



COLORADO

Parks and Wildlife

Department of Natural Resources

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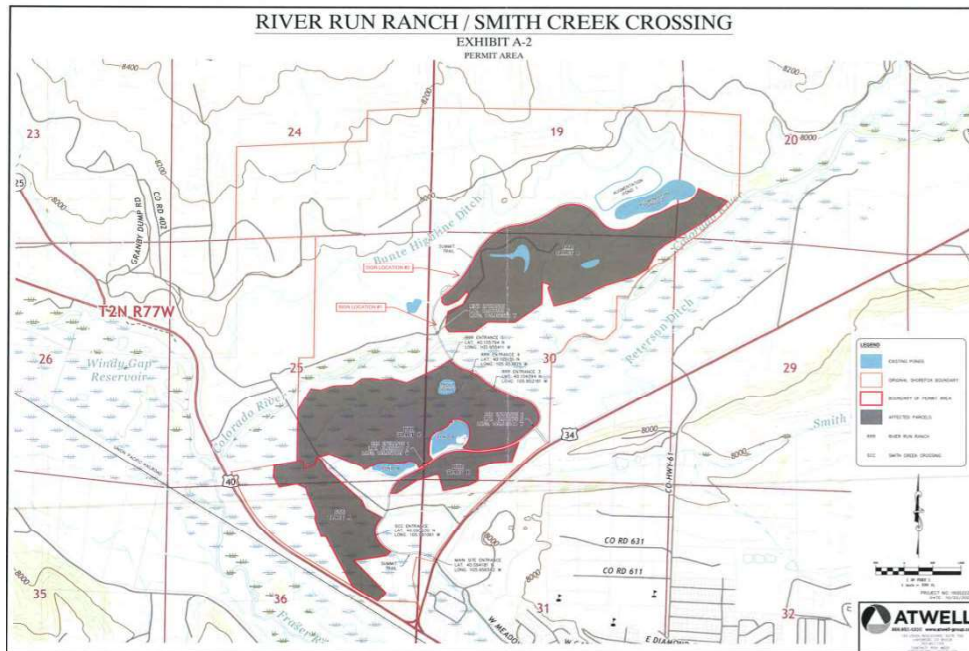
RE: Sun River Run Ranch RV LLC Reclamation Permit Application File No. M-2021-001

Thank you for the opportunity to comment on the proposed 426.5-acre surface mining and reclamation operation at River Run Ranch Gravel Mining Permit from Sun River Run Ranch RV LLC located on the northwest corner of Highway 40 and Highway 34, in the Town of Granby, Grand County, Colorado.

The Mission of Colorado Parks and Wildlife (CPW) is to perpetuate the wildlife resource 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.

CPW understands the proposed permit application is for 426.5-acres of surface mining and reclamation with two boundary areas at River Run Ranch (see map below). The area has been negatively impacted by past and current development; however, the property northwest of the Colorado River currently functions as important winter and severe winter range for deer and elk, and quality summer range for pronghorn antelope. CPW continues to express concern for the negative impacts the development in this area (particularly north of and including the Colorado River) will have on greater sage-grouse as the property is near the only known active sage-grouse lek in Grand County east of Hot Sulphur Springs.





Wetland and Riparian Habitat:

The Colorado River currently provide important wildlife habitat and watchable wildlife opportunities to the community of Granby.

Wetlands and riparian areas represent only about 2% of the land area in Colorado. The Colorado River and associated riparian areas are some of the most highly productive and valued wildlife habitats in Colorado and provide essential movement corridors for many of Colorado's avian, mammalian and aquatic species.

Wetland buffers are essential for wetland protection. As buffer width increases, the effectiveness of the buffer will increase and direct human impacts will decrease. Wetland and river buffers should be evaluated further to insure that affective buffers are in place to provide valuable wildlife habitat and protection of the existing wetland and riparian system. For wetland-dependent wildlife, buffers need to retain plant structure for a minimum of 200 to 300-feet beyond the wetland (Castelle, et al 1992). Scientific literature indicates that buffers from 50 to 150-feet are necessary to protect wetlands from direct human disturbance in the form of human encroachment (Castelle, et al 1992).

