COLORADO
Parks and Wildlife
Department of Natural Resources

Hot Sulphur Springs Office, Area 9 Service Center
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August 24, 2026

Brian Glaspell
Forest Supervisor
c/o Sarah Strehle
Dillon Ranger District
680 Blue River Parkway
Silverthorne, CO 80498

RE: Arapahoe Basin 2026 Improvement Projects

Dear Mr. Glaspell,

Colorado Parks and Wildlife (CPW) has received a request for comments on the Arapahoe Basin 2026 Improvement Projects in Summit County. 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. CPW understands and recognizes the importance of this area and the opportunities the area provides for outdoor recreation. CPW encourages Arapahoe Basin and the Dillon Ranger District of the White River National Forest(WRNF) to afford the highest protection for Colorado's wildlife species and habitats.

The proposed project is on the WRNF on approximately 2,000 acres of land. The area is primarily alpine and subalpine habitat with spruce-fir trees and exposed slopes and rocks. The proposed action includes the following projects:

1) Enhancement of snow making capabilities
2) New snowmaking lines
3) Two new parking lots
4) A new pedestrian bridge
5) Remote Avalanche Control Systems (RACS) installation zones

CPW has reviewed the proposed project and would like to offer specific comments on the impacts to wildlife:

Bighorn Sheep

The project area is located within an identified Rocky Mountain bighorn sheep production area, summer range, and winter range. The drainages and ridgelines just east of the project area provide valuable summer foraging habitat, winter range, and movement corridors for bighorn sheep. CPW recommends limiting human activities from November 1- April 30 for the winter range of bighorn sheep. Specific recommendations include a surface density limitation of less than one linear mile of routes per square mile (640 acres). If route density cannot be achieved or maintained, CPW recommends implementing offsite mitigation to offset functional habitat loss. Ewes and lambs are sighted regularly throughout the summer months, feeding just above treeline in the mornings and evenings and retreating into the timber during daytime hours. The noise and human activity from construction and increased recreation will be disruptive to sheep, and has the potential to displace bighorn sheep from valuable habitat during the crucial lamb-rearing season (April-July) and could affect reproductive success. CPW recommends limiting human activity to the area from April 15- June 30 for the reproduction season of bighorn sheep.

Mountain Goats

The project area falls within summer range and a concentration area for mountain goats. The Lenawee Mountain area is heavily utilized by mountain goat nannies and kids throughout the summer months. The talus rock faces adjacent to alpine meadows and ridge tops near the project area provide valuable summer habitat for rearing kids, as well as movement corridors that provide connectivity between surrounding high alpine habitats. Studies of mountain goat populations in the vicinity of ski areas suggest that either physical modification of the landscape, or the level of risk perceived by mountain goats resulting from anthropogenic activities occurring throughout the year may alter spatial use of habitat (Richard and Cote 2015).

Goats can become incredibly habituated to humans, due to the large amount of recreationists that actively seek to feed and interact with the goats. The habituation of mountain goats to humans can lead to unhealthy concentrations of goats, as well as aggressive and unnatural behavior stemming from food rewards. CPW recommends that mountain goat awareness signs (CPW can provide) be placed in areas with high human and goat traffic in order to discourage approaching or feeding mountain goats, which will also increase human safety.

Canada Lynx

The project area falls within likely habitat for Canada Lynx. Lynx den in February and this period of time is very sensitive for this species. In areas with non-motorized activity that increases to moderate or moderately high levels of intensity (i.e., Leadville and Vail Pass Winter Recreation Area), lynx respond by becoming more nocturnal and slowing their movement rate during the day (e.g., presumably remaining stationary and hiding out). Some individuals may also shift their space use away from parts of their home range experiencing the heaviest use. Lynx strongly avoid the highest levels of human recreation (i.e., developed ski areas). The limited use they do exhibit in these places occurs at night rather than during the day, on weekdays rather than weekends, and shoulder seasons rather than heavy-use seasons (Olson et al. 2018). The construction, maintenance, and use of this area could deter the use of the habitat by Lynx and other wildlife species and alter movement through the area.

