

STATE OF
COLORADO

Ridley - DNR, Hunter <hunter.ridley@state.co.us>

Fwd: Hard Rock Reclamation Permit

West - DNR, Molly <molly.west@state.co.us>

Wed, Feb 12, 2025 at 4:21 PM

To: "Ridley - DNR, Hunter" <hunter.ridley@state.co.us>

Cc: Katie Smith - DNR <katie.smith@state.co.us>

Hunter,

CPW appreciates the flexibility to address this permit application. Attached is our signed comment letter that identifies wildlife concerns and makes recommendations on how to avoid or minimize impacts to those wildlife resources. After meeting with the project proponent onsite, we were also able to address their operational needs.

Please let me know if you have any questions,

Sincerely,

Molly West**Land Use Specialist**

C 970.250.3818

molly.west@state.co.us | cpw.state.co.us

On Wed, Feb 5, 2025 at 8:19 AM Ridley - DNR, Hunter <hunter.ridley@state.co.us> wrote:

[Quoted text hidden]

**CPW Comments DRMS West Side Placer M2016081 Feb 2025 (signed).pdf**

281K



COLORADO

Parks and Wildlife

Department of Natural Resources

Meeker (Area 6) Service Center
P.O. Box 1181
73485 Highway 64
Meeker, CO 81641
970.878.6090

Hunter Ridley
Division of Reclamation, Mining and Safety
1313 Sherman St, Room 215
Denver, CO 80203

February 12, 2025

RE: West Side Placer -File No. M-2016-081, AuPt Industries LLC Permit Conversion (CN-2)
Conversion to a 112 operation

Dear Mr.Ridley,

Thank you for consulting and facilitating a site visit with Colorado Parks & Wildlife (CPW) on the proposed conversion of mining lease M-2016-081. CPW has a statutory mission to perpetuate wildlife resources of the State 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.

CPW understands that the West Side Placer mine located 35 miles north of Craig will be mining within 5-acre blocks with no more than 15 acres will be disturbed at one time, with each block being mined for approximately one month or less. County roads and temporary haul roads will be used to move ore from the active mining block to the wash plant and be a maximum width of 20 feet and lengths of up to 1,300 feet. When roads are no longer in use, they will be ripped to loosen compacted soil and prepared for final reclamation, including imprint seeding to promote vegetation growth.

The wash plant will operate within an industrial tent designed for sound buffering, weather protection, and consistent operational performance. The plant is equipped with a closed-loop recycled water management system that employs thickening agents and specially designed containment vessels that prevent process water discharge. Surface water management will be adapted to the site's natural water flow patterns, with attention to mitigating the effects of heavy rainfall. The water necessary for the mining operation and reclamation activities will primarily be supplied by an on-site well drilled to a depth of 200 feet under Well Permit #80109 issued by the Office of the State Engineer, Colorado Division of Water Resources.

After mining activities are completed, washed ore is graded to match the original topographic contour of the site as closely as possible, using Lidar technology. Stockpiled topsoil will be spread evenly over the area. The seeding of the reclaimed mining block is scheduled for



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
Marie Haskett · Tai Jacober · Jack Murphy · Gabriel Otero · Murphy Robinson · James Jay Tutchton · Eden Vardy

October or April to maximize success. The seeds used for this process are part of an approved seed mix. Areas that are compacted are ripped before seeding.

