COLORADO
Parks and Wildlife
Department of Natural Resources

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20 November 2026

Alan Greaves and Judith Ann Greaves
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RE: CPW Comments in the Greaves Pinery Subdivision, El Paso County

Dear Alan Greaves,

Colorado Parks and Wildlife (CPW) received your request for comment on the Greaves Pinery Subdivision Project (the Project), to be developed by Alan Greaves and Judith Ann Greaves in El Paso County. CPW staff are familiar with the location of the Project as well as the area surrounding the site. This letter includes a summary of CPW's statutory responsibility, understanding of the project, general recommendations, potential impacts to wildlife, and recommendations for impact avoidance, minimization, and/or mitigation.

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

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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.

UNDERSTANDING OF THE PROJECT

CPW understands that the Project will be located in El Paso County, approximately 20 miles northeast of Colorado Springs, and approximately four miles northeast of the Black Forest Regional Park. Anticipated surface disturbance associated with the rezoning and replatting of the site into three single-family residential lots entail each proposed lot approximately 3.03 acres, with a total of approximately 9.093± acres.

GENERAL RECOMMENDATIONS

CPW recommends that, when selecting sites for development, the developer focuses 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. 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.

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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

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, seven (7) invertebrate species, eight (8) 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	*Aquila chrysaetos*	Golden Eagle	SWAP Tier 1
Birds	*Antigone canadensis*	Sandhill Crane	SWAP Tier 2
Birds	*Athene cunicularia*	Burrowing Owl	SWAP Tier 2, ST
Birds	*Calamospiza melanocorys*	Lark Bunting	SWAP Tier 2
Birds	*Circus hudsonius*	Northern Harrier	SWAP Tier 2
Birds	*Falco mexicanus*	Prairie Falcon	SWAP Tier 1
Birds	*Leiothlypis virginiae*	Virginia's Warbler	SWAP Tier 2
Birds	*Selasphorus rufus*	Rufous Hummingbird	SWAP Tier 2

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CPW Project Area Species of Greatest Conservation Need*			
Major Group	**Scientific Name**	**Common Name**	**CPW Status#**
Insects	*Bombus fervidus*	Golden Northern Bumble Bee	SWAP Tier 2
Insects	*Callophrys mossii schryver*	Schryver's Elfin	SWAP Tier 2
Insects	*Celastrina humulus*	Hops Azure	SWAP Tier 2
Insects	*Danaus plexippus*	Monarch	SWAP Tier 1
Insects	*Epitheca petechialis*	Dot-winged Baskettail	SWAP Tier 2
Insects	*Polites rhesus*	Rhesus Skipper	SWAP Tier 2
Insects	*Somatochlora ensigera*	Plains Emerald	SWAP Tier 2
Mammals	*Zapus hudsonius preblei*	Preble's Meadow Jumping Mouse	SWAP Tier 1, LT, ST
Mammals	*Cynomys ludovicianus*	Black-tailed Prairie Dog	SWAP Tier 2, SC
Mammals	*Eptesicus fuscus*	Big Brown Bat	SWAP Tier 2
Mammals	*Lasionycteris noctivagans*	Silver-haired Bat	SWAP Tier 2
Mammals	*Lasiurus borealis*	Eastern Red Bat	SWAP Tier 2
Mammals	*Lasiurus cinereus*	Northern Hoary Bat	SWAP Tier 1
Mammals	*Myotis evotis*	Long-eared Myotis	SWAP Tier 1
Mammals	*Myotis lucifugus*	Little Brown Myotis	SWAP Tier 1
Mammals	*Myotis thysanodes*	Fringed Myotis	SWAP Tier 1
Reptiles	*Phrynosoma hernandesi*	Hernandez's Short-horned Lizard	SWAP Tier 2
Reptiles	*Terrapene ornata ornata*	Plains Box Turtle	SWAP Tier 2

* 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; Federally Listed Threatened=LT; Species of Concern=SC; State Threatened=ST

IMPACT AVOIDANCE, MINIMIZATION AND/OR MITIGATION RECOMMENDATIONS

Native Fish and Aquatic Species Conservation Waters

Aquatic Native Species Conservation Waters (HPH) are lakes and river segments containing species under population conservation and recovery management.

Seasonally wet areas along and into Kettle Creek provide potential 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.
- 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.
- 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.

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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 15 to August 31). 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 (February 1 to October 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 to 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.

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:

- 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

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. 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.

CLOSING

We appreciate your consideration of our comments and recommendations. As always, CPW staff are available to work with developers 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 Demetria Wright - Area 14 District Wildlife Manager - demetria.wright@state.co.us or Land Use Coordinator Vee Torres at vee.torres@state.co.us.

Sincerely,

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