



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

June 4, 2021

Ref: 8ORA-N

Scott Fitzwilliams, Forest Supervisor
c/o Sam Massman
White River National Forest
Dillon Ranger District
P.O. Box 620
Silverthorne, Colorado 80498-0620

Dear Supervisor Fitzwilliams:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service May 18, 2021, Scoping Notice for the White River National Forest Copper Mountain Resort – Lumberjack Chairlift Replacement Project. The Dillon Ranger District is proposing to replace the existing Lumberjack chairlift, moving the top terminal approximately 600 feet uphill and extending the access road, power line and snowmaking to that location as well as constructing the Middle Roundabout Bypass trail to improve beginner ski terrain accessed from the chairlift. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), we are providing scoping comments. These comments convey questions or concerns that we recommend be addressed during the NEPA process.

The Proposed Action includes the Lumberjack chairlift replacement, construction of the Middle Roundabout Bypass Trail, road construction and the installation of snowmaking infrastructure. The scoping notice indicates the Proposed Action falls under the Categorical Exclusion at 36 CFR § 220.6(e)(22): “Construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site, including infrastructure or improvements that are adjacent or connected to an existing recreation site and provide access or utilities for that site.” Activities within this category include but are not limited to “Replacing a chair lift at a ski area.” We recommend the USFS document how the construction of the Middle Roundabout Bypass Trail and the installation of snowmaking infrastructure fits within the specified categorical exclusion at 36 CFR 220.6(e)(22) and make this information publicly available.

From review of the wetland delineation shapefiles provided to EPA on May 21, 2021, it appears that the construction of the Middle Roundabout Bypass Trail will bisect a forested-slope wetland. From review of the scoping notice it is unclear whether the direct and indirect wetland impacts associated with this construction have been quantified and evaluated. Indirect effects are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect impacts to wetlands could result from a number of actions including, but not limited to: overstory vegetation removal, wetland dewatering from grading, increased snow compaction, increased noxious weed invasion, and erosion and sedimentation. We recommend the USFS evaluate and provide a description of both the direct and indirect impacts associated with the development of the Middle Roundabout Bypass Trail.

EPA understands from email correspondence on May 21, 2021, that a more detailed wetlands/soils report is being developed. EPA recommends that this report include a discussion of the construction techniques and the potential direct and indirect impacts of those techniques to aquatic resources in the project area. These details will help inform the categorical exclusion determination as well as any potential permitting requirements under Clean Water Act Section 404.

If you have any questions or comments, or would like further explanation of our letter, please contact me at (303) 312-6704, or Shannon Snyder of my staff at (303) 312-6335 or snyder.shannon@epa.gov.

Sincerely,



Philip S. Strobel
Director, NEPA Branch
Office of the Regional Administrator