

Grand Junction Service Center Northwest Regional Office 711 Independent Ave. Grand Junction, CO, 81505

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Division of Reclamation, Mining, and Safety 1313 Sherman St. Room 215 Denver, Colorado 80203 5/11/2021

Attn: Clayton Wein

Re: McClane Canyon Mine (Permit No. C-1980-004) Permit Renewal Application No. 9 (RN-9)

Dear Mr. Wein,

Thank you for the opportunity to provide comments on the McClane Canyon Mine Permit Renewal (RN-9). Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced and fulfilled through CPW's mission to perpetuate the wildlife resources of Colorado and to provide sustainable outdoor recreation opportunities that educate and inspire future generations. CPW fulfills this mission by responding to requests for comments on wildlife impact reports, land use actions, and consultations through public-private partnerships.

It is CPW's understanding that this procedure is a standard permit renewal for a period of 5 years. The owners do not intend to resume mining operations at this time but would like to retain the McClane Canyon Mine as an asset. Should the owners decide to pursue mining activity, CPW requests an additional consultation.

The McClane Canyon Mine site is located in elk and mule deer severe winter range & winter concentration areas. Due to the inactive nature of this mine, CPW staff was primarily concerned with reclamation plans for this location. The property had significant amounts of cheatgrass (*Bromus tectorum*) and white top (*Lepidium draba*); the property manager has primarily focused on white top reduction over the past few years. Adjacent parcels have similar issues and provide seed to the McClane Canyon Mine site, which makes weed management difficult. CPW recommends that McClane Canyon Mine continues to spot spray for white top.

The topsoil pile, which will be used during reclamation activities, is taller than 2 meters with established cheatgrass and white top. Soils stored in such a manner causing anaerobic conditions which kill the soil organisms necessary for plant support. It is recommended that this topsoil pile be redistributed into windrows no more than 1.5 meters tall, seeded with desirable seeds such as western wheatgrass, Indian ricegrass (White River or Rimrock), slender wheatgrass (preferably San Luis), dryland alfalfa, and Utah sweetvetch, and treated with compost to revive the soil. The redistribution of the topsoil pile will provide opportunity



to slow the spread of cheatgrass on the property. The redistribution and seeding should ideally take place in the fall to maximize burial of cheatgrass seeds prior to the next growing season.

Colorado Parks & Wildlife values the opportunity to provide comments on this proposal. If you have any questions or concerns, please reach out to Albert Romero, District Wildlife Manager, at (970) 216-3847.

Sincerely,

Kirk Oldham, Area Wildlife Manager

CC. Albert Romero, District Wildlife Manager Taylor Elm, NW Region Energy Liaison Danielle Neumann, Land Use Specialist Garett Watson, Deputy Region Manager File.