

STATE OF
COLORADO

Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

Cross Gold Mine M1977-410 Public Comments

Stephen Jones <curlewsj@comcast.net>

Wed, Apr 2, 2025 at 7:50 PM

To: "patrick.lennberg@state.co.us" <patrick.lennberg@state.co.us>

2 April, 2025

To: Bureau of Reclamation, Mining and Safety

Attn: Patrick Lennberg

Re: Comments On Mining Permit #M-1977-410

Date: April 2, 2025

Dear Mr. Linnberg,

As a 35-year wildlife consultant for Colorado Parks and Wildlife, the cities of Boulder and Longmont, and a variety of mining and other companies within Boulder County; and a 42-year participant in the Boulder County Nature Association Indian Peaks bird counts, I'd like to offer a few comments regarding the mining permit application for the Cross and Caribou Mines.

I agree with most of Boulder County Audubon's comments, including:

1. The applicant's supposition that alarmingly high levels of copper in groundwater surrounding the mine are the result of natural mineral infiltration rather than mining activity does not seem to be supported by adequate research.
2. 50 years is way too long to grant a mining permit for this area, especially given the lack of long-term data concerning impacts on water quality and wildlife populations.
3. Regular testing of mineral content in water flowing off the mine site needs to be conducted before approval of creating 40,000 cubic yards of waste rock. The supposition that wetlands compromised by dumping of waste rock and by other mining activities can be restored is speculative, not taking into account the difficulty of reestablishing natural wetlands within the upper montane life zone.
4. Given that the site lies within a Boulder County designated Environmental Conservation Area, the applicant should be required to meet water quality standards protecting aquatic life.
5. There's an absence in the plan of thorough inventories of vertebrate and other wildlife species of special concern, and these need to be completed on the property before permitting is considered.
6. The Environmental Resources Element of the Boulder County Comprehensive Plan stipulates that a primary goal of Environmental Conservation Areas is to reduce human impacts on the natural environment, which would require that native plant communities on site should be preserved or enhanced throughout the mining operation.
7. To the extent possible, night lighting should be eliminated on the site, since it disturbs nocturnal activities of large mammals, such as grey wolves, Canada lynx, elk, and moose; along with small forest owls and a variety of insects.

In addition to the Indian Peaks Environmental Conservation Area designation which includes all of this property, the property lies between two designated Critical Wildlife Habitats: Caribou Ranch and the rich meadows surrounding the Delonde Homestead. While there is no Wildlife Migration Corridor designation linking these two Critical Wildlife Habitats, it's nearly certain that large mammals pass through the property while moving from one of these wet meadow complexes to the other. Hence the need for thorough mammal studies before considering a mining permit.

If I had been contracted to coordinate wildlife studies, they would include:

1. A year-round study of large mammal presence and migration activities, using motion-activated wildlife cameras, along with sighting, scat, and tracking studies along a series of transects within and adjacent to the mining area.
2. At least four replications of breeding bird counts from at least 20 count-stations located within and surrounding the property.
3. April-September butterfly counts conducted along transects separated by no more than 100 m.
4. Small mammal trapping conducted throughout and adjacent to the property.

One purpose of the Environmental Resources Element of the Boulder County Comprehensive Plan is to ensure no future degradation of areas critical to sustaining native ecosystems and their native wildlife populations. We should always address this goal first, without proceeding with permitting of industrial-style operations within our remaining natural areas.

Thank you for considering my comments,

Stephen R. Jones, wildlife consultant

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