

Maribeth Gustafson
Joe Foreman
Dillon Ranger District
P. O. Box 620
Silverthorne, CO 80498

June 9, 2006

via e-mail: comments-rocky-mountain-white-river-eastzone@fs.fed.us

Dear Ms. Gustafson and Mr. Foreman

The following are the comments of Backcountry Snowsports Alliance and Colorado Wild on the proposal to expand snowcat-accessed skiing in the Upper Independence area at Keystone Resort.

I. THERE IS NO NEED OR JUSTIFICATION FOR THE PROPOSAL, WHICH WOULD REDUCE THE QUALITY OF NON-GUIDED BACKCOUNTRY SKIING.

Opening an area to snowcat-accessed skiing means that more people will be able to access good skiing terrain that would otherwise only be available to someone willing to hike to, and/or back from, such areas. Hike-to skiers could still access the Upper Independence area under the proposed action, but they would find the area well tracked out when they arrived, as use could increase to 100 skier trips per day in a 278-acres area. EA at 3-6. Snowcat skiers, because they would not have to exert any energy to get to the Upper Independence area, could get in several runs before hike-to skiers could get to the area. Thus, contrary to what is stated at EA p. 3-7, the area would not maintain its “off-piste/backcountry” character because even a low number of cat-assisted users could easily track out much of the powder after snowfalls.

The loss of formerly hike-to terrain is unfortunately occurring at all four ski resorts in Summit County. See EA at 3-7. In other words, it is becoming more difficult, or even impossible in some places, to find good hike-to (or -back from) ski terrain in Summit County.

Probably due to the cost of hiring a snowcat, there is not a great demand for cat skiing at Keystone, as shown at EA 3-4. Only 11 of 27 days of operation of this service in Bergman and Erickson Bowls were at full capacity in the 2005-2006 season through late February. Id. Since this season was one with frequent and plentiful snow, one could assume that demand would be higher this season than in most seasons.

In other words, the existing snowcat skiing serves a very limited clientele. The proposed terrain would serve an even smaller clientele because it is composed of steep slopes, up to 50 percent grade, while the existing area in Bergman and Erickson Bowls is rated as intermediate terrain. EA at 2-3 and 3-3.

We are troubled by the following statement:

Because of the lack of variety in Erickson and Bergman bowls, guided snowcat skiing guests at Keystone are unable to progress to more difficult guided terrain.

EA at 3-4.

Why does the Forest Service feel obligated to meet the very small demand for advanced cat-accessed skiing? Skiers desiring steep terrain can find it elsewhere at Keystone, as well as at neighboring resorts. Does the cat-accessed skiing in North Bowl, mentioned but not further described at EA p. 3-4, provide any of this type of skiing?

Keystone already has 580 acres of snowcat-accessed skiing¹. EA at 3-6. How much is enough? Notably, much of the proposed new terrain would be west or southwest facing (see EA Figure 3), on which “rapid deterioration of snow conditions” is said to occur in Bergman and Erickson Bowls with these aspects. EA at 1-2. If snow deterioration is so bad in these areas, why have more terrain with the same aspects?

Approving the proposal would also put Keystone’s operations one step closer to the area near the Town of Montezuma, where such operations would be totally inappropriate. Currently, people can reach this area via a backcountry access point. But some hiking is required, even above the existing snowcat access route for Bergman and Erickson Bowls. See EA Figure 3. The proposed snowcat route would bring more people even closer to this backcountry access point. Even those not using a snowcat would make use of the snowcat track for easier access to backcountry areas.

II. THE ANALYSIS OF IMPACTS DOES NOT CONSIDER THE EFFECTS OF SNOW COMPACTION OR SNOWFENCING. Increasing the snowcat skiing would compact snow, with repeated runs throughout the season over the same area. The snowpack would thus become denser and melt more slowly in the late spring and fall. This would especially be the case for the 20-foot wide snowcat route and the north-facing portion of the proposed new terrain. Furthermore, avalanche control, which is planned (EA at 3-6), might accumulate large amounts of compacted snow in some areas.

