



August 8, 2020

Steamboat Ski Area Project
c/o Erica Dickerman
2468 Jackson Street
Laramie, WY82070-6535

Submitted online: <https://cara.ecosystem-management.org/Public/CommentInput?Project=58336>

Re: Steamboat Resort Improvements Project #58336

Dear Ms. Dickerman,

Keep Routt Wild has reviewed the Hahns Peak-Bears Ear Ranger District's scoping for Steamboat Resort Improvements Project #58336 dated July 9, 2020. We appreciate the opportunity to submit comments on the proposal. This letter addresses four key points that we believe are critical to the success of the proposal and the protection of the associated land and resources.

An overarching concern is that there are currently three parallel and interconnected EAs being pursued by the US Forest Service in the same region: The Buffalo Pass Road Improvement, the Mad Rabbit Trails Proposal, and the Steamboat Resort Improvement Project. The projects are not only interconnected but, in some cases, the actual project areas overlap as we will show below. Furthermore, these three EAs are going forward without any comprehensive Travel Management Plan from the Forest Service. These projects together threaten to fragment and reduce large areas of currently intact habitat, and the ramifications on migratory big game in particular could not only be significant, but substantial. We will point out that current NEPA regulations mandate that these interconnected projects be combined and evaluated as a single Environmental Impact Statement.

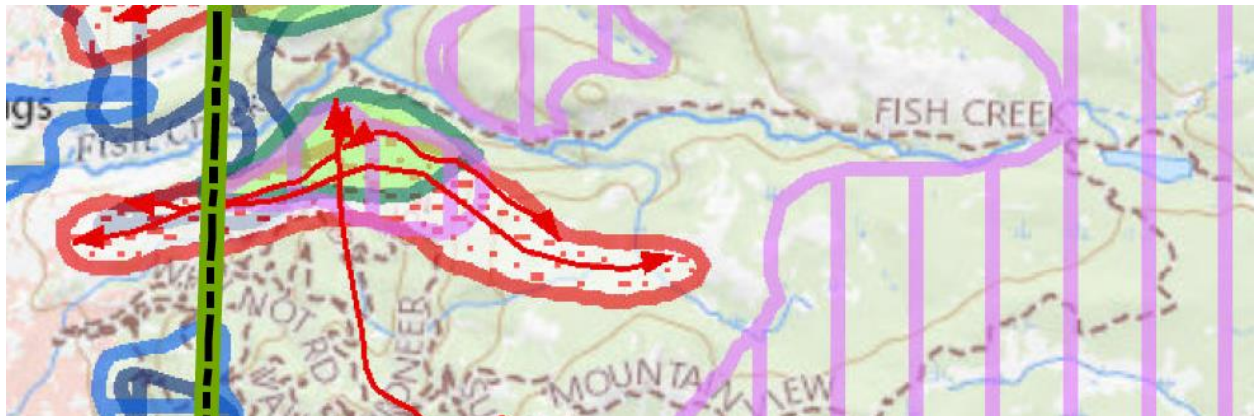
Fish Creek Expansion Area. The Fish Creek Expansion Area presents several issues with respect to wildlife and fauna. This is an area that currently has little human disturbance outside of winter, and is seasonally home to raptors, mountain lions, bear, elk, moose, mule deer, and potentially lynx. The expansion area, and particularly the construction and maintenance of the proposed egress trail, offers a new and attractive location for non-winter recreationalists. This of particular concern for raptors and elk, who are easily disturbed and displaced by humans. Tree clearing to create the new egress trail will disturb both raptors and elk. However, to the extent that this area would be frequented by non-winter recreationalists, the disturbance would continue well after construction. In the case of raptors such as red-tailed hawks or

goshawks, this may lead to the nests being abandoned before the offspring have fledged. In the case of elk, this may lead to increased energy expenditures when disturbed, and permanent fragmentation and loss of habitat. In [Effects of Off-Road Recreation on Mule Deer and Elk](#) (Wisdom 2004 et al) the researchers measured that elk would flee from hikers up to 500 meters and from mountain bikers up to 1,500 meters. A [follow-up study](#) (Wisdom 2018 et al) showed that elk maintained large minimum separation distances from recreationalists due to these disturbances. Elk maintained $547\text{m} \pm 44\text{m}$ from hikers and $662\text{m} \pm 53\text{m}$ from mountain bikers.

