



Vail Valley Mountain Trails Alliance  
PO Box 3986  
Avon, CO 81620  
[www.vvmta.org](http://www.vvmta.org)

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To: Eagle-Holy Cross Ranger District, White River National Forest  
From: Vail Valley Mountain Trails Alliance  
Date: February 4, 2022  
Project: Mill Creek Trail Reroute, Vail Uphill Trail and North Trail Connector Construction  
Project #61186  
Subject: VVMTA Comments Supporting Project #61186

Dear Reviewing Officer(s),

**The basis and purpose of VVMTA's comments are in support of the three trail projects as proposed.**

The Vail Valley Mountain Trails Alliance (VVMTA) believes that the three proposed trail projects' social benefits largely outweigh any potential or perceived negative impacts to habitat, wildlife, and/or landscapes. The benefits of increased user safety and trail user experience in these three areas have been identified by the public and multiple stakeholders and organizations.

VVMTA believes that when weighing the balance between recreation and wildlife, the recreation opportunities and limited impact these three trail projects have on our landscape, provide desired connections and experiences for the community.

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**Comments: Vail Uphill Trail**

We support the trail project and believe that an uphill trail on Vail Mountain is a great addition to its trail system. We support Vail Mountain's goal with this uphill trail to increase safety for both mountain bikers climbing mountain roads and its staff driving vehicles for necessary mountain operations. The uphill trail should connect with the shoulder of the Game Creek trail and also connect with the bottom of Radio Flyer and PMT which would offer loop opportunities and improve the trail user experience. In addition, we recommend the trail be built as close to existing trails (Radio Flyer & Game Creek) as possible to minimize any further potential impact on wildlife and habitat. Dense trail systems within existing areas that are heavily recreated reduce the area of disturbance.

***Forest Plan:***

Almost half of the proposed trail is located within Vail Mountain's permitted ski area boundary. The portion of the trail on National Forest land is located within an area managed and designated as 7.1 Intermix. The Forest Plan manages 7.1 Intermix as following:

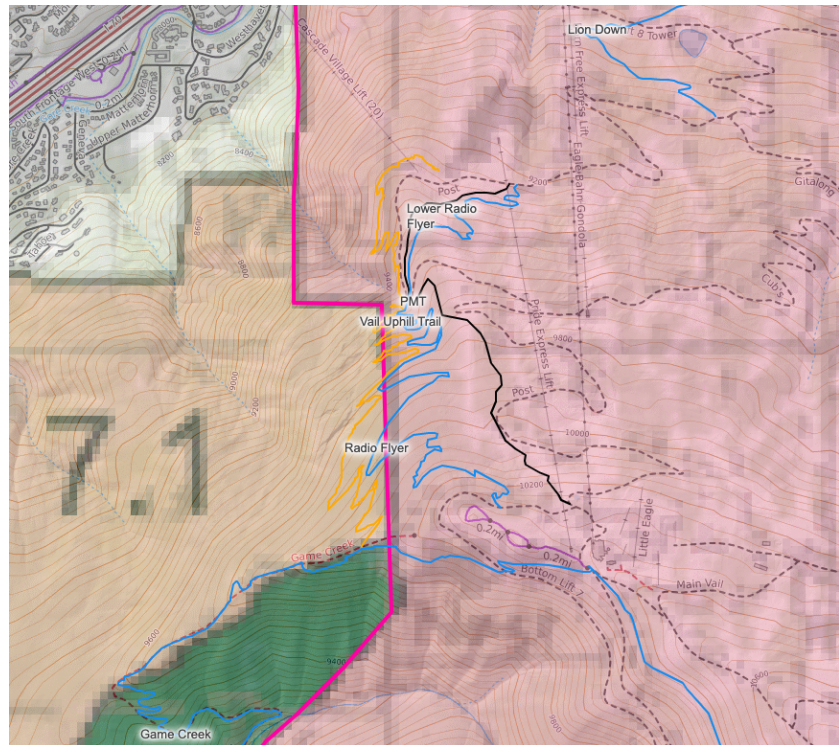
*Theme:*

Areas characterized by an interface between National Forest System lands and other public and private lands are managed to protect natural resources, provide compatible multiple uses, and maintain cooperative relationships between private landowners and other governments with jurisdiction. Opportunities to consolidate landownership patterns are pursued.

