



COLORADO

Parks and Wildlife

Department of Natural Resources

Hot Sulphur Springs (Area 9) Service Center
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Hot Sulphur Springs, Colorado 80451
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March 26, 2022

Peter Hays
Environmental Protection Specialist
Division of Reclamation, Mining, and Safety
1313 Sherman St. Room #215
Denver, CO 80203

Re: Flintstone Gravel & Trucking, Inc., Pickering Family Pit, File No M-2009-086 Amendment Application (AM-1) to add 16.84 acres to the existing 19.90-acre site for a total permit area of 36.74 acres.

Dear Mr. Hays,

Thank you for the opportunity to provide comments on the proposed Amendment Application from Flintstone Gravel & Trucking, Inc. for the Pickering Family Pit, File No. M-2009-086. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced and fulfilled through CPW's mission to perpetuate the wildlife resources of Colorado and provide sustainable outdoor recreation opportunities that educate and inspire future generations. CPW fulfills this mission by responding to requests for comments on wildlife impact reports, land use proposals, and consultations through public-private partnerships.

Flintstone Gravel & Trucking Inc. Pickering Family Pit is located approximately ¼ mile north of the Town of Granby and immediately north of the regional airport. The property has an active 19.90-acre gravel operation permitted in 2009 and is requesting an amendment to that permit to expand the boundary to encompass an additional 16.84 resulting in a total permitted area of 36.74 acres.

The additional permitted acreage will expand in all four directions to the property boundaries but will be done in phases beginning with phase III to the east and working counterclockwise around that original permit perimeter known as phase I and phase II. Phase III is slated to begin late in 2022 and continue to 2024, phase IV will begin in 2025 and continue to 2028, phase V will begin in 2029 and continue to 2031, phase VI will begin in 2032 and continue to 2033 and will include a 100-foot setback from a natural ravine that currently exists on the property, and the final phase VII will begin in 2034 and continue until 2036. All phases could go as deep as 55 feet but are expected to be mined dry and avoid the water table.



Operations currently do not and are not expected to use or encounter explosives, lights for night operations, incidental products, or acid-producing or toxic materials and are planned to minimize disturbance. Vegetation is observed to be comprised of shrubs, forbs and grasses including Big sage, Sulphur Flower Buckwheat, Smooth Brome, Blue bunch Wheatgrass, Inland Salt Grass, Poa spp., Sheep Fescue, and Needle & Thread with a basal ground cover of <10%.

The Pickering Family Pit property was historically grazed and will maintain a 60-foot easement along the north boundary to facilitate the movement of livestock for grazing purposes. Notable surrounding landscape features include the proximity of a regional airport with exclusion fencing adjacent to the Pickering Property, county roads 608 and 609, Middle Park High School, and a riparian corridor that includes adjacent ponds, and wetlands of an unnamed tributary of the Smith River that are mapped as jurisdictional wetlands by the U.S. Army Corps.

CPW has identified that this project is located within the following CPW-mapped [High Priority Habitats](#) (HPH). High-priority habitats are home to species for which CPW has sound spatial data and scientifically-backed Best Management Practices (BMPs). To protect those habitats for the species listed below, CPW recommends that no permitted or authorized human activities from December 1st to April 30th to avoid, minimize, and mitigate adverse impacts.

- **Greater Sage Grouse Priority Habitat Management Area and production and brooding area**
 - **Production Area:** An area that would include the majority of important sage grouse nesting habitats.
 - **Brood Area:** Areas supporting sage grouse broods. This generally includes wet areas such as meadows, springs, ponds, and streams which all function as important brood-rearing sites.

Protecting large landscapes that support a wide variety of wildlife species with complex movement patterns can only be accomplished by partnering with other conservation agencies and neighboring land uses. CPW collects and models scientific data to delineate and protect sensitive wildlife habitats to promote sustainable populations of priority species. While this project property is outside delineated priority habitat areas for other species, the use of this area by elk, deer, and pronghorn as they move between priority habitats is documented through observations of individuals and groups of deer, elk, and pronghorn as well as evidence left behind. Wildlife is most commonly observed congregating in the wetland areas and traveling across the area proposed for the expanded permit.

