



Community Planning & Permitting

Courthouse Annex • 2045 13th Street • Boulder, Colorado 80302 • Tel: 303.441.3930

March 5, 2021

Amy Eschberger
Environmental Protection Specialist
Colorado Division of Reclamation, Mining, and Safety
1313 Sherman St
Room 215
Denver, CO 80203

RE: M-1977-410 AM-2

Dear Ms. Eschberger:

Boulder County Community Planning and Permitting (CPP) completed a review of AM-2 the modification of the Cross Gold Mine's permit with the Division of Mining, Reclamation and Safety. The proposal constitutes a modification of the existing SU-08-0006 approval between the mine's owners and Boulder County. Prior to any action that goes beyond the scope of the Development Agreement, Grand Island Resources must submit a Modification Determination request to Boulder County Community Planning & Permitting in order to determine the scale of the modifications proposed and what type of modification process will be required for the work to comply with the Boulder County Land Use Code.

In the existing Development Agreement for the Cross Mine, the Special Use recognized the existing mining use, approved the expansion of the operations which included a new mine tunnel, underground mine workings, construction and operation of a new onsite ore-processing facility, construction of a new ore storage building, development of a new internal access road, and other site improvements.

The following items do not appear to be contemplated in the Development Agreement and must be assessed as part of the Modification Determination:

- The new office and dry room at the Cross Mine site
- Grading and shoring of the Idaho Tunnel may need to be reviewed
- New waste rock storage may exceed the existing agreement limits

The addition of the new interior road from Cross Mine to Caribou Mine was noted in SU-08-0006, the new office building (1,710 sf) was not listed in the SU at this location and was referred to as the Ore Storage Building. It's unclear if this is the same building. The addition of a new waste rock pile by the warehouse at the Cross Warehouse was not listed in SU-08-0006. The waste rock dump was noted by the Caribou parking area.

Deb Gardner County Commissioner

Elise Jones County Commissioner

Matt Jones County Commissioner

The operator Grand Island Resources also notes in their letter that they want to convert their 110-mining permit to a 112 permit. DRMS noted in their correspondence to CPP that they believe it is related to giving them more workable space within the permit area, as the 9.9 acre limitation of the 110 permit doesn't give them a lot of room to operate without disturbing land off site. In addition, they want to construct a mill on site and that would require them to convert the 110 permits to a Designated Mining Operation (DMO). Per Resolution 2008-125, the extraction of ores at the Cross Mine shall be limited to 70,000 tons per year, as allowed by the State DRMS permit. It is likely that a change to a 112 permit will require a modification and Grand Island should engage Boulder County early in discussions on such a modification.

In addition, this mining operation is the subject of an on-going zoning violation that will need to be resolved and may be resolved through the Special Use Modification Process. It appears that many structures may have been built without permits, a violation of the existing Development Agreement.

Boulder County CPP appreciates the opportunity to review AM-2 and looks forward to reviewing the modifications proposed by Grand Island Resources. The modification review will take time and may require a significant amount of discussion.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JR' or 'Jesse Rounds', is positioned above the printed name.

Jesse Rounds