



## COLORADO

### Parks and Wildlife

Department of Natural Resources

Steamboat Springs (Area 10) Service Center

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September 12, 2024

Colorado Division of Reclamation, Mining, and Safety  
1313 Sherman Street Room 215  
Denver, Colorado 80203  
Attn: Ben E. Hammar

Regarding: Arapaho Pit, File No. M-2024-043 112 Regular Mining Operation Permit

Mr. Hammar,

Colorado Parks & Wildlife (CPW) appreciates the opportunity to comment on the Arapaho Pit 112 Regular Mining Operation Permit application. CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors.

The Arapaho Pit proposes using 210 acres as a surface mining operation to extract sand, gravel, and fill. Operations will occur approximately 180 days per year subject to market demands. This project will disturb approximately 5-6 acres annually for 22-35 years.

Wildlife in this area include pronghorn, elk, mule deer, greater sage-grouse, and black bear. Big game frequently cross Highway 14 at this location and are susceptible to wildlife-vehicle collisions. Greater sage-grouse breeding and brood-rearing can be disturbed by artificial light and human activity; greater sage-grouse are also susceptible to wildlife-vehicle collisions. This project is within a black bear summer and fall concentration area. As such, CPW makes the following recommendations to minimize impacts on wildlife populations and reduce wildlife-human conflicts from the proposed Arapaho Pit operations.

- CPW requests daily timing limitations on gravel haul trucks. Gravel haul trucks should be active between 9:00 am and 4:00 pm from December 1 to July 15, annually, to protect wildlife and humans from vehicle collisions.
- Wildlife exclusion fences should be installed around the perimeter of pits to exclude big game. If total exclusion fencing is not an option, wildlife escape ramps should be incorporated into all active pits utilizing the following recommendations:
  - Escape ramps or ladders should be installed at each end/corner of the pit and on each side segment at 50 to 100-foot intervals.



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu  
Marie Haskett · Tai Jacober · Jack Murphy · Gabriel Otero · Murphy Robinson · James Jay Tutchton · Eden Vardy

- Ramps/ladders should be between 3:1 to 5:1 angle.
- Ramps/ladders must be strong enough for a large animal, such as an elk, to gain purchase and use them to climb out of the pit. CPW suggests utilizing galvanized chain link fencing for each ramp (minimum 36" wide).
- All fencing on the property should adhere to recommendations found in CPW's [Fencing with Wildlife in Mind](#)<sup>1</sup> document.
- All lighting on the property should be turned off when unnecessary. All lighting should be downcast and capped from above to reduce night sky light pollution and disruption to lekking grouse.
- IGBC-certified bear-resistant canisters should be used throughout the site to reduce the potential for human-black bear conflict.
- Any dogs allowed on the site should be leashed or kenneled when not within wildlife exclusion fencing to reduce potential encounters with wildlife.

CPW offers the following recommendations to support the reclamation phase of this operation.

- CPW prefers that the reclamation utilize native seeds with landowner concurrence. The [Colorado Seed Tool](#)<sup>2</sup> allows users to enter project management goals and site conditions to either produce a seed menu of candidate species for a seed mix or to verify if an existing seed mix will meet management goals and establish well in a location.
- It is recommended that the topsoil pile be stored in windrows no more than 1.5 meters tall to maintain viability for the facility's life. Improper topsoil storage can lead to anaerobic conditions and render the topsoil inviable without amendments. The topsoil pile should be immediately seeded with desirable seeds to prevent noxious weeds from establishing.

Colorado Parks & Wildlife values the opportunity to provide comments on this proposal. If you have any questions or concerns, please contact District Wildlife Manager Zach Weaver at (970) 819-7547 or NW Region Land Use Specialist Danielle Neumann at (970) 471-4441.

Sincerely,

*Kris Middledorf*

Kris Middledorf  
Area Wildlife Manager

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<sup>1</sup> Colorado Parks & Wildlife. (n.d.). Fencing with Wildlife in Mind. <https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf> 10 September 2024

<sup>2</sup> Colorado Parks and Wildlife. (n.d.). Colorado Seed Tool Fact Sheet. Colorado Seed Tool (Application). <https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/SeedMixFactSheet.pdf> 10 September 2024.

