



COLORADO

Parks and Wildlife

Department of Natural Resources

Southeast Region, Area 14
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5223

December 18, 2017

Timothy Cazier
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
1313 Sherman St. Room 215
Denver, CO. 80203

Wildlife Fencing Modifications and Wildlife Monitoring Technical Revision (TR) - 91

Dear Mr. Cazier,

Colorado Parks and Wildlife is aware that Cripple Creek and Victor (CC&V) Gold Mine has constructed a wildlife exclusion fence in the area south of Country Road 82 in Sections 17 and 18, Township 15S, Range 69W, 6th Principal Meridian in Teller County. CC&V Gold Mine made modifications to the standard Colorado Department of Transportation (CDOT) wildlife exclusion fence design specifications. According to point three in the Technical Revision CPW needs to document acceptance of any modifications from the standard CDOT design. CPW staff offers the following comments for your consideration.

Colorado Parks and Wildlife received the attached letter from Taylor Fence Company dated November 27, 2017. CPW has reviewed the letter and found the modifications to the standard CDOT wildlife exclusion fence made by the fence company to be acceptable. The fence maintains the 8 foot height and its design is satisfactory for excluding wildlife.

On October 25, 2017 CPW conducted a site visit to CC&V Gold Mine. During the site visit CPW determined that a wildlife monitoring program around the active mining site would be beneficial. CC&V Gold Mine has created a wildlife management plan since that time. CPW has reviewed the attached Wildlife Monitoring Plan proposed by CC&V Gold Mine and determined it to be adequate. CPW suggests that the data collected from the monitoring program be available for review. Once the data is compiled, the placement of wildlife exclusion fences or other structures can be determined so they are more effective.



Thank you for the opportunity to comment on the project. If you have any questions or require additional information, please contact District Wildlife Manager Tim Kroening at 719-227-5281 or via e-mail Tim.Kroening@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank McGee".

Frank McGee
Area Wildlife Manager

Cc: Tim Kroening DWM
SE Regional File
Area 14 File

Cripple Creek & Victor Gold Mining Co

Wildlife Monitoring Plan

Overview:

CC&V recognizes that there is potential for risk to local wildlife associated with current mining operations at the CC&V site. In order to better understand this risk, and to mitigate any potential loss, CC&V proposes the following outline for a Wildlife Monitoring Plan as an addendum to the approved Wildlife Management Plan. Common species known to be at potential risk and have been observed on the property include:

- Black bear
- Elk
- Mule Deer
- Little brown bat and Townshend Big eared bat
- Numerous small birds and raptors (red tailed and Cooper's hawk, Golden eagle)
- Mountain lion
- Bobcat
- Red fox
- Coyote

Purpose:

This plan is intended to identify species and locations of existing wildlife populations. Additionally, this plan will determine the potential wildlife risks and exposures associated with high walls and chemical storage and processing areas.

Proposed obligations of the Plan

- **Monthly S&ER Inspection:** Personnel from the Sustainability and External Relations department will conduct monthly inspections of the permit boundary, identifying areas traveled frequently by wildlife.
 - **Record locations of sightings or by tracking:** A monthly log will be kept of all sightings and interactions and recorded in a database. In addition, each area in Process, Mining Operations, and Mine Maintenance will record each sighting and location to S&ER on shift area inspections.
 - **In terrain particularly steep or difficult to access in adverse conditions:** CC&V proposes to use game cameras. Areas of difficult access are primarily the interface of the Valley Leach Facilities and the natural environment.
 - **Conduct necropsies on all wildlife mortalities onsite:** CC&V will continue to notify CPW of any wildlife mortalities onsite, as is required by the Wildlife Management Plan. Additionally, small animals or birds that are found deceased on property, or adjacent to the permit boundary, will be sent for autopsy. CC&V will notify CPW immediately in the event any large ungulate is found deceased; arrangements will be made for CPW to perform an autopsy.

- **CC&V will work with Industrial Hygienists** and other professionals to better understand toxic exposure limits to animals seen onsite. Thresholds will be established for each species.
 - **Bat monitoring:** In the summer months, bat monitoring around the Process Areas where open tanks are located will be monitored both visually and ultra-sonically. Bat activity is generally constrained to the period of late May to September.
 - **Habitat Loss and Alteration:** CC&V will monitor and map major habitat alterations during this period and note any movement of wildlife concurrent with these operations.
 - **Waste Management:** Any wildlife interactions with solid waste will be noted. Employee waste management training programs and waste management strategies will be reviewed and updated to prevent further negative wildlife interactions.
- **One year Monitoring Term:** The proposed monitoring period will begin in January 2018 and continue for a full year. After one year of data collection, CC&V will review findings with CPW and identify areas of high risk and determine where mitigation is required and what actions should be taken moving forward.



PETER JACOBS, OWNER – 719-576-1626 – FAX 576-4421
1410 DUSTRY DR. – COLORADO SPRINGS, CO 80905
www.taylorfenceco.com

November 27, 2017

To whom it may concern,

The design for the perimeter fence at the Cripple Creek and Victor Gold Mine was based on a CDOT Wildlife Fence (Standard CDOT plan Number M-607-4). The CDOT design was used only as a guideline and ultimately upgraded based on the terrain and longevity of the materials. The fence is 8' height including Woven Wire fabric, the fence includes no more than a 6" gap in between the bottom of the fence to the ground. The CDOT detail calls for 5" diameter treated wood posts spaced at 16' on center. We upgraded the fence design to include heavy duty galvanized steel posts set at 16' On Center in lieu of the wood posts. All Terminal posts to be set in concrete footers (The only deviation from the CDOT M-607-4 fence design is the upgrade from Wood posts to Steel posts).

Based on our expertise and experience we are confident that the fence design is adequate for the terrain and purpose intended.

Respectfully,

Jeff Poulin
Senior Estimator
Taylor Fence Company

