or loses, and compare the result with the cost of the reroute.

Alternatives 2 and 3 End Snowmobile Access to the Backcountry Beyond Brian Head

The project would add 1,651 acres to the resort's special use permit, taking it from roughly 887 acres to 2,538 acres, with new lifts, ski terrain, snowmaking, and roads. Alternatives 2 and 3

would eliminate about five miles of state-managed snowmobile route. The route through the Dry Lakes area is the only way for riders to reach the backcountry beyond Brian Head, and Alternatives 2 and 3 cut that connection.

The route carries heavy use. A local permitted snowmobile business runs up to 100 machines a day on peak days, and private riders add about 50 more, for up to 150 snowmobiles a day. The Forest Service identified potential impacts to that permitted operation as an issue in its Notice of Intent for this project (Federal Register Doc. 2025-13252, July 2025). The DEIS does not resolve it.

The DEIS proposes to reroute riders through Brian Head Town. That reroute does not replace the route. Up to 150 machines a day would cross nine roads, which creates a safety problem for riders, drivers, and pedestrians, and the reroute still does not reach the backcountry.

Trailering to Cedar Breaks National Monument does not fill the gap either. The trailhead has no parking lot that can handle trucks and trailers at this volume. As written, Alternatives 2 and 3 end snowmobile access as it exists today and would put out of business the guiding operation that depends on it. The current snowmobile use patterns also make it easy for riders in the Dry Lakes Pod to navigate to the Cedar Breaks riding area. The reroute through town would make it difficult to explore both areas in a single ride, and would require duplicative use of routes.

Alternative 4 Protects the Route by Dropping the Pod

Alternative 4 is the only action alternative that keeps snowmobile access to the backcountry that private riders and outfitters use today. It does so by removing the Dry Lakes Pod from the project. BRC cannot support Alternative 4 as written, because the Forest Service does not have to choose between an expanded resort and snowmobile access.

The DEIS offers one alternative that keeps the route and no alternative that keeps the route and builds the pod. That is a gap in the range of alternatives, and it leaves the decision maker with a false choice. Resort growth and snowmobile access can coexist, but only if the route is planned into the project now and not left to be worked out later.

Removing a Longstanding User Group Is User Conflict

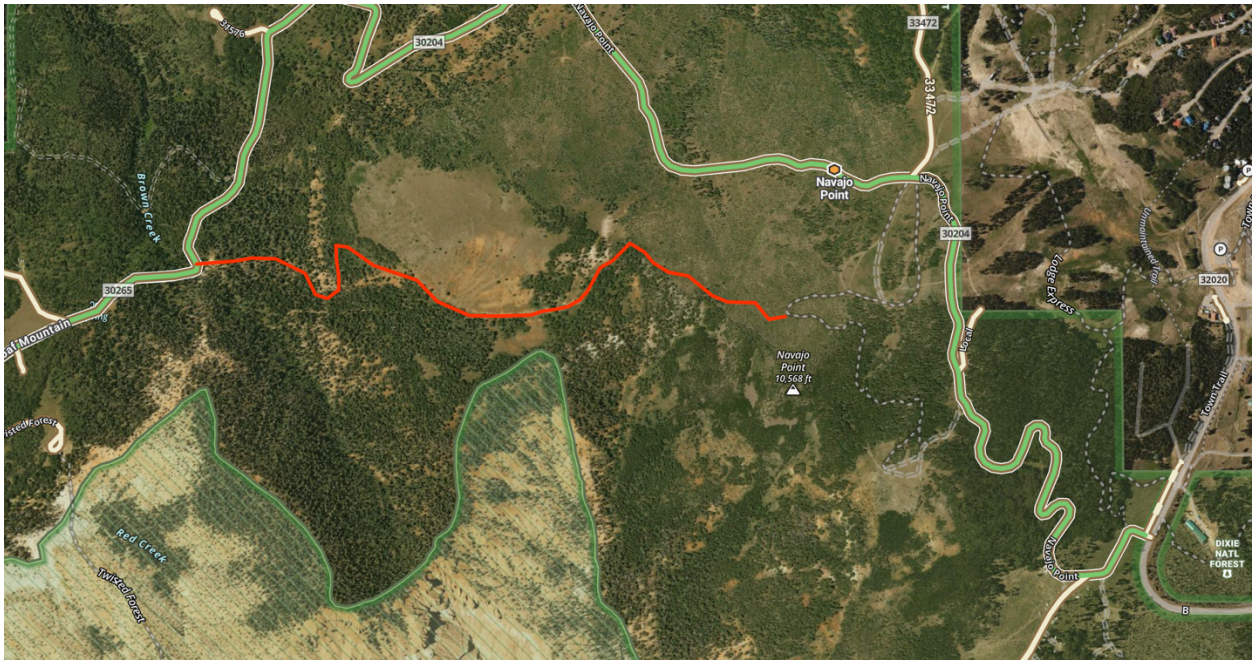
Snowmobilers and guided riders have used the Dry Lakes area and the route beyond it for decades. Alternatives 2 and 3 do not manage a conflict between skiers and snowmobilers. They end it by removing one group so that the other has the terrain to itself.

