Grand Junction Office, Area 7 Service Center 711 Independent Ave • Grand Junction, CO 81505 PH: (970) 255.6100

December 19, 2025

Amy Yeldell

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

RE: C 1/2 Road Gravel Pit, File No. M-2025-049

Dear Mrs. Yeldell,

Thank you for the opportunity to review the proposed construction and operation of a new gravel pit referred to as the C 1/2 Road Gravel Pit in Mesa County, Colorado. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in the State of Colorado. CPW embraces and fulfills this through our mission to protect, preserve, enhance, and manage all wildlife within the State of Colorado for the use and enjoyment by all current and future generations of Colorado residents as well as the visitors of the State of Colorado. CPW encourages the Division of Mining, Reclamation, and Safety and the project applicant to afford the highest level of protection to Colorado's wildlife and their current and future habitat.

CPW understands this project to be the construction of a sand and gravel mining operation on 27.8 acres with an 11.5 acre lake. Active mining will occur over a 10-year period and following the completion of active mining, an additional two years will be used to remove remaining stockpiled materials and complete final reclamation. The final reclaimed landform, consisting of an open-water pond with surrounding grassland, will provide new habitat opportunities for waterfowl, amphibians, and riparian-associated wildlife, while upland areas will support forage and cover for small mammals and deer.

After reviewing the application, CPW has identified several areas of wildlife concern and has developed the following Best Management Practices (BMPs) to avoid and minimize wildlife impacts to the best extent possible.



• There is an active Bald Eagle Nest approximately 150 yards west of the property boundary. CPW recommends No Surface Occupancy (NSO) beyond that which historically occurred, within 1/4 mile (1320 feet, 400 meters) radius of active nests. No permitted, authorized, or human encroachment activities within 1/2 mile (2640 feet, 800 meters) radius of active nest sites from December 1 through July 31. The majority of bald eagle chicks in Colorado have fledged by July 31; however, for late-nesting or potential re-nesting bald eagles, CPW recommends seasonal restrictions beyond July 31 if chicks are still present in the nest.

If surface occupancy cannot be avoided within 1/4 mile of the nest AND the nest is located within a highly developed area, then the recommended NSO extends 1/8 mile (660 feet, 200 meters) from the nest site. No permitted, authorized, or human encroachment activities within 1/4 mile radius of active nests from December 1 through July 31. This buffer recommendation matches the USFWS 2007 Guidelines in the instances where eagles have demonstrated the ability to tolerate previous levels of human encroachment and surface occupancy.

- Given that the work area for this project has a very high density of noxious weeds, CPW
  recommends that all work equipment be sanitized and have any existing dirt, vegetation, or
  seeds from landscaping and operational work removed before leaving the work area.
- As stated in the application, the U.S Fish and Wildlife Services should be consulted in regards
  to other threatened and endangered plant and animal species (pike minnow, razorback
  sucker, humpback chub, and bonytail chub, Yellow-billed Cuckoo, etc.) which may be found at
  the site of the proposed operation.
- In the application it is noted that the project perimeter will be fenced with a 6' chain link fence.
   CPW recommends constructing wildlife friendly fence, if possible. More information can be found at this <u>Link</u>.

## Reclamation and Future Operational BMPs

- One of the CPWs largest concerns is with the future operation of the recreational pond that will be left after the mining operations have concluded. In the past there have been issues with unwanted predatory fish (Northern Pike, Smallmouth Bass, etc.) being stocked into recreational ponds that have potential to spill into the Colorado River. In the last decade CPW has put extensive efforts into eliminating these species in waterbodies near the Colorado River. With this project being a matter of yards from the Colorado River, CPW would like to emphasize the importance of maintaining the berms separating the recreational pond from the Colorado River and avoiding floodplains.
- CPW understands that all existing vegetation on the property will be removed for the proposed mining operation. The application states that only native grasses will be replanted during the reclamation process. CPW recommends additional seeding and planting of native brush species (greasewood, rabbitbrush, etc.) as well as several cottonwood trees in any area disturbed by the proposed mining operation.
- The recreational pond should be constructed with bank slopes of 3H:1V ratios or several available escape ramps to allow for any wildlife to escape from the pond.

Colorado Parks and Wildlife appreciates the opportunity to comment on the C ½ Road Gravel Pit project. If there are any questions or need for additional information please contact District Wildlife manager Jace Zundel at 970-250-4503 or Land use specialist Molly West at molly.west@state.co.us.

Sincerely,

Kirk Oldham, Area Wildlife Manager

Cc. Pete Firmin, Park Manager