CPW utilizes High Priority Habitats (HPH), for which CPW has sound spatial data and scientifically backed recommendations when conducting reviews of land use proposals. These protections and avoidance measures protect critical breeding, nesting, foraging, migrating, or other uses by wildlife. CPW has reviewed the area and identified the following HPH areas that occur in the proposed area and the respective scientifically-backed recommendations:

- **Aquatic Sportfish Management and Native Species Conservation Waters:**
 - CPW recommends that no ground disturbance occurs within 500 feet of the Ordinary High Water Mark of the stream or water body
 - If work is proposed within the 500-foot buffer, consultation with CPW Area Staff should be initiated within 30 days before the work for subject matter expertise evaluation. This work will only be considered during dry periods when the project can achieve operations and be reclaimed before any water is expected to return to the riparian area.
- **Mule Deer Severe Winter Range Area:**
 - CPW recommends that no surface activity be conducted from December 1 to April 30, with a surface density limitation of one pad per square mile and less than one linear mile of routes per square mile.
- **Pronghorn Winter Concentration Area:**
 - CPW recommends no authorized human activities from January 1 to April 30, with a surface density limitation of one pad per square mile and less than one linear mile of routes per square mile.
- **Greater Sage Grouse General Habitat Management Area:**
 - CPW recommends no surface occupancy within 2 miles of a lek site. Outside of the 2-mile buffer from a lek site, no permitted or authorized human activities from March 1 to July 15.
 - Noise should be limited to less than 49dB as measured 30 feet from the source.
 - This species is a Tier 1 State Special Concern Species and therefore, should adhere to the 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan¹

In addition to CPW's High Priority Habitat recommendations, the following recommendations should be incorporated into further planning and permitting process development.

- Avoid construction during winter months to facilitate wildlife concentration and migration in the area, as recommended above.
- Develop a revegetation plan for any disturbed upland habitat as a result of the construction of the project, staging areas, access roads, and wash plant that references CPW's Colorado Seed Tool²

¹ Colorado Parks and Wildlife Northwest Colorado Greater Sage-Grouse Working Group (n.d). 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan.

<https://cpw.widencollective.com/assets/share/asset/4zvhyphd0>

² Colorado Parks & Wildlife Colorado Seed Tool App.

<https://cpw.widencollective.com/assets/share/asset/z6owwh8sfa>



- Adhere to The Project's CDPHE stormwater permit requirements to arrest any sediment transport offsite. This shall also apply to haul roads that traverse previously mined areas that have been recovered with topsoil.
- Implement a noxious weed plan that agrees with the Moffat County Noxious Weed Management Plan³ and includes treatment of topsoil stockpiles.
- Conduct general construction operations during daylight hours, remove trash daily, and minimize noise and light so as not to disturb wildlife in the area.
- A 25 mph speed limit should be implemented on all access roads to minimize wildlife collisions and overall disturbance.
- CPW requests that the project follow incremental development plans for this property and reclaim any active locations before expanding to new areas.
- Any artificial lighting should be directed downward and shielded from above.
- Water and thickening agents from the wash plant should be disposed of off-site at an appropriate landfill facility with special precautions to avoid any spills.

Colorado Parks and Wildlife appreciates the opportunity to review this project and provide recommendations to avoid, minimize, and mitigate adverse impacts on wildlife. As details for this lease continue to be explored and developed, CPW requests that the project proponents continue to engage our staff and facilitate a site visit to have the most accurate and up-to-date information. If there are any questions or needs for additional information, don't hesitate to contact CPW staff:

Seth Schwolert, District Wildlife Manager, 970-706-9874, seth.schwolert@state.co.us
Molly West, Land Use Specialist, 970-250-3818, molly.west@state.co.us

Sincerely,

Johnathan Lambert

Johnathan Lambert,
Area Wildlife Manager

Cc:

Mike Swaro, Assistant Area Wildlife Manager
Brian Holmes, Terrestrial Wildlife Biologist
Darby Finley, Terrestrial Wildlife Biologist
Becca De Vergie, Terrestrial Wildlife Biologist
Dean Gage, Aquatic Biologist
Taylor Elm, Energy Liaison
Katie Smith, Administrative Assistant

³ Moffat County. Moffat County Noxious Weed Management Plan 2017.

https://moffatcounty.colorado.gov/sites/moffatcounty/files/MC_NoWeedMgmtPlan%26Attach_merged_03152017.pdf

