COLORADO
Parks and Wildlife
Department of Natural Resources

Area 14
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Colorado Springs, CO 80907
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September 17, 2018

Thomas and Thomas Planning Group
ATTN: Jason Alwine
702 N. Tejon Street
Colorado Springs, CO

Re: Creekside at Lorson Ranch PUDSP Plan/ PUDSP- Combined PUD/Preliminary Plan

Dear Mr. Alwine:

Thank you for the opportunity to comment on the Creekside at Lorson Ranch PUDSP Plan. Colorado Parks and Wildlife (CPW) has reviewed the project materials and visited the site. CPW has commented on previous phases of this development, and offers the following comments on this phase.

The vegetation is comprised of short grass prairie species. This habitat type will sustain numerous wildlife species including antelope, deer, coyote, fox, raptors, songbirds and numerous small mammals.

Construction even near riparian habitats can have downstream effects, such as increased sedimentation and erosion. If bank stabilization is not completely necessary in an area, we recommend leaving it in its natural state. Disturbance to soil can lead to introduction of invasive plant species which, among other things, can reduce the amount of quality forage for wildlife and cattle as well as possibly create an increased fire hazard. CPW recommends the development and implementation of a noxious weed control plan for the site. CPW recommends that in places where vegetation is removed, a native seed blend is used that matches the surrounding vegetation types as accurately as possible. All disturbed soils should be monitored for noxious weeds and noxious weeds should be actively controlled until native plant re-vegetation and reclamation is achieved. All landscaping in the developed area should be comprised of native species, and CPW recommends against using non-native plants or noxious weeds. Some care should be taken with species choice to prevent the attraction of unwanted wildlife into the development area. Information on plant species consumption by specific wildlife species is available through CPW.

By using native species with high food and cover values in an open space area large enough to maintain a viable movement corridor, and native plants with little food and cover value in the

developed area, wildlife will be concentrated in areas that minimize conflict and optimize wildlife watching opportunities. Native species provide an aesthetically pleasing landscape that requires little maintenance and are frequently more drought-tolerant than non-native species.

CPW has identified current and past raptor nesting in the area. CPW recommends the use of preconstruction surveys, as well as continuation of those surveys during construction, 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 attached document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors". Removal or relocation of any active raptor nests will require consultation with CPW and US Fish and Wildlife Service prior to moving. Both active and potential nest sites, winter night roosts should be considered when evaluating disturbance during construction.

Jimmy Camp Creek contains a population of Arkansas darters, a state threatened and federal candidate species. The Jimmy Camp Creek population of Arkansas darters is an important population in the Arkansas Basin. Arkansas darters are a high priority Tier 1 species in the CPW State Wildlife Action Plan. One of the conservation actions of CPW is securing habitat quality for existing populations. Although no Arkansas Darters were located during a stream survey conducted in 2005, the East Tributary of Jimmy Camp Creek (ETJC) does provide potential darter habitat.

In 2006, then, Colorado Division of Wildlife (CDOW) wrote a comment letter advising against straightening the ETJC. Reduction in sinuosity (the way a stream channel bends) can cause negative impacts to the riparian wildlife habitat associated with this stream. As streams are straightened, the slope of the channel tends to steepen, thus increasing water flows and sedimentation. Riparian areas and flood plains slow flood waters, provide habitat for wildlife, and decreases potential damage to any structures that end up being built near the creek channel. A stream with higher sinuosity allows for willows and other plants to establish along the banks and create a complex root system, thus strengthening the integrity of the stream channel. Although some sinuosity was left, the channel has undergone a drastic change and is for the most part straight; the channel is perfectly "U" shaped which further increases water velocity during high flow/flood events. ETJC also no longer has a riparian/flood plain as it goes through the development. Since 2006, several hundred acres of short grass prairie have been developed creating a large amount of impervious surface. The proposed addition will add an additional approximate 83.08 acres of impervious surface. This increase in impervious surface combined with the new straightened and channelized nature of the creek will increase erosion, siltation and water velocity during heavy rain events which could have a negative impact on the surrounding environment as well as manmade structures. Jimmy Camp Creek's hydrograph already has a flow pattern dominated by flood pulse events that is sharply amplified by the already constructed developments both up stream and down from the development's future location. CPW is concerned about the possible addition to the amplitude of flows that could result from the impacts listed above.

Conflicts may arise between homeowners and wildlife. The following is a list of general recommendations that CPW would also like to be taken into consideration in order to avoid

nuisance conflicts with wildlife. Coyotes, foxes, cottontail rabbits, and raccoons are several species that have adapted well to living within city limits. Open space, as well as developed areas, may become suitable habitat for many wildlife species. Coyote sightings are common within the city and few interactions are negative for the coyote. While coyotes will not usually approach people, in places where they see us often, they become less fearful. Coyotes feed near homes, yards, trails, and roads in order to survive in urban areas. Homeowners can do their part by *not* inviting wildlife into their yard. Many times these conditions can be enforced through the local Homeowner's Association or through covenants.

1. 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 coyotes, foxes or owls.

2. Trash should be kept indoors until the morning of trash pickup. CPW recommends using bear resistant trash containers. Skunks, raccoons, bears, and neighborhood dogs are attracted to garbage and do become habituated.

3. Feeding of all wildlife should be prohibited, with the exception of songbirds. The use of bird feeders, suet feeders, and hummingbird feeders are discouraged. However, if feeders are used, they should be placed so they are inaccessible to raccoons or skunks and other wildlife species that might cause damage or threaten human safety. It is illegal to feed big game including deer, elk, antelope, moose, bear and lion as well as coyote and fox.

4. 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.

5. 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.).

6. Fences, other than those around the immediate domicile and serving to protect landscaped trees and shrubs, should be designed so as not to impair wildlife movements. Ornamental fences with sharp vertical points or projections extending beyond the top rail should be strongly discouraged. Wildlife friendly design recommendations can be provided upon request.

CPW has further resources available to developers and residents on our website at CPW's homepage.

CPW believes that the development as proposed will lead to increased nuisance wildlife conflicts as well as erosion concerns on the East Tributary of Jimmy Camp Creek similar to those seen in many other Colorado Springs streams. The proximity of human development on both sides of the ETJC as well as the main channel limits the effectiveness of these streams as

wildlife corridors. To preserve the ETJC as outlined in the 2003 Highway 94 Comprehensive plan CPW recommends increasing the size of the open space surrounding the creek.

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 Regional File
Area 14 File