



COLORADO

Parks and Wildlife

Department of Natural Resources

Southeast Region, Area 14
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5223

February 20, 2018

Tim Crazier
Colorado Division of Reclamation, Mining and Safety
Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Gaede Pit Expansion in Lincoln County, CO

Colorado Parks and Wildlife (CPW) has received the request for information regarding the mineral development in Lincoln County and the Gaede Pit Expansion project. Information associated with the application packet provided a brief description of the reclamation and wildlife information. CPW staff is familiar with the proposed location of the project as well as the area surrounding the site and have prepared a list of potential impacts to local wildlife and recommendations to avoid, minimize, and mitigate those impacts.

The proposed area of mineral development is characterized by short grass prairie. Native short grass prairies are highly valued for their ability to support obligate species. In Lincoln County, native short grass prairies are critical habitat for a high proportion of the county's wildlife species including Burrowing Owl, Black-tailed prairie dog, Ferruginous Hawk, Swainson's Hawk, Prairie Falcon, Golden Eagle, Swift Fox, and Pronghorn. It would be very important that any disturbed soil in this area be replanted in native grasses as soon as possible to minimize loss of top soil and the introduction of invasive noxious weeds.

Impacts to wildlife from the proposed mineral development are likely to be temporary in nature and highest during the time of disturbance. To further reduce the impacts to wildlife and the extent of exposed soils we recommend phased mining in small increments and reclaiming the site before moving to a new area. We recommend reclaiming the site for native prairie species including pronghorn antelope and scaled quail. We recommend including the use of a native, short grass prairie seed mix with some added shrubs for cover. Species associated with short grass prairie include but are not limited to; blue grama, side oats grama, buffalo grass, sand dropseed, little bluestem, scarlet globemallow, leadplant, and sand sage. We suggest working with local USDA Natural Resource Conservation Service professionals for final approval on seed mix and recommendations for application. Finally, disturbance of the existing vegetation resulting from mineral development could lead to the establishment of



noxious weeds. The Division recommends implementation of a weed control plan to reduce the potential for infestation and impacts to surrounding habitats.

Also of importance are revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. CPW prefers that native vegetation be retained on site during the operational lifespan of the project, both as habitat for wildlife and to ensure successful reclamation of the project area. Proper reclamation, from a wildlife perspective, involves not only stabilizing the soil and establishing ground cover, but fostering plant communities with a diversity of species and plant types -grasses, woody plants, and broadleaf forbs- which will fully serve the nutritional needs of wildlife. Strict adherence to the Natural Resources Conservation Service's recommendations is advised. CPW would appreciate the opportunity to review the project's Reclamation and Noxious Weed Management Plans prior to implementation.

CPW appreciates this opportunity to review the proposed Gaede Pit expansion development project. If you have any questions regarding this letter, please contact District Wildlife Manager Logan Wilkins at 719-740-1521 or via email at logan.wilkins@state.co.us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank McGee".

Frank McGee
Area Wildlife Manager