



COLORADO
Parks and Wildlife
Department of Natural Resources

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12 March 2026

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RE: CPW Comments in the Antler Range Filing No. 1, El Paso County

Dear Lisa Elgin,

Colorado Parks and Wildlife (CPW) received your request for comment on the Antler Range Filing No. 1 Project (the Project), to be developed by Vertex Consulting Service on behalf of Antler Range LLC in El Paso County, Colorado. CPW staff are familiar with the location of the Project as well as the area surrounding the site. CPW comments will address potential impacts to wildlife and habitat within the identified Project area.

CPW'S STATUTORY RESPONSIBILITY

CPW has a statutory responsibility to manage all wildlife species in Colorado; as such, we encourage protection for Colorado's wildlife species and habitats through responsible energy development and land use planning. Protection of core wildlife areas, quality fisheries and habitat, big game winter range and seasonal migration corridors, and raptor nesting locations are of extreme importance. CPW recommends that all proposed projects be assessed to avoid,



minimize, or mitigate impacts to sensitive wildlife habitats and species. That includes species of concern as well as Federal and/or State listed species, big game wildlife (migration corridors, winter range, and parturition areas), breeding and nesting habitats for sensitive ground-nesting birds, and nests of raptors sensitive to development in order to prevent loss of habitat or fragmentation of habitat. US Fish and Wildlife Service should be consulted on any Federally-listed Endangered and Threatened Species that might be present at the location.

GENERAL RECOMMENDATIONS

CPW recommends that, when selecting sites for development, the developer focus on options that avoid critical wildlife habitats over the use of mitigation strategies. If developers can consolidate facilities and roads to the extent possible, this will minimize the amount of land that is disturbed and fragmented. New transmission lines should follow existing transmission corridors and pre-disturbed areas, such as roads, whenever feasible, to minimize additional impacts on wildlife and habitat fragmentation. If there are multiple developments planned for an area, CPW recommends consideration of wildlife movements at a larger scale. Early consultation between CPW and developers is critical for avoiding impacts to sensitive species, and we appreciate the continuing coordination.

UNDERSTANDING OF THE PROJECT

The proposed Project will be located in El Paso County, in the Falcon area, on the northeast side of Colorado Springs (about 4.7 miles north of the intersection of Highway 24 and Woodmen Road). The first filing of this project will be the development of the southwest corner of the overall Antler Range project area. The developer has platted 9 residential lots ranging in size from 2.5 to 2.75 acres. In this first filing, a cul-de-sac road is platted to allow ingress and egress to the west end lots to the north of Ayer Road.



In August of 2025, CPW wrote comments for the entirety of the project area within the Antler Range Preliminary Plan. CPW provided comprehensive comments on the project, which we will reiterate below. These comments apply to the entire project area described in the Antler Range Preliminary Plan, but may not apply to Filing No. 1. These differences will be noted within the comments below.

POTENTIAL IMPACTS TO WILDLIFE RESOURCES

High Priority Habitats (HPH) are sensitive areas identified using CPW’s Species Activity Mapping (SAM) database, which incorporates scientific data and wildlife observations. These publicly available maps inform environmental assessments and planning. CPW review and GIS analysis showed that the proposed project area overlaps with the following HPH.

- Aquatic Native Species Conservation Waters HPH (not located within Filing No. 1, but within the Preliminary Plan area)

CPW also considers Species of Greatest Conservation Need (SGCN) and Species of Concern (SC) identified in the State Wildlife Action Plan (SWAP). SGCN and SC are species experiencing population declines, habitat threats, or ecological vulnerabilities requiring proactive conservation. These may include federally or state-listed threatened, endangered, or special-concern species.

A number of SGCN and SC species have been documented in the area or may be present based on modeling and range maps. These SGCN species include seven (7) bird species, one (1) invertebrate species, three (3) mammal species, and two (2) reptile species. All SGCN and SC are listed in the table below.

CPW Project Area Species of Greatest Conservation Need*			
Major Group	Scientific Name	Common Name	CPW Status[#]
Birds	<i>Antigone canadensis</i>	Sandhill Crane	SWAP Tier 2
Birds	<i>Athene cunicularia</i>	Burrowing Owl	SWAP Tier 2
Birds	<i>Buteo swainsoni</i>	Swainson’s Hawk	SWAP Tier 2



