Data Submitted (UTC 11): 12/4/2021 7:00:00 AM
First name: Kevin
Last name: Walters
Organization:
Title:
Comments: Kevin Walters objection to the Ice Creek Expansion Project attached along with supporting map and comments for clarification.

December 4, 2021

USFS Region 2

Att: Objection Review Officer 1617 Cole Blvd. Building 17

Golden, CO 80401

Re: Purgatory Resort Ice Creek Pod project # 57877

To whom it may concern:

Please accept this correspondence as my objection to the Purgatory Resort Ice Creek Pod project (#57877) draft decision notice issued for the Environmental Assessment dated March 2021. As the assistant groomer for the San Juan Sledders Snowmobile Club, I concur with the Colorado Snowmobile Association's objection in that the snowmobile parking situation has been completely overlooked from the current round of NEPA discussions and must be addressed before allowing Purgatory Resort to proceed with the Ice Creek Expansion. As we have now passed our third round of NEPA analysis for this area spanning more than 25 years that has resulted in no actual snowmobile parking improvement, despite inclusion of the same in the previous NEPA documents, I would request either of the following be required under the current decision;

1. a specific completion date for completion of the parking lot expansion and snowmobile trail relocation prior to the opening of the expanded resort to the public; or
2. a general requirement that the parking lot be completed prior to further development of the resort and expanding public access to the areas.

The snowmobile community is concerned that the current EA is expanding usage beyond levels of visitation and size that were envisioned in the 2008 Programmatic EIS for the Durango Mtn Resort. While we are thrilled that this level of public access is sought for the unique recreational opportunities provided by the Resort, we are also very concerned that mitigation of user conflicts has not occurred and again could be easily pushed off without a hard deadline for completion of the project.

Prior to addressing our objection on the current EA, the long NEPA history of the area must be understood, as this history is critical to our objection. There is a long history of well documented user conflict around access to the area and USFS efforts to resolve the recognized issue have been limited to three rounds of NEPA with no follow through. When the previous expansion of the Durango Mtn resort was allowed in the programmatic 2008 EIS, concerns were immediately raised about the proximity of the expansion to snowmobile access for the Hermosa Drainage and groomed snowmobile trail network in the area, that has been permitted by the USFS for approaching 50 years. Concerns around expanding user conflicts in the area are throughout the EIS prepared for the renewal of the Durango Mountain Special

Use Permit in 2008. 1 This conflict has resulted from the ongoing expansion of the Durango Mtn Resort into areas where public access is provided for areas that are unrelated to the ski area. This conflict has grown to include the club ability to provide winter grooming for public access to portion of the Colorado Trail that connect to this parking area.

There were serious concerns raised in the 2008 Programmatic EIS about increasing levels of conflict that could result from the expansion of Durango Mtn Resort into access points that had historically been available. This included access lands outside the Durango Mtn Resort permit area, such as the Snowmobile parking/staging along Hermosa Park Road or Forest service road 578. Topography in the area serious limits the number and size of access points for public lands in the area, such as the Hermosa Creek Drainage, outside the Durango Mountain resort. Historically the public has had to utilize access points to public lands via shared access with ski resort patrons and permittee activities. This parking area also serves as an important multiple use access point for non-motorized users who are seeking to access winter recreational opportunities on the Colorado Trail. The shared use parking lot we are concerned about is the focal point of a lot of diverse users accessing world class recreational opportunities. Completing the snowmobile parking lot would significantly resolve this conflict.

The success of this shared access model has waned as ski area visitation has continued to expand since the 2008 programmatic EIS. Several provisions were included in the 2008 Programmatic EIS for the Durango Mtn Special Use permit to address this conflict, and when it was signed the snowmobile community was optimistic that issues in the Snowmobile parking/staging along Hermosa Park Road or Forest Service Road 578 had been finally resolved. The provisions of the 2008 EIS were specifically included in an attempt to mitigate rapidly growing conflicts between snowmobilers, downhill skiers, permitees from the ski area and included other users seeking to access recreational opportunities on the portion of the Colorado Trail groomed from this area outside Durango Mtn Resort. The snowmobile community was optimistic the access issues would be resolved within a short time of execution of the EIS. This optimism has proven to be misplaced as once the EIS was signed, discussions with Durango Mtn on fixing some of the conflict ceased and conflict continued to expand annually. When this issue has been raised with USFS, there was always a higher priority project that needed to be addressed. The failure to follow through on the commitments made in the 2008 EIS to balance public access to lands outside the Durango Mtn resort and the desire to expand the resort has continued to fuel ever expanding user conflicts in the area.

The inaction on implementing the 2008 EIS and ever growing conflict around the parking area and access to the Hermosa Creek drainage and other areas accessed from the Snowmobile parking/staging along Hermosa Park

Road or Forest Service Road 578 was concerning to the snowmobile community. As a result the snowmobile community has taken steps to protect this access outside the USFS planning efforts such as Congressional recognition of the value of the winter motorized recreational opportunities provided for the public in the Hermosa

1 See, USDA Forest Service; San Juan National Forest; Durango Mountain Resort Improvement Plan; Final EIS September 2008 at pg. ES-16.

