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April 26, 2020

Tim Cazier Colorado Division of Reclamation, Mining and Safety 1313 Sherman St., Room 215 Denver, CO 80203

Mr. Cazier,

Please accept and consider my comments opposing Zephyr Gold USA's Notice of Intent to Conduct Prospecting Operations for their Dawson Gold Project in the vicinity of the Grape Creek Canyon, Lower Grape Creek Wilderness Study Area, and Grape Creek State Trust/Wildlife Management Area. All of this is west of Cañon City.

I am very familiar with this area, spending approximately 60 days a year backpacking, fishing, and wildlife watching in the canyon and surrounding hills. I also work as a professional fly fishing guide, and Grape Creek is one of our premier backcountry streams in the area, providing our clients with a unique experience in the southern Colorado canyonlands. I have been frequenting this area for over 30 years, not long after a portion of it was designated as a Wilderness Study Area.

This area is considered an "area of critical environmental concern" by environmental and wildlife habitat focused organizations. It's a rugged landscape that's very unique for Colorado, as its lower elevation eliminates nearly all snowpack during the winter, and offers quiet use recreation year-round. Along with its rugged scenic qualities, it's also home to a whole host of flora and fauna, including a healthy herd of bighorn sheep, numerous mule deer, mountain lions, black bears, ringtails, bobcats, and coyotes. The canyonland environment provides a sanctuary for Merriams turkeys, golden eagles, several species of waterfowl, and it's an identified nesting area for peregrine falcons. The strip of green vegetation on each side of Grape Creek has been ranked as having very good occurrence of the widely endangered riparian natural tree community that includes narrowleaf cottonwood, piñon pine, Rocky Mountain juniper, Douglas fir woodland mix, as well as occurrences of Arkansas Canyon stickleaf. Grape Creek itself is home to a thriving population of brown and rainbow trout. This complex and rare combination of lower elevation canyonland terrain, plants, and animals make the Grape Creek canyon and surrounding hills very special and worth protecting.

Zephyr has numerous items in their application that are alarming. These include the construction of multiple helicopter landing sites, the construction of wooden drilling platforms, and the storage of petroleum products on-site. This is all proposed to take place INSIDE a BLM Wilderness Study Area!

Additionally, and most alarming, Zephyr plans to lease water rights from the Upper Arkansas Water Conservancy District and pump it uphill out of Grape Creek to the drilling platforms. Pumping would most likely be done with gasoline or diesel powered pumps. Again, all of this is proposed to be done INSIDE a BLM Wilderness Study Area! If built, the landing sites would facilitate helicopter flights for prospecting, disturbing important lambing grounds for bighorn sheep and birthing areas for mule deer. After spending an entire 20-plus-year Army career around helicopters on a daily basis, I can tell you with authority that the noise and disturbance will be significant. The fact that Zephyr plans to do this work during the summer months makes the risk to the environment and wildlife even greater. As the water in Grape Creek warms during the summer, it becomes much harder for trout to survive. The fact that Zephyr wants to remove water from the creek, consequently reducing the flow downstream, means the water temperatures will become even higher, putting rainbow and brown trout in jeopardy. Once the summer water temperature in Grape Creek climbs above 70 degrees, and it will, fish will die.

Lastly, I would like to point out the irresponsible role the BLM is carrying out in this process. Instead of providing responsible oversight of the Lower Grape Creek Wilderness Study Area, the BLM has turned a blind eye to the process, and has not required an environmental assessment. According to its own public information, the BLM states that "...most of the actions the BLM takes to implement its land-use plans are reviewed under the requirements of the National Environmental Policy Act (NEPA), either through the production of detailed Environmental Impact Statements, (or )less-complex Environmental Assessments". In fact, the BLM hasn't even followed their own guidelines for the management of a Wilderness Study Area, since the mining claims Zephyr holds are recent enough they aren't grandfathered into the WSA. This is an important point, and one that needs to be looked into.

Please consider carefully the points I've made in my letter. This is not a trivial issue, rather its one that requires thorough and careful review of BLM policy, the input from public landowners like myself, and doing what's right for a unique and rugged landscape in southern Colorado.

Sincerely,



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

## Letter of Opposition-Dawson Gold Project

1 message

Paul Vertrees <sawtooth63@hotmail.com> To: "tim.cazier@state.co.us" <tim.cazier@state.co.us> Mon, Apr 27, 2020 at 3:38 PM

Mr. Cazier,

Attached is my letter of opposition regarding Zephyr Gold USA's NOI for their Dawson Gold Project. Thanks.

Paul Vertrees www.tenkaratracks.com (719) 431-1875

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