Removing a user who has enjoyed an area for decades so that another user can benefit exclusively is the clearest form of user conflict. Instead of managing conflict, the USFS is picking a side with this DEIS. A special use permit lets a resort operate on National Forest System land. It does not make that land the resort's, and it does not give the resort's guests priority over the public that already uses it.

Exclusion is the least defensible way to resolve a conflict when separation is available, and BRC's reroute is a separation. It is 1.1 miles, marked in winter, with standard boundary markers where it meets the permit boundary. Skiers keep the proposed terrain and snowmobilers keep their connection to the backcountry. The Final EIS should analyze separation as the way to reduce conflict and explain why it was not chosen.

BRC's Proposed Reroute

BRC staff walked the full 1.1-mile length of the proposed reroute and confirmed that it is feasible. The route skirts the proposed resort expansion in Alternatives 2 and 3 and connects the existing snowmobile routes on either side, so riders reach Dry Lakes and the backcountry beyond without entering Brian Head Town.



The route requires almost no construction. Much of the terrain has mild topography that needs no engineering or grading, and the route would be travelled easily on a snowmobile. At a minimum it can be designated as an over-snow-vehicle (OSV) only route, marked in winter with flagged stakes set in the snow, which causes minimal ground disturbance. Summer maintenance would be limited to clearing deadfall from the corridor and marking stump locations so the route avoids them. The guiding operator that uses the route today is equipped to maintain the winter markers, and volunteers can help. Standard ski area boundary markers can keep skiers off the snowmobile route where it approaches the permit boundary.

A winter-only route on snow also fits the DEIS's own seasonal protections. The DEIS restricts construction and maintenance in the Dry Lakes pod during the May 15 to July 15 mule deer fawning period and in crucial summer elk range. An OSV route operates outside those windows, and the summer deadfall work can be scheduled around them.

BRC's field work identified no notable extraordinary circumstances along the route. Staff walked its full length and found no resource condition that would call for heightened review or stall approval. Most of the terrain was gentle-sloped, and where grade was steeper a switchback could be maintained. Staff observed numerous tree stumps from cut trees and evidence of cut deadfall to suggest USFS is already conducting the level of maintenance necessary to establish this route. Route could be located away from riparian areas and drainages, which would see

much greater effects from the ski resort expansion itself. Snowmobiling has already been historically allowed in this area, which means impacts on other resources have already been analyzed. The Forest Service can confirm this on its own site visit, and BRC invites one.

The route shown is intended to illustrate the connection that must be made. If the Forest Service provides shapefiles for the resort expansion, BRC will conduct a site visit with the commercial guiding operators and deliver the exact alignment in standard digital mapping formats. BRC also asks that boundary marking along the shared edge be written into the special use permit as a resort responsibility, so the cost of keeping skiers and snowmobilers apart does not fall on local clubs and outfitters.

The Reroute Offers a Better and Safer Recreation Experience

The reroute is a better ride than the town route. It runs through country with numerous scenic viewpoints and a sense of seclusion that riders and guided clients come to this area for. The town route offers none of that. It runs through developed streets and puts riders in a setting that has little to do with the backcountry they came to reach.

The reroute is also safer. The Brian Head Town route requires riders to cross nine roads and to share the corridor with traffic and pedestrians. Each crossing is a point where a machine, a vehicle, or a person on foot can be hurt, and the risk grows with the 150 machines a day the route would carry. The town route is also often affected by plowing operations, which can block or bury the route and leave riders to work around equipment. A winter-only backcountry route away from town has none of these hazards.

The Final EIS should compare the recreation experience of each alternative, including scenery, seclusion, and rider safety, and should not treat a route through town as equivalent to the route it replaces.

