



COLORADO

Parks and Wildlife

Department of Natural Resources

Area 14, Southeast Region
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200

November 25, 2020

El Paso County Planning and Development
Attn: Rad Dickson, Project Manager
2880 International Circle, suite 110
Colorado Springs, CO 80910

RE: Ellicott Sand and Gravel Special Use

Dear Ms. Ruiz,

Colorado Parks and Wildlife (CPW) has received a request for comments on the sand and gravel project in El Paso County located in Sections 20, 29, and 32 of 14S 62W. CPW staff is familiar with the proposed location of the project as well as the area surrounding the site. Since a majority of the property is developed agricultural land, CPW comments will address potential impacts to Black Squirrel Creek.

The project area encompasses Black Squirrel Creek that flows North to South from the Northwest corner to the Southeast corner of the project site. Black Squirrel Creek is a drainage that is dry most of the year but sees flowing water during heavy rain events. Within the Squirrel Creek Drainage, there are populations of Arkansas Darter (*Etheostoma cargini*) downstream of that location. There should be minimal impacts to any riparian areas or stream beds, both during construction and after, and any stream bed should be handled as a stream crossing whether or not water is present at the time of construction. Minimizing impact to these streams is a priority for CPW and avoidance is best whenever possible. CPW recommends a ground disturbance buffer with minimal activities or operations within 300 feet of any lake, reservoir, wetland or stream. Erosion and sediment control precautions should be in place to avoid deposition into water ways. Destruction of riparian vegetation and truck/heavy machinery stream crossings should be avoided.

CPW further recommends crossing riparian corridors and streams at a perpendicular angle, in order to reduce impacts to natural resources, as well as spanning the corridors with structures located outside the riparian and stream zone. CPW



recommends avoiding treed areas of cottonwood and willow, as these areas provide bird and wildlife habitat. During construction, stream crossing by construction vehicles should be avoided. CPW requests that any new service roads that are proposed for construction in conjunction with the project avoid crossing creeks or stream beds to avoid impacts to wildlife and habitat. If any new access or maintenance roads will be constructed that cross stream habitat, CPW would like to be consulted on best management practices and options for construction to minimize impacts. A construction design for any new or reconstructed riparian crossing that actively minimizes barriers to fish passage at all water levels and mitigates any existing barriers where possible would minimize the negative impact of the project on native fish species.

CPW recommends the following Best Management Practices when working in or near aquatic habitats.

- Drainages should be crossed perpendicular to the flow of the stream
- Use existing road crossings and existing stream crossings for vehicles and other construction equipment instead of building new roads and stream crossings
- The width of construction should be minimized within the 100-year floodplain,
- Stream bank, wetland restoration/improvement should be performed, where necessary
- Vehicle and equipment crossing of creeks/streams should be made in locations that will cause the least erosion of banks and sedimentation.

We appreciate being given the opportunity to comment. Please feel free to contact District Wildlife Manager Philip Gurule, should you have any questions or require additional information at 719-227-5283 or via email at philip.gurule@state.co.us.

Sincerely,



Frank McGee
Area Wildlife Manager

Cc: Philip Gurule, DWM
SE Region Files
Area 14 Files