



## COLORADO PARKS & WILDLIFE

2300 S. Townsend Avenue • Montrose, Colorado 81401  
Phone 970 252-6000 • FAX 970 252-6053  
wildlife.state.co.us • parks.state.co.us

April 6, 2012,

Karen Fischer  
O'Connor Design Group  
2350 G Road  
Grand Junction, CO 81505

**RECEIVED**

APR 11 2012

GRAND JUNCTION FIELD OFFICE  
DIVISION OF  
RECLAMATION MINING & SAFETY

Re: SM-18 Mine, Cotter Corporation

Dear Ms. Fischer

Thank you for the opportunity to comment on the proposed SM-18 Mine in Montrose County.

We have reviewed the location of the proposed mine. The mine lies within winter range and severe winter range for both mule deer and elk. Mule deer and elk are found in the area during the winter months, specifically December through April. Although the property owned by Cotter Corporation is already developed with roads, trailers, compressor shed, warehouse, fuel storage tank, and electrical utilities, the increased activity around the SM-18 Mine may cause an increased disturbance to wintering animals when they are particularly susceptible. As the mining plan states, when functioning at full capacity the mine will be capable of producing 50-350 tons of material daily. This could cause a direct and indirect loss of severe winter range for both mule deer and elk in areas surrounding the mine due to a decrease in the use of these habitats associated with a general increase in traffic and human activity.

In order to maintain mule deer and elk winter use of the area surrounding the mine, the Colorado Parks and Wildlife (CPW) suggests implementing daily timing restrictions on mining activities between the months of December and April when the largest concentrations of wintering mule deer and elk are in the area. Mule deer and elk are most active in the early morning and late evening, CPW recommends daily limiting traffic and activity to 10:00am-3:00pm. If seasonal traffic and mining operation restrictions are not possible, CPW suggests performing off-site habitat enhancement projects to offset the direct and indirect impacts to wintering big game use of severe winter range.

There are approximately 10 different species of bats that inhabit the area. One species in particular, the Thompsons Big Eared Bat is considered a species of special concern in Colorado. Active mines have been shown to have little to no impact on bats due to continuous human activity in and around active mines. However, inactive mines are often used by bats as either winter roost sites or summer breeding areas. Many of these inactive mines have "bat gates" on them, allowing bats access and denying human disturbance. If bat gates are encountered on any mine shafts, the CPW strongly suggests contacting our field personnel to determine the time of year bats inhabit the area.

There are several existing roads in the area, and the CPW recommends improving existing roads and using those to access the mine sites versus creating new roads. This would help to minimize habitat fragmentation as well as disturbance to existing wildlife.

### STATE OF COLORADO

John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources  
Rick D. Cables, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: David R. Brougham • Gary Butterworth, Vice-Chair • Chris Castilian  
Dorothea Farris • Tim Glenn, Chair • Allan Jones • Bill Kane • Gaspar Perricone • Jim Pribyl • John Singletary  
Mark Smith, Secretary • Robert Streeter • Lenna Watson • Dean Wingfield  
Ex Officio Members: Mike King and John Salazar

With the increased human activity at the SM-18 Mine, the spread and control of noxious weeds becomes a concern for wildlife. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depends on them. Colorado law requires that invasive noxious weeds are managed and controlled through standard weed maintenance and controls. We recommend that Cotter Corporation continually control noxious weeds near the mine site on any and all roads used.

The Dolores River contains three BLM-designated Sensitive Species of fish that are also of great concern to CPW: bluehead sucker, flannelmouth sucker, and roundtail chub. These species are declining and are sensitive to any additional water depletions or changes in water quality in the Dolores River Basin. If any water is necessary for mining operations or if any discharge of water from the mine is, please contact the BLM and the CPW to discuss how to manage your operations to provide adequate protection for these species.

Regarding the reclamation plan, CPW has some suggestions to improve success of the seed mixture. CPW would also suggest the local collection of the seeds for anything not commercially available. Included are the recommended changes.

Thank you again for the opportunity to comment on the proposed SM-18 Mine. If necessary please contact the Bureau of Land Management and the CPW to recommend suitable off-site habitat enhancement projects to mitigate for direct and indirect losses of big game severe winter range habitat. Our field personnel are available to assist you with designing these projects and selecting a location with the highest potential for success.

If you have further questions please contact myself or District Wildlife Manager, Tony Bonacquista at (970) 864-7109.

Sincerely



Renzo DelPiccolo  
Area Wildlife Manager  
970.252.6010

cc: Tony Bonacquista-District Wildlife Manager, Tom Spezze-Southwest Region Manager

STATE OF COLORADO

John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources

Rick D. Cables, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: David R. Brougham • Gary Butterworth, Vice-Chair • Chris Castilian

Dorothea Farris • Tim Glenn, Chair • Allan Jones • Bill Kane • Gaspar Perricone • Jim Pribyl • John Singletary

Mark Smith, Secretary • Robert Streeter • Lenna Watson • Dean Wingfield

Ex Officio Members: Mike King and John Salazar

**SM-18 Seed Mix**

<b><u>Scientific Name</u></b>	<b><u>Common Name</u></b>	<b><u>Lbs/acre</u></b>
Pascopyrum smithii	Arriba western wheatgrass	2.0
Elymus trachycaulus spp	Slender wheatgrass (San Luis)	2.0
Oryzopsis hymenoides	Poloma Indian ricegrass	4.0
Hilaria jamesii (florets)	Galetta grass	2.0
Stipa comate	Neddle and thread grass	1.0
Stipa viridula	Lodorm green neddlegrass	2.0
Linum Lewisii	Lewis flax (Maple Grove)	1.0
Penstemon palmeri	Cedar Palmer penstemon	0.5
Atriplex canescens	Rincon fourwing saltbrush	3.0
Ceratoides lanata	Winterfat	1.0
Purshia tridentate	Antelope bitterbrush	3.0
Cercocarpus montanus	Birch-leaf Mountain Mahogany	2.0
Purshia Mexicana	Cliffrose	2.0

Total pounds per acre-25.5