Southern White-tailed Ptarmigan

The project area falls within Southern White-tailed Ptarmigan winter and overall habitat. Ptarmigan are dependent on alpine habitat, feeding and nesting on exposed slopes above timberline. Ptarmigan seek deep, soft snow for winter roosting in protected areas along tree lines, in isolated basins, and on the lee side of ridges. Snow compaction in these areas will negatively impact ptarmigan by limiting winter roosting areas, and potentially affecting plant growth and insect emergence in the spring. Increased winter recreation above timberline may also directly displace wintering ptarmigan out of the area due to disturbance. Arapahoe Basin also provides valuable spring and summer habitat for ptarmigan, which are naturally limited to alpine environments and rely on alpine forbs, mosses, lichen, shrubs and other lowgrowing vegetation for survival. Southern white-tailed ptarmigan utilize snow-free rocky areas adjacent to vegetation, cover and moisture during summer months for

nesting and brood-rearing. These birds face threats throughout much of their range from recreation, mining and grazing (Center for Biological Diversity 2010). CPW recommends limiting human activities and construction for the RACS and snowmaking infrastructure installation from May 15-August 15 to help minimize impacts to nesting ptarmigan.

Boreal Toads

Boreal Toads are a state-endangered amphibian species that occupy montane wetlands from roughly 7,000 - 12,000 feet in elevation. The project area is within the overall range and adjacent to known breeding sites for Boreal Toads. Boreal Toads have been observed upstream and downstream of the project area in the North Fork Snake River drainage. Boreal Toads have historically been observed in ponds and wetlands along the North Fork Snake River, which runs above and below Arapahoe Basin, especially from April to July during breeding season. After breeding, adults will disperse from breeding ponds and travel overland to find additional resources and hibernacula. Two Boreal Toad breeding sites are located along the North Fork Snake River between Arapahoe Basin and Keystone. The site most likely to be impacted by the proposed project is the upper breeding site, which lies just west and downstream of the Arapahoe Basin boundary and is currently active, with breeding and recruitment observed annually. CPW recommends that construction activities avoid any disturbance to the known breeding sites, as well as upstream/upslope activities that may cause downstream disturbance to breeding sites. CPW recommends avoiding drilling or digging in or near wetlands, or areas adjacent to wetlands with holes or crevices, as these activities may destroy toad hibernacula. Disturbance, discharge to, or sedimentation of the North Fork Snake River and surrounding wetlands may negatively affect the Boreal Toad population at Arapahoe Basin. CPW recommends avoiding changes to water quality and quantity in wetlands and maintaining water levels at the breeding site, especially from April to September or until tadpoles have completed metamorphosis.

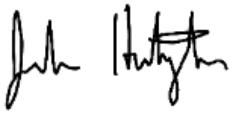
Brook Trout

The North Fork Snake River at the project site is occupied by a Brook Trout population. Brook Trout spawn in the fall from August to November and lay their eggs over clean gravel and cobble. Eggs hatch from April to June the following spring, depending on water temperatures during incubation. CPW recommends avoiding siltation and

reduced flows in the North Fork of the Snake River during spawning, egg incubation, and fry emergence, which may negatively affect the Brook Trout population in the North Fork Snake River. Reduced flows during incubation can increase siltation, thus smothering eggs, as well as increase the probability of anchor ice formation, which can destroy incubating eggs.

CPW appreciates the opportunity to be actively involved throughout this planning process, and would be happy to discuss wildlife issues with Arapahoe Basin and the Dillon Ranger District. If you have any questions, please contact Hannah Grimes at 970-485-3081 or hannah.grimes@state.co.us.

Sincerely,



Jeromy Huntington
Area Wildlife Manager (CPW)

Hannah Grimes- District Wildlife Manager (CPW)

Elissa Slezak- Terrestrial Biologist (CPW)

Annie Hart- Species Conservation Biologist (CPW)

Tyler Swarr- Native Aquatic Species Biologist (CPW)

Taylor Elm- Northwest Senior Resource Manager (CPW)

REFERENCES:

Center for Biological Diversity. 2010. Petition to list the white-tailed ptarmigan, (Lagopus leucura) as a threatened species under the Endangered Species Act. Center for Biological Diversity, Portland, Oregon, USA. 52 pp.

Olson, L. E., Squires, J. R., Roberts, E. K., Ivan, J. S., & Hebblewhite, M. (2018). Sharing the same slope: behavioral responses of a threatened mesocarnivore to motorized and nonmotorized winter recreation. Ecology and Evolution, 8(16), 8555-8572.

Richard, J. H. and S. D. Cote. 2015. Space use analysis suggests avoidance of a ski area by mountain goats. Journal of Wildlife Management 10.1002: 2-9.