Alternatives 2 and 3 Remove Snowmobile Use That Supports Local Jobs and Spending

The DEIS measures the loss of the Dry Lakes route in miles and does not value the use the route carries. BRC estimates that value below with a National Visitor Use Monitoring (NVUM) spending method BRC regularly uses in its comments. Every input comes from the Forest Service, the National Park Service, or the Forest Service-sponsored Recreation Use Values

Database (RUVD). The agency can replace BRC's inputs with its own visitation data and run the same calculation in its FEAST economic models.

How the Estimate Works

Local spending equals visits multiplied by spending per party, calculated separately for local day trips, non-local day trips, local overnight trips, and non-local overnight trips. The spending figures come from the Forest Service's NVUM spending profile for snowmobiling, which reports what a party spends within 50 miles of the site on each trip (Stynes & White, 2006). BRC converted them from 2003 to 2024 dollars with the Consumer Price Index (a factor of 1.70) and applied the NVUM national mix of trip types and party sizes for snowmobile visits. The calculation leaves out the 10 percent of snowmobile visits whose main purpose was not recreation on the forest.

Trip type	Share of snowmobile visits	Persons per party	Spending per party	Of which fuel and oil
Local day trip	57%	2.3	$117	$54
Non-local day trip	7%	2.2	$184	$89
Local overnight	13%	2.8	$330	$66
Non-local overnight	13%	2.5	$550	$110

Table 1. Snowmobile spending per party per trip within 50 miles of the site, 2024 dollars. Source: Stynes & White (2006), Tables 3-3, 3-3A, A-1, and A-2, converted from 2003 dollars. NVUM sets the local overnight figure by rule at 60 percent of the non-local overnight figure.

On this mix, 1,000 snowmobile visits generate about $78,700 in local spending, and about $25,000 of that is fuel and oil. Applying the NVUM ratio of 11.8 jobs per $1 million of visitor spending (USDA Forest Service, 2020) and the National Park Service ratios of $0.65 in labor income and $1.94 in economic output per $1 of visitor spending (National Park Service, 2024), those 1,000 visits support about 0.9 job, $51,100 in labor income, and $152,600 in economic output. Counting only non-local visitors, whose spending is new money to Brian Head and Iron County, the figure is about $34,400 per 1,000 visits. If every visit were a local day trip, it would be about $50,700.

What the Dry Lakes Route Carries

As described above, a local permitted snowmobile business runs up to 100 machines a day on peak days and private riders add about 50, for up to 150 machines a day. BRC counted one rider per machine, which understates use wherever two people share a machine. The operator confirmed that the season typically lasts 128 days. The 150-machine figure is a peak-day count, so the route does not carry that volume every day, and the DEIS does not say how many rider-days a season it carries. Until those records are supplied, BRC shows three levels of seasonal use: 3,000, 6,000, and 9,000 rider-days, which equal an average of 23, 47, and 70 riders a day across the 128-day season. The last row shows the ceiling, 150 riders on every day of the season, or 19,200 rider-days.

Rider-days per season	Local spending, all visitors	Local spending, non-local visitors	Jobs	Economic output	Rider value (consumer surplus)
3,000	$236,000	$103,000	2.8	$458,000	$257,000
6,000	$472,000	$207,000	5.6	$916,000	$513,000
9,000	$708,000	$310,000	8.4	$1.37 million	$770,000
19,200 (ceiling)	$1.51 million	$661,000	17.8	$2.93 million	$1.64 million

Table 2. Annual economic effect of the snowmobile use the Dry Lakes route carries, in 2024 dollars for spending and output and 2025 dollars for rider value. Jobs and output are calculated from spending by all visitors. Rider value uses $85.53 per person per day. The ceiling row assumes 150 riders on each of 128 days and is an upper bound.

Consumer surplus measures the value riders receive beyond what they pay to ride. The RUVD reports $85.53 per person per day for snowmobiling in the Interior West states, which include Utah (Bowker et al., 2009; 2025 dollars). A study of snowmobiling in Valley County, Idaho, found values of about $155 to $265 per person per day in 2025 dollars (Larsen et al., 2020). BRC used the lower Bowker figure. Spending and consumer surplus measure different things, and BRC does not add them together.

What the Estimate Leaves Out

The estimate does not include the permitted outfitter's own revenue, payroll, or permit fees. Alternatives 2 and 3 would threaten to put that business out of operation, and the DEIS has not disclosed what that costs Brian Head.