CPW Project Area Species of Greatest Conservation Need*			
Major Group	Scientific Name	Common Name	CPW Status[#]
Birds	<i>Calamospiza melanocorys</i>	Lark Bunting	SWAP Tier 2
Birds	<i>Circus cyaneus</i>	Northern Harrier	SWAP Tier 2
Birds	<i>Falco mexicanus</i>	Prairie Falcon	SWAP Tier 1
Birds	<i>Selasphorus rufus</i>	Rufous Hummingbird	SWAP Tier 2
Insects	<i>Euphilotes rita coloradensis</i>	Rita Dotted - blue	SWAP Tier 2
Mammals	<i>Cynomys ludovicianus</i>	Black-tailed Prairie Dog	SWAP Tier 2
Mammals	<i>Myotis lucifugus</i>	Big Brown Bat	SWAP Tier 1
Mammals	<i>Myotis thysandodes</i>	Fringed Myotis	SWAP Tier 1
Reptiles	<i>Phrynosoma hernandesi</i>	Hernandez's Short-horned Lizard	SWAP Tier 2
Reptiles	<i>Terrapene ornata ornata</i>	Plains Box Turtle	SWAP Tier 2
<p>* All species listed in this table have been documented in or within one mile of the Project area or have the potential to occur in the project area. [#] Species Wildlife Action Plan=SWAP; Species of Concern=SC; State Threatened=ST</p>			

IMPACT AVOIDANCE, MINIMIZATION AND/OR MITIGATION RECOMMENDATIONS

Native Fish and Aquatic Species Conservation Waters

The Preliminary Plan for Antler Ridge indicated that the areas of the project situated within the Native Fish and Aquatic Species Conservation Waters were intended to be avoided, as depicted on the plat. CPW appreciates the care taken to avoid these areas. The following recommendations are for cases where any of these areas cannot be avoided during or after construction.

Aquatic Native Species Conservation Waters (HPH) are lakes and river segments containing species under population conservation and recovery management. In the eastern plains, native fish species of concern include the Arkansas darter, brassy minnow, common shiner, flathead chub, Iowa darter, northern and southern red-belly dace, plains minnow, plains orangethroat darter, plains topminnow, stonecat, and suckermouth minnow. These fish are state-listed as species of special concern, threatened, or endangered. Additionally, seasonally



wet areas along Little Beaver Creek provide crucial breeding and foraging habitat for native fish and amphibians.

To avoid or minimize impacts to native aquatic species, CPW recommends the following:

- Avoid ground-disturbing activities within 500 feet of the Ordinary High Water Mark of drainages. In the event the Ordinary High Water Mark is indistinguishable at the time of development, CPW recommends a 300-foot buffer of any wetland, stream, or ephemeral drainage.
- Avoid impact to the stream bed during construction and after reclamation. The stream bed should be handled as a stream crossing whether or not water is present at the time of construction. Minimizing impacts to stream beds is a priority for CPW, and avoidance is best whenever possible to protect seasonally wet sections of the creek that provide native amphibians with important breeding and foraging habitats in the spring and summer months.
- Utilize stormwater control best management practices and construction controls for sediment control.
- Avoid any increased sedimentation in nearby drainages, including intermittent creeks, to avoid impacts to nearby aquatic habitat.
- Ensure stream crossings are perpendicular to reduce habitat disruption and use structures outside riparian zones where possible.
- Stream crossing by vehicles should be avoided whether or not water is present at the time of crossing. All trucks or heavy equipment should be restricted from crossing streams and if required, we recommend placement of culverts in streams in such a way that they do not impede seasonal surface water flow.
- Finally, CPW recommends that native riparian canopy or stream bank vegetation be conserved where possible.



Raptors and Migratory Birds

The Project is in the breeding range of Golden eagle (*Aquila chrysaetos*), though no nests are known in the area. The Project area contains suitable habitat for nesting raptors and migratory birds, including SGCN and SC species listed above. To ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, CPW recommends consultation with USFWS. All migratory birds are protected under the Migratory Bird Treaty Act, and any removal or disturbance of an active migratory bird nest requires prior consultation with CPW and USFWS. Both active and potential nest sites, as well as winter night roosts, should be considered when evaluating potential disturbance during ground-disturbing activities.

CPW mapping data includes the presence of an inactive stick nest in the area, and results from field surveys conducted for the Project indicate that some nesting habitat for raptors is present. CPW appreciates the commitment to conducting preconstruction surveys and adhering to seasonal buffers and time restrictions to mitigate impacts on nesting migratory birds to the greatest extent feasible.

