

February 19, 2021

Madison Harris, Planner I  
Town of Minturn  
301 Boulder Street #309  
Minturn, CO 81645

**RE: Environmental Review of Belden Place PUD**

Dear Ms. Harris,

SGM is providing this letter to document our review of the Belden Place PUD application as it relates to potential environmental impacts, on behalf of the Town. As part of this effort, we reviewed the PUD Narrative (Vail Land Company 2021), and the Environmental Impact Report (Wynn Ecological Consulting 2020).

We offer the following as items that could use additional discussion or clarification.

**Black Bear.** The project occurs within black bear (*Ursus americanus*) habitats, and a CPW-mapped Bear-Human Conflict Area; black bears are already known to be an issue in Minturn. Bears will be an issue for the PUD, and the developer should take very protective steps to minimize the risks to residents and bears. CPW should also be consulted on minimizing bear issues.

**Reclamation and Noxious Weeds.** The EIR did not state that a survey for noxious weeds has occurred, but this area of Minturn is known to have weed issues. Early weed treatment through the use of suitable herbicides is strongly recommended prior to the start of construction to begin reducing the density and seedbank in the project area. A noxious weed management plan, with biannual treatments is recommended given the nearby native habitats, and very high likelihood that noxious weeds will expand their presence and spread into nearby habitats. As a reminder, noxious weeds must be managed, per Colorado statute.

In summary, we concur with the findings of the EIR, that this project would not have any notable environmental issues. Strict black bear stipulations should be in place, and we also recommend an aggressive noxious weed management strategy.

Thank you for this opportunity to provide comments on the project. If you have any questions please feel free to email me at [ericp@sgm-inc.com](mailto:ericp@sgm-inc.com), or I can be reached by phone at 970-309-5190.



Eric Petterson  
Environmental Team Lead

