



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Office - Area 15
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Durango, CO 81301
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July 6, 2020

San Juan National Forest
Mr. Noel Ludwig
P.O. Box 439
Bayfield, CO 81122

RE: Notice of Proposed Action-Purgatory Resort Ice Creek POD Project

Dear Mr. Ludwig

Colorado Parks and Wildlife (CPW) has reviewed the Purgatory Resort Ice Creek Plan of Development (POD) Project notice of proposed action materials provided by the Columbine Ranger District. CPW appreciates the opportunity to comment. CPW is the state agency charged with managing Colorado's wildlife resources for the use and enjoyment of the state's citizens and visitors.

The purpose of the Ice Creek POD is to increase low-intermediate ability level ski terrain which will include the installation of the Ice Creek Chair Lift, construction of permanent roads to chairlift terminals, cutting and clearing of four ski runs, and rerouting the public existing snowmobile access trail. Approximately 31 acres of surface disturbance would occur including approximately 5 acres of grading.

The Ice Creek POD was previously analyzed in the *2008 Durango Mountain Resort Improvement Plan Final Environmental Impact Statement (2008 FEIS)*, but approval of the Ice Creek POD was deferred in the 2008 Record of Decision (ROD) due to unresolved environmental concerns raised by the public. It is our understanding that the USFS intends to tier the Ice Creek POD Environmental Assessment to the 2008 FEIS and rely primarily on the analysis contained therein.

Aquatic Resources

The East Fork of Hermosa Creek contains an important conservation population of Colorado River Cutthroat Trout (CRCT). The reintroduction of the species into the Hermosa Creek drainage has been a long-term collaborative project between CPW, USFS, and other stakeholders. The 2008 EIS does an adequate job of describing those efforts. As an update, several other sections of the West Fork of Hermosa Creek down through the confluence of the East Fork have been successfully reclaimed and repatriated with CRCT totaling approximately 23 miles of streams within the Hermosa Creek Watershed.



The 2008 EIS contains extensive documentation and discussions about water quality, quantity, stream health, and CRCT management. The EIS describes the impacts of additional development on these resources including the Ice Creek POD. The upper end of the East Fork of Hermosa Creek, and its tributary sub-basins, originate on the ski area and are sediment transport dominated stream systems. Deforestation due to the cutting of ski runs and the creation of access roads and trails increases runoff velocities, and the mobilization and deposition of sediment. This results in bank scouring and sloughing, diminished stream health, and ultimately loss of fish habitat.

Watershed health was a major driver to designate the Hermosa Creek Watershed Protection Act in 2014. Protection of the outstanding water designation should be a priority when considering the authorization of new uses and surface disturbance in the area. CRCT require clean cold water for their survival. Water quality and quantity are critical components of Cutthroat Trout habitat and survival in the East Fork and mainstem of Hermosa Creek.

2008 EIS Environmental Commitments

The 2008 EIS describes a system of sedimentation debts and credits for actions under ski area operations (pg. 3-230) and a "Road Restoration Plan." Several specific environmental commitments were made on the "backside" of the ski area which include a range project to exclude trespass cattle grazing, stream rehabilitation between lifts 3 and 5, enhancement/reestablishment of riparian vegetation, and the decommissioning of numerous roads. In addition, the 2008 EIS committed to monitoring water quality on a weekly and monthly basis (pg. 2-46). Please detail how the environmental commitments in the 2008 EIS have been implemented and completed. Please provide an update and accounting of the status of the debit and credit system and an accounting and a discussion of the efficacy of these environmental commitments and their impact to reduce the sedimentation load from ski area operations to improve stream health.

Stream Health Habitat Survey

In 2005 the San Juan National Forest conducted a R1/R4 fish habitat survey of the East Fork of Hermosa Creek and its tributary sub-basins. Please re-survey these stream reaches utilizing the same quantitative methodology and compare and discuss the results to the 2005 survey. Please detail any changes that have occurred in the past 15 years and provide rationale for those changes. The results should be used to inform additional management strategies and any additional environmental commitments that can be deployed to maintain or improve stream health.

Water Quantity and Snowmaking

Stream health and CRCT habitat are dependent upon surface water and the alluvial groundwater aquifer that supports base flows in the East Fork of Hermosa Creek. Southwest Colorado has

been experiencing a decades-long drought and currently La Plata County is in extreme drought conditions again. It is reasonably foreseeable that these conditions will continue into the future. Lack of snow not only affects ski area operations but it can have detrimental impacts to stream health and function due to reduced water availability. Any new depletions associated with water development to support snowmaking capacity may be a serious threat to the East Fork of Hermosa Creek. The existing Ice Creek POD proposal does not include snowmaking, however, the 2008 EIS analyzes and authorizes a total of 217.6 acres of snowmaking at Purgatory. Please include a discussion and analysis of how persistent drought has impacted water quantity in the Hermosa Creek Watershed and the extent to which snowmaking operations and water development are intended to compensate for decreased annual snowfall. Also, include an analysis on how future and/or expanded snowmaking operations would impact groundwater and surface water resources and by extension the aquatic resources that sustain CRCT in the East Fork of Hermosa Creek.

Thank you for the opportunity to comment. If you have any questions, or would like to schedule a time to discuss our recommendations, please contact District Wildlife Manager, Steve McClung at 970-799-0847.

Sincerely,

Handwritten signature of Matt Thorpe in black ink, appearing as 'MR Thorpe #997'.

Matt Thorpe

Area Wildlife Manger- Durango

cc: Cory Chick (SW Regional Manager); Jim White (Area 15 Aquatic Biologist); Brian Magee (SW Land Use Coordinator); Brad Weinmeister (Area 15 Terrestrial Biologist); Area 15 File

