

Saturday, June 15, 2024

These comments are submitted on behalf of the Grand County Historical Association (GCHA), which holds consulting party status with the U.S. Forest Service. Our mailing address is PO Box 165, Hot Sulphur Springs, Colorado, 80451; the GCHA's phone number is: 970-725-6009. The following comments are respectfully submitted on behalf of the GCHA by the President of the Board of Directors, B. Travis Wright, MPS, for the project or undertaking of concern: *Winter Park Resort Project 2025 EA # 66200*. On behalf of the GCHA, I attended the open house/public meeting on Wednesday, May 29, 2024, at the Upper Balcony House at Winter Park Resort.

To summarize our concerns:

- The existence of two versions of the Winter Park Resort 2022 Master Development Plan.
- The need to broaden the Area of Potential Effect and the criteria that will be used for reviewing historic properties.
- The expansion's environmental impacts, including cumulative impacts, downstream effects, and connected actions.
 - The resort should provide detailed specifics within their Master Plan. As such, many of our comments are on the master development plan scope and detail concerns about the direct and subsequent impacts, and we assume those will be addressed in the U.S. Forest Service's thorough draft Environmental Impact Statement (EIS) to evaluate the potential ecological, social, and economic effects of this development.
- Indirect and cumulative effects created by this project that may lead to pressures for future land exchanges in the area, even though no land exchanges are involved in the current project.
- A minor time zone issue related to the comment deadline.

In detail, our concerns with the undertaking are as follows:

- 1) There are two versions of the Winter Park Resort 2022 Master Development Plan Update document present in the public documentation for this process. This is confusing for those trying to understand and engage with the project, especially since the documents do not have a page-for-page match, lack a list of updates between versions, and do not include an explanation for why both are provided. Additionally, one document is longer than the other. It is unclear which document should be considered the primary version, since both were provided. The first document, "fseprd1055637.pdf," is dated "January 28, 2022," on the cover page, while the second document, "Winter Park Resort Master Development Plan June 2022.pdf," is dated "June 2022" on the cover page. This discrepancy raises questions about which document is controlling and how the public should reconcile the differences between them. Clarification and confirmation are needed to ensure that the public can accurately interpret and respond to the project's details; understanding why two versions exist and which one takes precedence is crucial for informed public participation.
- 2) On Broadening the Area of Potential Effect (APE): While the Environmental Analysis has yet to be written, it is crucial that the Area of Potential Effect (APE) is not narrowly defined or overly limited to only US Forest Service (USFS) property or boundaries. The supplementary materials and posters provided to the public at the open house (public meeting) illustrate this point: for example, the proposed new gondola to replace the Gemini lift shows its starting, lower terminal found well outside the USFS boundary. (As is the case today with the existing Gemini terminal, however, the new terminal is proposed to be shifted somewhat clockwise in a generally southerly direction, toward more historic resources.) This gondola will travel from property owned by the Winter Park Recreational Association (WPRA) into USFS land. The significance of this cannot be overstated. The USFS must include in the APE not only properties within USFS boundaries but also those impacted by the overall project, incorporating buildings at the base of the resort, and of course buildings and structures mid-mountain (and elsewhere), including but not limited to historic chairlifts such as Looking Glass and potentially Discovery and Arrow ought to be evaluated. This comprehensive

approach ensures a thorough evaluation of potential impacts on historic resources. One such property that requires careful consideration is the historic Balcony House, which has been identified by Colorado Preservation, Inc. as one of Colorado's Most Endangered Places and listed in 2022. The potential effects on the Balcony House must be rigorously reviewed as part of the EA process. Balcony House is located less than 250 feet away from the proposed new gondola terminal at the base. The AE must also detail structures and buildings currently listed on the National Register of Historic Places as well as the State Register of Historic Properties but also those that are eligible for listing.

