



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

January 11, 2022

Cesar Valenzuela  
C & J Gravel Products, Inc.  
27661 Highway 160-E  
Durango, CO 81301

***RE: Oakbrush Hill Gravel, File No.M-2021-064, Contruction Material Regular (112) Operation  
Reclamation Permit Application, Comments Received***

Dear Mr. Valenzuela:

To date the Division of Reclamation, Mining and Safety (Division) has received two timely agency comments (Copies enclosed) to the above listed application from Colorado Parks and Wildlife, Office of the State Engineer and the State Historic Preservation Office. Please address and respond to the recommendations contained within these comments. Please send your response to the Division separate from any other correspondence.

If you have any questions, concerns or require additional information please feel free to contact me at the Division's Grand Junction Field Office, by phone at (303)-866-3567 Ext. 8187 or by email at [lucas.west@state.co.us](mailto:lucas.west@state.co.us).

Sincerely,

**Lucas West**  
Environmental Protection Specialist  
Division of Reclamation, Mining and Safety

Enclosure:      Comment letter, Colorado Parks and Wildlife December 27, 2021  
                      Comment Letter, Colorado State Historic Preservation Office December 14, 2021

Cc:                Travis Marshall, Senior Environmental Protection Specialist

Ec:                Nathan Barton, Wasteline, Inc.





## **COLORADO**

### **Parks and Wildlife**

Department of Natural Resources

Durango Service Center  
151 East 16<sup>th</sup> Street  
Durango, CO 81301  
P 970.247.0855 | F 970.382.6672

**RECEIVED**

**DEC 27 2021**

**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](http://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](mailto:nate.martinez@state.co.us).

Sincerely,



Adrian Archuleta  
Area Wildlife Manager- Durango, CO

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



# History Colorado

Lucas West  
Division of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215  
Denver, Colorado 80203

Re: OakBrush Hill Gravel, File No. M-2021-064 (HC# 80730)

Dear Mr. West:

We received your letter dated December 01, 2021 initiating consultation with our office on the subject action pursuant to the Colorado State Register Act – Colorado Revised Statute (CRS) 24-80.1 et. seq.

A search of our database indicates that four historic sites (5AA.2433, 5AA.2434, 5AA.2624, and 5AA.4179), are located within or adjacent to the permit area. Site 5AA.4179, the Forest Service Job Corps site, officially needs data in order to determine its eligibility for listing on the National Register of History Places (NRHP). The other three sites have been determined not eligible for listing on the NRHP. As there are no properties of historical significance included or nominated for inclusion in the state register within the proposed permit area, a finding of no adverse effect is appropriate.

As most of Colorado has not been inventoried for cultural resources, our files contain incomplete information. Consequently, there is the possibility that as yet unidentified cultural resources exist within the proposed permit area. The requirements under CRS 24-80 part 13 apply and must be followed if human remains are discovered during ground disturbing activities.

We thank you for the opportunity to comment. If we may be of further assistance, please contact Holly McKee-Huth, Cultural Resource Information/Section 106 Compliance at (303) 866-4670/[holly.mckee@state.co.us](mailto:holly.mckee@state.co.us).

Sincerely,

Steve Turner, AIA  
State Historic Preservation Officer