



Colorado Division of Reclamation, Mining and Safety
Tim Cazier
(Sent via e-mail: tim.cazier@state.co.us)

Re: Zephyr Minerals' intent to use state lands in the vicinity of Grape Creek and the Lower Grape Creek Wilderness Area for development related to exploration mining and commercial purposes. Permit # P2013002

Dear Sir and Madam

I am writing on behalf of Pikes Peak Chapter of Trout Unlimited to express our concern over Zephyr Minerals' Application for a major modification of its Dawson Gold Conditional Use Permit seeking approval to expand the current exploration area from 593 acres to a total of 1,762 acres. The additional 1,169 acres is entirely on public land.

The proposed parcel is bordered to the north, south and east by the U.S. Bureau of Land Management's Lower Grape Creek Wilderness Study Area. Zephyr suggests their use would impact "less than 2 percent of the permitted area," according to the application. PPCTU desires to emphasize the greatly understated impact of disturbance to this area.

First, our Chapter represents your people. Our members (over 1,000 local residents of El Paso, Fremont and other Front Range communities) are very concerned about protecting the habitat of our public lands. We are not only interested in rivers and fish for recreation, but we are concerned about the health of all the elements that comprise an ecosystem. Our history of evaluating and monitoring local terrains and wilderness areas can ensure you of our well documented position. The health of the habitat directly impacts the health of the watersheds. Based on evaluation of water discharge, water recharge, water distribution, water use, climate, soils, vegetation, erosion and weathering characteristics of this area, (Grape Creek and surrounding Wilderness Area) data derived from BLM, Colorado State Geological Survey, Universities, conversations with local hunting and fishing groups, outfitting businesses, members, and local landowners, we are acutely concerned that this proposed industrial use would adversely affect the local habitat -irreparable damage.

Pikes Peak Chapter of Trout Unlimited
PO Box 458
Colorado Springs, CO 80901
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This barren-looking land is actually pristine mountain stream habitat. The current situation - a roadless area - is significant to the cycle of stream life, especially delicate due to the arid landscape. This is a fragile habitat! The presence of naturally occurring dust particulates in the air has a tremendous direct impact on the quality of fragile life forms and the quality of water in this delicate area. This land was designated within the Stewardship Trust program managed by the State Land Trust as is currently leased by Colorado Parks and Wildlife Public Access Program to ensure its natural beauty, rare plants, abundant wildlife, and connectivity to Temple Park. Grape Creek is a popular year-round, wilderness fishery that drives tourism and supports local businesses in Cañon City and surrounding municipalities. Resident brown and rainbow trout spawn in the creek as do potamodromous trout from the Arkansas River.

Our local Pikes Peak Chapter of Trout Unlimited strongly opposes the proposed use and development by Zephyr Minerals to conduct any commercial use in this area - especially roads.

The proposed mining operations fall within critical habitat for numerous important wildlife species, including mule deer, mountain lion, black bear, wild turkey, raptors, and resident and migratory trout. The area also provides critical winter range and spawning habitat for these species. Excessive noise and continued disturbance in this area can negatively impact local fauna. Closure of this area to development (road) is integral to protecting critical migration corridors, habitat connectivity, winter range, and Spring/Fall spawning fish and winter forage and calving of larger species.

The application of Zephyr Minerals to the Bureau of Land Management and the State Land Board recommends a significant increase in new roads throughout the lease area for access and exploration. We are significantly concerned that these disturbances will lead to increased erosion and sediment transport into Grape Creek. Due to the size of the stream, even moderate sediment loads and chemicals applied during road maintenance can have a tremendous negative impact on water quality and the stream bed substrate profile. Due to Grape Creek's critical habitat for healthy populations of resident and spawning trout, these impacts can be detrimental to the long-term health of the fishery and other wildlife dependent on the stream for survival.



The Grape Creek and Temple Canyon areas are well-known wilderness fisheries – providing local anglers and tourists with renowned opportunities to catch healthy Rainbow and Brown Trout in a high-quality fishery. These user experiences and reputation for wilderness character are significant drivers in return tourism and long-term economic resiliency for outfitters and businesses in the local communities. Increased mining and exploration activity will create unavoidable disturbances, noise, heavy truck traffic, visual landscape changes, roads, drilling equipment, and other routine mineral exploration impacts. These significant changes to the wilderness character and beauty - reasons for the original designation of the area to the Stewardship Trust - will likely result in decreased recreational use and quality of the experience. These occurrences can affect the rate of return tourism, visits to local outdoor businesses, and spending in the local municipalities.

We strongly oppose the proposed development (roads) in this area, which should remain closed to mining and mineral exploration to protect pristine public natural areas that are highly valued by sportsmen and women, recreationists, and local businesses – your people and our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Allyn Kratz", written over a horizontal line.

Allyn Kratz, President



STATE OF
COLORADO

Cazier - DNR, Tim <tim.cazier@state.co.us>

Grape Creek Permit application # P2013002

1 message

Allyn Kratz <allyn.kratz@ppctu.org>
To: tim.cazier@state.co.us

Tue, Apr 7, 2020 at 11:18 AM

Dear Sir

Please find attached our comments on the above listed permit.

Thanks

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Allyn J Kratz
President
Pikes Peak Chapter of Trout Unlimited
719-641-4925



Letter to DRMS on Grape Creek permit 4 07 20.pdf
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