

Data Submitted (UTC 11): 4/15/2024 6:00:00 AM

First name: Matt

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Organization: Colorado Parks and Wildlife

Title: Area Wildlife Manager

Comments: Dear Mrs. Noel,

CPW appreciates the opportunity to provide comments for the proposed extension of the EagleVail Trail (#2351). As you are aware, CPW's mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources.

CPW has reviewed the proposal and understands the extension of the EagleVail Trail (#2351) to be approximately 1.6 miles westward across USFS, Town of Avon, EagleVail Metro District, Front Gate, River Oaks, Arcadian Group, and Vail Resorts property. The trail will end on Vail Resort property near the Beaver Creek Entrance. 0.27 miles of the trail would be constructed, as well as 0.25 miles of illegal trail deconstructed on USFS land.

It is understood that the purpose of this extension is to meet a desire to connect communities with soft surface trails and to address use of illegally created trails. CPW has no direct concerns with the Proposed Action, but does have concerns with cumulative adverse impacts to wildlife from recreation in this immediate area. CPW understands only a small portion of the trail will be constructed on USFS land; however, anticipates ongoing trail-based recreation proposals and requests that the Forest Service meet with CPW staff to explore an adaptive management framework for appropriate trail networks. An important element of the adaptive management plan would be exploring appropriate areas to remove trail density and/or mileage elsewhere on the landscape to improve or restore wildlife habitat as mitigation for wildlife impacts with the construction of trails such as this. This framework could also incorporate best management practices such as the timing of building new trails compared to the decommissioning of illegal routes, and design elements that would deter future illegal use. The plan could also describe policies to close routes if illegal use persists or new illegal trails develop. CPW would also like to recommend identifying areas of critical importance to wildlife that currently experience frequent illegal use, and implement decisions and management strategies to prevent the formalization of recreation. One excellent example is the illegal trail commonly referred to as the "A-10" trail and the surrounding area. In addition, the current section of the EagleVail trail is not subject to a winter closure. Given that winter recreational opportunities are provided on trail #2351 and elsewhere; it would be beneficial to identify or expand polygons where wildlife would benefit from a seasonal area closure in exchange as recreation opportunity increases.

The general area involved is primarily characterized as north-facing conifer forest with intermittent stands of mountain shrub. This area is classified by CPW as a winter concentration area and severe winter range for elk, and is classified by the USFS as a 5.43 (elk) management area as well. It is important to note that elk generally serve as an umbrella species, and by managing and conserving elk habitat, many other flora and fauna species will potentially benefit from such management. Moose also utilize the area, particularly in the winter months, and have been associated with various human-moose conflict incidents. This area also interfaces with a urban-residential area, and multiple trails that materialize a zone of influence of visual, auditory, and olfactory disturbances that extend from the urban and trail footprint. Status of the Frying Pan River Elk Herd (DAU E-16)
The elk in this area belong to the Frying Pan River Herd (DAU E-16), which has experienced concerning declines in herd performance and productivity, with cow to calf ratios consistently observed below 40 calves to 100 cows in recent decades. This decline can be attributed to biological, ecological and anthropogenic influences. It is important to mention that decreases in herd productivity often results in fewer and less reliable opportunities for hunters; a large subset of the recreational community and an important tool in wildlife management that relies heavily on access to public land in order to engage such opportunity and have a quality experience. While persistent drought, poor habitat conditions, and other factors exist that impact this herd, the human population and visitation in Eagle County has significantly increased in recent decades, and the infrastructure and activity

associated with such increases has resulted in a variety of cumulative direct and indirect impacts, and have exacerbated impacts such as recreation that radiate onto adjacent public land. The area of Minturn, EagleVail, Beaver Creek, and adjacent USFS land is one example of how land use changes over time have eliminated and diminished habitat quantity, quality, connectivity, and subsequently, decreased the productivity of the elk herd. As the human population and visitation continues to grow in Eagle County, it is expected that impacts to wildlife will continue to increase in intensity and complexity. There are many existing, proposed and future developments that interface with USFS directly or indirectly. All of these associated developments have and will increase the amount of people looking to recreate on adjacent public land, as well as have convenient access and trail connectivity from their community. As a result of these impacts, quality habitat on public land (federal, state, local) has become increasingly significant in its role in sustaining productive wildlife populations, and it has become increasingly important to be strategic and proactive in managing recreation across land ownership as it interfaces with wildlife and wildlife habitat. With the abundant recreational opportunity currently provided across land ownership in Eagle County, and continued demands for additional opportunity, connectivity, CPW sees an opportunity to bring land managers together to assess what opportunity is currently provided and determine which recreational demands are legitimate, as well as explore opportunities to use the landscape more efficiently and effectively as it pertains to trail networks and the productivity and health of local wildlife. CPW understands the difficult and complex role the USFS has in managing their land for multiple-use and appreciates the ongoing efforts for the benefit of wildlife and wildlife habitat.

Trail Design & Management Recommendations

The current adjacent land use, the zones of influence, and the historic illegal construction and use of the trail proposed for extension has diminished the habitat value, so CPW does not anticipate any significant additional wildlife impacts associated with the extension of trail #2351. However, the cumulative adverse impacts that have diminished the wildlife value to present are not insignificant. CPW appreciates continued efforts to destroy illegal routes, such as the "Oso Trail", and still recommends avoiding the formalization of illegal trails as much as possible, as there are areas of high wildlife value and prevalent illegal use that could more appropriately be managed as both trailless and areas of concentrated enforcement to deter and minimize such use. CPW appreciates the site visit on 04/09/2024 to discuss the project and provides the following recommendations to minimize impacts to wildlife specific to this trail:

- ? In areas where possible, further decrease the distance between the trail alignment and the edge of the urban footprint in order to decrease the zone of influence from human activity that will affect habitat to the south of the trail.
- ? There is no current seasonal closure on the existing section of trail #2351, at a minimum, implement a trail closure as needed when requested by CPW, given this area is classified as winter range and this area has potential to fluctuate in presence or concentration of elk.
- ? Implement a leash requirement for all pets on the trail given the frequent presence and conflict with moose and potential to harass other wildlife.
- ? Prohibit any future trails that would extend south from trail #2351 and from connected trails into remaining wildlife habitat on USFS land.
- ? Install adequate signage to educate and promote responsible use, and to deter illegal use.
- ? Ensure all illegal routes are adequately restored before construction of the established route.
- ? Restore any illegal route to native vegetation, utilizing recommendations from CPW's Colorado Seed Tool

CPW would like to thank you again for the opportunity to comment, and while CPW understands that some of the recommendations and considerations may not be implemented, it can at least initiate proactive and productive discussions around recreation and wildlife management moving forward. CPW values the current communication with your staff, so please don't hesitate to reach out to District Wildlife Manager Layton Stutsman at (720) 626-9051 with any questions or concerns.