



COLORADO

Parks and Wildlife

Department of Natural Resources

Northeast Regional Office

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August 11, 2025

Kathleen Hammer

Senior Planner Public Works and Development

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Englewood, CO 80112

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RE: May Farms RV Resort and Sanctuary / Referral GDP25-001 / Arapahoe County

Dear Ms. Hammer,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the first step of a three-step proposed General Development Plan application, known as GDP25-001 of the May Farms RV Resort and Sanctuary Project. The project is located on private property that is currently zoned for agriculture in Section 4 of Township 4 South, Range 61 West in the Town of Byers, Arapahoe County, Colorado. CPW understands that the proposed use of the site is to create an RV park and sanctuary on 150 acres alongside West Bijou Creek. The proposed development will include 700 camp sites, 400 short-term residential units with associated support amenities, including welcome centers, laundry facilities, recreational equestrian and hiking trails, and also the development of a water park with waterslides.

The mission of 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. CPW has a statutory responsibility to manage all wildlife species in Colorado, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this project.



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Richard Reading, Chair · James 'Jay' Tutchton, Vice-Chair · Eden Vardy, Secretary · Jessica Beaulieu · Frances Silva Blaney · John Emerick · Tai Jacober · Dallas May · Jack Murphy · Gabriel Otero · Murphy Robinson

After review of the proposed project and location, CPW would like to share some concerns and also recognize several potential impacts to wildlife and wildlife habitat such as habitat loss, habitat fragmentation, concerns with water use, development along and proximity to West Bijou Creek which is a High Priority Habitat (HPH) riparian corridor for wildlife.

CPW recognizes and values the importance of areas known as High Priority Habitats (HPH). Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High Priority Habitats are defined as sensitive habitats where CPW has recent maps regarding sensitive wildlife use, plus scientifically-backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity maps that are collected and updated for a variety of species and their particular habitats; CPW provides these maps to the public and regulatory agencies for the environmental assessment and land use commenting of proposed development on a given parcel, and general scientific research.

Aquatic Native Species Conservation Waters are areas of High Priority Habitat identified within the State of Colorado's 2015 State Wildlife Action Plan (SWAP). This HPH layer is designated for the recovery, conservation, protection, or enhancement of native fish species, and to aid in the conservation of other native aquatic species, such as amphibians, crustaceans, or mollusks (includes CPW Tier 1 and 2 SWAP Species). These surface water features provide critical habitat for native aquatic wildlife, such as amphibians and fish, while also providing crucial habitat for mammals, birds, and reptiles that utilize the habitat.

Within the proposed Project area, there is a possibility of sensitive aquatic native species (fish, amphibians, invertebrates) presence within West Bijou Creek. CPW recommends no surface occupancy and no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters and the implementation of appropriate storm water and sediment control BMPs.

Mule Deer Winter Concentration Areas are areas of High Priority Habitat defined as the part of the winter range where mule deer densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average of five winters out of ten.

The western half of the proposed project area borders West Bijou Creek, which is mapped as Mule Deer Winter Concentration Area HPH. For the identified portions of the proposed project area that traverse Mule Deer Winter Concentration Area HPH, CPW typically recommendations be implemented during construction:

- Complete construction and development in these areas outside of the winter season, which December 1st to April 30th.

Mule Deer Migration Corridors are High Priority Habitats with a specific mappable site through which large numbers of animals migrate and the loss of which has the potential to change mule

deer migration routes. With regard to the proposed development of May Farms RV Resort and Sanctuary, Mule Deer Migration Corridors are present along the western side of the proposed project area along West Bijou Creek. For the identified portions of the proposed Project area that traverse Mule Deer migration corridor, CPW recommends the following recommendations be implemented during construction:

- CPW recommends avoiding the riparian corridor to the maximum extent possible in order to keep the mule deer migration corridor along the river as open and undisturbed as possible.

If prairie dog burrows are present at the site, CPW recommends that burrowing owl surveys be conducted prior to any development. Burrowing owls are listed as a State Threatened species and are known to nest on flat treeless ground with short vegetation in active or inactive prairie dog burrows or the burrows of other terrestrial wildlife. Because burrowing owls are included in the protections afforded by the Migratory Bird Treaty Act, it is important to avoid actions that could negatively impact the owls, nests, and eggs.

To best avoid or minimize impacts to Burrowing Owls within the project area, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends adherence to [CPW's Burrowing Owl Survey Protocol](#).
- CPW recommends conducting targeted surveys for any activities resulting in ground disturbance between March 15th and October 31st.
- If nesting Burrowing Owls are present, no human encroachment or surface disturbance should occur within a 200-meter buffer of nesting burrows from March 15th to August 31st.
- If Burrowing Owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until late fall after they have migrated.

With regard to fencing, CPW is concerned for the safety and natural movement of mule deer, white-tailed deer and pronghorn antelope herds along and throughout the area of the proposed project. CPW recommends that if fencing (project perimeter or internal) is erected, either during or after the project, it should be the type that would allow the free passage of wildlife.

Fencing plans should avoid the use of woven wire-type fences that will trap or prevent the movement of wildlife. This would include avoiding the use of wrought iron fences or fences with spikes on top where deer could become impaled. CPW recommends using three or four-strand smooth-wire fencing with a bottom strand height of 17 inches above ground level and a maximum top strand height of 42 inches above ground level, along with the installation of double stays between posts.

CPW's "[Fencing with Wildlife in Mind](#)" brochure.

