



COLORADO PARKS & WILDLIFE

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January 14, 2013

Ms. Angela M. Bellantoni
Environmental Alternatives Inc.
1107 Main Street
Canon City, CO 81212

Re: Colorado Parks & Wildlife Review and Comments - Dawson Gold Project – Fremont County

Dear Ms. Bellantoni,

Colorado Parks and Wildlife (CPW) would like to thank you for the opportunity to review the Dawson Gold Project.

CPW respectfully submits our comments and recommendations based on our review of this project. As always, CPW encourages, through thoughtful design and careful development, any actions that avoid or minimize impacts to wildlife. We believe our recommendations offer the greatest opportunity for avoiding development impacts where we believe they may be high and difficult to remedy.

As described within Sections 14 and 15 of T19S R71W, the project does overlap with multiple known Townsend's big-eared bat winter hibernation sites. Townsend's big-eared bats are a state species of concern as well as a BLM sensitive species. There are six mines that have been gated to protect Townsend's big-eared bats within the proposed project vicinity. Please see attached map titled "Dawson Bats/Inactive Mine Project Gated Bat Sites" for specific Townsend's big-eared bat winter hibernation roost locations. Disturbance that causes hibernating bats to arouse, or wake up, during the hibernation time period can cause bats to burn vital fat reserves, which can lead to the starvation of the bat prior to the end of the winter season. Surface disturbance can transmit to underground locations from both direct and indirect means. The transfer of sound through the rock to the roost site may be at high levels, if surface activity is close to roost sites. Additionally, if such activity is very close, the surface disturbance may cause the collapse of internal passages. . .

CPW offers these recommendations for minimizing impacts to special concern species:

1. Provide a ¼ mile buffer around all Townsend's big-eared bat winter roost sites in order to avoid disturbance to hibernating bats.
Or
2. Avoid disturbance to hibernating Townsend's big-eared bats by restricting activities from November 1st through April 1st.

Mule deer winter range is mapped within Section 9 and bighorn sheep production areas are mapped within Section 16, directly northwest and west; respectively, of the project site.

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: Robert W. Bray • Chris Castilian • Jeanne Horne
Bill Kane, Vice-Chair • Gaspar Perricone • James Pribyl • John Singletary, Chair
Mark Smith, Secretary • James Vigil • Dean Wingfield • Michelle Zimmerman
Ex Officio Members: Mike King and John Salazar

Transitory wildlife, such as raptor nesting sites, is highly probable within the project area and CPW recommends a pre-construction survey of the area to identify and avoid disturbances to protected nest sites.

Grape Creek flows along the west boundary of the project site and CPW recommends proper methods of erosion control be utilized throughout the property as applicable; including waterbars, sediment barriers and mulch applications using erosion control fabric, fiber, or mats.

Plant cover includes Pinon-Juniper tree stands with an understory composed of small shrubs and bunch grasses. Soil reports for the project site indicate a mix of gravel/sandy loam to boulder outcrops, all which create significant challenges for establishing permanent ground cover during final reclamation.

CPW recommends a reclamation schedule with appropriate performance standards that include a self-sustaining, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development. A post-reclamation monitoring plan is necessary to assure achievement of the agreed upon performance standards.

CPW further offers these recommendations for final reclamation:

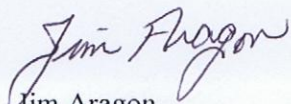
1. Non-essential roads and other areas where earth has been moved will be restored to approximate, as close as possible, the original contour of the land.
2. Once sites have been re-contoured and compacted, any topsoil removed from the site will be redistributed over the entire disturbed area from which it is salvaged. Replaced topsoil will be left in a roughened condition to discourage erosion. Additional erosion control and soil stabilization may be required on steeper slopes, in areas of erodible soils, and in areas adjacent to or within drainage.
3. Scarify, till, or harrow the seedbed to a depth of 3 to 4 inches to enhance re-vegetation. Those sites where this method is not practical (e.g., steep slopes, rocky areas, etc.) will be dozer-tracked perpendicular to the slope or otherwise left with adequate roughness following topsoil placement to provide micro sites for seed germination, and reduce soil movement.
4. The basic seed mixtures and seeding rates should be based on NRCS recommendations with final approval from the affected landowner.
5. Erosion control methods will be utilized as needed to prevent movement across the landscape and ingress into Grape Creek. Site specific applications of mulch will be applied on erodible soils to control erosion. In areas with slopes in excess of 40 percent, erosion control fabric, fiber, or mats will be used to control erosion. These materials will be anchored immediately after placement.

These are general guidelines and may be revised based on seasonal climatic conditions, on-site conditions, and concurrence with regulatory agencies.

Once again CPW appreciates Environmental Alternatives Inc. request for our recommendations on the Dawson Gold Project. If the initial phase determines minerals in sufficient quantity to move the project forward to a surface mining development, CPW would greatly appreciate the opportunity to provide additional comments and recommendations.

