



Robinson Sons Gravel response

Furton - DNR, Bonnie <bonnie.furton@state.co.us>
To: Amy Eschberger - DNR <amy.eschberger@state.co.us>

Thu, Nov 8, 2018 at 9:20 AM

Good morning,

Attached please find our response letter to the Robinson Sons Gravel Pit, Permit M-2008-076-AM01. The original letter will be in the mail today.

Should you have any questions or concerns please do not hesitate to contact us.

Thank you,

Bonnie Furton
CSR/Administrative Assistant III
Pueblo Office - Area 11



COLORADO
Parks and Wildlife

Department of Natural Resources

P 719-561-5302 | F 719-561-5321
600 Pueblo Reservoir Road, Pueblo, CO 81005
bonnie.furton@state.co.us | www.cpw.state.co.us



Robinson Gravel pit response.pdf

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November 8, 2019

Amy Eschberger
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Amy Eschberger,

Thank you for the opportunity to comment on the proposal from Robinson Sons Gravel Pit No. 1, Permit No. M-2008-076-AM01. This permit is an amendment to expand the permit boundary significantly from 78 permitted acres to 180.6 acres which is an acceptable revision pending appropriate reclamation procedure. Robinson Sons propose to have up to 25 acres disturbed at any one time which include haul roads acreage.

Reclamation will start when mining is complete in an area as they move to a new area of disturbance. This strategy reflects Colorado Parks and Wildlife recommendations of segmented or phased mining strategies and CPW appreciates that consideration. If reclamation is properly allocated and successfully completed this will be a valid and conscientious approach to reclamation. However, we must stress that reclamation be completed prior to moving to new sites to avoid inadequate efforts to salvage habitat loss. Smaller acreages impacted would be our preference to avoid large scale, long term habitat degradation.

Review of Exhibit H WILDLIFE INFORMATION (page 27) Although mule deer are a definite species of concern on the property, others listed are scaled quail and pronghorn antelope which are species of concern. Elk, black bear, mountain lion and Merriam turkey occur on the property in various numbers dictated by human and habitat disturbance, food source, weather (winter range) etc. This noted, employees and contractors should be cognizant of wildlife on the property and familiarize themselves with conflict avoidance. CPW website provides a myriad of educational materials on avoiding wildlife conflict and can be found at Colorado Parks and Wildlife (CPW) at www.cpw.state.co.us/.

Additionally, Exhibit H WILDLIFE INFORMATION describes no fishery on site which is indeed correct. However, the impact zone is immediately adjacent to the Purgatoire River which is a viable brown trout fishery. Extreme caution needs to be exercised in regard to potential spills, equipment/vehicle accidents or siltation which might develop at the site and negatively

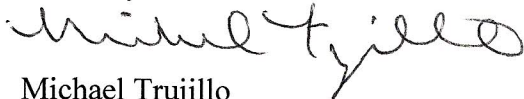


impact the Purgatoire River or Wet Canyon. Wet Canyon discharges in to the Purgatoire River and is the source of vehicular access to the mining area.

As to Seasonal Use listed on Page 27 in Exhibit H WILDLIFE INFORMATION, please review maps and information which can be found on our web page at cpw.state.co.us. Please feel free to contact our local District Wildlife Manager, BOB HOLDER #754 @ 719-680-1410 or bob.holder@state.co.us should you experience on site wildlife issues, conflicts or questions.

Again, Thank You, for your request and if CPW staff can be of any assistance do not hesitate to contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Trujillo", written in a cursive style.

Michael Trujillo
Area Wildlife Manager – Area 11
600 Reservoir Road
Pueblo, CO 81005
(719) 561-5303