Some riders displaced from Dry Lakes would trailer to Cedar Breaks National Monument or ride elsewhere, so the net loss to the region is smaller than the gross figures above. The DEIS has not disclosed whether the Cedar Breaks trailhead can take them, and BRC asks for that analysis in request 3. The results scale in direct proportion to the visits lost. If half the riders are displaced, the loss is half the amount shown. The loss to Brian Head Town is larger than the regional net, because riders who go elsewhere take their fuel, food, and lodging purchases with them.

The inputs have limits. The spending profile is a national Forest Service profile built from data collected in the early 2000s, and the ranges NVUM reports around its snowmobile averages run from roughly 10 to 35 percent. The Forest Service holds current forest-level spending profiles and visitation counts, and the Final EIS should use them in place of these figures.

The Economic Comparison the Final EIS Should Make

The resort will point to the activity its expansion brings, and the DEIS projects comfortable carrying capacity rising from 4,330 guests to 13,250. BRC does not need to dispute those figures. The comparison that matters is between the town reroute and BRC's reroute, because BRC's reroute keeps the resort's proposed terrain. Under Alternatives 2 and 3, the spending, jobs, and rider value in Table 2 are lost. Under BRC's alternative, they stay, and the cost is a 1.1-mile winter route marked with stakes, which the resort can fund as a permit condition.

BRC asks the Forest Service to add the following to the Final EIS:

- Estimate snowmobile visits on the Dry Lakes route under each alternative, using the outfitter's permit records and the Forest Service's own counts.
- Estimate local and non-local visitor spending, jobs, labor income, and economic output under each alternative, using current forest-level NVUM spending profiles and FEAST, and report the effect on Brian Head Town and on Iron County separately.
- Estimate snowmobile consumer surplus for Utah from the current RUVD.

- Disclose the permitted outfitter's annual revenue, payroll, and fees, and the effect of each alternative on them.
- Compare the economic effect of each alternative with the cost of BRC's stake-marked 1.1-mile route and the cost of the Brian Head Town reroute.

Why the Forest Service Must Analyze This Alternative

NEPA requires an EIS to consider a reasonable range of alternatives that are technically and economically feasible and meet the purpose and need for the project. 42 U.S.C. § 4332(2)(C)(iii). A marked 1.1-mile winter route is technically feasible, costs almost nothing, and leaves the resort's proposed ski terrain in place. It meets the project's purpose and need in full. The Forest Service has discretion in choosing alternatives, and the Final EIS should either analyze this one or explain in its response to comments why a route that serves both purposes was not carried forward.

The effects analysis must also cover what the expansion does to existing recreation, as set out under Cumulative Effects below.

The project also requires amending the Dixie National Forest Land and Resource Management Plan to reassign 1,155 acres to Management Area 1B, Winter Sports Sites. The Final EIS should show how the amendment and the project remain consistent with the plan's recreation direction and with the Multiple-Use Sustained-Yield Act, 16 U.S.C. §§ 528-531, which names outdoor recreation among the purposes for which national forests are administered. It should also disclose whether the amendment changes the recreation opportunity spectrum classes that govern over-snow vehicle use in the project area, and whether the Dry Lakes route appears on the Dixie National Forest's over-snow vehicle use map.

Cumulative Effects Must Be Analyzed

NEPA requires the Forest Service to analyze the reasonably foreseeable environmental effects of the proposed action. 42 U.S.C. § 4332(2)(C)(i). The effect of Alternatives 2 and 3 on snowmobile access cannot be measured one route at a time. The 1,651-acre addition is one step in a buildout that the resort describes as decades long under its 2023 Master Development Plan, and the resort projects its comfortable carrying capacity rising from 4,330 guests to

13,250. Each increment takes more terrain, and the Dry Lakes route is the only connection left to important backcountry riding areas.

The Final EIS should analyze, together with the effects of this project:

- The snowmobile terrain and routes already lost, restricted, or crossed by development in the Brian Head area, so the reader can see the baseline the project subtracts from.
- The resort's later phases and the private-land development tied to them, including Aspen Meadows and the added traffic on Brian Head Town's roads.
- The displacement of up to 150 machines a day: where they go, what that does to the remaining routes and to the Cedar Breaks trailhead, and what it does to other users there.
- The effect on the permitted outfitter's ability to operate, and on the winter businesses in Brian Head that depend on snowmobile visitors.

A DEIS that treats the loss as five miles of route has not analyzed the effect. The Final EIS should show the loss of snowmobile access in the Brian Head area before and after each increment of the buildout, for each alternative.

