



Vail Valley Mountain Trails Alliance
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USDA Forest Service Rocky Mountain Region

Attn: Objection Reviewing Officer

P.O. Box 18980 Golden, CO 80402

Submitted online via: <https://cara.ecosystem-management.org/Public/CommentInput?Project=50041>

RE: Berlaimont Estates Access Route FEIS and ROD

Dear Reviewing Officer,

The basis and purpose of VVMTA objections reiterate and reinforce previous comments submitted by our organization and board members in 2018.

The Vail Valley Mountain Trails Alliance (VVMTA) believes that impacts to recreational use in this community-treasured location are inadequately addressed by the proposed mitigation actions. Addition of a paved, year-round road will fundamentally change the nature of recreation use in the area by both increasing the number of recreation users in the area and significantly shifting the typical access patterns of recreation use. The Berry Creek and Mesquite trail networks within the project analysis area will transition from an already heavily-used WUI/semi-backcountry character, to something more reflective of a near-urban or front-country recreation area character.

VVMTA believes that due to these inevitable changes to use levels, the FEIS falls short in addressing recreation impacts within the project analysis area and does not address current trail use levels and the ever increasing demand for future trail use. We describe a number of these shortcomings in the proposed mitigation plans below.

Objection 1: Recreation use in the area is significantly underestimated by the little available data, and is likely to continue to significantly increase as a result of Eagle



County population growth, increasing number of trail users, and the establishment of paved access.

We believe the small amount of quantified user data available to WRNF (2009) significantly underestimates use. Partly because use has increased since 2009 when data were collected, but also because the time period (3/17-6/1) only included 9 days of motorized use (Seasonal restrictions on FSR 774 exist until 5/21) and collected infrared pedestrian and biker data primarily during late winter to late spring, a time when Berry Creek is used at levels far lower than summer and fall seasons.

The WRNF Eagle-Holy Cross Ranger District Trails and Wilderness Manager placed a trail counter near the lower FSR774 gate in April/May 2018 for 36 days. Below is the data that was received from this counter:

Berry Creek Trail Counter	April/May 2018
Total Users	2,698
Total Days	36
Avg. Users Per Day	74.9
Max Users In One Day	153
Avg. Weekday Use	66.6
Avg. Weekend Use	96.6

The USFS employee stated that this data is, “prior to the road opening (before 5/21),” and “I mentioned to the Berlaimont team that these numbers probably accounted for 1/3 of the use that was occurring in the area.” Furthermore, the USFS employee stated, “Also, given the timing (prior to 5/21), there was not any motorized use, and probably limited bike use, too.”

During March and April, system routes are frequently still snow-covered, or passable only on foot due to mud conditions. Anecdotally, several dozen cars are regularly observable at the lower signed trailhead and the Moonridge Drive pull-outs, just on *weeknights* in summer and fall. Weekends regularly receive even higher use. VVMTA believes that if traffic surveys had occurred during high use months, from early June to September, pedestrian and bike use estimates alone use would easily tally several hundred per day on weekends, and cumulatively tally in the multiple thousands across a full season. VVMTA does not suggest a particular solution to address this data gap, but feels it is strongly important to recognize this area is much more heavily used than suggested in the DEIS, which lends further importance to the issues and mitigation measures described below. VVMTA is also interested in working with WRNF to establish user surveys and updated counter statistics to more-accurately describe use levels in this zone and other trail systems.



The paved parking lots, both at the lower Berry Creek trailhead and upper FSR774 need to accommodate a total of at least 50 vehicles. On any given Spring/Summer day, between the FSR774/Moonridge Dr. intersection and the lower Berry Creek trailhead there are regularly 20-30 vehicles parked on the dirt road (see pictures below). Trail users parking in the lower paved parking lot will have direct access to soft surface trails via lower Berry Creek trailhead. However, trail users parking in the upper FSR774 lot will currently have to take the paved road to access a soft surface trailhead. It is inevitable that the upper FSR774 parking lot will be used during the spring, summer, and fall and mostly used as an overflow lot due to the lower Berry Creek trailhead lot being full. This is one of the reasons why we are proposing the re-addition of the trail switchbacking up the hillside from the upper parking lot and connecting to the new climbing trail at the hairpin turn on FSR780 [Trail A on attached map].