This means that the snowpack will last longer into the summer in normal and above-normal snow years, and vegetation such as willows would be covered for a longer time. This could impact ptarmigan, which do inhabit the alpine areas within Keystone special use permit boundary and are known to use willows for habitat. EA at 3-21. There are some willows at the bottom of the Upper Independence area that are covered early in winter (id.), so presumably they are, or can be skied over, and thus become snow-compacted. Similarly, the EA identifies a 10-acre willow patch at the skier pick-up point (EA at 3-18), which would also be skied over and compacted if the project is approved.

¹ Mysteriously, this only includes Bergman and Erickson Bowls; it does not include North Bowl, which p. 3-4 hints is still served by snowcats.

The growing season in the alpine region is extremely short. If more area is covered with snow further into summer, species inhabiting the alpine portion of the project area (EA at 3-8) may diminish or even die out in places.

The possible impacts of snowfencing are also not disclosed. It appears that more than half a mile of snowfence would be installed (see EA Figure 3) to ensure adequate coverage of the snowcat access route (EA at 2-4). However, if the fencing successfully redistributes snow onto the snowcat route, it is also redistributing it away from one or more other areas. This could adversely affect plants which might need that snow for their early summer growth period. There is evidence that snowfencing has already caused, or at least contributed to, the death of krummholz at Winter Park Ski Resort.

III. THE PROPOSED EXPANSION MIGHT SLIGHTLY HARM LYNX HABITAT, ADDING TO CUMULATIVE IMPACTS. The EA notes that most of the proposed cat-accessed ski terrain is above timberline, but that two tree islands, 13 and 8 acres in size, both containing denning habitat, also exist within the project area (EA at 3-17), and are open enough to be skied through (id. at 3- 8) The EA at 3-16 notes that lynx have been observed moving through Summit County, including areas near Keystone. See also CDOW, 2005.

Allowing skiing in these areas would destroy their value as denning habitat, as denning lynx would not be able to withstand the frequent disturbance of skiers and snowcats. While it is probably unlikely that lynx would take up residence near the ski resort, these areas could still be used by lynx as daytime bedding areas, a function that would also be disrupted if not terminated by skiing.

The loss of habitat here is relatively minor, but more habitat would be lost if the expansion of A-Basin Ski Area into Montezuma Bowl is approved. Lynx habitat is already well fragmented in Summit County by ski resorts, housing development, highways, and other human factors, and continues to be degraded or disappear entirely. Given that lynx are a threatened species, every reasonable effort to provide for the conservation of the species should be undertaken. Certainly, skiing through denning habitat at Keystone is a luxury we can do without.

If the proposal is approved, we recommend that skiing in the tree islands be prohibited.

We are glad to see that no nighttime snow grooming is proposed. EA at 2-3, footnote 22. Limiting grooming to daylight hours would reduce the impacts to lynx, if any reside in or pass through the area, as this species is often active at night. A prohibition on nighttime grooming must be a strictly enforced condition of the permit, if the proposal is approved and implemented.

CONCLUSION. The proposed expansion of snowcat-accessed terrain at Keystone is not needed. It would serve only an elite few at the expense of everything else, including hike-

to skiers, ptarmigan, lynx, and tundra vegetation. It should not be approved. The Forest Service does not need to, and should not, approve every request of the ski industry. This is one that need not be approved.

If it is approved, we recommend prohibiting skiing in the tree islands described in the EA and discussed above.

Sincerely,

Ben Fibbe?
Backcountry Snowsports Alliance

Rocky Smith
Colorado Wild
1030 Pearl #9
Denver, CO 80203
303 839-5900
rocky@coloradowild.org

REFERENCE

CDOW, 2005. General Locations of Lynx (*Lynx Canadensis*) Reintroduced to Southwestern Colorado from February 4, 1999 to February 1, 2005. Tanya Shenk, Colorado Division of Wildlife. April 2005.