*Management Area*

*Description:*

These areas are located along the borders of the forest, adjacent to other public and private lands. The private lands are usually undergoing pressure from urban and private residential development. Cooperative relationships are emphasized with other agencies, local governmental jurisdictions, and adjacent landowners. Opportunities are sought for coordinated, multijurisdictional



management approaches to address resource issues and impacts that transcend the national forest boundary. Management actions are geared toward influencing the vegetation composition and structure to promote visual screening and to minimize hazardous fuel loading patterns.

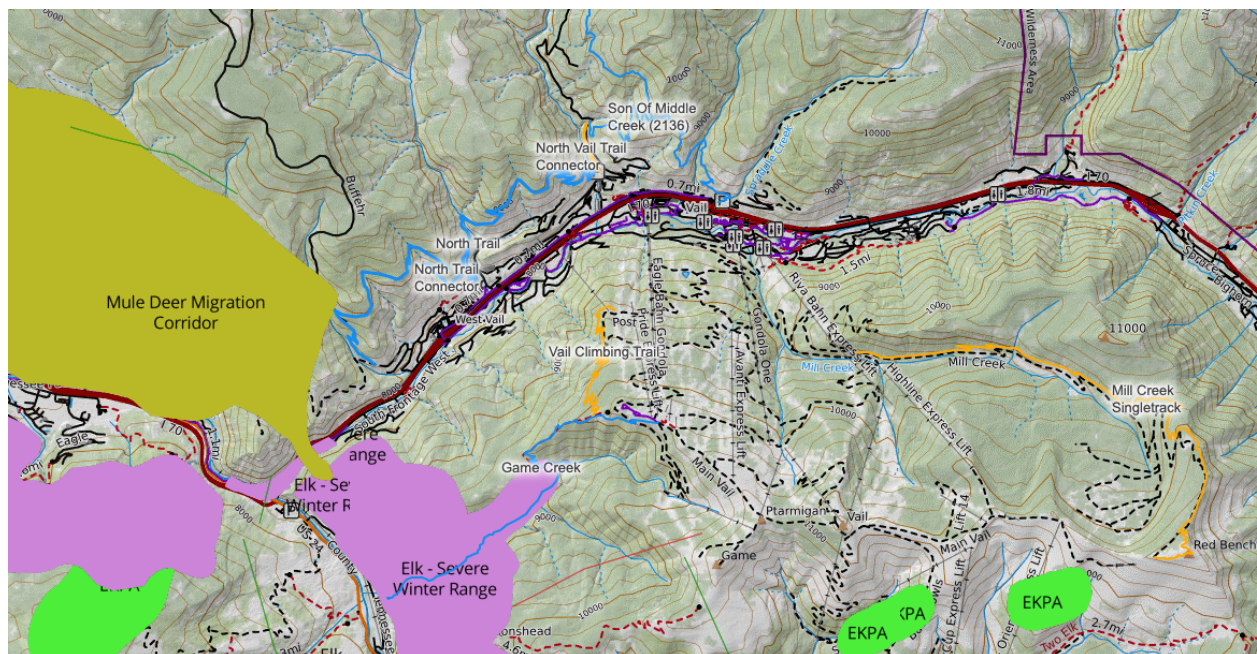
*Desired Condition:*

Wildlife habitat provides adequate cover for big game species between winter and summer ranges. Wildlife viewing is encouraged in areas not identified as winter range or sensitive habitats, and discouraged in those habitats considered sensitive. In high recreation-use areas, human disturbance may limit viewing opportunities to those species that are common or accustomed to the presence of people. Aquatic habitats that provide for recreation fisheries are protected. Opportunities for solitude are limited. Sights and sounds of human development are evident. The area is accessible for use by visitors, while conflicts

with adjacent landowners are minimized to the extent compatible with overall management objectives. Land ownership patterns are simplified. Clearly identified property boundaries and acquisition of rights-of-way are a priority. Both motorized and non-motorized recreation activities are provided. The recreation opportunity spectrum (ROS) for this management area is semi-primitive non-motorized, semi-primitive motorized, roaded natural, or rural year-round. Scenery is managed to provide a range of scenic integrity objectives from low to moderate.

