

THINK SAFETY FIRST!

(*Upcoming days off: June 21-July 1)

The mission of Colorado Parks and Wildlife (CPW) is to perpetuate the wildlife resources 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 has a statutory responsibility to manage all wildlife species in Colorado; as such we encourage protection for Colorado's wildlife species and habitats through responsible development and land use planning.

With regards to the proposed Two Rivers Sand, Gravel and Reservoir Project (DRMS File No. M-2022-013), CPW has two main species of concern and their associated High Priority Habitats (HPHs):

- 1) Mule deer - specifically their severe winter range and migration corridors.
- 2) Aquatic native species.

The protection of HPHs is of extreme importance to CPW. HPHs are a subset of CPW's Species Activity Maps that we collect and regularly update for a variety of species and their particular habitats. We provide these maps to the public and regulatory agencies for the environmental assessment and land use commenting on a proposed development on a given parcel, and for general scientific research.

CPW recommends that all proposed projects be assessed to avoid, minimize, and/or mitigate impacts on sensitive wildlife species and their habitats. Our goal in responding to land use proposals, such as this project, is to provide complete, consistent, and timely information to all entities who request comments on matters within our statutory authority. CPW particularly examines the temporary and permanent surface occupancy (e.g., habitat loss) of a given project, as well as the expected increase in human activity (e.g., construction workers, maintenance workers, etc.).

Recommendations

- Mule Deer
 - *Severe Winter Range Habitat.* To demonstrate avoidance, CPW requests that this construction begins outside the mule deer wintering season (Dec. 1 to April 30). Recommended minimization measures would include minimizing the amount of fencing required, and using four-strand smooth wire [wildlife-friendly fencing](#) where appropriate.
 - *Migration Corridors.* Fencing is very important as the development and other adjacent developments abut both sites of the major movement corridor for deer. Besides the use of wildlife-friendly fencing, the developer should examine and implement ways to encourage the facilitation of spring and fall migrations and as a daily movement corridor for mule deer for the life of this mine and beyond. Some ideas could include a conservation easement, removing existing but unnecessary fences that bisect the riparian area and restrict mule deer north-south migrations, new shrub/tree plantings, noxious weed management, planting CPW's mule deer seed mix, and/or other creative ideas that the applicant can come with.
- Aquatic native species. To demonstrate avoidance, CPW requests that construction stays outside the 500-ft buffer from the river's ordinary high water mark. Recommended minimization measures would be to employ stormwater BMPs to protect eastern plains minnows from sedimentation.
- Revegetation. Also of importance to CPW is the revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. CPW prefers that native vegetation be retained on-site during the operational lifespan of the project, both as potential habitat for wildlife and to ensure successful reclamation of the project area, as noxious weeds could spread to adjacent habitats outside the project area.

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Mon, Jun 13, 2022 at 10:51 AM

To: "Marette - DNR, Brandon" <brandon.marette@state.co.us>

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Thanks, Brandon.

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Hi Rob and Michael C.

Can we also add to our comments the following regarding wildlife escape ramps and retention ponds/lakes. I know we are late in getting our comments to you. I spoke with the landowner/applicant about this project prior to the submission of his application. That landowner/applicant has since sold his business (Varra Companies Inc.). I was told he (applicant) will stay with the new owner for another year for transition purposes. This project is large in scale, it has a long life expectancy for a mining operation, and the project is located near the confluence of two major river corridors east of the mountain foothills. As a result, the riparian zones (Thompson River and South Platte River) and agricultural fields within and adjacent to this project are important habitat types, nesting areas and transition zones for numerous wildlife species. If possible, it would be appreciated if the applicant was provided a copy of our recommendations. Especially given the fact that the company who will be mining this area has new ownership. The new owner will be the one mitigating these issues long term. We appreciate the opportunity to provide comments, although we are late in doing so. Thank you for your time.

Wildlife Escape Ramps

During open pit or open trench mining operations, CPW recommends backfilling escape ramps in areas where steep slopes occur. Escape ramps will allow wildlife to safely exit an open pit or trench if they become entrapped.

Retention ponds

Ponds or lakes created by reclamation efforts could potentially have significant value to wildlife. To maximize this benefit, CPW recommends that ponds be designed to include irregular shorelines and one or more islands to provide cover, shelter, and nesting areas for migratory birds. Islands should be at least 15' x 25' in size for every two surface acres of water in the pond. Shoreline and island slopes should be graded to a ratio of 4 horizontal feet to every 1 vertical foot of distance, with some areas having slopes no steeper than 8 horizontal feet to every 1 vertical foot of distance. Such shallow areas will allow for the establishment of a variety of aquatic vegetation and invertebrate prey for waterfowl and shorebirds. Shorelines should be re-vegetated with native aquatic vegetation.

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LIVE LIFE
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