



COLORADO

Parks and Wildlife

Department of Natural Resources
Durango Area 15 Office
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Durango, Colorado 81301
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January 7, 2025

Todd Jesse
Division of Reclamation, Mining, and Safety
1313 Sherman St, Room 213
Denver, CO 80203

RE: Line Camp Pit - File No. M-2001-001- Amendment (AM-2) for Smith's Materials LLC

Dear Mr. Jesse,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and provide comments on the proposed Line Camp Pit Expansion Project in Montezuma County, CO. The project proposes to expand the existing gravel mine, located on Highway 145, 9 miles Northeast of Dolores, to an additional 27 acres. This is a heavily mined area and is mostly barren pastureland with minimal grasses and forbs. Many species utilize the surrounding area including but not limited to elk, mule deer, black bear, mountain lion, and various raptor species. There are no known raptor nests in close proximity to the project area. CPW offers these comments regarding potential conflicts with wildlife in the area of the proposed project.

Big Game:

The proposed project area is within close proximity to a CPW mapped mule deer migration corridor which connects to mapped mule deer winter concentration area located around the McPhee Reservoir with summer ranges to the north. CPW recommends that Best Management Practices (BMPs) and project design features are included with the goal of reducing hazards to wildlife and retain permeability for migrating ungulates. This would include following CPW's [Fencing with Wildlife in Mind](#) if the addition of new fencing is necessary, and minimizing gravel pit designs that could result in entrapped wildlife (pits, trenches, retention ponds with steep banks). Once the material has been mined to exhaustion, we recommends that the site is reclaimed with a wildlife friendly seed mix, which CPW would be happy to provide upon request.

Aquatic Species:

The project area is in the Dolores River watershed which CPW has mapped as Aquatic Sportfish Management Waters. CPW's primary concern regarding aquatic species is to maintain water quality by limiting erosion and sedimentation into streams. CPW recommends that BMPs are implemented to prevent erosion and sedimentation from entering the Dolores River.



Non-native/Invasive Weeds:

One of the most visible and immediate threats to ecosystem health in the area is non-native/invasive weeds. Invasive weeds typically flourish following surface disturbance, and active weed management should be incorporated during and after the lifespan of the proposed project. In regards to post-mining reclamation, native drought-tolerant revegetation is recommended.

Thank you for the opportunity to comment on this proposed project. If you have any questions concerning these comments, please feel free to contact Dolores District Wildlife Manager Matt Sturdevant at 970-749-1435 or matt.sturdevant@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adrian Archuleta', with a stylized, flowing script.

Adrian Archuleta
Area Wildlife Manager- Durango, CO

Cc: SW Region File; Area 15 File; DWM Matt Sturdevant