



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Area 15 Office
151 East 16th Street
Durango, CO 81301
P 970.247.0855 | F 972.382.6672

June 11, 2018

Lucas J. West
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
1313 Sherman St. Room 215
Denver, CO 80203

RE: Notice of 112 Construction Materials Reclamation Permit Amendment Application
Consideration
C&J Gravel Products, Inc., Montoya Pit, Permit No. M-1980-146-AM05

Dear Mr. West,

Thank you for the opportunity to provide comments for the Notice of 112 Construction Materials Reclamation Permit Amendment Application Consideration for C&J Gravel Products, Inc., Montoya Pit, Permit No. M-1980-146-AM05.

The mission of Colorado Parks and Wildlife (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.

In our initial comment letter to the BLM regarding the Montoya Gravel pit expansion, CPW identified concerns over the cumulative effects of ongoing fragmentation of severe winter range and winter concentration area habitat types in the Grandview Mesa Area (see attachment 1). CPW also has concerns with the post-mining land use of the site. Therefore, given the habitat importance of this area, CPW would like to see full vegetative reclamation to pre-mining conditions (including species composition) and use. CPW also has concerns with the proposed changes to the post-mining land use at the existing pit including a 'bike skills park' and potentially a parking lot. CPW would prefer the post-reclamation land use include no additional human impacts to the area.

Thank you again for the opportunity to provide comments on the Notice of 112 Construction Materials Reclamation Permit Amendment Application Consideration for C&J Gravel Products, Inc., Montoya Pit, Permit No. M-1980-146-AM05. If you have any further questions please contact Brandon Dye at (970) 799-0846.



Sincerely,

A handwritten signature in black ink, appearing to be 'B. Dye', written over a horizontal line. To the right of the signature, the number '#141' is handwritten.

Brandon Dye
Acting Area Wildlife Manager
Area 15-Durango

CC: SWR, Magee, Weinmeister, Area File



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Durango Area Office
151 E. 16th St.
Durango, CO 81301
P 970.247.0855

January 11, 2018

Ms. Connie Clementson – Field Office Manager
BLM Tres Rios Field Office
161 Burnett Drive #4
Durango, CO 81301
blm_co_montoya_pit_expansion@blm.gov

Re: DOI-BLM-CO-S010_2017-0019-EA-Montoya Gravel Pit Expansion Preliminary Environmental Assessment

Dear Ms. Clementson,

Thank you for the opportunity to provide comments for the BLM's Preliminary Environmental Assessment (EA) analyzing the proposed expansion on the Montoya gravel pit (operated by C&J Gravel). The proposed expansion would allow the continued mining on BLM administered lands by extending the existing 60 acre area of the pit an additional 46 acres over the next 9 to 19 years. This expansion would increase the total size of the gravel pit to 131 acres, including the 25 acres that exist on private land.

The mission of Colorado Parks and Wildlife (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.

In our initial scoping comment letter, CPW identified concerns over the cumulative effects of ongoing fragmentation of severe winter range and winter concentration area habitat types in the Grandview Mesa Area. We appreciate BLM's commitment to offset the lost habitat associated with the proposed project within the Grandview Area.

CPW does have concerns with the impact analysis, post-mining land use of the site, and failure to adequately address the loss of habitat connectivity. The preliminary EA evaluates the percentage of habitat impacted by the pit expansion in comparison to the entire DAU. While this percentage is accurate, it is not representative of the magnitude of impact within the project area. The loss of this habitat in the project area is more significant because the area around it has already been lost to development. The remaining relatively small undisturbed acreages containing suitable hiding cover and forage, pockets of winter range, are all that remain in the San Juan Basin on both public and private lands. We agree, in a relatively un-fragmented landscape, reduced habitat effectiveness is appropriately summarized in Table 3-4. However, to suggest that these remaining pockets of winter range in the San Juan Basin don't have high value for big game is incorrect. Monitoring data suggest these areas are heavily used in the winter by big game and are still incredibly valuable for the population of mule deer and elk that winter in the San Juan Basin. The literature documents that reduced habitat effectiveness actually makes these animal's reproductive success more susceptible to additional disturbance and



habitat loss – leading to reduced survival and recruitment in the population. CPW agrees that there is reduced habitat effectiveness on the project lands from a variety of uses, but the fact is there are significant numbers of migratory big game animals that continue to use that area. Unmitigated additional cumulative habitat loss to this population will eventually affect the deer and elk populations and negatively impact hunting opportunity.

The EA concludes that after post reclamation there would be no permanent loss of big game winter habitat (pg 28). We are concerned with the proposed changes to the post-mining land use at the existing pit including a 'bike skills park' (pg.3) and potentially a parking lot. Given the undisclosed future management of additional bike trails and parking lot, it is uncertain if the conditions necessary for post mining reclamation habitat use by wildlife can be achieved. We recommend clarifying seasonal use restrictions and facility densities for post mining reclamation to restore suitable wintering wildlife habitats.

The EA does not recognize the importance of big game migration in the Grandview Area and does not discuss CDOT's foreseeable future planned installation of the Wilson Gulch big game underpass directly adjacent to the project area. This underpass is part of a series of underpasses that were carefully planned with CDOT along both the US160 and US550 corridors to maintain big game daily and seasonal movements. We anticipate the expansion of the pit is likely to render CDOT's Wilson Gulch big game underpass ineffective - causing migratory impacts to mule deer and elk. This is a significant undisclosed and unmitigated issue in the EA, and may affect the local populations of big game well beyond the proposed projects footprint.

CPW recommends a definitive habitat mitigation strategy near the project area to offset the habitat loss and partnering with CDOT and CPW to identify and fund other mitigation opportunities that address the loss of habitat connectivity for big game.

Thank you again for the opportunity to provide preliminary EA comments on the proposed expansion of the Montoya gravel pit. While CPW does not see this project as a benefit to wildlife, we would very much like to work with the BLM and C&J Gravel to develop alternatives and strategies for mitigating the impacts of this expansion and promoting better resource stewardship to benefit wildlife. If you have any further questions please contact District Wildlife Manager Brandon Dye at (970) 799-0846.

Sincerely,

M.R. Thorpe #997

Matt Thorpe
Durango Area Wildlife Manager

CC: SWR, Magee, Weinmeister, Area File, Mark Lawler, CDOT