



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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October 25, 2024

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[chris.girardi@state.co.us](mailto:chris.girardi@state.co.us)

RE: CPW's Comments on the Rodeo Dunes Mine, File No. M-2024-049

Dear Chris,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the proposed Rodeo Dunes Mine project. It is our understanding that the project includes sand extraction on 335 acres to be used for frac materials for oil and gas development located in parts of Sections 27 and 34 of T3N, R63W. The plan is to strip and reserve the topsoil, remove the sand for fracking, and replace and regrade the area. The entire operation is planned to take place over 5-12 years, at which point it will be reclaimed and revegetated.

The mission of 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, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this project.

On July 29th CPW met with the operator, Weld County and other stakeholders in a pre-application meeting through the Weld County permitting process. At that point, CPW provided the operator with basic verbal recommendations that are very similar to the recommendations we will provide in this letter. After review of this project and location through the previously mentioned meeting and the application through DRMS, CPW has the following recommendations:

### RECOMMENDATIONS:



### **The Importance Of High Priority Habitats**

Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High priority habitats (HPH) are defined as sensitive habitats where CPW has recent maps regarding sensitive wildlife use, plus scientifically-backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity maps that we collect and 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 of proposed development on a given parcel, and general scientific research.

### **Mule Deer Severe Winter Range High Priority Habitat**

Mule Deer Severe Winter Ranges are defined as that part of the overall winter range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten. Therefore, CPW recommends no initial ground disturbance from December 1 to April 30.

### **Fencing**

CPW is concerned for the safety of Mule deer, White-tailed deer and Pronghorn Antelope. in the area for the proposed project. CPW recommends that if fencing (project perimeter or internal) is erected, either during or after the project, it should be the type that would allow the free passage of wildlife. Fencing plans should avoid the use of woven wire-type fences that will trap or prevent the movement of wildlife. CPW recommends using three or four-strand smooth-wire fencing with a bottom strand height of 17 inches above ground level and a maximum top strand height of 42 inches above ground level, along with the installation of double stays between posts.

CPW's "[Fencing with Wildlife in Mind](#)" brochure.

### **Noxious Weeds and Native Re-seeding**

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. CPW recommends that the applicant consult with the Weld County and Natural Resource Conservation Service (N.R.C.S) for the best noxious weed management practices.

### **Lighting**

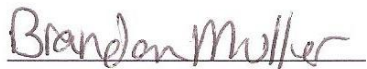
Nighttime artificial lighting affects wildlife species of all sizes, from small macroinvertebrates to large mammals. These effects are often species-specific, and in some cases may be

beneficial to one species within a local ecological community, but detrimental to another species within the same ecological community. These impacts could be expected year-round and can affect local resident species and migrating wildlife, which may lead to collisions with other birds and structures, exhaustion, increased depredation, and direct mortality. Nighttime artificial lighting may also disrupt nocturnal species that are not accustomed to the large increase in light, leading to temporary blindness, which may also increase the likelihood of collisions. CPW also recommends that all outdoor lights be down-shielded to minimize disturbance areas and dim the lights as much as practicable.

Per the U.S Fish and Wildlife service, all outdoor lighting should be limited to warmer colors with “longer wavelengths (>560 nm) and a lower correlated color temperatures (CCT<3000 Kelvin degrees)” (“Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service”) 3. Per the American Bird Conservancy, CCT of 2200 Kelvin Degrees up to 2700 Kelvin Degrees is the preferred range of color. (Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass | Sheppard, PHD)4. CPW recommends the latter.

If the timing or scope of this project changes and/or if you have any questions, please contact Lexi Hamous at 303-916-2987 or [lexi.hamous-miller@state.co.us](mailto:lexi.hamous-miller@state.co.us).

Sincerely,

A handwritten signature in dark ink that reads "Brandon Muller". The signature is written in a cursive, slightly slanted style.

*Brandon Muller*  
*Acting Area 4 Area Wildlife Manager*

Cc: *Mike Grooms, Greeley South District Wildlife Manager, [michael.grooms@state.co.us](mailto:michael.grooms@state.co.us)*  
*Lexi Hamous, NE Land Use Coordinator- [lexi.hamous-miller@state.co.us](mailto:lexi.hamous-miller@state.co.us)*