If reclamation includes ponds, CPW recommends ponds be constructed to have irregular shorelines, and contain one or two islands of at least 15' x 25' in size per 2 surface acres. Shorelines and island slopes should be 4H:1V, with some area having slopes no steeper than 8H:1V. Such shallow areas will allow for establishment of a variety of types of aquatic vegetation and invertebrate prey for waterfowl. Such a shoreline coupled with a planting of variety of wetland plant species will allow for a variation in wetlands to be established which will have long term benefits to wildlife.

Elk, Deer, Pronghorn:

The River Run Ranch was documented winter range for mule deer and an elk winter concentration area. The possibility of increased fragmentation and disturbance on big game winter range would negatively affect big game that rely heavily on the open space north of the Colorado River at River Run.

CPW recommends at least a 300-foot buffer from the Colorado River riparian area to provide for less disturbed movement on elk and deer.

Vehicles associated with the proposed gravel operation are recommended to travel south through River Run, an already established road system. The creation of more roads or increased use of current roads north into the property owned by the Town of Granby would cause further disturbance to the critical big game winter range and nearby greater sage-grouse leks. Efforts should be made to protect big game winter range by limiting accesses north of the Colorado River during winter months from December 1st until April 30th of each year to allow deer and elk to winter on the property with minimal disturbance.

Greater Sage-Grouse

One active greater sage-grouse lek is located within a 1-mile radius of areas of the proposed gravel mine. In accordance with CPW recommendations to avoid and minimize impact to greater sage-grouse from land use development in Colorado, a year round 1 mile buffer from the active lek site is recommended. At a minimum, to minimize the impacts to wintering wildlife and breeding sage-grouse (specifically northwest of the Colorado River), a seasonal restriction of mining operations should be observed from December 1st - April 30th and to limit operation that results in noise from March 1st - June 30th between house of 9am and 4pm. CPW recommends decibel levels do not exceed 49dB as measured from the source.

Avian Species:

Raptors and other migratory birds are protected from take, harassment, and nest disruption at both the state and federal levels. CPW recommends that a nest survey be performed in each project area (half mile radius) no later than two weeks prior to initiating construction for each project to identify potential raptor and songbird nests, raptor perching and foraging areas, and winter roosting areas.

For furtherer information on ways to minimize impacts to raptors and migratory birds, please contact your local District Wildlife Manager. Following CPW recommendations will decrease the likelihood of the unintentional take of nesting migratory birds through likely disturbance from construction and recreational activities.

Non-native Plants and Weed:

CPW recommends consideration be made for using principles of an integrated weed management plan, which Grand County may already have in place, to control and eliminate the spread of any noxious weeds in and around the area. The spread and control of noxious weeds in the area is a concern for wildlife in the immediate and surrounding area. Invasive

plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them.

Fencing:

CPW recommends fences no longer needed or in use should be removed. Detailed specifications for wildlife-friendly fencing can be found on our website at:

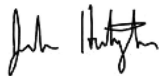
<https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf>

Lighting and Noise:

To minimize disturbance of birds and other nocturnal wildlife, CPW recommends all lighting near the Colorado River be motion-sensitive, down shielded, and of a minimum intensity to reduce constant nighttime illumination of movement corridors. Noise should be regulated during the evening and early morning hours to minimize disturbance to wildlife.

Thank you again for the opportunity to comment on the proposed River Run Ranch Gravel Mining permit. CPW and your local District Wildlife Manager look forward to working together through cooperation, conversations and education to maximize wildlife values in the Granby Community. If you have any further questions, please contact District Wildlife Manager Serena Rocksund at (970) 531-2396 or email at serena.rocksund@state.co.us.

Sincerely,



Jeromy Huntington
Area Wildlife Manager

CC: JT Romatzke, Northwest Regional Manager
Elissa Slezak, NW Region Land Use Specialist
Serena Rocksund, District Wildlife Manager
Bryan Lamont, Area Wildlife Biologist
Michelle Cowardin, Area Wildlife Biologist