Creek drainage, that is accessed by the Snowmobile parking/staging along Hermosa Park Road or Forest Service Road 578. This concern was specifically recognized by the US Congress with the designation of the 70,650 acre Special Management area with passage of the Hermosa Creek Watershed Management Act into law in 2015.2 This Congressional designation was obtained by CSA and the San Juan Sledders partially due to ongoing concerns around access to the Hermosa Creek SMA due to the conflicts around the primary means of accessing the area, mainly the Snowmobile parking/staging along Hermosa Park Road or Forest service road 578.

The need for the 2015 Congressional Special Management Area designation recognizing snowmobile recreation in the area was partially due to the fact that the 2008 Programmatic EIS for Durango Mtn had not reduced conflicts but rather made them worse. This conflict has increased as the Durango Mtn resort has continued to expand into new areas and this continued expansion of conflict is a major concern to CSA. The optimism at the time of the 2008 EIS completion was nothing more than optimism as no meaningful effort has been undertaken since this signature to resolve the access issues around Hermosa Creek for the snowmobile community. As the current EA seeks to expand the resort to levels of use beyond those anticipated in the 2008 EIS, we have no reason to expect conflict will reduce or remain the same and this conflict is unacceptable to us.

In the September 2017 NEPA analysis for development of management for the Congressionally designated Hermosa Creek SMA for the 70k acres generally to the west of the Snowmobile parking/staging along Hermosa Park Road or Forest Service Road 578, user conflicts were again a major point of analysis. Again, the struggles to gain access to the Hermosa Creek drainage were also recognized by the USFS in this EA as well as follows:

"For example, the Elbert Creek Road 581, the Cascade Divide Road 579, the Hermosa Park Road 578 connecting to Highway 550, the Elbert Creek Trail west of the Elbert Creek Road 581, and the Colorado Trail where it parallels the watershed boundary are included in this analysis. Conversely, some roads and trails that connect to the transportation system in the watershed are not included in this analysis because they can be accessed from outside the watershed."3

The 2017 Hermosa SMA EA took a very unique position on the Snowmobile parking/staging along Hermosa Park Road or Forest Service Road 578 as this document asserted that the parking lot was being built at that time and access was restricted to a parking lot that still has not been completed. Summer access to the area has grown to be an issue but winter access has always been worse simply due to the limited number of access points that

area available in the winter and the fact that parking is entirely reserved for the Durango Mtn resort patrons forcing snowmobilers to park on the sides of the road leading back to US 550. This assertion

2See, Public Law 113-291 [sect]3062(b).

3 See, USDA Forest Service; HermosaCreekWatershedManagementPlan Environmental Assessment; September 2017 at pg. 67

is summarized in the 2017 Hermosa Creek SMA EA as follows:

"Related to this, all of the action alternatives propose that a parking area currently being built near the ski area base would be closed in the summer, so that OHVs would not unload there, to support the implementation of the mixed use proposal. The parking area would be open in the winter to provide an unloading and parking area for over-snow vehicle use. This parking area was previously authorized for construction, but this travel management decision would designate season of use."4

As a result of this position that the parking lot was under construction, again optimism increased on a resolution of the parking issues on the north end of the Hermosa SMA. That optimism waned as discussions and efforts on the parking area again stopped with the signing of the EA. Looking back, this inconsistency should have been reviewed more closely in the EA, but again the snowmobile community chose to rely on assertions being made in good faith.

With this history of misdirected optimism from the snowmobile community around the 2008 programmatic EIS, 2017 Hermosa Creek EA and now the third NEPA analysis of this parking project I object to the current EA. This EA expands the resort to levels that are beyond those envisioned in the 2008 programmatic EIS as the resort has expanded as has interest in winter recreation in areas outside the Durango Mtn Resort. While the current EA addresses the parking lot construction, there is no deadline for completion of the parking lot or requirement that the parking area be completed before public access to the entire expansion is provided. I am very concerned that the further expansion of the resort in the manner outlined in the EA will draw significantly more new visitors to the area. We are thrilled that new members of the public will be able to enjoy winter recreational opportunities but are also concerned that this will result in an explosion of user conflicts if access issues are not addressed prior to the opening of the resort to the public.

The relationships in the Hermosa Creek area have been rocky for an extended period of time as concessions in NEPA analysis to obtain the resort expansion in the 2008 EIS. None of these concessions have been followed through to date. After 15 years of good faith efforts and a third round of NEPA we are concerned that the current EA will simply be another failed attempt to resolve user conflict that is never completed. Three rounds of NEPA analysis has resulted in no actual on the ground improvement of conditions. In this objection, CSA is asking for either;

1. a specific completion date for completion of the parking lot expansion and snowmobile trail relocation prior to the opening of the expanded resort to the public; or
2. a general requirement that the parking lot be completed prior to further development of the resort and expanding public access to the areas.

4See, USDA Forest Service; HermosaCreekWatershedManagement Plan Environmental Assessment; September 2017 at pg. 94

As a club goomer, skier and snowmobiler, I welcome further discussion of these opportunities and any other challenges that might be facing the Snowmobile parking/staging along Hermosa Park Road or Forest service road 578 moving forward at your convenience. Please feel free to contact me Kevin Walters at (DELETED).

Digitally signed by Kevin Walters Date: 2021.12.04 11:37:16 -07'00'

Kevin Walters

Assistant Grooming Foreman

San Juan Sledders Snowmobile Club