Northeast Regional Office 6060 Broadway Denver, CO 80216 P 303.291.7227

September 20, 2021

Sandy Vossler, Senior Planner Town of Castle Rock Development Services Department 100 N. Wilcox Street Castle Rock, CO 80109

RE: Dawson Trails Planned Development (Project #PDP21-0001)

Dear Sandy Vossler:

Thank you for the opportunity to comment on the Dawson Trails Planned Development (PDP21-0001). The mission of Colorado Parks and Wildlife (CPW) is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Our goal in responding to land use proposals such as this is to provide complete, consistent, and timely information to all entities who request comment on matters within our statutory authority.

The 2062-acre project area is located west of I-25 and south of Territorial Road in Castle Rock, CO Douglas County. The property currently consists of open meadows, pine trees, and Gambel's Oak.

The proposed development includes a plan to allow a maximum of 5,850 residential units on the property, together with a maximum of 3.2 million square feet of commercial and other non-residential uses. The proposed plan includes roughly 36% of the total land area to be designated as either open space or public land dedication (PLD).

The main impacts to wildlife from this development include fragmentation and loss of habitat. Fragmentation of wildlife habitat has been shown to impede the movement of wildlife across the landscape. Open space areas are more beneficial to wildlife if they connect to other nearby natural areas creating corridors for movement. The areas of wildlife habitat that most closely border human development show heavier impacts than do areas on the interior of the open space. However, when open space areas are smaller in size, the overall impacts of the fragmentation is greater (Odell and Knight, 2001). By keeping open space areas larger in size and contiguous, the overall benefit to wildlife increases dramatically.

Although it is impossible to eliminate fragmentation and habitat loss with any development, impacts to wildlife can be minimized through the use of clustering configurations, density reduction, and providing open space and corridors for wildlife. With respect to the proposed project, clustering the anticipated lots and allowing a continuous corridor is encouraged to minimize fragmentation of wildlife habitat and increase the size of open space or undisturbed areas on the parcel.



When planning trails, special consideration should be given to the impact trails have on wildlife within the area. Trails have the ability to contribute to fragmentation of habitat, disrupt the natural movement of wildlife through an area, and spread noxious weeds. Trails should not cut through riparian areas or wetland areas and should remain at least 150 feet from each side of a riparian/wetland area. Trails should also be placed at the edges of open space areas and should be no wider than 8 feet throughout their entire length.

Noxious weeds should be monitored very closely. The spread of noxious weeds on and around the property is a concern for wildlife. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them. CPW recommends the implementation of a weed management plan that may already exist within Douglas County.

CPW would expect a variety of wildlife species to utilize this site on a regular basis, including small to mid-sized mammals, big game, songbirds, and raptors. Raptors are protected from take, harassment, and nest disruption at both the state and federal levels. Should a raptor nest be discovered or constructed on the property, CPW recommends the coordination of buffer zones around the nest during the nesting and fledging seasons. This will prevent the intentional or unintentional disturbance and destruction of an active nest. For further information on this topic, a copy of the document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors" can be provided by the local District Wildlife Manager (DWM) upon request.

Prairie dog colonies may exist within the development site, and with that, the possibility exists for the presence of burrowing owls. Burrowing owls live on flat, treeless land with short vegetation, and nest underground in burrows dug by prairie dogs, badgers and foxes. These raptors are classified as a state threatened species and are protected by both state and federal laws, including the Migratory Bird Treaty Act. These laws prohibit the killing of burrowing owls or disturbance of their nest. Therefore, if any earth-moving will begin between March 15th and October 31st, a burrowing owl survey should be performed. Guidelines for performing a burrowing owl survey can be obtained from the local District Wildlife Manager.

CPW also recommends that any prairie dog colony discovered on the property be completely vacated of living animals prior to the start of any earth-moving. If prairie dogs are present and any earth-moving is to be done on site, CPW recommends euthanasia or relocation (with the appropriate permit) prior to any work being done. If relocation is chosen, please consult with the local District Wildlife Manager for the required permit.

Due to the location of this proposed project, it is inevitable big game species including elk, deer, bear, and mountain lion will be present, as well as additional small game mammals. Based on data outlined in CPW's Species Activity Mapping, part or all of the property contains the following designations:

- Black Bear Summer Concentration Area
- Black Bear Overall Range
- Mt. Lion Human Conflict Area.
- Elk Resident Population Area
- Elk Summer Range

- Mule Deer Summer Range
- Mule Deer Resident Population Area
- Mule Deer Winter Range
- Preble's Meadow Jumping Mouse Overall Range
- Golden Eagle Breeding Range
- Peregrine Falcon Foraging Area

As mentioned above, the project area lies within excellent bear and lion habitat, and both species will be observed in the area. Residents should expect to see these species and be familiar with how to avoid conflicts with them. Each year, CPW is forced to euthanize bears as a result of human-bear conflicts which typically begin with bears accessing attractants including human food, trash, and birdfeeders/hummingbird feeders. Residents should be provided with CPW documentation on human-wildlife conflict prevention and mitigation. Prospective buyers should be informed that wildlife such as foxes, coyotes, deer, elk, bears, mountain lions, etc. might frequent the residential area in search of food and cover. Residents residing in this area should take the proper precautions to minimize conflicts by supervising and protecting their pets and reducing attractants on their property. Homeowners can do their part by reviewing CPW literature and learn how to avoid inviting wildlife into their yards. Due to the potential for human-wildlife conflicts associated with this project, please consider the following recommendations when educating future homeowners about the existence of wildlife in the area:

- Develop and enforce strict policies on the management of human food, trash, bird feeders, and other attractants on the properties.
- Inform residents that the intentional and unintentional feeding of big game animals is illegal.
- Place all trash in bear-resistant trash cans and dumpsters with a locking mechanism.
 Information on bear-resistant devices can be obtained through the local DWM.

Thank you again for the opportunity to comment on the Dawson Trails Planned Development (Project #PDP21-0001). Please do not hesitate to contact CPW about ways to continue managing the property in order to maximize wildlife value while minimizing potential conflicts. If you have any further questions, please contact the local District Wildlife Manager, Sean Dodd, at (303) 291-7134.

Sincerely,

main most

Matt Martinez

Area Wildlife Manager

Cc: M. Leslie, S. Schaller, S. Dodd