



Mr. Tim Cazier  
Colorado Division of Reclamation, Mining, and Safety  
tim.cazier@state.co.us

April 26, 2020

Brian VanIwarden  
Fremont Adventure Recreation  
455 Greenhorn Drive  
Cañon City, CO 81212  
brian@joinFAR.org

Re: Permit #P2020002

Dear Mr. Cazier,

Thank you for this opportunity to comment on Permit #P2020002. As an organization dedicated to advancing trails and outdoor recreation in Fremont County, we are no strangers to the procedures necessary to introduce new projects on BLM lands. We work with local land managers, often the BLM, to create trail systems that allow individuals to responsibly access their public lands. We recognize that any intrusion into wild places has an effect on the ecology, watershed, and wildlife population. But we always operate with appropriate land use in mind and are proud to coordinate our efforts to determine the best use for all.

It is with these efforts in mind that we would like to express our opposition to the mining exploration application submitted by Zephyr Minerals.

Our Grape Creek watershed (the upper and lower portions having been designated as a Wilderness Study area in 1980) is one of the most pristine and important in our area. From the BLM's own website, it states that, "The appeal of wilderness for recreation is strong, and wilderness areas are seeing steadily increasing use from people who wish to experience freedom from fast-paced industrialized society" (BLM, <https://www.blm.gov/programs/national-conservation-lands/wilderness>, April 26, 2020). Adding industrial use to this area would be counter-productive to the current preferred use of this area. Backcountry recreational activities could and likely will be negatively affected by the introduction of mining exploration and, eventually, active extraction. Our partners and outfitters that guide fishing trips through this area have indicated that they believe the area would be negatively impacted, thereby inhibiting their ability to provide quality backcountry experiences for their guests. As these outfitters are a crucial part of our local economy, we defer to their understanding of the area and support their concern. While this area has seen historic mining use, we feel that this is an opportunity to repair and reduce those lasting impacts and allow natural reclamation of prior offences to the land.

As a direct tributary of the Arkansas River, Grape Creek's protection and preservation is of the utmost importance to our community – both recreation, economic, and otherwise. We find it unnerving that the application submitted suggests that the applicants will be allowed not only to pipe water from the creek, but will also (by default) be within operating distance from the creek





(though the application states that activities will stay 400 feet from the creek). Though this may be only an expropriative application, we feel that any disturbance, operations with heavy machinery, and / or pumping could prove destructive to the health of the creek and river.

Since the area is designated as a Wilderness Study Area and also an Area of Environmental Concern, we would like to see the integrity of these designations upheld. Disturbances such as helicopter

flights, platforms built within the permit area, and also drilling, should not be allowed in these locations. Not only do wildlife in this area (including but not limited to mule deer, mountain lion, black bear, various small mammals, wild turkey, and trout) deserve the absence of these annoyances, but the recreation users (anglers, hikers, etc.) in the area also should be allowed to continue to access this area without noise pollution and impeded viewshed. Mining activity could "impair its suitability for designation as wilderness" (BLM, <https://www.blm.gov/programs/national-conservation-lands/wilderness>, April 26, 2020). If not even a bicycle is allowed in a wilderness study area, then helicopters should not be, either.

While no trails would be directly impacted by this particular application, we find that an approval would be inconsistent with the precedent that should be set. Wilderness designations for the protection of the land, wildlife, and backcountry experiences should be upheld in this case and others.

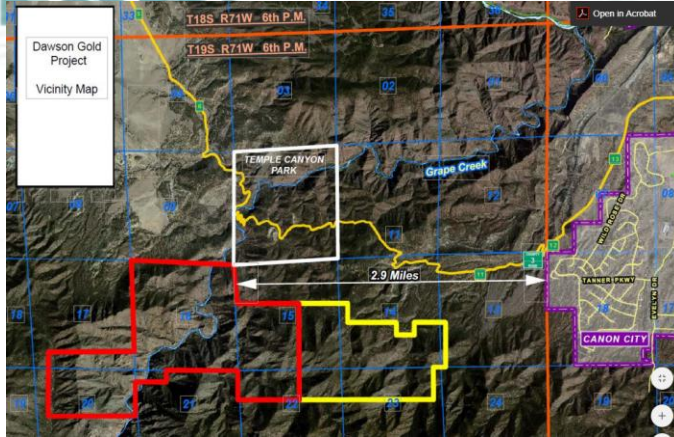
We hope that your office will recognize the inconsistent nature of this request and adhere to the objectives of the Wilderness Study Areas and Areas of Environmental Concern for these two areas.

Best,

A handwritten signature in black ink, appearing to read "Brian VanIwarden", with a long horizontal line extending to the right.

Brian VanIwarden  
Director, Fremont Adventure Recreation  
joinFAR.org







STATE OF  
COLORADO

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

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## Reference #P2020002

1 message

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**Brian Vanlwarden** <brian@joinfar.org>  
To: tim.cazier@state.co.us

Mon, Apr 27, 2020 at 8:43 AM

Dear Mr. Cazier,

Please find the attached letter / comments in regards to Reference #P2020002. Thank you for your consideration.

Best,

Brian Vanlwarden

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