



United States Department of the Interior

NATIONAL PARK SERVICE
Black Canyon of the Gunnison National Park
Curecanti National Recreation Area
102 Elk Creek
Gunnison, CO 81230



April 5, 2021

Dustin Czapla
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Subject: Blue Creek Staging Area, file #M-2021-016, Gunnison County, Colorado

To the Colorado Division of Reclamation, Mining and Safety:

The National Park Service (NPS) appreciates the opportunity to comment on the application submitted for a Construction Materials Special 111 Operation Reclamation permit (Permit File #M-2021-016) for the Blue Creek Staging Area in Gunnison County, Colorado. The NPS understands that the project seeks to construct a staging yard and use a mining area to support the Little Blue Creek Federal Project on Highway 50, and that the proposed operation would disturb 19.93 acres of soil on a 35-acre parcel of land that shares its northern border with Curecanti National Recreation Area (CURE). The NPS supports the road improvements and hazard reduction on Highway 50 because the road provides access to the Black Canyon of the Gunnison National Park, Curecanti National Recreational Area and other federal lands.

General NPS Comments

The NPS understands that the proposed project does not require a land use change from Gunnison County because it is for a State and Federal highway project. CURE staff do not believe that the project will encroach upon the park's boundary, but the proximity of this proposed project may have implications for cross-boundary impacts to the park's natural and cultural resources and the unique visitor experience the park provides. As such, the NPS respectfully requests that the Colorado Division of Reclamation, Mining and Safety consider the following requests for information and recommended mitigations when assigning conditions to this mining permit.

Detailed NPS Comments

Archaeological Resources

Because of the high potential for archaeological resources to occur in the area of the southern boundary of CURE, the NPS requests that the project design minimize ground disturbance near the CURE boundary, with special attention to potential soil movement and erosion at the CURE boundary to protect resources that exist at the southern rim of the canyon.

Hydrological Processes

The mining plan states that stormwater will be stored on the pit floor and will infiltrate into the groundwater. The current stormwater management plan is based on a non-disturbed condition and does not indicate that a groundwater assessment regarding seasonal surface flow has occurred. Because the proposed project has the potential to alter infiltration rates due to the potential removal of vegetation and topsoil, and the increased activity and use of heavy equipment could result in soil compaction, the NPS is concerned that altered hydrological processes may impact park resources such as ice climbing routes that emerge from seeps and springs along canyon walls on the south rim of the canyon adjacent to the project area. Similarly, current US Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) identifies several springs and wetlands within a quarter mile of the site ranging from 8300 ft to 8076 ft. in elevation, showing that groundwater occurs at the same elevation where Mine Plan Map E-2 reflects work will occur. Because of the project's potential to impact groundwater that may connect with springs within the park, the NPS recommends that the current stormwater management plan be based on a disturbed condition to ensure that adequate assessment regarding seasonal surface flow occurs.

Vegetation

The NPS requests that the project proposal analyze potential impacts to the existing spring and groundwater system, including impacts to seeps and springs within CURE that provide water for hanging gardens that grow on the north facing canyon walls in the Black Canyon. These ecologically important plant communities consist of state-listed rare plants such as hanging garden *Sullivantia* that are endemic to the Black Canyon, and the impacts to canyon seeps and springs must be evaluated to determine if the project also may impact native vegetation within CURE.

Similarly, the permit's Weed Control Plan does not mitigate for the additional spread of invasive plants from the Blue Creek area by movement of rocks, soil, water, vehicles, and equipment. Existing state and federal noxious weeds in Blue Creek include knapweed species, musk thistle, Canada thistle, and common mullein. Other invasive plants present are yellow and white sweetclover, cheatgrass, goosefoot, Russian thistle, tall tumble mustard, and kochia. Because these species have the potential to spread into Blue Creek, the project area and ultimately into the NPS boundary, NPS requests that these potential impacts be identified in the project Weed Control Plan, and that permit conditions require only native or sterile plants be used for revegetation, landscaping, and erosion control.

Wildlife

The NPS has documented nesting sites of migratory bird species such as Peregrine Falcons and Bald Eagles within the portion of the Black Canyon that borders the project site. Research shows

that increased noise and activity levels can impact sensitive wildlife well beyond the project area and impact bird breeding/nesting activity. To ensure that the sensitive nesting raptors are not impacted from the anthropogenic activity resulting from the operation, we recommend consultation with the U.S. Fish and Wildlife Service for this project proposal to ensure the necessary requirements for raptor nest protection are met.

Visitor Use and Experience

The proposed mining operation is adjacent to the southern boundary of CURE, and the rim of the Black Canyon and the Gunnison River are located directly below. The area provides popular recreational access for fishing, hiking, and boating, and the NPS manages the area in a way that promotes opportunities for solitude and a unique visitor experience. Because of the proximity of the project to the park boundary, there may be impacts to CURE viewsheds, and the NPS requests that the visual aesthetic of the project proposal be carefully considered to reduce impacts to the integrity of the visual landscape and to protect the visitor experience. Similarly, the construction and operation of the project has the potential to amplify the levels of anthropogenic sounds within the area, and the NPS requests that the project proponents consider implementing noise level restrictions or abatement measures to prevent noise impacts to NPS visitors, community residents, and wildlife.

Thank you for the opportunity to comment. We request continued communication regarding this project so that we can work together to prevent activities that occur within the Blue Creek Staging Area from impacting NPS resources. We appreciate the opportunity to work with all agencies involved to help ensure that the proposed permit includes analysis of and appropriate mitigations to reduce impacts to resources within CURE. For further information regarding Curecanti National Recreation Area, please contact Superintendent Deanna Greco (970-641-2337 X220 deanna_greco@nps.gov).

Sincerely,

A handwritten signature in cursive script that reads "Deanna Greco".

Deanna Greco
Superintendent
Curecanti National Recreation Area

CC: Kate Hammond, Deputy Regional Director, DOI Region 6, 7, & 8
Karen Skaar, Regional External Review Coordinator, DOI Region 6, 7, & 8
Michael Reynolds, Regional Director, DOI Region 6, 7, & 8