



COLORADO

Parks and Wildlife

Department of Natural Resources

Steamboat Springs (Area 10) Service Center
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Steamboat Springs, Colorado 80487
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Routt County
136 6th Street, Suite 201
Steamboat Springs, CO 80477

November 18, 2022

RE: Routt County Wastewater Treatment Plant Upgrades in Phippsburg and Milner

Dear Mr. Cowman

Thank you for the opportunity to provide comments on the proposed wastewater treatment plant upgrades in Milner and Phippsburg. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced through our mission to perpetuate the wildlife resources of Colorado and provide sustainable outdoor recreation opportunities that educate and inspire future generations. CPW fulfills this mission by responding to requests for comments on wildlife impact reports, land use proposals, and consultations through public-private partnerships.

CPW Understands that the wastewater treatment facilities for the towns of Phippsburg and Milner will be replaced by converting the facilities from lagoon treatment operations to mechanical treatment operations utilizing membrane technology. The existing lagoons will be decommissioned by removing biosolids and liners and then backfilled. The new treatment facilities will consist of subsurface concrete basins and a treatment plant housed in a shipping container set on top of those basins. Connections will utilize the existing collection lines through a trenchless construction approach through existing manholes with the outfall to the Yampa River to remain in operation. The updated treatment facilities expect to improve the water quality discharged into the Yampa River.

In a review of the engineering material, CPW has identified the following scientifically-backed High Priority Habitats, (HPH) that support sensitive wildlife habitats that may be impacted by the proposed design and timeline. Improvements to the water quality and removal of wastewater lagoons will benefit the surrounding wildlife populations and disturbance will be short-term; therefore, CPW incorporates logically based flexibility to accommodate the project construction. The following recommendations are intended to avoid, minimize, and mitigate adverse impacts to those HPH areas.

Phippsburg WWTP Improvement Project:



Located approximately $\frac{1}{3}$ of a mile North of the Town of Phippsburg and will replace the current wastewater lagoon system between the railroad line and the Yampa River along the Little White Snake Creek corridor.

Bald Eagle Active Nest: located within $\frac{1}{4}$ of a mile from the construction site.

- Due to the construction of wastewater improvement facilities near an active highway and railroad, Bald Eagles that occupy this site are likely conditioned to disturbances. It is recommended to avoid construction during egg incubation until mid-April after the eggs are fully hatched.

Sportfish Management Waters

- During construction and operations, the contractor should prioritize erosion control measures identified within the NPDES Permit to minimize sediment transport that may enter the waterway.
- Remove any mud or debris and disinfect equipment, hand tools, pumps and hoses, boots, and other equipment previously used in a river, stream, lake, pond, or wetland before moving the equipment to another water body following the attached aquatic disinfectant protocols: <https://cpw.state.co.us/Documents/Research/Aquatic/pdf/Publications/Quaternary-Ammonia-Compound-Disinfection-Protocols.pdf#search=disinfect>

Milner WWTP Improvement Project: This location occupies undeveloped land between the railroad line and the Town of Milner and will replace the current lift pump station of the existing wastewater treatment system, eliminating the need for the existing lagoon system.

Colombian Sharp Tailed Grouse Production Area and Winter Range

- The construction area is mapped within Colombian Sharp Tailed Grouse production area; however, because of the proximity to the Town of Milner, active railroad lines, and roadways, construction activities are not expected to disrupt the local population.

Elk Production Area

- The construction area is mapped within Elk production area however, because of the proximity to the Town of Milner, active railroad lines, and roadways, negative impacts are not expected on local populations or interfere with calving activities.

Colorado Parks and Wildlife commends the project proponent for minimizing new disturbances and acknowledging wildlife in the area. CPW appreciates the opportunity to review this project application material and provide recommendations to avoid, minimize, and mitigate adverse impacts on wildlife. If there are any questions or needs for additional information, don't hesitate to contact CPW wildlife managers:

Kris Middledorf, Area Wildlife Manager, kris.middledorf@state.co.us, 970-819-3150

Molly West, Land Use Specialist, molly.west@state.us.co, 970.250.3818

Sincerely,

A handwritten signature in black ink, appearing to read "K Middledorf". The signature is written in a cursive, flowing style.

Kris Middledorf
Area Wildlife Manager

cc.

Bill Atkinson
Eric Vannatta
Libbie Miller