



August 14, 2002

NEPA Task Force
PO Box 221150
Salt Lake City, UT 84122

**Re: Comments on NEPA Task Force Improvement and
Modernization of NEPA Analysis and Documentation**

Dear NEPA Task Force:

Crystal Mountain, Inc. (CM) submits the below listed comments in response to the CEQ's Notice and Request for Comments published in the *Federal Register* on July 9, 2002 on the NEPA Task Force's efforts to improve NEPA analysis and documentation. CM is a medium sized ski resort located on USDA Forest Service land within Washington State. The Northwest Forest Plan for the Mt. Baker Snoqualmie National Forest, June 1990 CM is defined as 3C Developed Winter Sports Resorts.

We will confine our comments to our recently completed Environmental Assessments (EA's) since 1997 and the on going saga of wading through the Environmental Impact Statement (EIS) process.

EA's, Expense and Complexity

Due to the ever increasing complexity of writing EA's CM felt it necessary to work with a consultant who specializes in such document writing. In 1997 and 1998 we submitted three EA's to the U.S. Forest Service (FS) for a cost of \$310,000. One EA alone cost \$204,000 that only contained two alternatives (action and no action). Even though these documents are written by a highly qualified firm in NEPA writing, the FS feels compelled to review and word-smith these documents prior to them going to press (of course that costs additional time and money).

At times the FS will make the document so tight we almost had problems changing from an approved four passenger chairlift to a six passenger chairlift with the same capacity of people per hour. Rather than use words such as "approximately, almost or nearly" the FS will require that the exact number (which might not be precisely known at the time) be used.

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EIS, Complicated, Time Consuming and Expensive

Crystal Mountain released our new Master Development to the public in October of 1998 after 2½ years of planning and \$750,000 of expense. Public scoping meetings were then held and almost 3 years later in August of 2001 the FS finally released the DEIS at an expense of 2.5 million dollars. The DEIS is over six inches thick and weighs more than 12 pounds, talk about information overload!

It is estimated that the FEIS (projected cost \$700,000) may be released by October of 2002, four years after the Master Development Plan was presented to the public. The FS anticipates that the document will be appealed by a local Indian Tribe or conservation group upon issuing the Record of Decision.

Given the elapsed time it is taking to work this document through the various agencies, address comments and eventually gain approval, perhaps we should start a new master development plan now so that we are not out-of-date.

NEPA as a Tool to Delay

The NEPA process is good tool to ensure environmental protection. When self serving groups are able to turn these documents into lengthy delays for projects, that is wrong. Cumulative impacts are easily approached by individuals or groups wishing to slow or delay projects. How far, when to stop or enough is enough does this documentation need to go? The responsible agency needs to do a good job defining the parameters.

The "Appeal" is another fear factor used by environmental groups. A document should not become so large and lengthy it needs to cover all the minute details that may be brought up in an appeal. This defeats the purpose of NEPA.

We have reviewed the National Ski Areas Association letter dated July 31, 2002 and strongly support those comments listed by Mike Berry. We thank you for the opportunity to provide comments on such an important issue, as we look towards a future with an improved NEPA process.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Steel".

William Steel
Director of Planning

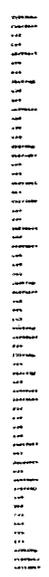
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