**Wildlife:**

The Vail Uphill Trail is not located in [critical habitat or migration corridor \(elk, deer, bighorn sheep\)](#) as mapped per the [Colorado Parks & Wildlife \(CPW\)](#). While we understand that mapping is not perfect, it is created from data and science collected in the field.



## **Comments: Mill Creek**

### ***Golden Peak EIS Decision:***

We support the reroute of the existing Mill Creek Trail/Road. Due to the increased impacts on the Mill Creek watershed from construction and new facilities of the Golden Peak project, Mill Creek Trail/Road is required to be decommissioned to offset impacts of the project. Mill Creek Road/Trail is eroded and soils/runoff regularly impact the Mill Creek watershed which are only exacerbated by the new impacts from the Golden Peak project. Decommissioning Mill Creek Trail/Road is a benefit to the Mill Creek watershed and the Native Cutthroat Trout that live in it.

We are very concerned that trail and recreation access will be lost in the area because the approved Record of Decision in March 2019 ([Vail Mountain Resort Golden Peak Improvements Project](#)) only states that Mill Creek Road/Trail is to be decommissioned. The decommissioning of Mill Creek Trail/Road and build of a new sustainable singletrack trail allows trail based recreation to exist in this area and improves the health of the Mill Creek watershed at the same time. To help further mitigate impacts to the Mill Creek watershed we recommend that the trail be aligned above the existing trail/road and away from the creek and built to sustainable standards ensuring erosion and soils are not entering the creek.

### ***Forest Plan:***

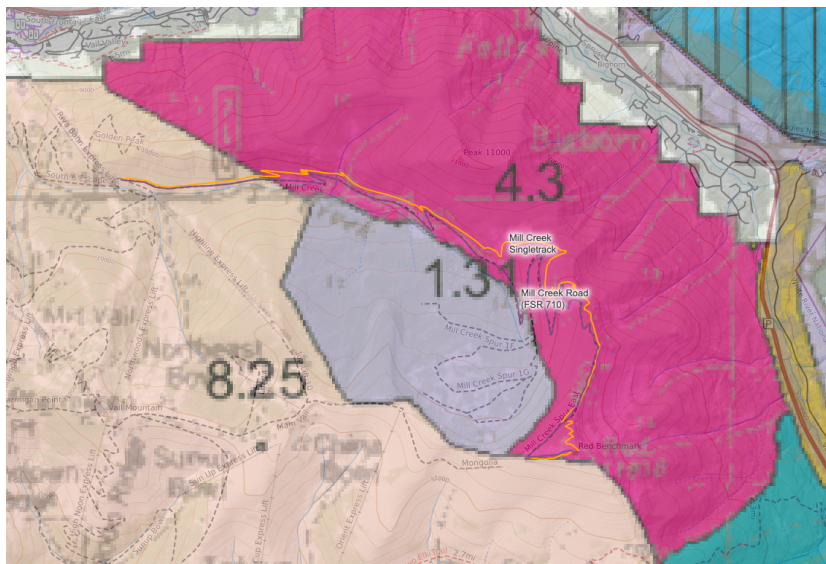
Per the Forest Management Plan, the Mill Creek Trail as proposed is located within and near areas managed for recreation; 4.3 Dispersed Recreation, 1.31 Backcountry Recreation - Non-motorized, and 8.25 Ski areas - Existing Potential. The new Mill Creek Trail alignment is entirely located within the 4.3 Dispersed Recreation management area which states:

#### ***Theme:***

The areas may be designated as either motorized or non-motorized. The non-motorized areas will usually have good vehicular access to a central parking area from which the non-motorized use originates.

