



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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October 6, 2020

Ref: ORA-N

Noel Ludwig
USFS Clear Creek Ranger District
1617 Cole Blvd Building 17
Lakewood, CO 80401

Dear Mr. Ludwig,

The U.S. Environmental Protection Agency Region 8 recently received the September 2020 Notice of Proposed Action for Scoping and Comment prepared by the U.S. Department of Agriculture Forest Service (USFS) concerning the proposed Loveland Ski Area Parking and Terrain Improvement Project (Project) Environmental Assessment (EA). The following scoping comments were prepared in accordance with our responsibilities under the National Environmental Policy Act (NEPA).

The Project proposes to expand the Loveland Ski Area (Loveland) by constructing a new parking lot and two new ski trails and make terrain improvements to two existing ski trails. Based on our current understanding of the Project and the area, the EPA has identified the following key topics that we recommend evaluating in the NEPA analysis so that potential impacts or benefits to public health and the environment can be fully understood: (1) water resources; (2) air resources; and (3) mitigation and control measures.

The EPA's detailed comments are enclosed; we appreciate your consideration of our comments at this early stage of Project development and request a future notification to review the Draft EA. If further explanation of our comments is desired, please contact me at (303) 312-6441 or gleason.carolyn@epa.gov, or Region 8 NEPA Branch Chief Philip Strobel at (303) 312-6704 or strobel.philip@epa.gov.

Sincerely,

Carolyn L. Gleason
NEPA Branch

Enclosure

Enclosure -EPA Comments
United States Forest Service – Loveland Ski Area Parking and Terrain Improvement Project

(1) Water Resources

A. Water Quality Impacts and Mitigation

The EPA recommends discussing the following aquatic resource impacts, including which waters may be impacted, the nature of these impacts, and the specific pollutants that they deal with:

- Sedimentation and Water Quality: Potential impacts to water quality and quantity from runoff associated with surface disturbance during the construction and operation of the proposed facilities. This runoff would include sheetwash and channelized snowmelt from the Project catchment area into the Clear Creek Watershed. Specifically, we recommend assessing the potential for runoff to modify sediment loads and introduce salts, refuse, heavy metals, hydrocarbons, automotive chemicals or other pollutants into Clear Creek.
- Parking Lot Snow Management: Potential impacts to water quality in Clear Creek stemming from pollutant accumulation in plowed snow storage in the Project area, especially around its parking lots. Clear Creek flows so near the proposed and existing parking areas that on-site snow storage practices may directly influence its water quality during seasonal melting events.
- Drinking Water: Potential impacts to drinking water from the Project including source water protection areas and other municipal or private water supplies.
- Snowmaking: Potential impacts to water quality and quantity from any additional snowmaking potentially associated with the proposed ski trails and terrain improvements over the life of these structures. This analysis is recommended to include a detailed description and water quality analysis of any snowmaking source waters, a map of existing and proposed snowmaking coverage, and a statement of need for any potential expansion of snowmaking activities in the Project Area.

The EPA recommends the NEPA analysis identify and discuss how surface water quality will be protected or impacted by Project activities. To this end, the EPA recommends the NEPA analysis include:

- A list of Best Management Practices (BMPs) that will be required to protect surface water resources;
- A discussion of the circumstances under which the BMPs would be applied (e.g., proximity to surface water resources, presence of erosive soils, slope, adequate drainage, etc.);
- A description of snow management protocols for the Project's parking lot expansions detailing the location(s) where removed snow would be stored. We recommend including snow management specific BMPs and stormwater retention structures around the parking area in order to prevent refuse, sediment, salt and automotive pollutants from entering Clear Creek.
- An assessment of the water source/use relationships associated with any potential increases to seasonal snowmaking and detailed description of associated BMPs, and,
- An explanation of how the USFS would ensure that BMPs would be monitored to ensure timely and correct implementation as well as timely maintenance.

B. Protection of Wetlands and Riparian Areas

The protection and restoration of wetlands and riparian areas is a high priority. These resources increase landscape and species diversity, support many wildlife species, and are critical to protecting water

quality and designated beneficial water uses. We recommend that USFS analyze potential impacts from all potential Project alternatives to the following:

- Total wetland area and function;
- Wetland vegetation, riparian habitats, and aquatic biota; and,
- Wetland erosion or aggradation from runoff channelization or redirection.

We also recommend that the NEPA analysis evaluate methods to protect surrounding wetlands and riparian areas including the following:

- Specific mitigation requirements and BMPs applicable for construction, maintenance and reclamation activities to prevent adverse impacts to aquatic resources in the Project area. These could include initiatives prioritizing development away from steep slopes, erosive soils, road crossings, and alpine streams, seeps, and meadows. Other control measures could include the use of silt fences, detention ponds, waste collection grates, or off road/trail culverts; and,
- A map of seeps, springs, and wetland areas delineating these resources before development in order to facilitate their protection and support any necessary US Army Corps of Engineers permits.

(2) Air Resources

Dust suppression from disturbed areas is an important mitigation consideration in many areas of the West. Given the proximity of the project to major transportation corridors and active air quality monitoring stations, the EPA recommends the NEPA analysis include a plan for addressing dust control during construction. We suggest the plan include the level of required or anticipated dust control, control methods, documentation procedures, and accountability processes. The EPA recommends reducing surface disturbance to effectively reduce fugitive dust. Impacts can also be reduced by reclaiming disturbed areas as soon as practicable.

(3) Mitigation and Control Measures

We recommend that the BLM include a section in the NEPA analysis that details the mitigation and control measures that will be implemented for the Project and what entity will be executing any mitigation. A list of all necessary permits for construction, transportation, water, air, or land use in the Project vicinity may also clarify implementation and mitigation plans in the Draft EA. A detailed disclosure of Project funding sources is also recommended for inclusion in the interest of public understanding as are surface water quality monitoring efforts in the Project area following construction and additional snowmaking. Such monitoring efforts would identify any potential resource improvements or mitigation needs developed through Project implementation.