The results of the two studies were summarized in the [September 2019 publication of Science Findings](#), a US Forest Service publication. The publication reads, “avoiding motors, wheels, hooves, or feet takes a toll on elk in two ways: increased energy expenditures and decreased access to food sources. Moving more than necessary and not having enough to eat can be detrimental to the viability of elk populations. For example, if females don’t put on enough body fat, they may not be able to reproduce.” It continued, “output from the elk “Fitbits” showed that the animals spent less time feeding and resting and more time running compared to when there was no human activity. And the amount and quality of forage area available to the animals shrank as they shifted away from recreation trails.”

This leads to habitat compression. “You’ve basically reduced what we call carrying capacity, the number of animals that can make a living on the landscape,” Wisdom summarized.

This is a particular risk in the Fish Creek area if the new egress trail offers easier access to recreationalists. CPW data (see figure below) shows the area as an elk migration corridor (red), an elk production area (shaded green), and elk summer range (vertical purple).



It is also a migration corridor for mule deer. It should be noted that on August 21, 2019 Governor Jared Polis signed executive order [D2019 001](#):Conserving Colorado’s Big Game Winter Range and Migration Corridors which seeks to protect these critical corridors for big game animals such as deer and elk.

The Fish Creek Area is further complicated by the fact that USFS trails have been proposed in or around the area. During pre-scoping in 2018, the USFS published a map of Mad Rabbit Trails

Proposal “C” that traverses the expansion area at the west end (purple):



In 2019, the Mad Rabbit pre-scoping changed the location of the trail to the east end of the ski area expansion (Trail #5):



Regardless of the exact routing of the trail, the Mad Rabbit Trail Proposal is actively considering a trail that impacts the same area. Current NEPA regulations and the Ski Area Improvements own documents state “Cumulative effects analysis will include past, present and reasonably foreseeable future activities that could affect, or could be affected by, implementation of proposed projects.”

With Trail #5 under consideration, Mad Rabbit becomes a connected action under 1508.25(a)(1) from the standpoint of its inclusion in the scope of the EA. Just as importantly, the combined *effects* from the Ski Area Expansion and Mad Rabbit Trail #5 qualify as reasonably foreseeable cumulative impacts (Section 1508.7) that must be analyzed (1508.25(c)). Therefore, the Ski Area Improvements and the Mad Rabbit Trails Proposal must be combined into a single analysis. We believe the large scope of this combined analysis requires an EIS.

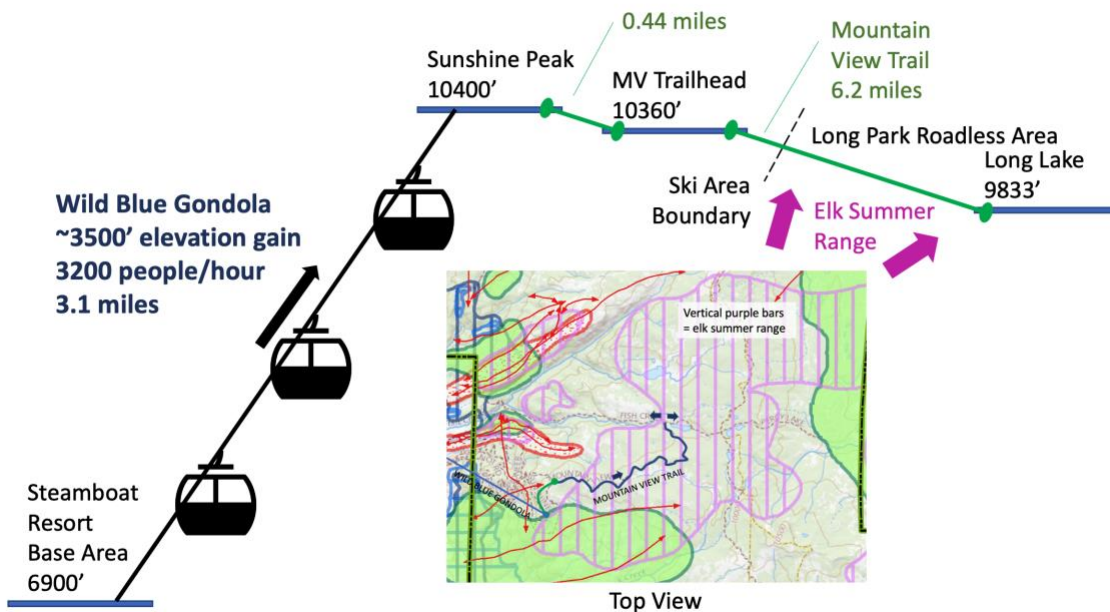
Wild Blue Gondola. The proposed Wild Blue Gondola is designed to carry an additional 3200 people per hour from the base to the summit of Sunshine Peak, the terminus of the Sundown

