



COLORADO BACKCOUNTRY HUNTERS & ANGLERS

The sportsmen's voice for our wild public lands, waters and wildlife

To: Tim Cazier
Colorado Division of Reclamation, Mining and Safety
1313 Sherman St., Room 215
Denver, CO 80203
tim.cazier@state.co.us

Subj: Zephyr Gold USA's Notice of Intent to Conduct Prospecting Operations for their Dawson Gold Project

April 27, 2020

Dear Mr. Cazier,

Backcountry Hunters & Anglers is the voice for our wild public lands, waters and wildlife. We seek to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife and wild places. With over 40,000 members spread out across all 50 states and 13 Canadian provinces and territories—including chapters in 45 states, two Canadian provinces and one territory, and Washington, D.C.—BHA brings an authentic, informed, boots-on-the-ground voice to the conservation of public lands

Please consider our 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 west of Cañon City.

This area is considered an "area of critical environmental concern" by 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 host of flora and fauna, a healthy herd of bighorn sheep, numerous mule deer, mountain lions, black bears, ringtails, bobcats and coyotes.

This canyonland environment provides a sanctuary for Merriam's 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 unique 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 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 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.

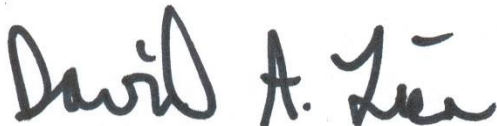
As the water in Grape Creek warms during the summer, it becomes much harder for trout to survive. The fact that Zephyr wants to remove water from the creek, consequently reducing the flow downstream, means the water temperatures will become even higher, putting rainbow and brown trout in jeopardy. Once the summer water temperature in Grape Creek climbs above 70 degrees fish will die.

Lastly, we would like to point out that instead of providing responsible oversight of the Lower Grape Creek Wilderness Study Area, the BLM has not even 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."

Apparently, the BLM hasn't followed their own guidelines for the management of a Wilderness Study Area, since the mining claims Zephyr holds are recent enough that they aren't grandfathered into the WSA.

Please take our comments into consideration and thank you for your public service.

Sincerely,

A handwritten signature in black ink that reads "David A. Lien". The signature is written in a cursive, slightly slanted style.

David A. Lien
Co-Chairman, Colorado
Backcountry Hunters & Anglers
The Voice for Our Wild Public Lands, Waters and Wildlife
www.backcountryhunters.org



STATE OF
COLORADO

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

Zephyr Gold USA's Notice of Intent to Conduct Prospecting Operations for their Dawson Gold Project

1 message

David Lien <dlien442@gmail.com>
To: tim.cazier@state.co.us

Mon, Apr 27, 2020 at 6:49 PM

Tim,

Please take the attached comments from Colorado Backcountry Hunters & Anglers into consideration regarding Zephyr Gold USA's Notice of Intent to Conduct Prospecting Operations for their Dawson Gold Project.

Thank you,

David A. Lien
Colorado BHA Co-Chair



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