



COLORADO

Parks and Wildlife

Department of Natural Resources
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August 11, 2022

San Juan National Forest
Dolores Ranger District
Beaver Rim Pit Expansion Project
Attention: Derek Padilla - District Ranger
29211 Highway 184
Dolores, CO 81323

RE: Draft Environmental Assessment for the Beaver Rim Pit Expansion Project

Dear Derek Padilla,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and provide comments on the proposed Beaver Rim Pit Expansion Project #61531 in Montezuma County, CO. The project proposes to re-enter the existing 20.55 acre reclaimed gravel mine and operate an additional 19.8 acre gravel mine located on Forest Service Road 526.B in the Dolores Ranger District of the San Juan National Forest. Currently the existing site is used by the public as an OHV riding area, camping area, and shooting range. Numerous wildlife species utilize the proposed project area and its direct surrounding habitats, including big game species such as deer, elk, and bear; small game species such as turkey and coyote; and non-game species such as small mammals, songbirds and raptors. CPW offers these comments regarding potential conflicts with wildlife in the area of the proposed project.

Big Game:

The proposed project area is within a CPW mapped mule deer migration corridor which connects to mapped mule deer severe winter range located northeast of McPhee Reservoir. CPW recommends that the USFS include Best Management Practices (BMPs) and project design features, with the goal of minimizing displacement of migrating mule deer in respect to all mining operations. Such design features could include scheduling mining and hauling of aggregates outside of the migration periods, limiting truck speeds to reduce wildlife vehicle collisions and the use of wildlife-friendly fencing designs to reduce hazards to wildlife and retain permeability for migrating ungulates. Once the material has been mined to exhaustion, CPW recommends that the site is reclaimed for wildlife habitat and that future recreational uses be managed. Reclamation should also include the decommissioning and reclamation of Forest Service Road 526.B as well as reclamation of the previously excavated area, which was never reclaimed to the extent that is needed to allow for the regeneration of trees, shrubs, and native grasses.



Aquatic Species:

The project area is approximately 0.3 miles from Beaver Creek. CPW currently has Beaver Creek mapped as aquatic native species conservation waters. CPW has conducted recent studies within this area and found that native fish do not currently exist within this stretch of Beaver Creek, which may be a result of the extended periods of drought the area has seen in recent years. 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 Beaver Creek.

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. CPW is happy to work with the USFS to develop a native seed mix for reclamation.

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,



Adrian Archuleta
Area Wildlife Manager- Durango, CO

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