



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Area 15 Office
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10/04/2024

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

RE: Disappointment Valley – File No. M-1980-038; Permit Conversion (CN-1) – Conversion from 110(c) to a 112(c)

Dear Mr. West,

Thank you for the opportunity to comment on Dolores County's Disappointment Valley permit conversion and resulting gravel pit expansion in San Miguel County. The existing gravel mining project is located on BLM land, twelve miles east of Slick Rock in Section 20, T43N:R17W. This application would allow for the mining operation to expand the disturbance area from 7.00 acres to 11.60 acres.

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 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. Numerous wildlife species utilize the project area and its direct surrounding habitats, including big game species such as deer and elk, small game species such as rabbit and coyote, and non-game species such as small mammals, songbirds, and raptors. CPW has reviewed the proposal and would like to offer the following comments on potential impacts on wildlife.

Big Game:

Big game species, including elk and mule deer, utilize this landscape for forage and travel. Mining activities may impact these species' concentrations and increase conflicts with surrounding private lands. The project area is located within or adjacent to winter range and migratory pathways for these species. The project is within a mapped elk and mule deer Severe Winter Range and Winter Concentration Area- [High Priority Habitat](#) (HPH). CPW recommends no permitted or authorized human activity from December 1st to April 30th annually to protect big game during this time period when elk and mule deer are at their weakest body condition and are most sensitive to disturbance. If this cannot be achieved, CPW recommends that winter mining activities be restricted to loading and hauling operations to reduce disturbance and displacement from prolonged heavy equipment operations.

Non-native/Invasive Weeds:

One of the area's most visible and immediate threats to ecosystem health is non-native/invasive weeds. Invasive weeds typically flourish following surface disturbance, and active weed management should be



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
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incorporated during and after the lifespan of the proposed project. Regarding post-mining reclamation, native drought-tolerant revegetation is recommended. CPW is happy to provide a drought-tolerant native seed mix upon request, as the proposed reclamation seed mix originally was void of a native forb and shrub component.

CPW appreciates the opportunity to be actively involved throughout this planning process and would happily discuss wildlife issues with you and/or the project proponent. If you have any questions, please contact Land Use Coordinator Peter Foote at (970) 375-6713.

Sincerely,



Adrian Archuleta
Area Wildlife Manager- Durango, CO

Cc: SW Region File; Area 15 File