and Sunshine lifts, where a new restaurant would be added. Under the current proposal, the ski area could haul hikers, bikers, backpackers, and even hunters up nearly 3500 feet to Sunshine Peak where they could subsequently descend the reverse side of the ski mountain into sensitive wild lands, including elk summer range.

This presents a serious environmental impact well outside the boundaries of the ski area. At a recent Bud Werner Library event, wildlife biologist Paul Millhouser [presented his findings](#) that human encroachment, specifically into summer range, was a key factor in the steeply declining elk herds in the Eagle and Roaring Fork valleys. This is the most comprehensive study of the cause of the declining elk herds around Vail, and emphasizes the importance of summer range. “By about 2000, the winter habitat was about as fragmented as it could be,” [Millhouser said](#). “At this point, the development started turning into areas that were traditionally summer habitat. When the elk already weren’t getting the winter habitat they need, that summer habitat becomes more critical because if they can’t feed well in the winter, they sure as heck better bulk up during the summer and fall or they’re going to be out of luck.”

The figure below shows how the proposed gondola may significantly impact areas outside the ski area.

ELEVATION MAP OF WILD BLUE GONDOLA BACKCOUNTRY ACCESS

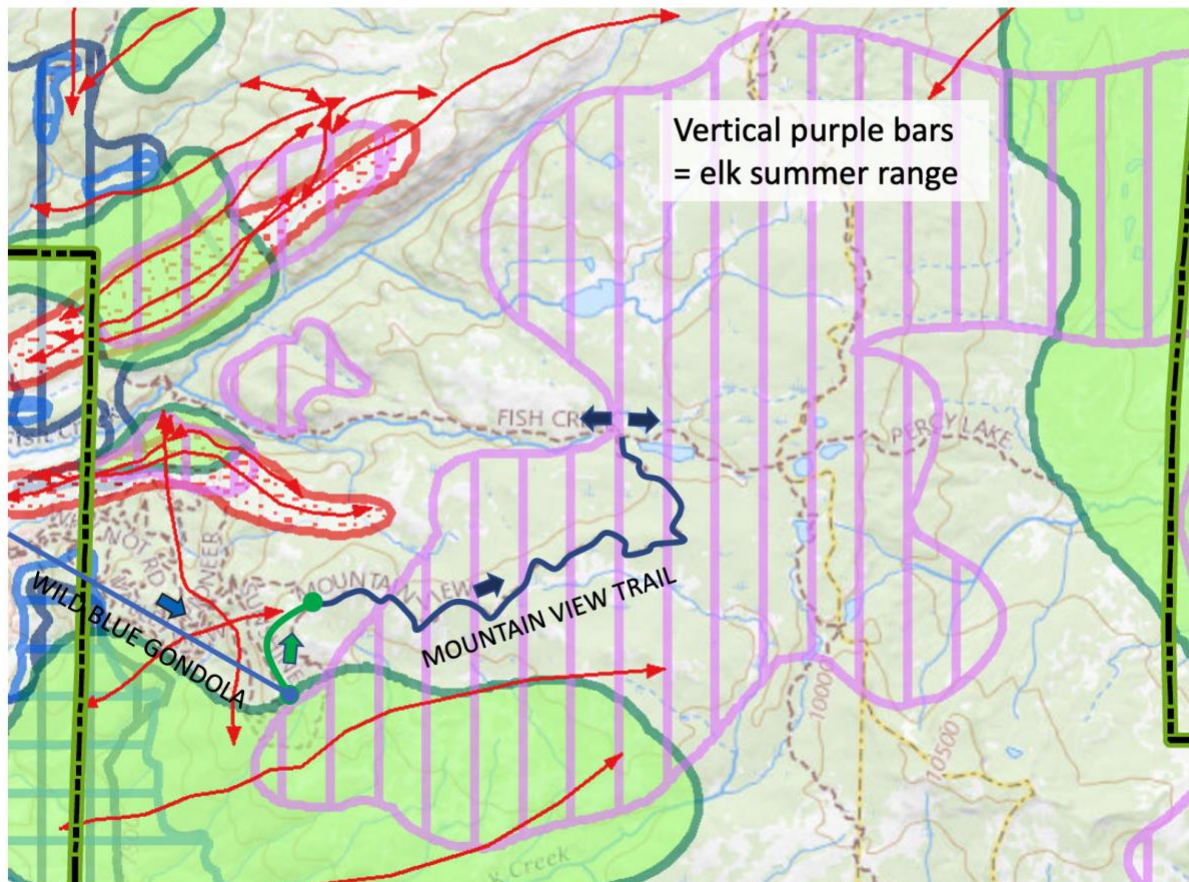