- 3) Given the historic resources within the APE, a historic preservation professional, meeting requirements in 36 CFR 61, should review both listed and eligible resources. The information required by Section 106 must be presented in a manner that is consistent with the standards set forth by 36 CFR 800.11(e). As in other prior projects, the GCHA concurs with the Colorado SHPO that the information for historic resources should include:
 - a) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, include photographs, maps, and drawings. (This review will require both site visits and archival research.)
 - b) A description of the steps taken to identify historic properties
 - c) A description of the affected historic properties, including information on the characteristics that qualify them for the National Register (not just NRHP listed properties)
 - d) A description of the undertaking's effects on historic properties
 - e) An explanation of why the criteria of adverse effect were found applicable, or inapplicable, including any conditions of future actions to avoid, minimize or mitigate adverse effects.
 - f) Relevant comparisons of alternatives and how historical assets are affected.
- 4) It seems that it would be a fair summary to state this project is about expanding skiable acreage while adding/improving mountain infrastructure so as to increase uphill capacity. While these developments are vital for the resort's growth and economic prosperity, it is therefore crucial to thoroughly consider the cumulative impacts, downstream effects, and connected actions that accompany such expansion. In short, the US Forest Service should do an EIS for this type of development.
 - a. Cumulative Impacts: the proposed project will likely trigger a series of connected actions and developments, each with potential environmental, social, and economic implications. These cumulative impacts must be comprehensively evaluated to ensure sustainable growth and minimal negative effects on the surrounding community and environment.
 - i. Environmental Impacts: Expanding skiable acreage will involve clearing forested areas, which can lead to habitat destruction, increased soil erosion, and altered water runoff patterns. This can adversely affect local wildlife and water quality in nearby streams and rivers. The environmental impact assessment must address these concerns and develop mitigation strategies. The USFS and Winter Park Resort should acknowledge that global climate destabilization (climate change) is resulting in the need to run snowmaking infrastructure earlier, longer, and in more areas so as not to negatively affect the guest experience. Public awareness campaigns should be launched underscoring the need to take care of our planet and that skiing has environmental costs.
 - ii. Wildfire Mitigation: while Winter Park Resort operates under a Special Use Permit from the US Forest Service, it nevertheless has a massive amount of acreage under its purview. The various Master Plan documents did not comprehensively address wildfire mitigation, apart from a short paragraph: "WPR recognizes potential wildfire threat to the existing and future improvements at the resort and will continue to implement vegetation management projects and other proactive measures to reduce wildfire risk." These strategies and measures must be elaborated on, in depth, within the Environmental Analysis.
 - iii. Traffic and Transportation: Increased visitor capacity will result in higher traffic volumes, necessitating road improvements or new road construction, and the roads

within Grand County, particularly US Highway 40, are in a degraded state and have been for several years. These improvements attracting more visitors into the county will lead to congestion, increased greenhouse gas emissions, and impacts on nearby communities. A comprehensive transportation plan should be developed, including considerations for public transportation options to reduce traffic burden. While the Winter Park Express (train) is a superb option for those who can afford it, it has a capacity for 500 skiers. The Moffat Tunnel has additional capacity, for its busiest was likely during World War II when more than 30 defense-related trains hurried through the tunnel daily. Can additional ski trains or additional cars be added for runs on holidays and weekends?

- b. Downstream Effects: the resort's expansion will have several downstream effects that must be accounted for in the planning process:
 - i. Healthcare Services: With an influx of visitors and resort staff, there will be an increased demand for medical services, including emergency care. This might require the expansion of existing healthcare facilities or the construction of new ones. An assessment of healthcare needs and capacity is essential to ensure adequate medical support for the expanded resort operations. This is not detailed in the Master Plan and ought to be considered, especially if there is a tour bus accident on Berthoud Pass affecting several dozen passengers during a blizzard and medevac helicopters cannot fly.
- c. Connected Actions: several connected actions will arise from the proposed expansion, each requiring careful consideration:
 - 1. Utilities and Infrastructure: Expanding skiable acreage and visitor facilities will significantly increase the demand for utilities such as water, electricity, natural gas, broadband, trash, and sewer services. Infrastructure upgrades, as discussed in the documents and during the open house, will likely be necessary within the town and county (outside of USFS boundaries) to support these increased demands, especially with accommodating a new record number of daily visitors. It is crucial to plan for sustainable resource use and waste reduction to prevent overburdening the existing systems and to ensure long-term viability. While some utilities are mentioned in the Master Plan document, they primarily focus on what is being brought into the resort's boundaries, rather than addressing if, how, or to what extent this will burden the existing infrastructure outside of the resort. This suggests a focus on internal needs over the broader community impact, which is a crucial aspect that requires more thorough consideration.
 - a. This needs to be included and thoroughly detailed within the resort's Master Plan document, ensuring complete transparency regarding all proposed actions on public lands and the downstream, connected actions elsewhere. This level of detail required is akin to the resort presenting a comprehensive business plan to secure financing from a bank; every facet of the business, from inception to execution, must be meticulously addressed to meet the standards of the bank's underwriting department. **In the case of public lands, it is crucial to recognize that we, the public, effectively serve as the underwriters and must see this level of detail in planning documents and are not presently seeing this.** (To carry the banking analogy through to all parties, the US Forest Service serves as bank's regulatory compliance department, to ensure the process operates in conformance with legal standards, protecting the public's interests and safeguarding the public's resources.) If the resort intends to expand both capacity and terrain, it's imperative to assess their engagements

with local municipalities and county authorities. These discussions are crucial to prevent any dissonance or incongruity in the expansion of town-level infrastructure, ensuring a harmonized, thoughtful approach to scale appropriately.