To minimize impacts on nesting migratory birds, CPW recommends the following:

- Conduct ground disturbance and vegetation clearing activities outside of the breeding season (March 15th - August 31st). If construction must occur during the breeding season, surveys for active nests of ground-nesting species as well as tree-nesting raptors should be conducted prior to groundbreaking.
- Since prairie dog colonies occur within the Project area, the colonies should be surveyed for Burrowing owls. If development in prairie dog colonies occurs during the spring through late summer months (Feb 1 to Oct 31), the presence of Burrowing owls and whether they are actively nesting should first be determined. If nesting Burrowing owls are present, no human



encroachment or surface disturbance should occur within 100 meters of nesting burrows during March 1-August 15. If Burrowing owls merely occupy the site, it is recommended that earthmoving and other disturbance activities be delayed until late fall after they have migrated.

- Preconstruction surveys should be conducted to identify raptor nests within the Project area and implement appropriate restrictions. CPW recommends adherence to the recommended buffer distances and timing stipulations identified in the CPW document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors," available on the CPW website.

Burrowing Owl Active and Potential Nest Sites

Burrowing owls are listed as State Threatened, and nest in active or inactive prairie dog (black-tailed or white-tailed) burrows.

To minimize potential impacts to Burrowing Owl, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends the adherence to CPW's Burrowing Owl survey protocol if development occurs from March 15 through August 31.
- If nesting burrowing owls are present, no human encroachment or surface disturbance should occur within a 660 ft buffer of nesting burrows from March 15 to August 31.
- If burrowing owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until after they have migrated away from the site.



Native Bat Species

In Colorado, native bat species, including those known to occur within the project area, use buildings, caves, mines, concrete culverts, and other structures for maternity roosts, night roosts, and hibernacula as well as for transition roosts. They may utilize existing swallow nests for these purposes. Roosting bats are sensitive to disturbance and could leave roost sites following human visitation. Protection of roosting bats from human disturbance, especially at significant winter hibernation sites and summer maternity sites, is important for the conservation of the *Myotis* species.

To avoid or minimize impacts to native bat species, CPW recommends the following:

- When maintenance of the campground is planned to occur, maintenance technicians should conduct a visual bat survey in crevices, cracks, and seams of any campground feature larger than approximately three feet tall or wide before performing maintenance. CPW is happy to provide additional information regarding the completion of visual bat surveys if maintenance will be performed in an area where bat use is suspected.
- Because bats may also roost in old swallow nests, it's important to check for bats before washing off any nests from structures. CPW recommends leaving swallow nests in place or completing the visual bat surveys before washing off nests from the concrete.

OTHER CPW RECOMMENDATIONS

Habitat Loss and Fragmentation

The Project location provides habitat to big game, including pronghorn and mule deer. Security fencing prevents the movement of wildlife throughout the site and without breaks in the Project fence, wildlife species will be forced to move to one end, or completely go around the entire Project. That impact would be in addition



to the habitat loss and the wildlife displaced by the planned infrastructure and fencing. To minimize habitat loss and fragmentation impacts that could adversely impact big game, CPW recommends the following:

- Design facility footprint and fence layout to allow for wildlife movement through the project. CPW appreciates that ibV will consider a project layout with unfenced breaks to allow wildlife to pass through the area.
- Ensure wildlife movement corridors are sufficiently wide (200–300 meters) to accommodate large herds.
- CPW is happy to provide more detailed suggestions as Project plans progress.

Native plant management

Soil disturbance from construction activities may introduce invasive plant species that degrade habitat quality, reduce forage availability for wildlife and livestock, and increase fire risk. Land cover in much of the Project is native grassland, which provides critical habitat for numerous species, including identified SGCN. Proper reclamation is essential not only for soil stabilization but also for fostering plant communities that provide the structural diversity and resources necessary to support wildlife. CPW recommends the following additional measures:

- CPW prefers that native vegetation be retained on site during the operational lifespan of the Project, both as habitat for wildlife and to ensure successful reclamation of the Project area.
- Where ground disturbance occurs, re-establish a diverse plant community including native grasses, woody plants, and broadleaf forbs, to support wildlife nutrition and cover.
- Revegetate with native species; use a native seed blend that closely matches the surrounding vegetation to restore ecological function and maintain habitat integrity. Strict adherence to the Natural Resources Conservation Service's recommendations for seed mixes is advised.



- Prevent the spread of invasive plant species and listed Noxious Weeds by incorporating a comprehensive weed management plan, including monitoring and treatment as needed. CPW would appreciate the opportunity to review the Project's Noxious Weed Management Plan prior to the start of construction.
- Conduct long-term monitoring to assess revegetation success and complete weed control and maintenance to ensure the establishment of a functional, native plant community.