The gondola would all but eliminate any significant physical climbing to access the areas to the east of the ski area. From the top of Sunshine Peak a short 0.44 mile trail, net downhill, brings a person to the Mountain View Trail, where they could descend out of the ski area boundary to Long Lake.

The Mountain View Trail offers over 500 feet of descent to Long Lake. This creates a defacto downhill mountain bike trail with mechanical access from the gondola. Today, the challenge of riding or hiking Mountain View Trail keeps the area free from high levels of human disturbance. This would change if the ski area offered to bring summer recreationalists to the Sunshine Peak summit. This would essentially create a commercial downhill biking or hiking operation, but with the impacts largely outside the ski area, but within the Long Park Roadless Area. With the gondola offering nearly unlimited capacity for access, large numbers of recreationists would fundamentally change the character of the area. We note that the Colorado Roadless Rule states that proposed actions “that would significantly alter the undeveloped character of a Colorado Roadless Area require an Environmental Impact Statement.” 36 CFR 294.45(a).

Below is a larger map of the impacted area.

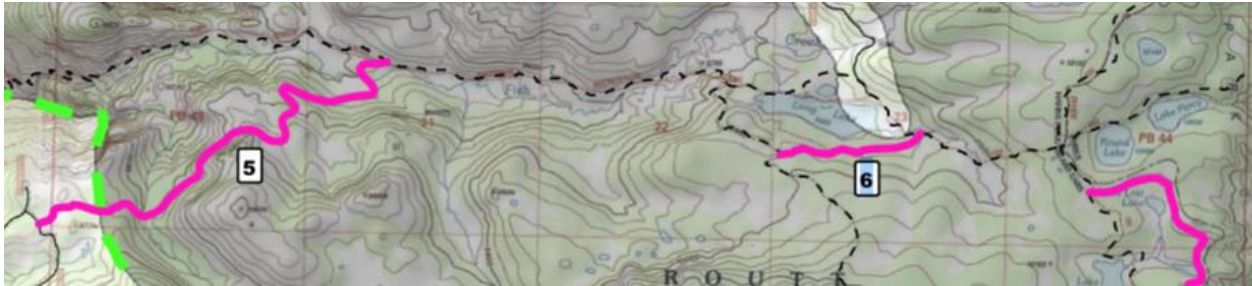
TOP VIEW OF BACKCOUNTRY ACCESS via WILD BLUE GONDOLA



In the expanded image we can see that the Mountain View Trail enters elk summer range almost immediately after exiting the ski area. A large number of recreationalists would create the conditions shown in the Wisdom studies, fragmenting and decreasing summer habitat. This

is exacerbated by the average speed of a net-downhill trail. As speeds increase, the zone of impact widens.

