

June 6, 2022

Lucas West
Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, Colorado 80203

Re: Klondike Basin Exploratory Drilling Project – COSLB Section 16, Notice of Intent, P-2022-007, Alianza Minerals

Dear Mr. West,

Thank you for the opportunity to comment on the Notice of Intent P-2022-007 submitted by Alianza Minerals Ltd. These comments are submitted on behalf of Sheep Mountain Alliance and the Information Network for Responsible Mining.

Klondike Basin is a treasured little spot that stands out amidst the spectacular West End and its embarrassment of riches that are provided in natural form. First and foremost, we encourage you to require the mitigations necessary to protect this treasure from the permanent impacts of mineral exploration and mining. Alianza has proposed drilling on both BLM lands and on state trust land, and mitigations and other permit conditions have also been imposed by San Miguel County. There are three significant issues to address should mining activities proceed in Klondike Basin: the impacts to wildlife, impacts to recreation and public lands users, and potential environmental impacts and off-site damage.

The proposed exploration sites neighbor the Dry Creek Basin State Wildlife Area and are adjacent to the BLM Wild Horse Management Area for the Spring Creek herd. The horse management area partially overlaps the state trust parcel on the southeastern boundaries. Because the herd is treasured by regional residents and it faces numerous pressures, the prospector must not conduct any exploration within the boundaries of the horse management area where it overlaps the state section, or modify its permit to do so later on. Klondike Basin is home to numerous species of wildlife, notably the sage thrasher and sage sparrows, as well as montane species such as black-throated grey warblers and flycatchers, reflecting the basin's especially valuable border zone habitat of pinyon-juniper woodlands and sagelands. The general exploration area contains severe winter range for elk, and is home to large populations of mule deer and pronghorn, not to mention cattle grazing by a local rancher. Other species found in the basin are raptors, lion and bobcat. Disappointment Valley is home to the Disappointment Creek Elk Herd, as identified by Colorado Parks and Wildlife (CPW). This elk herd has experienced steadily declining calf to cow ratios since 2006. Maintaining severe winter range is critical to this important Southwest Colorado elk herd. In order to minimize disturbances to big game and other wildlife, Alianza's exploration activities should be prohibited during winter.

The presence of Gypsum Valley Cat-Eye (*Oreocarya revealii*) and Naturita Milkvetch (*Astragalus naturitensis*), both endemic species to the area, have been identified in the region of the Klondike Basin operation. This was noted in the San Miguel Board of County Commissioners public hearing as well. We ask that the Division require an assessment of the drilling location to prevent any disturbances to these rare species. We request that the native seed mix used in reclamation follow San Miguel County and Colorado Parks and Wildlife recommendations rather than BLM's.

Klondike Basin is also utilized by the public for its trails and hunting, and especially in the fall months, for camping. As a side canyon to Disappointment Valley, it provides respite from the heat of the valley and has marvelous rocks. It would be a tremendous loss to the burgeoning recreation economy in the West End should Klondike Basin be lost to future mining, and its highest and best value with the most public benefit is found in recreation rather than extraction.

Off-site damages from stormwater events and waste disposal must be seriously considered in the permit conditions. Klondike Basin includes mixed habitat zones and soils that are easily disturbed and eroded. Strict erosion and sediment controls should be utilized in order to prevent the release of any contaminants into Disappointment Creek, where all stormwater runoff from Klondike Basin reports. In the natural conditions of Disappointment Valley, sediments can travel very quickly over long distances, ultimately increasing the sediment- and selenium-loading into the Dolores River and impacting water quality downstream. Although stormwater controls at permitted mines in Colorado are generally designed to withstand 100-year flood events, they have proven to be insufficient to prevent the off-site deposition of sediments. For example, at the Sunday Mine complex in Big Gyp Valley in 2013, just a few months after improvements to storm water controls (berms, ditches, and overflow basins) were upgraded and completed, a fast-moving stormburst overwhelmed the mines and resulted in significant erosion of the waste piles, deep rilling on their banks, and overflows of mine waste onto the valley floor; this was *not* a 100-year flood event, but rather a run-of-the-mill storm, albeit a strong one. The permittee should be required to provide sediment fencing around drill pads, mud pits, and any disturbed areas during the drill. At a minimum, provisions for a monitoring plan, lined mud pits, and off-site disposal of cuttings and other waste, which could potentially include radioactive contaminants or materials with acid-generating potential, should be required. Hazardous substances used for mining activities – such as diesel – should be stored onsite only when secondary containment structures are also in place, in order to prevent damage to the surface from spills and leaks. We encourage you to require the best management practices that are appropriate for the drill sites in order to minimize any impacts to the watershed and to restore the area once exploration is completed.

New or existing roads should not be left in an improved condition beyond their current state. Road development in Klondike Basin will have a negative impact on the public's ability to enjoy the lands and will change the primitive character of the canyon as it currently exists. The permittee should also be prohibited from disturbing or

destroying any long-lived woody species, as their restoration after the fact would be difficult or impossible to achieve, considering the long-term drought conditions the region is experiencing. Any degradation of existing pinyon-juniper woodlands would be unfortunate, and during reclamation, the permittee should be required to re-seed with sage, pinyon and juniper in addition to (and not instead of) other native flora species.

In addition, before any surface disturbances occur, it would be prudent to inventory any cultural or historic resources that may be present in the project area, since archeological resources are widely dispersed in the West End, petroglyph sites and camps are nearby, and Klondike Basin itself was likely utilized by historic peoples. The prospector should be required to be especially diligent in its care for the landscape should the exploration be approved.

Lastly, it is impossible to separate the approval of mineral exploration activities in Klondike Basin from the future possibility of a developed mine in Klondike Basin, despite the line of demarcation between an exploration permit and a mining permit. Again, we see recreation and grazing as the highest and best use for the basin, and mining is incompatible with those uses because of its exclusive dominance and permanent degradation of the landscape.

Thank you again for the opportunity to comment.

Respectfully submitted,

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