



COLORADO
Parks and Wildlife
Department of Natural Resources

Area 16 Office - Gunnison Service Center
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10/04/2024

Division of Reclamation, Mining and Safety
Dustin Czapla
1313 Sherman Street, Room 215
Denver, CO 80203

RE: Sooner Lucky Strike Mine and Mill – File No. M-1982-020, ALSH, LLC Amendment (AM-3)

Dear Mr. Czapla,

Thank you for the opportunity to comment on the Sooner Lucky Strike Mine and Mill permit amendment in Gunnison County. The existing mill is located on a private inholding surrounded by BLM land, 9 miles southeast of Gunnison in Section 10, T48N:R1E. This permit amendment would allow for the mining and mill operation to receive offsite sources from operations not owned by the project proponent. There is no proposed additional disturbance associated with this permit amendment request.

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 the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Numerous wildlife species utilize the project area and its direct surrounding habitats, including big game species such as deer and elk, small game species such as rabbit and coyote, and non-game species such as small mammals, songbirds, raptors, and Gunnison's sage-grouse. CPW has reviewed the proposal and would like to offer the following comments on potential impacts on wildlife.

Big Game:

Big game species, including elk and mule deer, utilize this landscape for forage and travel. The processing facility is located within a mapped elk and mule deer Winter Concentration Area- [High Priority Habitat](#) (HPH). Due to the permit amendment not requesting additional acreage of disturbance, and the resulting activities at the site being similar in nature to existing practices, CPW does not foresee additional impacts to wintering mule deer and elk at the facility location from this proposal.

Gunnison Sage-grouse:

The existing facility and the County Road utilized for access is located within Gunnison sage-grouse Critical Habitat, Occupied Habitat and Production Area. In addition, an active lek is located within a mile of County Road 42A, which is utilized to access the site. CPW is concerned that additional truck traffic during the lekking season may impact lek attendance and may increase the risk of direct mortality due



to potential vehicle collisions. In addition, CPW holds a conservation easement on the property to the north of the mill site, which was acquired to maintain and improve wet-meadow brood rearing habitat for this species and we have an ongoing interest in maintaining the conservation values of that property. In order to reduce potential impacts, CPW requests a stipulation be included in the permit that restricts travel to and from the facility prior to 10:00 am from the period of March 15 to May 15.

CPW appreciates the opportunity to be actively involved throughout this planning process and would happily discuss wildlife issues with you and/or the project proponent. If you have any questions, please contact District Wildlife Manager Nick Gallowich at (970) 275-4306.

Sincerely,



Brandon Diamond
Area Wildlife Manager – Gunnison

cc: SW Region File, Area 16 file, SW Region Land Use Coordinator – Peter Foote