#### ***Management Area***

#### ***Description:***





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Dispersed recreational opportunities include viewing scenery and wildlife, dispersed camping, picnicking, fishing, snowmobiling, cross-country skiing, and mountain biking. Opportunities for solitude are limited. A broad range of management activities, including grazing, may occur. Facilities may be present to provide for health and sanitation, to protect resources, or to enhance the recreation experience. These structures may range from small resorts and campgrounds to fire grills, signs, or vehicle barriers. Roads are generally open to motorized activities. The travel system may include motorized and non-motorized trails. A wide variety of backcountry recreation opportunities exist as long as they do not interfere with maintaining a natural-appearing landscape. Resource management activities are compatible with, and reduce impacts to, recreation resources and opportunities.

*Desired Condition:*

Biological communities are maintained or improved to provide an attractive setting for visitors, complement the recreational values, and provide varied plant communities, structural stages, and associated wildlife. Habitat for sensitive species will be protected and maintained, and may also be enhanced where such opportunities exist.

***Improved User Experience:***

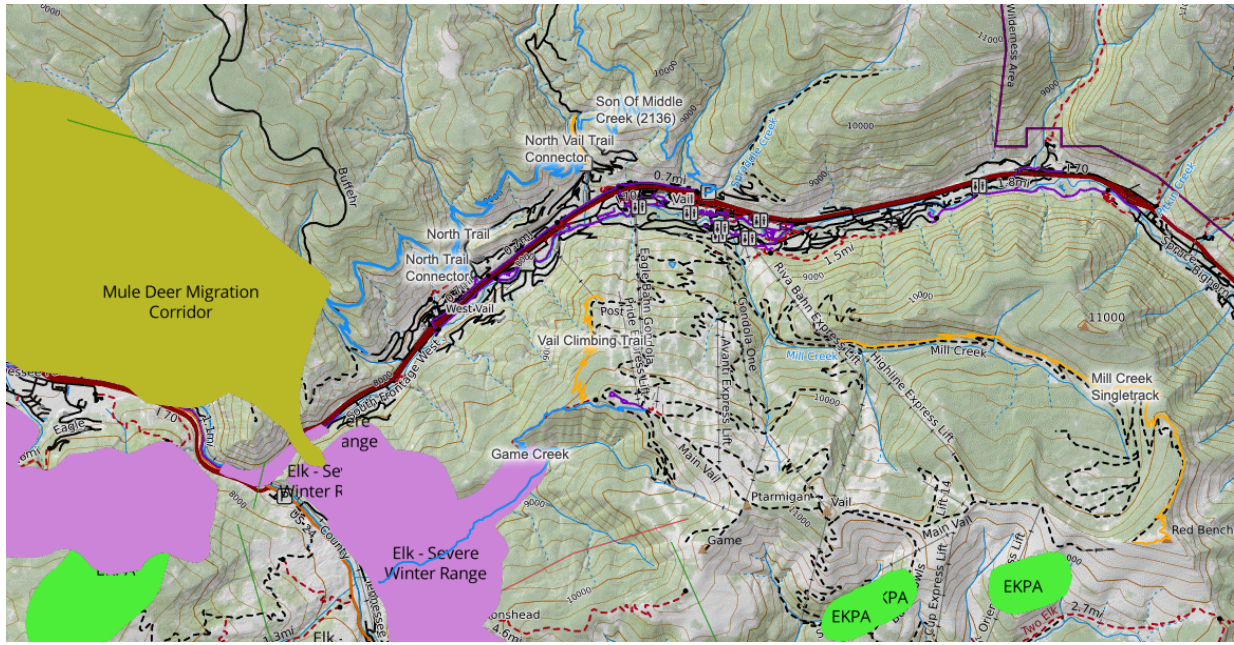
The new trail will take users through different types of terrain including old growth pines, incredible Gore Range views, large rocks, aspen stands, and more. Mill Creek has historically and predominantly been used as a climbing trail for mountain bikers and long distance trail runners. We recommend the new trail alignment keep grades and sight-lines that allows an enjoyable climb but now also offers a 6-7 mile descent of almost 3,000'. We recommend the trail tread width to 18"-24" to maintain a backcountry trail experience. The new trail will provide seemingly endless singletrack trail connections to existing National Forest System trails including Two Elk and Vail Mountain's trail system.

