

Richard P. Brooks PO Box 934 Gypsum, CO 81637 (970)376-0750
brooksgypsum@aol.com

Scott Fitzwilliams c/o Max Forgensi
Mountain Sports Permit Administrator, White River National Forest
PO Box 190
Minturn, CO 81645

May28, 2018

Beaver Creek McCoy Park Alpine Ski Area Expansion

Honorable Forest Service Reviewers:

Since 1984 living in Lake Creek I have watched deer and elk use of this area. I worked as a Mountain Planner, landscape architect, contractor and ski patroller at Beaver Creek since then. I care deeply about this area. I have never thought that McCoy Park should be alpine ski terrain. This area has always supported wildlife and everyone who lives here has loved them as a part of the local environment. Development pressures on all sides have reduced these populations. Death by a thousand cuts. The impacts of this proposal may be the final tipping point, but some changes to this proposal might eliminate several of the worst impacts.

The Alpine Beginner Pod proposed for McCoy Park has several major impacts. Many components of this proposal have impacts far beyond the ski area boundary. Many of these impacts could be reduced or mitigated by alternative component, facility locations which could greatly reduce the impacts to adjacent critical areas. As well as help control new volunteer transportation issues. While the Purpose and need state only a beginner, low intermediate winter project this proposal will result in greatly increased year round use in McCoy Park and all areas below it. These impacts are foreseeable and must be considered in this analysis.

Having had discussions at the Forest Service with Beaver Creek executives and the acting District Ranger I appreciate that every one believes that they would like to develop McCoy Park as proposed their will be little to no impacts and they will create a low key, wonderful beginner pod. I think that this plan while confined in area distributes impacts far more broadly and negatively. Because the area is still closed to access, I am expressing them now. Some concerns could arise when this area opens to public access after the comment period is over.

- Specifically
1. Location of the warming hut and ski patrol facility.
 2. New proposed road alignments.
 3. Excessive glade creation in easiest to easier ski terrain.
 4. Presenting a proposal that will require future modifications, whose impacts should be considered at this point.

5. The stated purpose and need for this proposal is winter use as beginner and low intermediate terrain not to increase year round use at McCoy Park and surrounding area with wildlife prescriptions in the Forest Plan.
6. Unstated Purposes
 - 1) 2000 skiable acre BC
 - 2) Connection To Mud Springs Expansion

Purpose and Need

The claim of a need for additional beginner terrain at Beaver Creek is a statistical straw man argument. I worked for Vail Associates, Beaver Creek Resort and Vail Associates for 25 years. In that time almost every former and current executive at Beaver Creek said that if Beaver Creek could market 2000 skiable acres that would be a valuable marketing tool. If there was a need for additional beginner or intermediate ski terrain, it never had any impact on many capital or expansion projects especially on private land where development of ski and out real estate development always took the highest priority. Chair 5 at the top of the mountain where most of the existing easier terrain at Beaver Creek is remained a two was the last fixed grip low capacity ski lift to be upgraded only last summer. There is no real shortage or need for additional easy ski terrain at Beaver Creek and certainly 250 acres is an arbitrary number. They want 2000 skiable acres as a marketing tool and they have created a purpose and need to achieve that primary and longstanding goal. As long as I have lived here people in Arrowhead, Singletree and Edwards have wanted ski runs in Mud Springs, this is the connection. If the wildlife concerns are eliminated now, mud springs is in line for the next expansion.

The purpose and need statement says nothing of increasing the year round access and use of McCoy Park and the adjacent public lands, but the proposal will increase use and impacts. There is an inverse relationship between human use and habitat use by wildlife. The offsite impacts of this proposal need to be reduced or mitigated. If the decline of the deer and elk herds in the Vail to Edwards is the result of 1000 cuts, the future impacts of this development could be 500 – 800 more cuts. These uses and impacts need to be part of this analysis.