The most recent Mad Rabbit Trails Proposal shows Trail #6 intersecting with the Mountain View Trail near Long Lake.



Traffic from Mountain View Trail would either go to the left onto the Fish Creek Trail, or the right onto Trail #6 and towards other proposed Mad Rabbit trails. If summer recreation is allowed on the Wild Blue Gondola, there is a clear interaction between the ski area expansion proposal and the Mad Rabbit Trails proposal. As in the case of the Fish Creek Expansion, this becomes a connected action under 1508.25(a)(1). Similarly, the combined *effects* from the Ski Area Expansion and Mad Rabbit Trail Proposal qualify as reasonably foreseeable cumulative impacts (Section 1508.7) that must be analyzed (1508.25(c)).

Steamboat Resort stated that they have no plans to carry summer recreationists up Wild Blue Gondola. The summer plans only include special events, such as weddings, that pose little impact. If so, there is a simple solution – explicitly restrict the approved summer operations to events like these. But without explicit restrictions, the impacts due to the Wild Blue Gondola or the Fish Creek Expansion must be evaluated. And because of the connected nature to Mad Rabbit, the evaluations must be combined.

Patchwork of EAs should be replaced with a single EIS. The US Forest Service is currently proposing three different EAs, all in the same general area, and all having a significant recreational aspect: Buffalo Pass Road Improvements, Steamboat Ski Area Improvements, and the Mad Rabbit Trails Proposal. We've shown the significant interplay between the Ski Area project and the Mad Rabbit project above. In previous comments we've shown the interplay between the Buffalo Pass Road project and Mad Rabbit. We also note that the Buffalo Pass trail project was performed as an independent EA. We believe that this patchwork of EAs is counter the NEPA process and is designed to ignore or avoid the evaluation of cumulative impacts.

With so many simultaneous recreation projects proposed, all in connected areas, the only way to effectively evaluate cumulative impacts on a landscape scale is to combine all of these into one evaluation. We note that the US Forest Service does not have a current comprehensive Travel Management Plan. This needs to be developed as well. We believe the scope of the combined projects requires an EIS.

Public Comments on the EA or EIS. The USFS should allow comments on the project EA (or EIS) prior to the objection period and approval. Currently, we are in the midst of a global pandemic that has disrupted life for nearly everybody in Routt County, and indeed Colorado. There is intense interest in this project, but there have been no in-person public meetings due to the mitigation measures against the coronavirus. While the USFS has offered two “virtual” public meetings, these are not an effective tool for a large fraction of the population, as many people find the technical aspects challenging. Furthermore, this is a large and complex project. The issues we have raised were not addressed in the current scoping, and we suspect other issues will come to light as the project is examined.

Due to the intense interest in the project, video meetings being substituted for in-person meetings, and the complex nature of the proposal, we believe that an additional opportunity for comment should be granted to the public. Public skepticism is at a very high level. Proceeding with the project without soliciting further comments on a proposed EA or EIS is likely to be viewed negatively by a large portion of the citizenry. For the project’s success, and to retain credibility that the public was given every opportunity to comment on a project that was a complete surprise less than a month ago, the public should be given this additional opportunity to comment on the final proposal.

Thank you for giving us this opportunity to comment. In summary, the combined effect of this project with the other interconnected projects present a serious and significant threat to migratory big game animals, particularly elk. They may very well pose a significant impact to other species. The entire area needs a comprehensive and combined assessment of the cumulative impacts and an up-to-date and comprehensive Travel Management Plan.

Yours sincerely,
Keep Routt Wild

Larry Desjardin
President of the Board

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