CPW recommends that an active weed management plan be implemented in accordance with Arapahoe County standards to control and eliminate the control and spread of any noxious weeds in and around the site. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them.

Also of importance is the 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 revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. It is preferable that native vegetation be retained on-site during the operational lifespan of the project, both as potential habitat for wildlife and to ensure successful reclamation of the project area, as noxious weeds could spread to adjacent habitats outside the project area. CPW recommends that the applicant consult with Arapahoe County and the Natural Resource Conservation Service (NRCS) for current noxious weed best management practices.

Artificial lighting of the area at night has been documented to potentially negatively affect wildlife species of all sizes, from small macroinvertebrates to large mammals. These effects are often species-specific, and in some cases may be beneficial to one species within a local ecological community, but detrimental to another species within the same ecological community. These impacts could be expected year-round and can affect both local resident species and migrating wildlife, which may lead to collisions with other animals and structures, exhaustion, increased depredation, and direct mortality. Nighttime artificial lighting may also disrupt nocturnal species that are not accustomed to a significant increase in artificial light, leading to temporary blindness and disorientation, which may also increase the likelihood of collisions with infrastructure on site. CPW recommends that all outdoor lighting be down-shielded to minimize disturbance areas and dim the lights as much as practicable.

Per U.S. Fish and Wildlife Service recommendations¹, all outdoor lighting should be limited to warmer colors with “longer wavelengths (>560 nm) and lower correlated color temperatures (CCT<3000 Kelvin degrees)” (“Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service”). Per the American Bird Conservancy, CCTs ranging from 2200 Kelvin Degrees to 2700 Kelvin Degrees are the preferred range of color. (Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass | Sheppard, PHD²) CPW recommends the latter range of lighting color options for implementation at the project site.

The intentional feeding of any wildlife is greatly discouraged and even prohibited in Colorado with the exception of feeding birds from bird feeders (2 CCR 406-0 #021.A pursuant to 33-6-104(1): Feeding or Attracting - Big Game, 33-6-131(1): Feeding or Attracting - Bear Citation).

¹ “Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service.” FWS.gov, 4 May 2023, www.fws.gov/story/threats-birds-collisions-nighttime-lighting.

² Sheppard, PHD, Christine. *Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass*. American Bird Conservancy, 11 May 2022, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf.

The feeding of wildlife such as deer, elk, bear, coyote, and foxes by any type of feeding, baiting, salt blocks, or any other means of attracting wildlife is illegal. Feeding of wildlife can also be extremely harmful to wildlife and to humans alike. Please see the following CPW publications for more information:

Do Not Feed Wildlife: <http://cpw.state.co.us/learn/Pages/do-not-feed-wildlife.aspx>

CPW recognizes some other concerns regarding the proposed development along West Bijou Creek. This area has been mapped by CPW for a variety of wildlife species, including but not limited to: pronghorn (overall range and winter range), wild turkey (overall range and production area), and general habitat for nesting raptors along with roosting and foraging habitat for birds of prey.

CPW is concerned with recreational equestrian and public hiking trails accessing West Bijou Creek from this development and would like to reiterate that CPW recommends no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters, this includes hiking and recreating within the dry creek bed due to this area being crucial to wildlife.

CPW would also like to bring attention and concern to the proposed development of a water park on the site. Water quantity and water use is of great concern in such a western arid environment. It is quite possible that the proposed water park will include pools, water slides and the need for water treatment and chlorination.

Concerns about water quantity during and water quality after chlorination and other human treatment is of concern due to the sensitive nature of nearby West Bijou Creek. If a water park is approved for development, it is recommended that the water park location be planned as far away from the riparian creek corridor as possible in order to prevent chlorine and other contaminants from getting into West Bijou Creek.

Finally, it is important to note that incremental and cumulative loss of natural areas and open space will, over time, significantly degrade the overall quality of wildlife habitat in the area. Although relatively moderate in acreage, it is important to know that the development of May Farms RV Resort and Sanctuary contributes to the overall fragmentation of and loss of native short grass prairie habitat in Colorado and in Arapahoe County.

Thank you again for the opportunity to comment on the proposed May Farms RV Resort and Sanctuary project in Arapahoe County Colorado. CPW appreciates the consideration of recommendations to help avoid and minimize impacts to wildlife and wildlife habitat. CPW looks forward to hearing back from the applicant with a management plan to address wildlife habitat concerns outlined above. If you have any additional questions regarding wildlife concerns for this project, please contact District Wildlife Manager Travis Harris at (303) 915-8444 or travis.harris@state.co.us

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Martinez", with a stylized flourish at the end.

Matt Martinez
Area Wildlife Manager

Cc: M. Leslie, T. Harris

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October 17, 2025

Arapahoe County Public Works & Development
Planning Division
6924 S. Lima Street
Centennial, CO. 80112

Re: May Farms RV Resort & Sanctuary @Byers (GDP25-001)/Response to CPW Comments

Dear Public Works and Development:

This letter will confirm discussions with the Colorado Parks and Wildlife (CPW) regarding their questions about the proposed GDP for May Farms RV Resort & Sanctuary at Byers.

On October 8, 2025, the Applicant met with CPW representatives Lexi Hamous Miller, Travis Harris, and Matt Martinez. CPW raised questions and provided suggestions regarding a variety of topics, including wildlife migration and habitat, night time lighting, traffic, parking, aquatic and other species assessment, and mitigation steps.

The Applicant acknowledged all concerns and committed to working with CPW as this project moves into later approval phases, including the Site Development Plan process. The Applicant will also host a site tour for CPW representatives.

As always, we are happy to discuss.



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