**Wildlife:**

The Mill Creek Trail is not located in [critical habitat or migration corridor \(elk, deer, sheep\) as mapped per the Colorado Parks & Wildlife \(CPW\)](#). While we understand that mapping is not perfect, it is created from data and science collected in the field. Furthermore, to mitigate any potential wildlife impacts during the spring migration and calving season, we recommend installing signage at the bottom (north) and top (south) trailheads to inform users that the Two Elk Trail and area has a seasonal closure of May 6-June 1. We recommend that gates, similar to other seasonally closed trails, be installed on the Two Elk Connector to stop users from entering the back bowls area during this time.

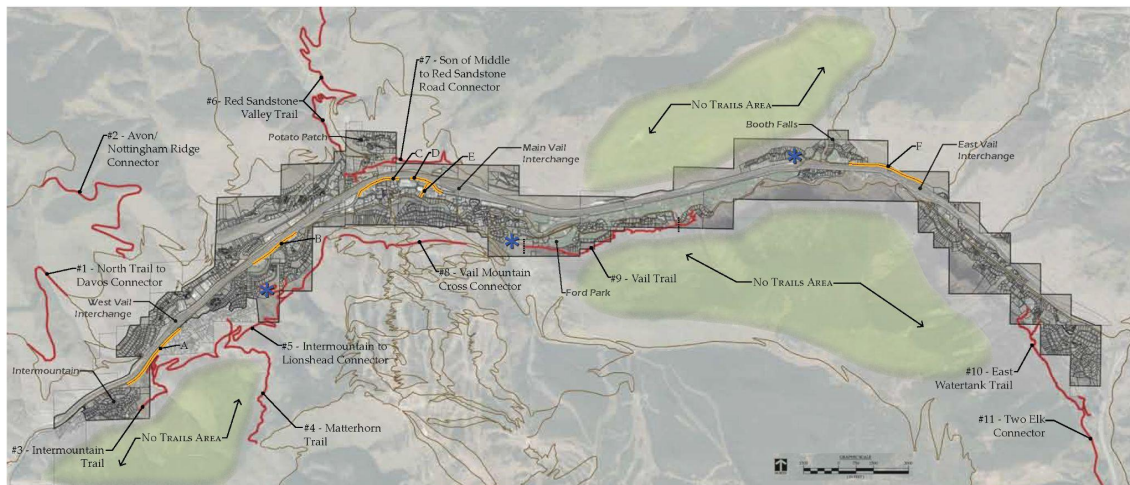


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### **Comment: North Vail Trail Connector**

The North Vail Trail Connector will create a desired singletrack trail connection of the entire North Trail and improve the safety and experience for trail users. We strongly support this trail connection knowing that the benefits significantly outweigh any perceived or potential negative impacts. This trail connection was identified and included in the Town of Vail Open Lands Plan that underwent thorough agency and public vetting and approved in 2018 that states:



“Proposed multi-use trail connecting Vail to existing and proposed trails in the forest north of Vail. This soft-surface trail parallels Red Sandstone Road and Piney Lake Road to provide a much safer alternative by providing trail users an alternative to Red Sandstone Road. This trail, if deemed feasible from a design and wildlife impact standpoint, will need to be “tight” to Red Sandstone Road in order to minimize habitat fragmentation and impacts from trail use.”

### ***Benefits & Goals:***

- **Safety:** We placed a trail counter on the dirt lower Red Sandstone Road (between Potato Patch Drive & Winter Closure Gate) from June 30-November 23, 2021 that clocked 50,148 counts (missing an estimated 6,500+ before June 30). This equals approximately 368 vehicles per day and 31 cars per hour (based on 12 hour day/dalyight). Normally, trail counts are divided by two to account for returning trail users. But in this case, as a trail user (or wildlife), a car speeding and creating dust on this road from behind or in front has the same impact both ways on safety and disturbance. Additionally, this does not even account for the cars on Potato Patch Drive that trail users encounter leaving or returning to the Red Sandstone paved parking lot/trailhead. The Town of Vail website currently directs hikers to hike up Potato Patch Drive and Red Sandstone Rd for 1 1/4

miles to reach the North Trail/Son of Middle Creek Trailhead which if anyone tried, would have a horrible experience and genuinely feel unsafe.