The Resort, Not Riders, Should Bear the Cost of Separation

The expansion creates the need for a reroute. Without the expansion there is no conflict to separate. The cost of keeping the route open should fall on the permit holder as a condition of the project and not on the outfitter and the local clubs that the project displaces.

BRC asks the Forest Service to include the following in the decision, as mitigation measures and as terms and conditions of the special use permit, so that they are enforceable:

- The resort installs and maintains boundary markers along the edge where the permit area meets the snowmobile route.
- The resort funds winter marking of the route, and summer clearing of deadfall and marking of stump locations in the route corridor.
- The resort remains responsible for these measures for the life of the permit, and the permit allows the Forest Service to act if they are not carried out.

The outfitter and local volunteers have offered to help maintain the markers. That offer shows the route is workable. It does not make them the right party to pay for a problem the expansion

creates. The Final EIS should also disclose the cost of building and policing the Brian Head Town reroute in Alternatives 2 and 3, including the nine road crossings, who would bear it, and how it compares with the cost of a stake-marked 1.1-mile winter route.

The Route Must Be Secured in the Decision

The DEIS would designate all of the project's new and improved roads as administrative routes that are closed to the public year-round. The Forest Service has said the snowmobile corridor will stay open to ATVs in the summer, but nothing in the DEIS prevents a later closure, and a later closure would turn a winter loss into a year-round one.

BRC asks the Forest Service to write the approved route into the decision as a designated route and to exempt it from the administrative-route closure. The decision should designate the winter route for over-snow vehicle use under 36 C.F.R. Part 212, Subpart C, and should record the summer ATV use the Forest Service has described under Subpart B. Any later change should require separate analysis and public involvement under the same subpart.

BRC recognizes that the Forest Service may revise or replace Subpart C, including its minimization criteria, while this EIS is under review. If it does, BRC asks the Forest Service to apply the travel management rules in effect when the decision issues and to show in the Final EIS how the approved route meets them. BRC will hold the agency to whatever rules replace the minimization criteria. A change in the rules is not a reason to leave the route out of the decision.

Conclusion

BRC supports a Brian Head Resort expansion that keeps snowmobile access to the Dry Lakes area and the backcountry beyond it. Alternatives 2 and 3 cut off that access, and Alternative 4 protects it only by removing a full terrain pod. A re-route that avoids Brian Head Town would let the Forest Service approve the resort's expansion and protect existing snowmobile use in the same decision. BRC asks the agency to analyze that re-route in the Final EIS.
We would like to close by saying we support “shared use”. Motorized and non-motorized recreation also overlap, because OHVs and snowmobiles often increase access to hiking, camping, and equestrian use. A marked winter route that separates snowmobiles from ski terrain serves every winter user of this corner of the Dixie National Forest.
As long as overall visitation numbers are appropriate for the affected resources, motorized and

non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,



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References

- Bowker, J. M., Starbuck, C. M., English, D. B. K., Bergstrom, J. C., Rosenberger, R. S., & McCollum, D. W. (2009). Estimating the net economic value of national forest recreation (Faculty Series Working Paper FA 09-02). University of Georgia.
- Larsen, R., Taylor, R. G., McKean, J. R., & Johnson, D. M. (2020). Willingness to pay for snowmobile recreation: Travel cost method models with and without post-season resurvey of trip count. Applied Economics, 52(20), 2178-2190.
- National Park Service. (2024). Visitor spending effects report, 2024.
- Rosenberger, R. S. (2026). Recreation Use Values Database, 2025 update. Oregon State University.
- Stynes, D. J., & White, E. M. (2006). Spending profiles for national forest recreation visitors by activity. Michigan State University for the USDA Forest Service.
- USDA Forest Service. (2020). National Visitor Use Monitoring national summary report, Table 15.

- U.S. Bureau of Labor Statistics. Consumer Price Index for All Urban Consumers (CPI-U), annual averages of 184.0 (2003) and 313.7 (2024).
- USDA Forest Service, Dixie National Forest. (2026, August 18). Brian Head Resort Expansion EIS: DEIS open house presentation.
- USDA Forest Service, Dixie National Forest. (2026). Brian Head Resort Expansion Project draft environmental impact statement (Project #292353). https://www.fs.usda.gov/r04/dixie/projects/292353
- Statutes: 42 U.S.C. § 4332(2)(C) (National Environmental Policy Act).