



## DEVELOPMENT SERVICES Current Planning

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June 26, 2015

Colorado Division of Reclamation, Mining and Safety  
Attn: Michael Cunningham, Environmental Protection Specialist  
1313 Sherman Street, Room 215  
Denver, CO 80203

Dear Michael Cunningham,

Thank you for including the City of Loveland in the review of Notice of 112 Construction Materials Reclamation Permit Amendment Application for Coulson Excavating Company, Inc., Brownwood Pit project. The City's Development Review Team has provided the following comments:

**Planning - Review:** Scott Pearson Complete 06/26/2015

1. The proposed site is within the City of Loveland Growth Management Area (GMA).
2. The development is outside of and not contiguous to city limits.

**Fire:** Carie Dann Complete 06/26/2015  
FIRE CODE REQUIREMENTS

1. The storage or use of any hazardous materials, including but not limited to liquid or gaseous fuels, requires the issuance of a hazmat operational permit by Loveland Fire Rescue Authority.
2. The property address must be displayed on permanent signage, at the drive(s) providing access to the site. Minimum numeral height on the sign is 6 inches in height, 0.5-inch stroke width.

**Parks and Rec:** Bill Wildenberg Complete 06/24/2015  
No Corrections.

CONDITIONS

1. This property contains the entire Natural Area Site #146 and portions of Natural Area Site #17, #19, #22, and #147 along the Big Thompson River corridor, as identified in the Natural Areas Sites report (2008).
  - Natural Area Site #17 is part of the Simpson Ponds State Wildlife Area.
  - Natural Area Site #19 contains diverse habitat along the Big Thompson River that is important to waterfowl, aquatic insects, and fish.

- Natural Area Site #22 contains emergent wetlands and four open water areas. This site functions as part of the Big Thompson corridor and provides a buffer to the river, which is narrow in this location.
- Natural Area Site #146 has a high rating for enhancement potential because of the woody vegetation, existing pond with shoreline wetlands, and adjacency with Simpson Ponds State Wildlife Area.
- Natural Area Site #147 is a large site containing a diversity of habitat types. The far west end of the natural area lies within the project site and consists entirely of a former gravel mine pit. Reclamation of this area as uplands or a pond would improve its natural areas potential.
- Detailed maps, ratings, and descriptions of each natural area site are available in the Natural Areas Sites report: <http://www.cityofloveland.org/index.aspx?page=1413>
- A. An Environmentally Sensitive Areas Report (ESAR) should be required to reevaluate the Natural Areas; which shall include but not be limited to: the extents of the natural area sites and overall habitat rating based on current conditions, proposed impacts of the proposed development, and mitigation measures for any impacts:  
<http://www.cityofloveland.org/modules/ESAR>
- B. This property contains wetlands identified on the Larimer County Wetland Inventory. As the wetland boundaries change over time, the inventory is a diagrammatic representation. As a condition of development, a survey of the actual wetland boundaries (wetland delineation) shall be completed and shown on any submitted plans.
- C. The Parks and Recreation Master Plan (2014) recommends a 50-foot setback from Natural Areas, which shall include the identified Natural Areas Sites with an overall habitat rating of 6 and above, natural drainage channels, streams and rivers, wetlands, and the floodway. This setback would maintain the wildlife movement corridor as well as protect water quality in the drainage and adjacent wetlands. As a condition of development, a 50-foot setback (that extends from identified Natural Areas Sites, wetlands, existing ponds, and the floodway to developed areas and impervious surfaces) shall be shown on any submitted plans.
- D. As a condition of development, non-native weedy vegetation shall be removed from Natural Areas per the Parks and Recreation Master Plan (2014).  
<http://www.cityofloveland.org/modules/showdocument.aspx?documentid=19612>
- E. As a condition of development, the enhancement recommendations noted in the Natural Areas Sites report (2008) shall be implemented:
  - Site 17: "The creation of additional wetlands, the planting of additional native trees and shrubs and the control of Russian olive trees would greatly improve the overall wildlife value of the site."
  - Site 19: "In areas where ponds are lacking, the riparian zone should be expanded where possible by planting additional trees and shrubs. Russian olive trees should be eradicated and their reintroduction prohibited."
  - Site 22: "The ponds have high potential for additional wetland creation. Emergent wetland vegetation should be established wherever possible. Adjacent uplands should be planted with native grasses and forbs. The island should be planted with native shrubs and herbaceous species to encourage duck nesting but discourage goose nesting."
  - Site 146: "Plantings of upland woody species in the grassland habitat areas would create additional habitat diversity in the upland areas."
  - Site 147: "Enhancement potential for the entire site except for the abandoned gravel mine pit was rated as high. Because of the proximity of the upland grassland, wetland grassland, and

hayfield habitats to the Big Thompson River corridor, there is a relatively high potential for creating a diversity of open wetland and upland grassland habitats intermixed with riparian habitat along the Big Thompson River. The overall diversity and structure of herbaceous upland and wetland vegetation should improve considerably over time with the removal of livestock grazing. Plantings of upland and wetland woody species in the open grassland areas would further enhance habitat diversity.”

2. Any wetland or drainage crossings shall encourage wildlife movement beneath the crossing structure(s). If bridge abutments are proposed, they shall be located outside the wetland / drainage area. If culverts are proposed, they shall be partially buried or have an open bottom (such as an arched water crossing) to encourage wildlife movement beneath the structure.

**Water/Wastewater, PW-Stormwater, Power, Transportation:**

No Comments.

Sincerely,

Scott Pearson  
Planning Technician  
City of Loveland  
[Scott.Pearson@cityofloveland.org](mailto:Scott.Pearson@cityofloveland.org)