- *Trail User Experience:* This connection significantly improves the singletrack experience of the North Trail for all trail users. Trail users can now park at the Red Sandstone paved parking lot and access the North Trail/Son of Middle Creek area trails without stepping foot or putting rubber down on paved or dirt roads heavily trafficked.
- *East Vail Trails Mitigation:* By creating a desirable and safer trail connection and experience in this area, it will draw trail users away from the overcrowded East Vail Trails and mitigate impacts on the Eagles Nest Wilderness Area.

### **Forest Plan:**

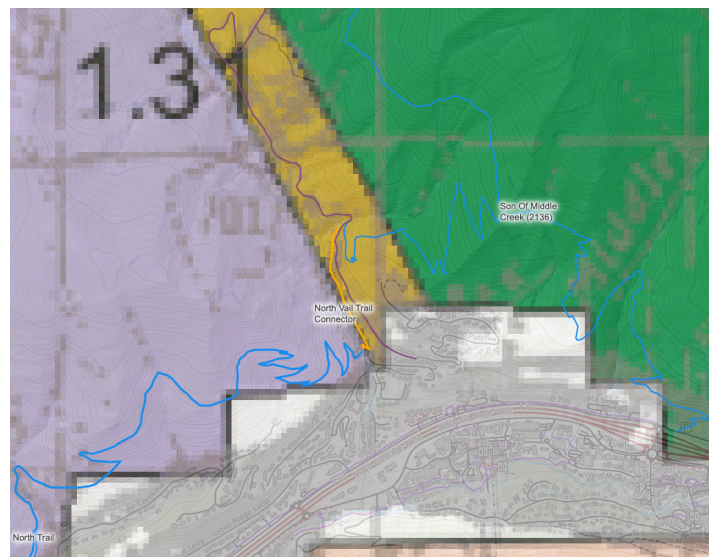
Per the Forest Plan, the North Vail Trail Connector is located within an area managed as 1.31 Backcountry Recreation - Non-motorized and a Utility Corridor 8.32. The Forest Plan manages 1.31 Backcountry Recreation - Non-motorized as following:

#### *Theme:*

Backcountry, non-motorized recreation areas are managed to provide recreation opportunities in a natural-appearing landscape. These areas, usually 2,500 acres or larger, are generally unroaded or may have some evidence of past roads. They are natural or natural-appearing with little evidence of recent human-caused disturbance. They are important for providing non-motorized recreation near the primitive end of the recreation opportunity spectrum.

#### *Management Area Description:*

A variety of year-round non-motorized recreation opportunities are provided in a natural or natural-appearing setting. Improvements such as trailheads, trails, signs, bridges, fences, huts, or shelters that enhance the recreational opportunities may be present. Trails provide challenging hiking, horseback riding, cross-country skiing, snowshoeing, or mountain biking opportunities. No road building occurs within the area. Noise from motorized use is a rare exception away from the area boundary.







**Desired Condition:**

The recreation opportunity spectrum (ROS) for this management area is semi-primitive non-motorized year-round. Scenery is managed to provide a range of scenic integrity objectives from moderate to very high.

**Wildlife:**

The North Vail Trail Connector is not located in [critical habitat or migration corridor \(elk, deer, bighorn sheep\) as mapped per the Colorado Parks & Wildlife \(CPW\)](#). While we understand that mapping is not perfect, it is created from data and science collected in the field. Furthermore, to mitigate any potential wildlife impacts during the spring migration season, we recommend the North Vail Trail Connector to have a seasonal wildlife closure consistent with the existing North Trail and Son of Middle Creek Trails of April 15-June 20. VVMTA Wildlife Trail Ambassadors would focus on this new trail to ensure users are educated and understand the importance of this seasonal closure.

