



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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April 25, 2018

Scott Fitzwilliams  
c/o Max Forgensi  
Mountain Sports/Special Uses  
White River National Forest  
PO Box 0190  
Minturn, CO 81645

### RE: Vail Mountain Resort Golden Peak Improvements Project Draft EIS

Dear Mr. Fitzwilliams,

Colorado Parks and Wildlife (CPW) has reviewed the Draft Environmental Impact Statement (Draft EIS) for Vail Resort's proposed Golden Peak Improvements Project. CPW has been involved in this project since the planning stages and submitted scoping comments to the Forest Service on April 25, 2017.

As you may be aware, CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors. Colorado Parks and Wildlife staff has reviewed the Draft EIS and would like to offer the following comments and recommendations for your consideration.

The project area provides important refuge habitat for mule deer, elk and other forest-dwelling species including American marten, pine squirrel, dusky grouse, etc. In addition to potential terrestrial impacts, CPW is concerned with the effects of additional snowmaking on the aquatic ecosystems and flow regimes of Mill Creek and Gore Creek.

#### Terrestrial Wildlife Considerations

Overall, CPW agrees with the Draft EIS and Biological Assessment/Biological Evaluation (BA/BE) that the impacts to terrestrial species will be mostly additive to existing impacts from the ski area and associated development and human activity. Although winter ski area operations may be mutually exclusive from the spring, fall, and summer use by many terrestrial species, we do recommend fully implementing the PDC from page 16 of the BA/BE that states "Extend a signed ski area boundary/ closure line around the north and top sides of the expanded ski terrain to minimize skier disturbance to the undeveloped north-facing habitat above the valley bottom."



We also recommend that Vail Resorts and the FS restrict future summer-use activities in this area to protect big game transitional movements.

Additionally, the elk information in the BA/BE is not up-to-date. It states that the 2011 post-hunt population estimate for DAU E-16 is the most current estimate available. While the population size did not change drastically throughout the following five years, CPW recommends using the 2016 post-hunt population estimate for the Draft EIS and associated documents. The 2016 post-hunt estimate for E-16 was 6,550 animals.

#### Aquatic Considerations

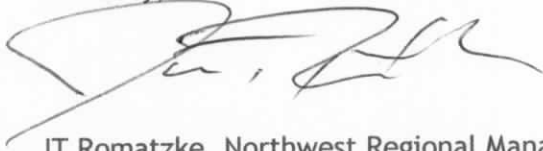
Given the presence of fish barriers to prevent non-native trout colonization, Mill Creek is an important area for Colorado River Cutthroat Trout to subsist without non-native competition or hybridization. CPW supports the proposed Mill Creek Road mitigation project to improve the hydrologic conditions in Mill Creek.

CPW encourages the FS to continue macroinvertebrate and fish sampling within Mill Creek following implementation of the Golden Peak Improvement Projects and Mill Creek Road/Trail mitigation project. If conditions continue to deteriorate, additional mitigation and/or restrictions should be considered to improve upon the diminished stream health conditions currently present. As stated in the Draft EIS, extensive work and planning has been undertaken to improve the condition of Gore Creek and its tributaries and every measure should be taken to compliment these efforts.

Additionally, CPW would like to see an expanded analysis (page 63 of the BA/BE document) of how the proposed changes in peak flow and annual runoff (page 111 of Draft EIS) may affect spring-spawning trout species (i.e. cutthroat trout and rainbow trout). Specifically, CPW is concerned with the shift in peak flows from May to June during average years and April to May during drier years.

Colorado Parks and Wildlife appreciates the opportunity to review and submit comments for this project. We look forward to assisting with future monitoring efforts on Mill Creek and Gore Creek. If there are any questions or needs for additional information, don't hesitate to contact Land Use Specialist, Taylor Elm, at (970) 947-2971 or District Wildlife Manager, Bill Andree, at (970) 328-6563.

Sincerely,



JT Romatzke, Northwest Regional Manager

cc Perry Will, Area Wildlife Manager  
Bill Andree, District Wildlife Manager  
Taylor Elm, Land Use Specialist  
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