



COLORADO

Parks and Wildlife

Department of Natural Resources

Steamboat Springs (Area 10) Service Center
PO Box 775777 | 925 Weiss Drive
Steamboat Springs, Colorado 80487
P 970.970.2197

May 20, 2022
Routt County Planning
Attn: Alan Goldich
136 6th St., Suite 200
Steamboat Springs, CO 80477

Re: Sanders Gravel Pit PL-2021-0004

Dear Mr. Goldich,

Thank you for the opportunity to comment on the Special Use Permit for the Sanders Gravel Pit. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is 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.

When this application went through the Division of Reclamation, Mining, and Safety, it was CPW's understanding that the applicant inherited a high wall of gravel with the purchase of this location. Since the applicant traded gravel from this high wall with a neighbor for topsoil, with the intention of grading the site to safe slope, they technically engaged in commercial mining operations. This exchange resulted in the need for permits with the Division of Reclamation, Mining, and Safety (DRMS) and Routt County. This mining effort was initially described to CPW by DRMS staff as a short-term property improvement initiative with reclamation occurring in as little as two years. DRMS issued the applicant their smallest permit, 110(C), which allows mining of up to 9.9 acres and annual production of 70,000 tons. This permit covers a 10-year period of activity and requires a reclamation process.

The current proposed application to Routt County describes the excavation of gravel material from a pit 8 hours per day, 5 days per week, and 50 weeks per year. The applicant anticipates approximately 20 vehicles per day to access the site. CPW has concerns with these activities. Routt County has the ability to place restrictions that will limit the Sander's mining activities. CPW recommends that Routt County consider regulating how many gravel trucks per day may access this property and applying seasonal timing limitations to protect wildlife resources. The Sanders' property is located within the following High Priority Habitats, which are habitats for which CPW has sound spatial data and scientifically-backed recommendations:



- Elk production, defined as: That part of the overall range of elk occupied by the females from May 15 to June 15 for calving. Only known areas are mapped, so these maps do not include all production areas for the Elk Data Analysis Unit.
- Elk severe winter range, defined as: That part of the range of a species where 90% of the individuals are located when the annual snow pack is at its maximum and/or temperatures are at a minimum in the worst 2 winters out of 10.
- Elk winter concentration area, defined as: That part of the winter range of a species where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.
- Columbian sharp-tailed grouse winter range, defined as: Observed winter range of sharp-tailed grouse, usually in a tall shrub vegetative type (greater than or equal to 2 meters) within 5 kilometers of lek sites. Shrub height should allow feeding on buds by birds above normal snow depths.

To avoid impacts to the above wildlife populations, CPW recommends that mining activities and truck hauling only occur from July 1 - November 14th, annually, to accommodate the following recommended timing limitations.

- Columbian sharp-tailed grouse winter range: November 15 - March 15
- Elk winter ranges: December 1 - April 30
- Elk production: May 15 - June 30

Additionally, CPW requests that the applicant utilize CPW and DRMS approved seed mixes during the reclamation process. Any topsoil piles to be used during reclamation activities should be stored in piles no more than 1.5 meters tall and seeded with desirable seeds such as western wheatgrass, Indian ricegrass (White River or Rimrock varieties), slender wheatgrass (preferably San Luis), dryland alfalfa, and/or Utah sweetvetch. Top soil piles should be monitored for the establishment of noxious weeds. Soils stored more than 2 meters tall cause anaerobic conditions which kill the soil organisms necessary for plant support.

CPW appreciates the opportunity to be involved in Routt County's planning process. Please contact Kyle Bond, District Wildlife Manager, at (970) 457-0075.

Sincerely,



Kris Middledorf
Area Wildlife Manager

Cc. Kyle Bond, District Wildlife Manager
Danielle Neumann, NW Region Land Use Specialist