



January 26, 2023

Scott Fitzwilliams, Forest Supervisor
c/o Sarah Strehle
USFS Dillon Ranger District
PO Box 620
Silverthorne, CO 80498

RE: Breckenridge Chair 5 Lift Replacement

Dear Mr. Fitzwilliams:

The Town of Breckenridge (Town) is a neighboring land manager and partner with the U.S. Forest Service in the Dillon Ranger District as well as the Breckenridge Ski Resort (BSR). The Town understands the challenge of providing quality opportunities for recreation while also protecting our area's biodiversity and high-quality natural resources.

The Town owns and manages Cucumber Gulch Preserve (Preserve), a unique geological and ecological wildlife preserve with a diversity of forested, meadow, shrubland, and wetland habitats adjacent to and downstream of the BSR. The Preserve is home to a diverse assemblage of species and encompasses 139 acres total, with 57 acres of wetlands and 82 acres of upland. Several types of wetlands are present, including globally rare fens and ecologically valuable beaver meiers. It is not a single habitat type that makes the Preserve such a biodiversity hotspot, but the mosaic of habitat intermix throughout the entire Preserve.

The Town and its contractors have conducted extensive water and wildlife monitoring in the Preserve for the past 20 years. One major area of concern is the amount of sediment coming from the BSR from Boreas Creek drainage above the base area at Peak 8 into a 60" culvert via several inlets on the ski resort that empty directly into the Preserve. The Town and BSR partner approximately every other year to dredge the uppermost pond of sediment, which also creates a disturbance for wildlife. Sediment drainage from BSR remains our top concern, especially with the recent wet summer and storm events, and the proposed 5 Chair Lift Replacement Project has the potential to increase the amount of sediment transported into the Preserve via the 60" culvert. Although periodically dredging the uppermost pond can be somewhat effective in reducing the amount of sediment that travels into the heart of the

Preserve, we strongly believe that preventing sediment from being transported off the ski area is a much more sustainable and cost-effective approach.

We urge the USFS to adopt conditions like those that the Town is requiring of BSR with their construction permit, which include submitting and obtaining approval from the Town Engineer of final drainage, grading, utility, and erosion control plans. Additionally, the permit requires BSR to install erosion control measures on the downhill side of disturbance areas, in a manner acceptable to the Town Engineer. An on-site inspection must also be conducted by Town Engineering Staff prior to the commencement of construction to ensure Best Management Practices are utilized. Best Management Practices for controlling erosion and sediment may include, but not be limited to, blocking affected inlets with waddles and inflatable balloon/gaskets so that the inlets that are directly within the flows of the construction zone are blocked from transporting water and sediment during and after the project, until the revegetation efforts have proven successful.

Following the highest standards and best management practices for the 5 Chair Lift Replacement Project will help ensure the quality resources of the Preserve are kept intact.

Thank you for the opportunity to comment on this project. We're happy to follow up with any additional questions or concerns.

Sincerely,

DocuSigned by:

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Rick Holman
Town Manager