

Department of Natural Resources Northeast Regional Office 6060 Broadway Denver, CO 80216 P 303.291.7227

January 12, 2024

Attention: Dylan Monke

Jefferson County Planning & Zoning Division 100 Jefferson County Parkway, Suite 3550

Golden, CO 80419 Phone: (303) 271-8718

Re: Shadow Mountain Bike Park, Case #23-102980 RZ

Dear Dylan,

Thank you for providing Colorado Parks and Wildlife (CPW) the opportunity to comment on the proposed Shadow Mountain Bike Park development that incorporates approximately 235 acres of the 306-acre Colorado State Land Board parcel identified as ID 61-163-00-001, commonly referred to as the Shadow Mountain Parcel, in Conifer, CO. This property is located within Game Management Unit (GMU) 39 in Jefferson County, Colorado.

The mission of CPW 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 a statutory responsibility to manage all wildlife species in Colorado and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests.

The Shadow Mountain Parcel is approximately 305 acres of mostly contiguous undeveloped land surrounded by residential mountain development. CPW District Wildlife Managers have conducted site visits of the property and have developed many years of on-the-ground working knowledge of the wildlife values of the property. The proposed property includes a riparian corridor along the lower elevations, rocky outcroppings at higher elevations, and a series of draws in heavily wooded timber. The Shadow Mountain Parcel also plays an important role in mitigating habitat fragmentation by connecting wildlife habitat on CPW and United States Forest Service (USFS) lands to the west with wildlife habitat on Jefferson County Open Space and Denver Mountain Parks lands to the east.

CPW appreciates the consultation because the location of this proposed project is identified as "Category 4 Crucial Big Game Habitat" whose primary threat is residential and commercial development and subsequent habitat fragmentation. Specifically, the location of the proposed project overlaps with wildlife habitat for numerous species, as described below by CPW's Species Activity Maps:



- 1. Black bear overall range, fall concentration area, summer concentration area, human conflict area, and adjacent to black bear migration pattern.
- 2. Mountain lion overall range and human conflict area.
- 3. Elk overall range, summer range, winter range, winter concentration area, and adjacent to elk resident population area.
- 4. Mule deer overall range, resident population area, concentration area, summer range, winter range, and adjacent to mule deer winter concentration area.
- 5. Moose overall range, summer range, and migration pattern.

District Wildlife Managers have observed elk and mule deer use on the Shadow Mountain Parcel year round. The property is identified as summer range for elk, provides winter range habitat for bull elk, and is used by elk during the breeding season. Resident herds of elk in the area also intermittently use the property throughout the year. The property is identified as summer range for mule deer and provides connectivity to nearby winter range habitat. The riparian corridor on the property has been used increasingly by moose and is currently one of the eastern most locations where CPW receives regular moose sightings in west Jefferson County. Mountain lions, bobcats, foxes, and coyotes use the property year round. District Wildlife Managers have observed significant use by these species along the rocky outcroppings at higher elevations, and have documented coyotes denning in the same area. District Wildlife Managers have also observed regular use of the property by black bears in the area.

CPW further appreciates the consultation because the location of this proposed project is in an area that experiences a high incidence of conflicts between residents and the aforementioned wildlife species, including but not limited to: black bear, mountain lion, coyote, fox, mule deer, and elk. The undeveloped Shadow Mountain Parcel provides important refuge for these wildlife species where they can avoid human contact and reduce the potential for conflict and game damage incidents. If development of the proposed project were approved, CPW makes the following recommendations based on CPW-documented wildlife habitat and wildlife conflicts in this area:

- 1. Implement a seasonal closure on construction activity and commercial operation from January 1 through July 1 to limit disturbance on wintering and newly born wildlife.
- 2. Require the use of bear resistant / bear proof trash cans and trash dumpsters for storage and disposal of waste on the property.
- 3. Prohibit bird feeders on the property between April 1st and the Thanksgiving holiday to prevent attracting black bears.
- 4. Prohibit feeding of all other wildlife on the property.
- 5. Prohibit outside composting, except when completely enclosed by electrified fencing.
- 6. Construction of any fencing to be completed in accordance with CPW recommended standards as outlined in the "Fencing With Wildlife in Mind" document https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf
- 7. Install round door knobs on all exterior doors instead of lever style door knobs to help prevent black bears from accessing unlocked doors.

- 8. Install motion sensing exterior lighting to illuminate the area around all exterior doors, garages, and walkways to deter wildlife conflict incidents.
- 9. Plant native vegetation that does not require additional watering, instead of planting non-native ornamental plants and grass lawns that require irrigation and fertilization.
- 10. Fully enclose all crawl spaces and areas under ground level decks to prevent wildlife access.

CPW recognizes that there is important wildlife value in maintaining this parcel of undeveloped land and protecting it from development and regular use by human recreation, which the proposed Shadow Mountain Bike Park development would exaggerate. In an area that is becoming increasingly fragmented by a combination of development, infrastructure, traffic, and growing recreational use of natural landscapes, the Shadow Mountain Parcel in its current undeveloped state provides habitat connectivity and refuge from human interaction that has become difficult for wildlife to find in Jefferson County.

If the timing or scope of this project changes and / or if you have additional questions regarding wildlife concerns for this property, please contact Jake Sonberg, District Wildlife Manager at jacob.sonberg@state.co.us

Sincerely, Mark Lamb Area Wildlife Manager, Area 1

CC: Leslie, Region file, JSonberg, JNicholson, Area file