



## COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

June 30, 2017

**Re: Interoffice Memo  
Trapper Mine, C-1981-010  
PR-8 Adequacy Questions**

Robin,

I have finished my review of the PR-8 application and have the following questions:

### Appendix D-VI

1. On page 7, it is stated that the Aspen plant community was not sampled because it lies outside of the potential mine disturbance area. The potential mine disturbance area is not described in the text or shown on a map. Please reference a map or describe in the text the potential mine disturbance area so that it can be verified that all Aspen plant communities are not going to be disturbed.
2. Many plant species were counted as contributing to plant cover in Tables 3, 6 and 9 but were not included in Table 1 List of Observed Plant Species. Table 1 clarifies the species codes used in the cover data tables and describes the life form of the plant. Please update Table 1 so all the species that contributed to plant cover are described in Table 1. If the plant was only identified to the genus, note that in the table.
3. *Bromus tectorum* is a Colorado listed Class C noxious weed. It is listed in Table 1 as an introduced annual grass but not noxious. It is also listed in Tables 3, 6 and 9 in the annual/biennial section. Please amend all tables so *Bromus tectorum* is counted as a noxious weed.
4. Many plant species were counted as contributing to shrub density in Tables 5 and 8 but were not included in Table 1 List of Observed Plant Species. Table 1 clarifies the species codes used in the cover data tables and describes the life form of the plant. The species codes that need to be included in Table 1 are: AMAALN, RIBAU and TETGLA. Please update Table 1 so all the species that contributed to shrub density are described in Table 1.
5. In Table 1, *Populus tremuloides* has the code POPANG. This appears to be a typo as it does not match the code POPTRE in Table 5. Please correct this typo.
6. On page 13 in section 3.2.4.7, it states "or the adjacent portions of Garfield County." Garfield County is not adjacent to Moffat County. Routt and Rio Blanco Counties are adjacent to Moffat County in the vicinity of the Trapper Mine. Please clarify the adjacent county in the text.
7. On page 13 in section 3.2.4.7, it states that 32 species of potential rare or endangered plant are known to exist in Moffat or the adjacent portions of Garfield (Routt) County. The CNHP website was consulted to verify the plant species and it was learned that CNHP no longer updates the purple Colorado Rare Plant Field Guide. CNHP maintains an Excel spreadsheet and interactive map of rare plants. The



updated Excel list shows that 48 species of rare or endangered plants are known to exist in Moffat County and 14 exist in Routt County (<http://www.cnhp.colostate.edu/download/list.asp>). Please update this section to include the additional species.

8. On Map M48A, polygons are used to outline the plant communities which are labeled accordingly. In three areas, several plant communities are within a single polygon: the NE portion of the half-mile baseline area (MS, SB and GL), SE within the permit area (SB and GL) and SW within half-mile baseline area (MS and GL). Please clarify the plant community that is associated with each polygon and update the acres for each plant community as necessary.
9. On Map M48A, the legend shows that WT is the symbol for wetland plant community which comprises 5.28 acres. The WT symbol is not shown on the map indicating the wetland area. Please identify the wetland area on the map with the WT symbol.
10. On Map M48A, the symbols DI and WM are used to label two polygons but are not described in the legend. Please include these two symbols in the legend.
11. In the legend on Map 48A, there is a section labeled "plant community acreages within the PR-7 mine pit disturbance area." The mine pit disturbance area is not depicted on the map which can be used to verify acreages. Please delineate the mine pit disturbance area on Map M48A.

#### Section 2.6

1. On page 2-345d, it states that 78 soil test pits locations are shown on Map 29A. The test pit locations are not shown on the version of Map 29A that was submitted with the PR8 application. Please update Map 29A to show the 78 soil test pit locations.