



COLORADO

Parks and Wildlife

Department of Natural Resources

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**DIVISION OF RECLAMATION
MINING AND SAFETY**

December 20, 2021

Lucas J. West
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203
(303) 866-3567

**RE: Consideration of 112c Construction Materials Reclamation Permit Application
Oakbrush Hill Gravel, File No. M-2021-064**

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and provide comments on the proposed surface mine and reclamation project in the area of Oak Brush Hill in Archuleta County, CO. The project will be operated by C & J Gravel Products, Inc on property owned by Silesia Property LP (Dutton Ranch). The project proposes to operate a surface mine, utilizing sand, gravel, and substrate for construction materials on a 163.2-acre parcel over the course of an estimated 20 years.

The project area lies within previously disturbed areas (mining) as well as undisturbed areas dominated by ponderosa pine and Gambel oak. Numerous wildlife species utilize the proposed project area and its direct surrounding habitats, including big game species such as deer and elk; small game species such as turkey and coyote; waterfowl; and non-game species such as small mammals, songbirds and raptors. CPW offers these comments regarding potential conflicts with wildlife in the area of the proposed project.

Big Game:

The proposed project area is utilized for cover, forage and travel by a number of big game species, including elk, mule deer, bear and mountain lion. The project area is located within elk winter range and is adjacent to (within 1-2 miles) an elk winter concentration area and an elk migration corridor. For detailed information on these areas of concern, please contact CPW or visit cpw.state.co.us/maps for various ways to access species activity map data. Mining activities may have impacts on the concentrations of these species and may increase conflicts with surrounding private lands. In order to reduce conflicts with the numerous big game species found in the area, it is recommended that as much standing vegetation as possible be preserved. In regards to post-mining reclamation, though intended for livestock grazing at the landowner's request as stated in the application, CPW recommends incorporating a variety of re-vegetation including native shrubs and forbs rather than non-native grasses to enhance wildlife cover and forage. In regards to any potential fencing during the project and post-mining reclamation, CPW recommends use of wildlife-friendly fencing designs to reduce injury to wildlife and to reduce fence maintenance.



Small Game and Non-Game Wildlife:

The project area is also home to numerous small-game and non-game wildlife. Notably, Merriams turkey, Abert's squirrel, and coyote commonly utilize the area throughout the year. In order to sustain the habitat for small-game and non-game species, it is recommended that as much standing vegetation as possible be preserved.

Non-native/Invasive Weeds:

One of the most visible and immediate threats to ecosystem health in the area is non-native/invasive weeds. Invasive weeds typically flourish following surface disturbance, and active weed management should be incorporated during and after the lifespan of the proposed project. In regards to post-mining reclamation, native drought-tolerant revegetation is recommended.

Thank you for the opportunity to comment on this proposed project. If you have any questions concerning these comments, please feel free to contact Pagosa Springs-West District Wildlife Manager Nate Martinez at 970-799-0842 or nate.martinez@state.co.us.

Sincerely,



Adrian Archuleta
Area Wildlife Manager- Durango, CO

Cc: SW Region File; Area 15 File; DWM Nate Martinez