



COLORADO

Parks and Wildlife

Department of Natural Resources

Northwest Region Office
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Received Via Email 10/07/2020
GJFO DRMS

Colorado Division of Reclamation, Mining and Safety

10/07/2020

Attention: Ms. Amy Yeldell
1313 Sherman Street, Room 215
Denver, CO 80203

Dear Ms. Yeldell.

Thanks for opening up the 23.25 Road permit application (M 2020035) so I could access it. I have looked at the area from 23.25 Road. The habitat in its current state is a dry upland site. Cottonwood trees are perhaps the most significant wildlife habitat feature. A grove of trees is located in the southwest portion of the property near 39.09205, -108.62454. Three mature cottonwoods, one with a large raptor nest, occur near 39.09247, -108.62252. A group of young cottonwoods occur along 23.25 road near 39.09185, -108.62228. All of these treed areas were heavily utilized by mourning doves when I visited the site this week. The parcel also contains a very large grove of elm trees that surround the existing structures of the site. Although not native, the elm trees do provide foraging and nesting habitat for a variety of songbirds.

Protection of the existing cottonwood trees on site would limit the impact of this mining operation on wildlife. Especially important would be saving the grove of trees in the southwest corner and the group of trees containing the raptor nest. A ground survey of wildlife utilizing the property prior to a final decision on the proposal is recommended to identify the species of raptors utilizing the site and the status of the nest. This is especially important, as the property is within occupied range of the bald eagle. There are a number of local consultants that could do that work. Colorado Parks & Wildlife has recommended guidelines on raptor nest buffer zones and seasonal timing restrictions that I can provide.

The mining plan will incorporate dewatering, with groundwater being routed to the Colorado River via the Wilsea Drain. The CPW is concerned about the proliferation of non-native fishes in ponds near the Colorado River, and the potential for those fish to enter the river to the detriment of native species. We recommend screening of discharge structures to prevent movement of non-native fish to the river.

The reclamation plan would benefit greatly from incorporation of trees, shrubs, forbs, and native grasses into the revegetation mix. Cottonwood, skunkbush sumac, and 4-wing saltbush would be desirable trees and shrubs that are adapted to the site. Cicer milkvetch is a recommended forb. Inland salt grass, Indian ricegrass and needle-and-thread grass would do well at this location. Cottonwood trees on site should be inventoried, and any trees removed during the mining process should be replaced upon completion of mining activities.

Don't hesitate to contact me if you would like to discuss this project in further depth.



Sincerely,

A handwritten signature in black ink, appearing to read "Paul Creeden". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Paul Creeden
Fruita District Wildlife Manager Area7
Northwest Region
(970) 250-4501



