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MAY 29 2022

DIVISION OF RECLAMATION
MINING AND SAFETY

May 29, 2022

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

RE: South Hinsdale Gravel Pit, File No. M-2022-018

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and provide comments on the proposed surface gravel mining and reclamation project in Hinsdale County, CO. The project proposes to establish and operate a 9.4-acre sand and gravel mine on and adjacent to irrigated pastureland above the Piedra River at South Hinsdale Sand & Gravel, LLC, whose physical address is 101 Kleckner Lane. 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 forage and travel by a number of big game species, including elk and mule deer. Mining activities may have impacts on the concentrations of these species and may increase conflicts with surrounding private lands. The project area is located within or adjacent to summer range, winter range, and migratory pathways for these species. The project is within a mapped elk winter concentration area. In order to protect wintering elk during this vulnerable period, CPW recommends no permitted or authorized human activity from December 1st to April 30th, annually. For detailed information on these areas of concern, please contact CPW or visit <a href="mailto:cpw.state.co.us/maps">cpw.state.co.us/maps</a> for various ways to access species activity map data. In regards to any potential fencing during the project and post-mining reclamation, CPW recommends the use of wildlife-friendly fencing designs to reduce injury to wildlife and to reduce fence maintenance. CPWs "Fencing with Wildlife in Mind" informational PDF can be found on <a href="mailto:cpw.state.co.us">cpw.state.co.us</a>.

## **Aquatic Species:**

The project area lies within close proximity to and is within a tributary of the Piedra River. This portion of the Piedra River is classified as a Sportfish Management Water and has special fishing regulations in place downstream from the Piedra River Bridge on nearby US Forest Service Road 631 (Piedra Road) to protect fish populations and enhance public fishing opportunities for species including rainbow, brown, cutthroat and brook trout. CPW recommends no ground disturbance year-round within 500 feet of the ordinary high water



mark. River otter, a State listed Threatened species, is also found in the Piedra River and its tributaries. CPW's primary concern regarding aquatic species is to maintain water quality by limiting erosion and sedimentation into streams.

## 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 me at 970-799-0842 or nate.martinez@state.co.us.

Sincerely,

Nate Martinez

Note Motor

District Wildlife Manager- Pagosa Springs, CO

Cc: SW Region File; Area 15 File; AWM Adrian Archuleta