



July 3, 2020

Kara Chadwick, Forest Supervisor
c/o Noel Ludwig
P.O. Box 439
Bayfield, CO 81122

Dear Ms. Chadwick:

On behalf of Purgatory Resort (Purgatory), Mountain Capital Partners (MCP) respectfully submits the following comments on the Purgatory Ice Creek Project Notice of Proposed Action (NOPA). We understand that the project includes the construction of the Ice Creek lift, two permanent access roads and electrical lines, four new intermediate ski trails, and a reroute of the existing snowmobile access trail. MCP strongly supports the Forest Service's approval of the project.

As the owners of Purgatory, as well as several other ski resorts in the Southwest (including Arizona Snowbowl Ski Resort and Sipapu Ski and Summer Resort), we have a longstanding partnership with the Forest Service. We value our working relationship with the agency and recognize your service to the American public. We would like to thank the San Juan National Forest for its work in reviewing the project, and for this opportunity to comment. We look forward to working cooperatively with the San Juan National Forest during the review and subsequent implementation of the project.

Please add the following comments to the administrative record for the project:

1. MCP strongly supports the stated Purpose and Need for the project.

As stated in the Purpose and Need for Action section of the NOPA, "there is currently a deficiency of low intermediate ability level terrain at Purgatory, which results in low-intermediate ability level guests skiing too fast on beginner and novice level terrain or skiing uncomfortably above their ability level on intermediate terrain. Furthermore, warming temperatures continue to affect the ability of the Columbine beginner area to meet the learn to- ski demands due to poor snow conditions at this lower elevation (approximately 8,750 feet above sea level)." As a considerable source of recreation and economic support for La Plata County and southwestern Colorado, this condition can severely impact our guest experience and our ability to open sufficient terrain. The addition of the Ice Creek lift and ski terrain would allow us to enhance the guest experience by improving the quality, quantity, and distribution of low-intermediate terrain at a higher elevation. MCP believes that these improvements are necessary to accommodate the growing expectations of guests visiting the resort.



The purpose and need for this project is supported by our MDP and the FEIS that was completed by the San Juan National Forest in 2008. This project is within our existing special use permit and within lands designated in the Forest Plan for downhill skiing. This project addresses that desired condition.

In addition, as stated in the Purpose and Need for Proposed Action section of the NOPA, “Purgatory and surrounding areas receive heavy snowmobile use. A snowmobile outfitter and guide service currently operates out of the base village, and dispersed snowmobilers can park in a snowmobile parking area along Hermosa Park Road near the base area. Both guided and dispersed snowmobilers generally travel west through the Purgatory SUP area and continue on adjacent NFS lands.” The rerouted snowmobile access trail would ensure existing and future snowmobile use does not conflict with the proposed ski terrain. This would provide a safe recreation experience for skiers and snowmobilers alike. This project need was substantiated during the Ice Creek Project Public Open House, when several members of the public, including a representative from Snowmobile Adventures Durango, expressed concerns about user conflicts and safety issues in the area. We would like to reiterate our commitment to maintaining snowmobile access for guided and dispersed use in the area and insert that if the project is approved, Purgatory would construct the reroute concurrent with or prior to developing Ice Creek. Furthermore, Purgatory is willing to work cooperatively with other stakeholders in the snowmobiling community in order to address issues that reduce the quality of the recreation experience in the area.

2. MCP encourages the use of past analyses from the 2008 FEIS, where appropriate.

As stated in the Background section of the NOPA, “while the project was fully analyzed in the 2008 FEIS, the Forest Service feels that it is necessary to analyze any changes in resource conditions that may have occurred since that time, as well as to incorporate new information into the analysis.” As the proposed action closely resembles the original Ice Creek projects proposed in the 2008 FEIS, MCP urges the Forest Service to incorporate past analyses into the forthcoming EA where appropriate, while analyzing any relevant changes in resource conditions. While the Ice Creek project was not included in the Selected Alternative from the 2008 Record of Decision, it was noted that “The analysis presented in the FEIS has shown to me [the Responsible Official, Mark Stiles] that the Ice Creek pod is an approvable project that appropriately responds to the Purpose and Need.” As minimal disturbance has occurred in or adjacent to the project area since the 2008 FEIS, MCP asserts that the proposed action will likely result in similar resource impacts determinations as those presented in the original analysis. Therefore, MCP encourages the use of past analyses from the 2008 FEIS in preparation of the forthcoming EA, where appropriate, to keep the analysis as concise as possible. This approach will be consistent with agency direction to make the NEPA process more efficient from a time and cost standpoint.



3. MCP encourages the Forest Service to incorporate the effects of grazing permits in Hermosa Park into the baseline conditions for watershed resources analyzed in the EA.

As stated in the Effects and Issues to Consider section of the NOPA, “Two response reaches within the proposed Ice Creek terrain exhibit diminished stream health with respect to unstable banks and fine sediment, related to existing roads and historic timber harvest and grazing allotments in the area.” MCP concurs that historic land management activities, particularly those not related to ski area activities, are causal factors for local watershed impairment, and therefore, must be considered in the baseline conditions for watershed resources analyzed in the EA.

We are grateful for our partnership with the San Juan National Forest and hope that you will consider these comments as part of your environmental review of the Purgatory Resort Ice Creek Project. MCP thanks the Forest Service in advance for its work preparing the EA and looks forward to continuing to work cooperatively with the Forest Service and other stakeholders. Please let us know if you have any questions on these comments or during the NEPA process.

Sincerely,



James Coleman, CEO
Mountain Capital Partners

