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Advocates for our rivers

April 24, 2017

Mr. Scott Fitzwilliams, Forest Supervisor
c/o Max Forgensi, Mountain Sports/Special Uses Administrator
White River National Forest
PO Box 190
Minturn, CO 81645

Re: Golden Peak expansion EIS scoping; File Code: 1950:2720

Dear Mr. Fitzwilliams,

Thank you for the opportunity to comment on proposed changes at Golden Peak Race Venue on Vail Mountain Resort. Eagle River Watershed Council (ERWC) advocates for the health and conservation of the Upper Colorado and Eagle River basins through research, education and projects. ERWC seeks to ensure the health of Mill Creek and Gore Creek remain a priority during the EIS process, as well as during construction and long-term operation of the new facilities should the project gain approval.

Our current understanding of Mill Creek is that although it experiences some level of impact from ski area activities, aquatic life indicators including benthic macroinvertebrate monitoring show relatively good stream health. Gore Creek is currently a 303(d)-listed waterbody for impaired aquatic life in the Town of Vail due to urban influences, as well as sedimentation in upper segments, deriving largely from highway maintenance activities.

Road infrastructure, removal of forest cover, and large scale soils disturbances from slope grading generally create an increased potential for sedimentation to streams. The positioning of the project on upper hillslopes above the streams and FSR 710 (Mill Creek Road) may preclude many direct stream impacts. From the 2009 ROD, it is our understanding that soils in the project area are susceptible to landslides and that the increased magnitude and duration of seasonal soils saturation deriving from snowmaking activities may further increase this risk. Landslide events have the capability of producing significant sediment to Mill Creek and by extension, Gore Creek, should they occur on the project area's flanks.

We believe these water quality, hydrologic, and geomorphic impacts are relevant for further consideration during the EIS process. ERWC looks forward to gaining a better understanding of how these issues are addressed in the new proposal, or improved from the original proposal, in order to ensure impacts to Mill Creek and Gore Creek are absent or minimal.

Thank you for the opportunity to provide comment on the proposal, please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Loff", is written over a light blue horizontal line.

Holly Loff
Executive Director