If you have any questions regarding this letter, please contact Canon City South District Wildlife Manager, Zach Holder, at (719) 269-0656.

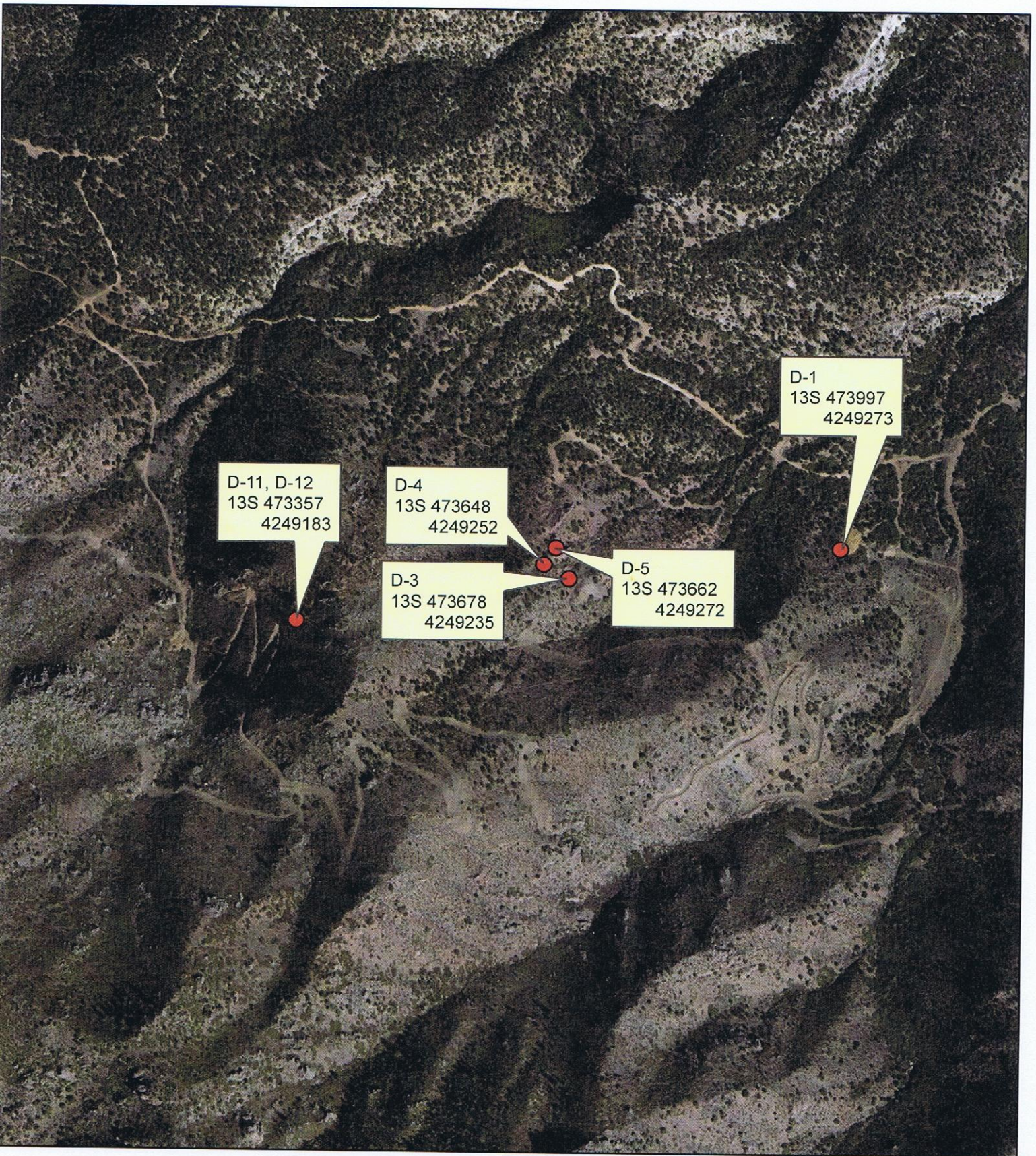
Sincerely,

A handwritten signature in dark ink, appearing to read "Jim Aragon". The signature is fluid and cursive, with the first name "Jim" and last name "Aragon" clearly distinguishable.

Jim Aragon
Area Wildlife Manager

Cc: Dan Prenzlows, SE Region Manager
Zach Holder, Canon City South DWM
Raquel Wertsbaugh, Conservation Biologist
Jamin Grigg, Terrestrial Biologist
Greg Policky, Aquatic Biologist
Al Trujillo, Energy Liaison

Dawson Bats/Inactive Mine Program Gated Bat Sites



Legend

● Townsend's big-eared bat winter roost sites (w/gates)

0 0.125 0.25 Miles

All UTM locations are in datum NAD 83