- i. To that end, it appears that some discussions have taken place, as indicated by the statement within the Master Plan document: “This MDP update was developed with input from local governments and the public. Meetings were held with Grand County, Town of Winter Park, Town of Fraser, Colorado Parks and Wildlife, and a public open house was held at the Town of Winter Park Council Chambers on April 25, 2022.” However, the specific results of the proposed expansions, improvements, and additions to infrastructure should be explicitly detailed in an appendix or, at the very least, as a footnote within the Master Plan. Without this information, it seems the public is being asked to sign a blank check, unable to fully understand how this growth will be managed, its potential impacts on our community, and the additional burdens it may place on local resources, including environmental, economic, and social aspects. We believe it is incumbent upon the resort, as the applicant and proponent, to provide detailed accounts of these discussions and project scopes, rather than relying on the entities with which it collaborated to do so. To ensure transparency and accountability, we urge the resort to publish a comprehensive report of these engagements and the anticipated outcomes and connected actions, thereby fostering goodwill and cooperation with the community.
 - ii. Telecommunications: Improved cell service and internet connectivity will be essential for both operational efficiency and visitor experience. The existing infrastructure while high-speed, needs improvements. From our experience, broadband and cell towers (which rely on a broadband backbone) are strained during the holiday season and for multiple weeks during spring break. While speeds suffer, latency for both upload and download can climb north of 3,000ms and spike to 12,000ms. This is unusable and unacceptable and must be improved, especially for those who work in and work remotely from Grand County. The resort should collaborate with broadband carriers to enhance bandwidth within the community, benefiting visitors, businesses, and residents in the county.
- d. Housing and Accommodation: The need for additional visitor and employee lodging will likely increase. This could lead to new housing developments, which must be carefully sited to avoid overdevelopment and to maintain the character of the local area. In particular, many of the improvements the resort is seeking to make involves beginner-level improvements that cater to families—families that will seek out second or third homes in the mountains. This leads to our other concern is that expanding the resort will lead to additional pressures for land exchanges—areas to build these homes, condos, and townhomes near the resort as indirect and cumulative effects related to this undertaking. Per the Advisory Council on Historic Preservation (ACHP), “*Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.*” Also, per the ACHP, “*Cumulative effects, which are effects on the environment that result from the incremental effects of the action*

when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.”

- i. The Corona Area Implementation Plan, devised in the 1980s, demands revision separate from the review of the resort’s proposed action. Historical research reveals that during its inception, the prevailing strategy within the US Forest Service was to utilize land exchanges as a mechanism to stimulate residential and economic growth in small mountain communities. However, the landscape and priorities have evolved since the 1980s, rendering the plan antiquated and irrelevant in today's context. Moreover, the consequences of such exchanges cannot be overstated: in short, they pose a direct threat to the rich historical and cultural fabric of the area. Furthermore, the commodification of mountain lands through land exchange programs prioritizes short-term economic gains over the preservation of invaluable natural and cultural assets and does not align with a contemporary and forward-looking understanding of conservation, historic preservation, and sustainability. **The Grand County Historical Association emphatically urges the USFS to decisively abandon outdated paradigms and to safeguard our mountain heritage, setting, and landscapes.**

Finally, there is one minor issue that should be considered for future comment periods, particularly those that conclude in the summer. The online comment form states, “Your comments are requested through 6/15/2024 11:59:59 PM (Mountain Standard Time).” It should be noted that the US Forest Service Sulphur Ranger District and the project proponent, Winter Park Resort, are both located in Colorado. During the summer, Mountain Standard Time (MST) applies only to Arizona, which is one hour behind the Denver time zone, as Colorado follows Mountain Daylight Time (MDT). To avoid confusion, a more evergreen and year-round solution would be to request comments by a select date/time using "MT" or "Mountain Time." We recommend the US Forest Service consider and accept any comments received within one hour after the published deadline for this project.

Thank you for considering these important issues. We look forward to collaborative efforts to ensure the responsible and sustainable development of Winter Park Resort and our mountain community.

Grand County Historical Association