



COLORADO

Parks and Wildlife

Department of Natural Resources

Southeast Regional Office
4255 Sinton Rd.
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5223

August 1, 2022

Kari Parsons

Planner 2880 International Circle,

Colorado Springs, CO 80910

Subject: Town of Ramah Wastewater System 1041

Thank you for the opportunity to review and comment on the application for the Town of Ramah Wastewater System 1041.

After reviewing the maps and documents for the proposed expansion, Colorado Parks and Wildlife (CPW) does not foresee significant impacts to wildlife, wildlife habitat, or aquatic resources. The proposed area of mineral development is characterized by short grass prairie. Native short grass prairies are highly valued for their ability to support obligate species. In El Paso County, native short grass prairies are critical habitat for Swift Fox and Pronghorn. It would be very important that any disturbed soil in this area be replanted in native grasses as soon as possible to minimize loss of top soil and the introduction of invasive noxious weeds. We would recommend using NRCS seeding guidelines for reclamation of any ground disturbance.

CPW recommends there be minimal impact to the stream bed, both during construction and after, and the 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. 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.

CPW would recommend identifying and avoiding all maternal swift fox den sites. Swift fox live



here year-round, breed, during December, and raise their young into the next fall. Any disturbance or destruction of dens while pups are den dependent should be avoided. It is recommended that swift fox surveys include daylight searches for den areas and nighttime spotlight searches. CPW recommends no human encroachment, surface disturbance, or construction activity within 0.25-mile of an active den site from **March 15 through June 15**. Swift fox is a species of state and federal concern that lives in and around the proposed area.

Also of importance of revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The Colorado Weed Management Association provides the booklet “Noxious Weeds of Colorado” that provides information on identification and management of noxious weeds in Colorado. 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. Proper reclamation, from a wildlife perspective, involves not only stabilizing the soil and establishing ground cover, but also fostering plant communities with a diversity of species and plant types- grasses, woody plants, and broadleaf forbs, which will fully serve the nutritional needs of wildlife.

Once again, we appreciate being given the opportunity to comment on the Ellicott Sand and Gravel Special Use. Please feel free to contact our office at 719-227-5250 should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Kroening', with a stylized flourish at the end.

Tim Kroening
Area 14 Wildlife Manager

Cc: Sarah Watson, DWM
SE Region File
Area 14 File