Fencing

The CPW document "Fencing with Wildlife in Mind" provides general suggestions for wildlife-friendly fencing. In addition to the measures outlined in the report, CPW recommends the following:

- For security fencing, CPW requests that the security fence be tall enough to discourage deer from jumping, at least 8 feet in height, and have a smooth top with no protrusions or wire that can risk entanglement or impalement.
- Security fencing should allow for movement of small and medium sized wildlife by providing a 6-inch gap at the bottom of the fence, or using woven wire fencing as described in the Colorado Department of Transportation Standard Plan No. M-607-4. CPW is happy to discuss this recommendation in more detail with the developer as site plans progress.
- Anywhere that security fencing is not required on the site, CPW recommends the use of wildlife permeable fencing (wildlife-friendly) to allow movement of wildlife to the extent possible.
- Project design should continue to consider wildlife movement and the inclusion of wildlife movement corridors through the Project to avoid potential impacts to big game and other wildlife moving through the area. Any planning should consider the entire Project area with the goal of allowing wildlife movements through the larger development site.



Above-ground Electrical Infrastructure

The Project is in the Golden eagle breeding range. The Avian Power Line Interaction Committee (APLIC) provides guidance on power line design that reduces collision and electrocution risk (<https://www.aplic.org/documents>). APLIC also provides recommendations for riser poles associated with underground collection systems (<https://www.aplic.org/poles-at-wind-energy-facilities>), which can reduce the risk of electrocution for eagles and other raptors that may perch on above-ground electrical infrastructure associated with the project.

Wildlife Movement Corridors

Security fencing prevents the movement of wildlife throughout the site and without breaks in the Project fence, wildlife species will be forced to move to one end, or completely go around the entire Project. That impact would be in addition to the habitat loss and the wildlife displaced by the planned infrastructure and fencing. CPW appreciates that the Project design leverages three distinct panel arrays to avoid the larger drainages between the three sites and that should help facilitate some wildlife movements. There is one small stream segment that bisects the western-most array. The fencing plan leaves the lower portion of the drainage unfenced, but closes off the upper portion of the drainage, creating a dead end for wildlife movement in the center of the panel layout. CPW appreciates that after consultation, the developer did not fence off the drainage at the southern boundary of the array. However, CPW requests that a corridor be maintained through the array so animals aren't at risk of being trapped in the fenced drainage.

Black Bear Considerations

Due to the potential presence of black bears in the Development, CPW recommends several measures to reduce human and bear conflicts.

- Homeowners should invest in bear-proof trash containers.



- Trash containers should be stored in the garage or in a solid, locked storage shed until the morning of trash collection during those months when bears are most active (April – November).
- Another possible alternative would be the use of a centralized and securely fenced trash collection site with the use of bear-proof dumpsters that homeowners and the trash service provider would have access to. This would eliminate the need for individual trash cans.
- Residents should also keep their barbecues and any food locked away in the garage or a secure building.
- The use of bird feeders and hummingbird feeders should be discouraged during the months mentioned above, since they also attract black bears.
 - If feeders are used, they should be placed so they are inaccessible to black bears, raccoons, skunks, deer and other wildlife
- Small livestock (ie, chickens and goats) and pets should be protected in hard-sided shelters that do not allow access to bears. Electric fencing is a good option to deter depredation from black bears and other species that might cause damage or threaten human safety.

A copy of a brochure entitled “Living with Wildlife in Bear Country” is available for reference upon request from CPW.

Avoiding Nuisance Conflicts

The following is a list of general recommendations the CPW would like to be taken into consideration with the residential side of this development in order to avoid nuisance conflicts with wildlife. Many times, these conditions can be enforced through the local Homeowner’s Association or through covenants.

- Pets should not be allowed to roam free, and fences should be installed to decrease or eliminate this problem. Dogs and cats chase or prey on various wildlife species. One benefit to keeping animals under control is that they are less likely to bother other people, be in roadways or become prey for mountain lions, bears, coyotes, foxes or owls.



- Pets should be fed inside or if pets are fed outside, feeding should occur only for a specified period of time and food bowls returned afterwards to a secure site for storage. Pet food left outside attracts various wildlife species, which in turn attracts predators.
- When landscaping lots, it is strongly recommended that native vegetation be used that wildlife is less likely to be attracted to.
- Planting of trees and shrubs that are attractive to native ungulates should incorporate the use of materials that will prevent access and damage (fencing, tree guards, trunk guards, etc.).
- It is strongly encouraged that dog kennels have a top enclosure, regardless of the kennel's height.

We appreciate your consideration of our comments and recommendations. As always, CPW staff are available to work with operators on how best to minimize development impacts to both wildlife and their habitats. If you have questions or would like clarification about any of our comments, please contact District Wildlife Manager District Wildlife Manager Aaron Berscheid at 719-439-9601 or aaron.berscheid@state.co.us.

Sincerely,



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