McCoy Park

McCoy Park has been and still is critical deer and elk wildlife habitat. The major elk calving areas of mud springs and the ridge west of arrowhead that descends to Edwards are connected to the high elevation summer range in the Holy Cross Wilderness by McCoy Park. The spring elk calving closure recognizes the fact that McCoy Park is critical habitat. McCoy Park has food water and some cover which is why it is such valuable as habitat. Cover from The tops of chairs 11 and 12 west into McCoy Park is still critical for migration and calving. Gladed Ski terrain is no longer valuable as cover or calving habitat. Glading and grooming for low ability skiers requires elimination of cover and unnecessarily fragments critical habitat. The impacts to diminishing wildlife populations in The Vail to Edwards of this proposal will be significant. Daily and seasonal migration corridors and elk calving areas will be impacted. They need to be studied and mitigated before this proposal can be approved. Daily and seasonally elk and deer migrate from Holy Cross Wilderness into McCoy Park from the ridge above chair 11

and the McCoy Chair. This proposal fragments this area and invites year round access and use of this area. This new use and constant disturbance unnecessarily eliminates much of the wildlife use and value of McCoy Park and adjacent areas.

The existing road works for access to this area but it is steep enough that far fewer casual cyclists access McCoy Park and Mud Springs with the existing road to the top terminal of Chair 11. Access from the top of 11 will be constructed anyway for skier and ski patrol access. The electric line should use that road to route power to the new lift.

Skier egress from the top of the McCoy lift skyway D should be a groomed trail no more developed than the existing on Grade cross country ski runs. This would eliminate much of the volunteer summer use whose repeated actions have reduced existing wildlife populations between Vail and Edwards.

The warming house does not need to be located at the top of the lift where it becomes a draw for pedestrians and cyclists in the summer. As well as weddings and other uses that are not part of the purpose and need. As well as a jump off meeting area for out of bounds skier and mountain bike access to mud springs and Arrowhead. Nor does it need to be visible from or into the Holy Cross Wilderness. If it was located near the base of the two lifts it would be easier to clear and egress at the end of the day. As well a water line could reach it with no pumping. Service and maintenance on the two lifts and at the warming building would have far less impact at that area as well. The construction Staging area by the proposed skier bridge is another possibility. Other locations could work as well which on the lower east part of this area may reveal themselves when public access to McCoy Park returns after this comment period. The point is that the proposed location will be a magnet for unintended use which will have major impacts.

The snowmaking and skyway B and vehicle access to the two lower lift terminals appears to be excavated and constructed on the sidehill adjacent to the main drainage. While this may be only a function of map scale, on such moderate terrain, is this the best location? Access to the area after this comment period may confirm this choice.

Boundary ropes and closures always catch and strangle bull elk. Maybe certain high elk migrations section along the boundary could be removed and replaced seasonally.

The gladdened ski run on the west side of McCoy Park 2/3 of the way down is not needed. Elk have always used the tall grasses and down timber in this stand for bedding. To create dubious beginner terrain destroys this cover and only creates a small amount of dangerous beginner terrain.

Beginner Ski Terrain

Having worked as a Ski Patroller and Mountain Planner at Beaver Creek I for over 20 years I have a sense of what beginners and low intermediate skiers require. Daily grooming is a must. If not daily, certainly every 2nd or 3rd day. McCoy Park will be no different. I do not believe there is enough natural snow in McCoy Park for the snow wear this causes. The ground has too much variation to accommodate regular grooming. This is particularly true in the early season and when ever the area goes more than a week between significant snowfalls. Bear spots and ground brush top show up quickly and grow rapidly as time between snowfalls increases. One or two grooming passes in late season as was done this past season does not equate with regular grooming for an entire

season. Beaver Creek should groom three trails down the middle of McCoy Park three times a week to demonstrate their proposal is even feasible for at least one full season so that the real nature of this proposal can be evaluated..

Beginners and intermediates too often ski faster than they should on groomed terrain, too often with disastrous results. Gladed groomed beginner terrain is a recipe for safety concerns, although the lower impact to visual and wildlife impacts are mitigating factors.

In Conclusion

I believe that Beaver Creek Resort Stated Purpose and Need for this expansion has some validity but 250 acres is arbitrary and unstated Purposes are drivers of this proposal. Moving the warming facility with another location would reduce and mitigate impacts of year round disturbance, as well the new road alignment to the top of McCoy Park can be simply changed at this point and numerous impacts would be reduced and mitigated. All of these alternatives should be examined at this time to see if this project can reduce the foreseeable impacts. A few more operating restrictions for off season use of this area would benefit wildlife and no need has been stated or is needed in this area. I believe this would create the proposal Beaver Creek Resort claims to desire. I look forward to talking with you about these alternatives and visiting the site when the calving closure is over.

Sincerely

A handwritten signature in dark ink, appearing to read 'Dick Brooks', with a stylized flourish at the end.

Dick Brooks,
Gypsum, CO