

To: Vail Planning and Environmental Commission, pec@vailgov.com and Kristen Bertuglia, KBertuglia@vailgov.com

Subject: Wildlife Mitigation Plan pertaining to East Vail Workforce Housing Subdivision impacts to bighorn sheep

Good morning, Planning and Environmental Commission members,

My name is Melanie Woolever. I have a B.S. and a M.S. in Wildlife Science and have been a professional wildlife biologist for 43 years. I have worked for a variety of agencies and organizations, but the majority of my career was with the U.S. Forest Service (FS) working at all levels of the organization. I was the Regional Wildlife Program Leader for the Rocky Mountain Region for over 20 years and was the Forest Service's Full Curl (bighorn sheep) Program Leader for 26 years. I worked internally providing guidance and technical expertise to FS specialists and leadership as well as with other Federal, State and local governments, non-governmental organizations and individuals to provide for bighorn sheep conservation. I have continued my involvement with bighorn sheep conservation issues since my 2015 retirement. I currently represent Colorado Wildlife Federation on the Colorado Statewide Bighorn Sheep Working Group, am on the Board of Directors for Rocky Mountain Bighorn Society, a member of the Professional Resource Advisory Board and Legislative Affairs Committee for the Wild Sheep Foundation and contract with CSU helping the National Park Service enhance their bighorn sheep conservation program.

I have been very interested in the proposed East Vail housing development referenced with specific concern regarding the likely impact to the struggling bighorn sheep herd occupying the area. I have read Rick Kahn's comments on the mitigation plan. I concur with his assessment of the situation and the inadequacy of the proposed mitigation and would like to underscore his comments and observations while adding a few of my own.

As Mr. Kahn clearly described, bighorn sheep, west-wide and in Colorado, are somewhere in the neighborhood of 3-5% of their historic numbers and distribution. Unlike deer and elk, bighorn sheep recovery, even with concerted effort, has not occurred. Consequently, the U.S. Forest Service, Rocky Mountain Region and surrounding Regions have included bighorns on their Sensitive Species lists which requires additional protect to insure activities do not result in a trend toward Federal ESA listing. The State of Colorado has also included bighorn sheep on their list of Species of Greatest Conservation Need. There is clear, science-based recognition of the vulnerability of our declining bighorn sheep populations. Small herds such as this one are particularly vulnerable to extirpation.

Loss of habitat, lack of ability to utilize habitat because of disturbance and disease events could all be factors affecting this herd's ability to survive. As Mr. Kahn mentioned, the herd has experienced a 40% reduction over the last number of years and has very limited winter range. Additional habitat loss, whether through actual structures or from preclusion of use as a result of the gamut of associated human activities, during and post construction, will further stress an already stressed population during the most energetically demanding time of year. The activities

are likely to severely reduce if not preclude use entirely, sharply increasing the risk of herd extirpation.

Mitigation of habitat loss, particularly for bighorn sheep, is problematic with highly variable response. Habitat improvement would need to be completed beforehand and demonstrated effective before a conclusion that loss of habitat has been mitigated and therefore, before any construction begins if there is a desire to maintain the bighorn sheep herd. In any case, it is clear that the scale and approach to habitat improvement will not likely meet the desired outcome for bighorn sheep as Mr. Kahn clearly describes.

I am hopeful that the citizens and local Vail government appreciate the amenity and the potential economic value this bighorn sheep herd provides, particularly in light of the high winter visitation when the sheep are easily seen. The bighorn sheep enhance visitor experience and frankly that of the local population as well. If keeping and even potentially exploring ways to recover the bighorn herd are a goal, then it is important to recognize that the suggested mitigation for the subdivision is inadequate and will not insure persistence.

Respectfully submitted,

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