



## BOARD OF COUNTY COMMISSIONERS

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May 31, 2020

Scott Fitzwilliams, Forest Supervisor  
C/o Sam Massman  
Dillon Ranger District  
PO Box 620  
680 Blue River Parkway  
Silverthorne, CO  
80498-0620

Re: Bergman Bowl Enhancement Projects at Keystone Resort

The Summit County Board of County Commissioners respectfully provides the following comments regarding the proposed Bergman Bowl Enhancement Projects at Keystone Resort currently under review by the USFS. We are providing these comments because issues such as water and wildlife resources are not contained by jurisdictional boundary lines, and their protection is a central component of the County and Snake River Basin guiding master plans. Furthermore, socioeconomic impacts resulting from any new ski resort development are of particular concern to the County.

Based on the information provided in the Keystone Bergman Bowl Enhancement Projects Notice of Proposed Action, we have the following concerns regarding this project:

- **Wetlands:** As proposed, grading associated with the bottom lift terminal, access road, and ski trails would have direct permanent impacts to 0.2 acres of wetlands. An additional 5 acres of wetlands could be indirectly impacted through overstory tree removal. Additionally, the NOPA states that snowmaking pipelines have the potential to temporarily impact wetlands and several components of the project proposal are located near fens. One of the Snake River Basin Master Plan policy goals is to direct development to avoid wetlands and furthermore, the County requires a minimum 25-foot setback from wetlands where no disturbance is allowed. Therefore, we request that project sites be reexamined in the Environmental Analysis (EA). If project sites are retained after further evaluation, we request that best management practices for sediment control and ongoing monitoring and remediation be required as a condition of approval to ensure the ongoing viability of these wetlands. Any mitigation for loss of wetlands should be completed in a manner consistent with Summit County's policies of no net loss, and mitigation sites should be established as close to the impacted areas as possible.
- **Lynx Habitat and Corridors:** As proposed, the project would result in the loss of suitable lynx habitat due to the addition of 73 acres of developed ski trails (a loss of 63 acres of habitat) and glading within 40 acres of forested areas (a loss of 21 acres of habitat). Furthermore, the project area is in close proximity to dispersal corridors. As the County seeks to avoid development in environmentally sensitive areas, including wildlife habitat for rare and endangered species, we request that Keystone Resort and the USFS reexamine trail and glading sites in the EA. Furthermore, Keystone and the USFS should explore impacts in the EA on forest carnivore movement corridors in and adjacent to the project area. Vail Resorts also owns multiple mining

claims in or near the project area and lynx dispersal corridors; we therefore recommend permanent restrictions on developing those claims so as to minimize disturbances.

If project locations are retained after further evaluation, we request that the USFS take active measures to limit disturbances to lynx habitat and corridors both during and after construction. It is our understanding that the proposed Bergman Bowl enhancements, with the exception of the Outpost Restaurant, would run only during the winter ski season. If the project is approved, we request that the ski area commit to this seasonal closure as part of the decision document, to prevent further disturbances to lynx habitat and corridors.

- **Traffic and Parking:** The NOPA states that the proposed action may result in negligible impacts to traffic on U.S. Highway 6 and parking at Keystone Resort due to incremental increases in visitation. However, without a comparative analysis illustrating the ratio of uphill lift capacity to parking spaces both before and after the proposed project, it is impossible to understand whether or not the proposed project's impacts to traffic and parking would only be "negligible." We request that the USFS and Keystone Resort undertake such a comparative analysis to better understand how traffic and parking will be impacted by the proposed action. Should the results of an analysis prove that traffic and parking will be adversely impacted, those impacts should be further investigated and considered in the environmental analysis.
- **Social and Economic Impacts:** The proposed action will result in the need for additional employees at the ski area. Given the fact that many ski area jobs are at the lower end of the County's wage scale, oftentimes ski employees are without adequate, affordable health insurance and child care. This impacts the County's ability to supply human services including health care, child care, and workforce housing. Any incremental increase in visitation to the County due to the proposed action could also impact services and facilities serving visitors, including emergency services.

We request that the EA include a comprehensive, cumulative social and economic analysis of potential housing, school, and social services/facilities impacts that could result from the proposed action. The analysis should also include an identification and evaluation of existing or new programs at Keystone Resort designed and intended to assist ski area employees and as such, help to mitigate socioeconomic impacts.

Finally, please be advised that Summit County staff where appropriate are available to assist in the collection and use of data the County has, to facilitate preparation of such an analysis.

Sincerely,



Elisabeth Lawrence  
Summit County Commissioner



Thomas C. Davidson  
Summit County Commissioner



Karn Stiegelmeier  
Summit County Commissioner