Furthermore, we are requesting that the trail in between FSR774 and Berry Creek be added back to the plan [Trail D on attached map]. This trail not only creates a soft surface connection to the upper parking lot but also accommodates the low-grade/beginner style trail that many hikers and dog walkers desire. Currently, these hikers and dog walkers use the dirt road FSR774 which would cease to exist when the road is paved per Alternative 2 decision. This trail also creates a soft surface trail connection to the Mesquite Trail, Singletree community, and the West Avon Preserve. Lower FSR 774 currently receives very heavy out-and-back traffic by dog walkers looking for creek access, short-distance walkers with children and older-demographic users, and bike users accessing FSR 780 and further up FSR 774.

To safely and sustainably accommodate the inevitable use of this trail [Trail D on attached map], the trail should reflect a 'beginner' design, similar to an urban recreational trail, with a much wider tread pattern to accommodate safe bi-directional passage of users, and occasional 'control features' such as boulder styles or chicanes to maintain rider/pedestrian speed differentials at a safe level. VVMTA suggest this trail should still strive to maintain a natural tread surface, but might be similar in width and grade to front-country multi-use designs. A tread width of at least 48", and potentially approaching 72", may be most appropriate for this segment.



Photos from November 2020 (top) and May 2020 (lower left & right)

Objection 2: The FEIS trail proposal underestimates significant changes to use types and frequencies due to paved road.

Based on observations in many other nearby locations, such as the West Avon Preserve, Tennessee Pass/Camp Hale Colorado Trail, Snowmass Village municipal trails, etc., car-shuttled biking has become a normal use type. This will increase pressure on existing lower Berry Creek trail tread, as well as increase the potential for undesirable socially-damaging user conflicts. Although measures such as not permitting pull-offs or parking, and establishing guardrails near the middle trail and upper Berry Creek Trail access points, these often fail in practice to fully prevent the activity. While Upper Berry Creek Trail (Endo Alley) tread has already been designed to accommodate heavy bike use, lower Berry Creek, even with proposed reroutes in the Final EIS, will experience tread degradation and increased maintenance needs



from this type of use. Additionally, many riders descend lower Berry Creek at high speeds, greatly increasing potential for user conflicts on the multi-use, bi-directional lower Berry Creek.

Implementation of the additional climbing trail in the lower Berry Creek zone on the ridge line west of the existing trail would mitigate these impacts more successfully [Trail C on attached map], this trail should be designed with lower gradients and tighter turn radius, in a manner that accommodates uphill riding, two-way pedestrian traffic, and slows rider speeds. We strongly suggest this trail should be uphill biking only and open to bi-directional foot traffic. If open to bi-directional riding, the design of this trail should slow speeds and mitigate user conflict. Completion of this trail in a sustainable fashion would also aid in more-successfully decommissioning the erosive fall-line 4wd road that continues to be heavily used by pedestrian traffic. The addition of a soft surface trail [Trail E on attached map] connecting the lower Berry Creek trailhead parking lot and the intersection of FSR774/Moonridge Rd. would provide a lower elevation, “beginner” style loop for older demographics, families, and kids. It would also provide access to a soft surface for bikers and hikers coming from the Moonridge neighborhood, surrounding businesses, and other surrounding residents.

The VVMTA is proposing a secondary, downhill bike optimized trail [Trail B on attached map] from the lower portion of upper Berry Creek (Endo Alley). This trail would provide an alternative and highly desired downhill route for mountain bikes. It would alleviate user conflict on lower Berry Creek, provide a high quality trail user experience for hikers, trail runners, and bikers, and preemptively eliminate the creation of illegal social trails.

Objection 3: Proposed mitigation trail will not fully address the current level of demand, unauthorized use routes, user patterns, and increases the likelihood for unsanctioned trails due to year-round paved road.

WRNF cites the existence of unsanctioned trails in the area and ad-hoc parking areas while discussing use patterns. Unsanctioned trail establishment has occurred variously from all user groups (i.e. the continued frequent pedestrian use of the decommissioned 4wd road on the ridge line directly west of lower Berry Creek trail; the former bike trail segment above the upper Berry Creek trailhead, restored in 2016; the various moto-established singletracks in the upper analysis area).

