



COLORADO

Parks and Wildlife

Department of Natural Resources

Meeker (Area 6) Service Center
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Meeker, Colorado 81641
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November 7, 2022

Colorado Division of Reclamation, Mining and Safety
1313 Sherman St. Room 215
Denver CO, 80203

RE: Trapper Mine (Permit No. C-1981-010) Permit Revision Application No. 11 (PR-11) PR-11 5-Year Mine Plan Update

Dear Ms. Reilley,

Thank you for the opportunity to provide comments on the proposed expansion of the Trapper Mine under permit revision number PR11(Project). Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced through our mission to perpetuate the wildlife resources of Colorado and 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 proposals, and consultations through public-private partnerships.

CPW Understands that the Project will be revising the disturbance area to bring the bond current to the actual disturbance that is within its permitted area as well as expand that permitted area to include an additional 295 acres. The additional acreage is adjacent to the existing northwest boundary, near the power generating plant and Highway 13, which is a highly disturbed area. The operations will be comprised of additional pits and advancing current pits. The current permit does allow for pond spillway and flume operations to exist within 100 feet of County Road 107.

CPW has identified that this project area is located within the following CPW-mapped High Priority Habitats (HPH) with sound, spatial data and scientifically backed Best Management Practices (BMPs) and recommends the following best management practices be implemented:

- **Elk Winter range and concentration area:** part of the overall range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten; and the part of the winter range where densities are at least 200% greater than the surrounding winter range.



- Project construction managers should pause work if elk are observed within an 800-meter buffer around the construction area, followed by a call to the District Wildlife Manager to discuss alternative plans.
- **Mule deer severe winter range and winter concentration area:** part of the overall range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten; and the part of the winter range where densities are at least 200% greater than the surrounding winter range.
 - Project construction managers should pause work if deer are observed within a 400-meter buffer around the construction area, followed by a call to the District Wildlife Manager to discuss alternative plans.

Through ongoing relationships with partners like Trapper Mine, CPW is able to avoid, minimize, and mitigate adverse impacts on sensitive species within the Project area. CPW appreciates the opportunity to review this project application material and provide recommendations to avoid, minimize, and mitigate adverse impacts on wildlife. If there are any questions or needs for additional information, don't hesitate to contact CPW wildlife managers:

Evan Jones, District Wildlife Manager, 970-824-2502, even.jones@state.co.us

Bill de Vergie, Area Wildlife Manager, 970-878-6061, bill.devergie@state.co.us

Molly West, Land Use Specialist, 970250-3818, molly.west@state.co.us

Sincerely,



Bill de Vergie
Area Wildlife Manager

Cc:

Evan Jones, District Wildlife Manager
Mike Swaro, Assistant Area Wildlife Manager
Darby Finley, Terrestrial Biologist
Brian Holmes, Conservation Biologist