



February 20, 2024

Lucas West
Division of Reclamation, Mining and Safety
1313 Sherman Street, Suite 215
Denver, CO 80203

RE: Leadville Mill Permit Application
CJK Milling Company, LLC
M1990-057

Dear Mr. West;

Collegiate Peaks Chapter of Trout Unlimited (CPCTU) would like to express concern over the CJK Milling Company application to reopen the Leadville Mill to process existing slag piles from around Lake County using sodium cyanide.

CPCTU is a local 501(c)3 conservation organization whose mission is for current and future generations of the Upper Arkansas River Valley to enjoy, appreciate, and cherish our waters, and to carry on the mission of protecting the quality watershed for present and future generations. CPCTU volunteers have been working to preserve and protect the Upper Arkansas River watershed since 1985.

Over the past several decades, countless hours of work and millions of dollars have been spent on repairing the devastating impacts of historic mining in Lake County on the Upper Arkansas River and its tributaries, particularly in the California Gulch watershed where the Leadville Mill and much of the targeted slag is located. As a result, the Upper Arkansas is now the longest continuous stretch of Gold Medal water in the nation.

We would ask DRMS to consider if the risks of this project to the Leadville community and the surrounding environment are worth the benefits. Of particular note, we would ask DRMS to carefully consider the following:

- Does the CJK proposal adequately identify groundwater depth throughout the site or the preferential flow pathways/rates? In the instance of a spill, it would be necessary to have groundwater defined. Groundwater mapping would also play into a remediation plan in the instance of a spill. Those pathways must be identified and mitigated during an emergency to reduce impacts on drinking water supplies and Evans Gulch.

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P.O. Box 1081
Salida, CO 81201

- Has CJK properly addressed concerns around the daily operations of the mill, such as mitigating impacts to wildlife and exposure to materials with elevated sodium-cyanide? This can include both terrestrial and aquatic wildlife/organisms.
- Has CJK properly addressed the disposal of processed slag throughout the life of the mine? Where will processed slag be disposed of or remediated to reduce impacts on human health and the environment? Does the life cycle of the proposed disposal plan fully mitigate the risks of its location in a highly sensitive environment?
- Does the CJK proposal address the risks to the community and the environment of disturbing the slag piles? The potential for release of toxic materials into the air, surface water, and groundwater must be addressed both during and after excavation. These slag piles have stabilized over time and disturbing them will increase the potential for erosion of freshly exposed surfaces by wind and water.

The Upper Arkansas River is a treasured resource that supports the recreational economy of many towns along its banks, as well as supplying irrigation and drinking water to millions of downstream Colorado residents. Any project with the potential to destroy this resource at its headwaters must be examined with the utmost diligence to ensure that its operation and its legacy wastes cannot harm the local community or the environment upon which so many depend for their quality of life and livelihoods. Thank you for taking our concerns into account as you review the CJK permit application.

Sincerely,



Chris Lamson
President
Collegiate Peaks Chapter of Trout Unlimited

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