VVMTA interprets this heavy use and continued establishment of unsanctioned routes in the analysis area as evidence that recreational needs and the Recreational Opportunity Spectrum continues to be mismatched to existing use levels and contemporary front-country/WUI recreation user patterns, which commonly include the desire for multiple shorter routes, variable difficulty levels, and looping options. VVMTA believes that the increased access to the area provided by the year round road will further increase this pressure, and is only partially mitigated by the proposed trail system addition in Alternative 2. We believe that the routes described



[Trails A, B, C, D, and E] on the attached figures would more-appropriately accommodate current increased uses, thus improving safety and user experience by better-preventing user conflicts and decreasing the likelihood for additional user-established, unsanctioned trails. Once sustainable re-routes and new segment designs are established, VVMTA will work with WRNF and Berlaimont project proponents to further decommission additional degraded and unsanctioned user routes in the zone.

The VVMTA is offering to provide our oversight, expertise, time, and resources to help build and maintain these proposed trails through our Adopt A Trail program.

Objection 4: The 2002 Forest Service Land and Resource Management Plan's MA 5.41 designation no longer reflects the current character of the lower Berry Creek and Singletree-adjacent analysis zone.

Upon the establishment of the subdivision with Berlaimont's inholding, and road improvements to paved year-round access; Management Area 5.41 designation will poorly reflect the actual on-the-ground conditions of resource use. We propose that the areas of MA 5.41 designation south of the FSR780 and FSR778 intersection would more realistically reflect contemporary use levels and conditions with a MA 7.1 Intermix designation. This designation most-accurately reflects existing conditions as well as likely future use trends, and in light of a number of unsanctioned use routes that are unlikely to respond successfully to decommissioning, would be allowable of an increased travelway density.

Because the Forest Plan must already be amended to accommodate Berlaimont's proposed use; VVMTA asserts that the most realistic long term management paradigm for the area would be to redesignate to MA 7.1 the lower portions of the analysis area as part of this action. This area includes lands south Berlaimont's inholding and east of Beard Creek down to the forest boundary at Cordillera, as well as the zone between the Edmund's Pole Road (FSR 774) and the Singletree neighborhood, eastward to the boundary with the West Avon Preserve.

Objection 5: The 2011 White River National Forest Travel Management Plan, specifically the Winter Travel Management Plan closure of the Berry Creek trail system to wheeled vehicles (mountain bikes) does not reflect current use nor meet the demands of users.

Because the Forest Plan must already be amended to accommodate Berlaimont's proposed use; VVMTA asserts that the Berry Creek trail system be removed from the Winter Travel Management Plan that restricts wheeled vehicles on the trails from November 23 - May 21. The south facing aspect and sage/juniper environment allows for the trails to dry significantly earlier than May 21 and are usually dry by mid-March. Thousands of mountain bikers use the Berry Creek trail system during the winter travel closure which has never been enforced and has



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always been ignored by the USFS. This area is also outside of the proposed seasonal wildlife closures proposed in the FEIS.

Vail Valley Mountain Trails Alliance's Comments

1. The VVMTA proposes the following soft surface multi-use trails in the Berry Creek trail system:

- A. Build a new multi-use trail connecting the upper trailhead parking area on 774 to connect to new climbing trail and Endo Alley or Lower Berry Creek at the existing
- B. Build a new multi-use trail at the intersection of the new climbing trail and Endo Alley to provide an alternate downhill route for mountain bikes which alleviates user conflicts on Lower Berry Creek
- C. Multi-use trail: Biking uphill only. Two-way hiking/foot traffic. This would create a consistent flow of direction, alleviate user conflict, and be very well received by all users groups
- D. Keep proposed new multi-use trail along FSR774 to allow soft surface trail access to the Mesquite Trail, June Creek, West Avon Preserve Trail System, and the Singletree Community
- E. Build a new multi-use trail connecting the trailhead parking area at the existing gate on 774 to Moonridge Drive. This would create a looped multi-use soft surface trail system

