



COLORADO

Parks and Wildlife

Department of Natural Resources

Area 8 - NW Region
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Town of Minturn
Ms. Madison Harris, Planner
Mr. Scot Hunn, Contract Planner
301 Boulder Street #309
Minturn, CO 81645

February 15, 2021

Dear Ms. Harris & Mr. Hunn,

Thank you for giving Colorado Parks and Wildlife (CPW) an opportunity to provide comment on the proposed Belden Place PUD project. CPW has a statutory authority 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.

The proposed action includes the development of 27 lots in southern Minturn, and is proposed to include 42 housing units of varying types and sizes. The proposed project also includes some small sections of open space and parks.

The proposed action site lies within and immediately adjacent to a variety of wildlife habitat. Furthermore, the development site exists within elk Data Analysis Unit (DAU) E-16, and mule deer DAU D-8. The E-16 DAU has been experiencing significant declines in elk populations, equating to a roughly 60% decline over the last 10 years. Additionally, as of the 2020 updated herd management plan for mule deer, the D-8 population is on a downward trajectory and is under CPW's established objective range. Subsequently, CPW has continued to reduce the mule deer population objective in the area to accommodate for human generated impacts and overall mule deer population decline.

CPW has also dramatically reduced hunting quotas for both elk and mule deer since the mid 2000s. Mule deer doe quotas have been reduced to negligible levels, while limited cow elk licenses have ostensibly been eliminated. These reductions in doe and cow quotas are in an attempt to protect the reproductive, fawn and calf-bearing portion of the herd. While these license reductions are an attempt to recover population levels, reproductive success and recruitment into the population has failed to rebound.

In addition to the pressing issues associated with local ungulate populations, the Eagle Valley has seen a significant increase in human-predator conflicts. These conflicts namely involve mountain lions and black bears. The Town of Minturn lies within the state's only designated Special Management Area (SMA) for mountain lions. Public reports of mountain lions in the SMA were rare 10-20 years ago. Now reports number in the hundreds annually and come from a variety of groups and members of the community. Minturn also lies within a human-black bear conflict area. Black bear conflicts in the Eagle Valley continue to rise compared to historic levels. These issues directly correlate with the human



footprint on the landscape and increasingly require mitigating management actions by local governments.

Habitat loss, habitat fragmentation and human disturbance continue to be the most significant concerns in managing local wildlife in the Minturn area. While in-fill development, or redevelopment of areas minimizes the direct impacts and net loss of habitat, the indirect impacts to the resource stand to be far more significant. The Minturn, and Dowd Junction areas along with portions of the Highway 24 corridor have been identified or already slated for a variety of developments and infrastructure improvements. As with many of these proposed actions, CPW continues to encourage local governments to approach the assessment of impacts to wildlife and the surrounding landscape through a more holistic and comprehensive lens. Specifically, impacts generated by one particular development will likely be accentuated and heightened due to the impacts generated by other surrounding developments, and vice versa. As such, CPW encourages continued dialogue with town planning staff, and initial dialogue with the applicant to potentially better account for these comprehensive impacts.

The Environmental Impact Report (EIR), prepared by Wynn Ecological Consulting correctly notes the potential for indirect impacts. However, the report minimizes the extent to which indirect impacts affect wildlife. Indirect impacts are often far reaching and expand beyond just human-wildlife conflict, and may equate to habitat loss, habitat degradation, and can ultimately result in population decline of local herds. This is currently the case with the local E-16 elk herd. The increase in the human footprint associated with this proposed development stands to generate the aforementioned impacts. Specific to this proposed action and similar to other Minturn area development applications, this project lies within and adjacent to elk and mule deer migration corridors, elk winter concentration area, elk severe winter range, documented golden eagle nests, and Canada lynx potential habitat. Given the high propensity for this proposed action to primarily generate and contribute to indirect impacts in the Minturn area, CPW offers the following recommendations:

- Construction & site disturbance should occur outside of the December 1 – April 30th timeframe, annually, to protect wintering elk.
- Open Space or natural sites disturbed during construction should be immediately reclaimed with a CPW-approved big game seed mix to provide adequate forage and reduce the potential for weeds. The site should be monitored for weeds on an annual basis.
- If any fencing is planned as part of, or in conjunction with this project, it is recommended that the fencing be constructed per CPW Wildlife Friendly fencing guidelines.
- Bear-proof trash canister covenant: The project area lies within a mapped black bear- human conflict zone. To help prevent habituation of black bears, CPW recommends all residences utilize bear-proof canisters and dumpsters. Furthermore, the development should provide secure enclosures for trash storage. CPW encourages enforcement of this practice to ensure effectiveness.
- Vegetation management on the parcel to minimize attractants for black bears, as well as minimize the visual cover available to mountain lions adjacent to buildings and dwellings.
- Adopt appropriate storm water drainage systems to avoid sediment loading into the Eagle River.
- Recommend anticipating the unplanned creation of social trails accessing adjacent National Forest. If this occurs, CPW suggests planning for (logistically and financially) the reclamation of such trails and addressing the issue through signage, education, and establishment and enforcement of HOA covenants to manage access to public lands emanating from the Belden Place parcel.



- Again, given the proximity of the development to elk severe winter range, and the planned increase in human density/activity, CPW recommends dialogue with the Town of Minturn, and the White River National Forest to entertain potential seasonal closures of the Martin Creek trail.
- CPW further recommends that the Town of Minturn explore financial funding mechanisms generated by this and future developments to help account for and potentially offset indirect and direct impacts associated with the developments, and to fund local conservation efforts by the Town of Minturn.
- Increasingly critical, CPW recommends the Town of Minturn adopt a holistic approach to assessing cumulative impacts to wildlife and natural resources in the local area. This locale is slated for a wide variety of actions in the near future that will result in both direct and indirect impacts to wildlife. CPW welcomes continued dialogue surrounding how to anticipate, minimize or avoid these impacts.

CPW appreciates the opportunity to provide comments on this project. For additional information or to request clarification on CPW's comments for this project, please contact District Wildlife Manager Devin Duval at (970) 930-5264.

Sincerely,



Matt Yamashita
Area Wildlife Manager

Cc. Devin Duval, District Wildlife Manager
Danielle Neumann, Land Use Specialist