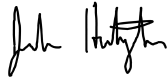
Expanding operations in the gravel pit will affect those movements of wildlife, however, if alternate routes can be kept open through fence removal or wildlife-friendly fencing, wildlife will continue to be able to access their preferred habitats and move between them. While wetlands and water bodies occupy less than 3% of the landscape, over 40% of all vascular plant species in Colorado can occur in wetland habitats, including over 100 of our rare and vulnerable plant species and wetlands support up to 80% of all wildlife species at some point in their lives. To protect these sensitive habitats, CPW recommends further consultation with the U.S. Army Corps of Engineers regarding jurisdictional wetland protections and

implementing the following best management practices to avoid, minimize, and mitigate adverse impacts to wildlife, habitats, wetlands, and vegetation.

- During construction and operations, the contractor should prioritize erosion control measures identified within the NPDES Permit to minimize off-site sediment transport, particularly in the areas adjacent to the wetlands and ravines.
- Disturbance to the landscape should be phased in accordance with the mining plan. It is preferred that the landscape be left undisturbed until construction is implemented so that vegetation communities are left in place to stabilize the soil. Erosion control measures should be implemented during the first disturbance activities or as necessary to protect the wetland area.
- Progressive operations into a new phase of disturbance should avoid occurring in the spring from March 1 to July 15 to minimize disrupting Greater Sage Grouse and other wildlife species utilizing the area. After the initial new disturbance is made in a new phase, operations can resume year-round operations.
- Implement dust suppression measures along the access road to minimize degrading air quality and movement of fine dust off-site.
- All work equipment be cleaned and sanitized removing any existing dirt, vegetation, or seeds before leaving the work area.
- Include a Noxious Weed Plan that aims to treat topsoil stockpiles and materials at least biannually using a Colorado-certified herbicide applicator. In addition, the project proponent should spot treat as needed to prevent any weed communities from seeding.
- Topsoil should be stored in a way that maintains its biological integrity and should be temporarily vegetated with a CPW-approved ground cover seed mix to minimize erosion.
- Surface water, groundwater, or stormwater discharged from operations within the permitted area to neighboring properties should first be treated by the site's sediment and erosion controls and ensure that it is within natural water standards.
- New and existing necessary fencing needed for the proposed project or property should be constructed or brought to align with wildlife-friendly fencing practices using [Guidelines for appropriate wildlife fencing](#) found on our website. Any old or unnecessary fencing should be removed from the property.
- Conduct operations between the hours of 7:00 a.m. and 5:00 p.m. to avoid excessive disturbance to wildlife species that utilize this area.
- The application material states that only smooth brome and pubescent wheat will be replanted during the reclamation process. CPW recommends additional grass and forb species be included in the seed mix and planting of native brush species (sagebrush, greasewood, rabbitbrush, etc.), to return the landscape back into a natural setting that will support wildlife as well as the intended pastureland.

Colorado Parks and Wildlife appreciates the opportunity to review this project and provide recommendations to avoid, minimize, and mitigate adverse impacts on wildlife. If there are any questions or needs for additional information, don't hesitate to contact CPW District Manager Serena Rocksund at 970-531-2396 or serena.rocksund@state.co.us or NW Region Land Use Specialist, Molly West, at (970) 255-6105 or by email at molly.west@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeromy Huntington". The signature is fluid and cursive, with the first name "Jeromy" and last name "Huntington" clearly distinguishable.

Jeromy Huntington
Area Wildlife Manager

Cc:

Travis Black, NW Regional Manager
Serena Rocksund, District Wildlife Manager
Molly West, Land Use Specialist
Elissa Slezak, Area Wildlife Biologist
Heather Halbritter, Area Wildlife Biologist