



Community Planning & Permitting

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April 1, 2024

TO: Patrick Lennberg, State of Colorado Division of Reclamation, Mining and Safety

FROM: Anita Riley, Principal Planner; Community Planning & Permitting, Development Review Team – Access & Engineering

SUBJECT: Cross Gold Mine - File No. M-1977-410, Grand Island Resources LLC Permit Conversion (CN-1)
Conversion application to a designated mining operation

The Boulder County Development Review Team – Access & Engineering has reviewed the above referenced docket and has the following comments:

1. Please note, a number of roads appearing on several maps throughout the materials are noted as US Forest Service (USFS) roads but are also under Boulder County's jurisdiction. This is a frequently occurring issue as evidenced by at least one road in the application being referred to as both a USFS and Boulder County road.

Please revise the maps and application materials to indicate Boulder County's jurisdiction of affected roads in and around the proposed permit areas.

2. Some of the roads, particularly in the Comstock area, are county jeep roads. Jeep roads do not have geometric standards outlined in the Boulder County Multimodal Transportation Standards (Standards) and often do not meet minimum safety guidelines. Should this application be approved, these roads would likely need to be improved by the applicant in order to proceed with this proposal. In order to evaluate the potential scope of improvements, a map showing proposed access and haul routes along county roads should be provided.
3. Numerous tunnels and areas noted as "underground workings" cross under county roads within the proposed permitted areas. This observation, in combination with the note in the *Cross Mine (M1977-410) Technical Revision No.7 Technical Memorandum* (Technical Memo), that the proximity of the Idaho Tunnel portal excavation to Caribou Road "creates potential long-term concerns for stability of the road," causes general concern for Boulder County regarding the safety and stability of its transportation network in the proposed permit area. The Technical Memo ultimately included follow up that demonstrated stability at Caribou Road following rehabilitation at the tunnel portal but not before a representative for the applicant suggested in a June 10, 2020, letter to DRMS activities in county right-of-way that it is not clear he had permission from the county to conduct.

Additional information is needed where tunnels and "underground workings" approach and/or cross county roads. Plan and profile drawings should be provided at all such locations and should indicate the cover/separation between the road surface and tunnels and tunnel dimensions and structural properties. Additionally, the application suggests that blasting operations will occur during the mining process. If the project moves forward to the Boulder County land use planning process, a document outlining the blasting procedures will be requested for review and approval. If the document does not adequately specify how blasting

procedures will be conducted near public roads, the county may place limits on these procedures as a condition of approval.

4. The proposal indicates county roads will be used for access between sites, however, there is no information in the application that addresses impacts to traffic. The application notes that ore and waste rock will be hauled offsite. Additionally, the parking area dimensions indicate space for over 100 vehicles, or parking for a large work force.

The county requests that DRMS require a transportation system impact analysis be conducted and consider the regional transportation impacts and risks associated with hauling as part of their review.

5. In addition to the traffic impacts created by the activities noted above, it appears that county roads are integral to the daily operations of the proposals as waste rock and ore must be conveyed from the Comstock area to the Cross Caribou area, where the waste rock land form and ore storage are located. This section of Caribou Road is heavily used by passenger vehicles, four-wheel-drive vehicles, and bicycles accessing the trailhead which is located at the entrance to the Comstock area. The applicant should develop and provide a plan describing how conflicts with the traveling public will be avoided.
6. The Cross Caribou access road is overlaid on the waste rock land form, what appears to be the expected drainage area, and an intermittent stream. It's unclear how those features will be coordinated and if a road can be constructed that meets the standards outlined in section 5.5 of the Mining Plan.
7. Should this application be approved by the DRMS, the county will require compliance with the Standards and the Boulder County Storm Drainage Criteria Manual (SDCM). The development review application to the county must include the following:
 - a. A site plan identifying existing and proposed conditions
 - b. Transportation system impact analysis that meets the requirements of Section 4.7 of the Standards.
 - c. Construction drawings for onsite improvements and road improvements
 - d. Drainage report and drainage plan in accordance with the SDCM
 - e. Blasting plan
 - f. Geotechnical report that includes an evaluation of the stability of any and all county roads that have tunnels and/or "underground workings" crossing under them.

This concludes our comments at this time.