



#### FRIENDS OF CLEAR CREEK

is a group of engaged citizens from the communities of Clear Creek County Colorado, who respect and protect the air, water, natural landscape, wildlife, and quality of life for all who reside in and visit our beautiful county.  
[www.FriendsOfClearCreek.com](http://www.FriendsOfClearCreek.com)

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Colorado Parks and Wildlife NE Region

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RE: Douglas Mountain Ranch Mining Project, Permit #M2018016 with the Department of Reclamation, Mining, and Safety

We write to you in opposition to the proposed Douglas Mountain Ranch Mining Project currently under permit review with the DRMS. Your office is tasked with identifying potential wildlife hazards for the project and in a letter dated June 18<sup>th</sup>, 2018, Mark Lamb, the Area 1 Wildlife Manager for Colorado Parks and Wildlife, expressed concerns on the project's impact to the health of local bighorn sheep, falcons, and elk. We believe this project would have impacts on far more wildlife than those listed but first want to focus on the risks to our state animal (and your official symbol), the Rocky Mountain Bighorn Sheep. Our local Bighorns are prized in the community for the emotional and economic benefits they bring; the town of Georgetown celebrates the herd with an annual festival. This mine would industrialize critical habitat and exacerbate existing herd stress which your department has specifically identified in research documents. As concerned citizens we demand you recommend outright denial of the mine permit to the DRMS on those grounds.

Mr. Lamb's letter states that the Bighorn Sheep population that inhabits this area is one of Colorado's primary "Tier 1" bighorn sheep herds, and the CPW's September 2015 report "Population Estimation, Survival, Estimation and Range Delineation for the Georgetown Bighorn Sheep Herd: Final Report" describes the herd as one of the "largest and most highly valued" in the State of Colorado for both hunting and wildlife viewing. As you are surely aware, this is an ancient native herd that has been used to repopulate many places in the Western USA. Ben Kraft, a biologist with CPW, was recently quoted on a Channel 4 newscast saying your department's objective was to "wisely manage bighorn habitat and make sure that habitat isn't lost, fragmented, or degraded because of our activities".

CPW's 2015 Bighorn Sheep Report specifically mentions Empire Junction (the site of the proposed mine and the Kraft interview) as high-consequence habitat where current road traffic produces the most sheep/vehicle mortality within the entire herd and a restriction point that hinders the herd's ability to genetically intermingle. In fact, your report recommends building road wildlife bridges in the area to assist the herd's long-term health. By literally removing the last natural passages for sheep in the area and adding up to 300 trucks a day (estimate provided by the developer to the community) the proposed mine will make the current strained conditions immeasurably worse.

Elk, deer, moose, black bears, and mountain lions also roam the Douglas Mountain Plateau. The threatened greenback cutthroat trout, rainbow trout, and brown trout all swim in the waters of Clear Creek, which is fed by the West Fork of Clear Creek that runs along the edge of the plateau. Bald eagles, golden eagles, peregrine falcons, ospreys and hawks all soar above the plateau and breed and nest in close proximity on neighboring mountainsides. This plateau has a rich diversity of wildlife and is important for migration corridors, nesting areas, lambing and calving areas, winter habitat, and denning sites for many species. Removing native vegetation

on the plateau would deplete food sources for all wildlife in the area, and the lush vegetation areas on the adjoining properties would be decimated by the disruption of the natural springs and ground water. Bighorn sheep, elk, deer, and moose are spotted and photographed daily on the plateau, drawn by the springs and vegetation, not just on the steep mountainsides.

The permit application from Empire Aggregate LLC gives very little detail as to how the wildlife will be protected throughout the mining project. Loaded gravel trucks will travel directly through the existing area of maximum vehicle to sheep mortality. Due to the massive landscape removal, large artificial flood berms would be built along the edge of the West Fork of Clear Creek risking fresh dirt sediment washing into the creek and negatively affect the creek bed. We must maintain our improving fishery, not go backward. High winds routinely rake the plateau and it will be impossible to prevent dust from filling the air (as happens at the existing nearby Frei gravel pit), effecting the neighboring mountainsides, specifically the peregrine falcon nesting areas. Also, the applicants hold extremely junior water rights and we question how they will source water to even attempt (surely unsuccessfully) to keep the dust down.

After a meeting with the Douglas Mountain Ranch Mining Project developers, CPW now chooses to appease the developers stating the adherence to a few guidelines would alleviate any harm to our bighorn sheep population and all other wildlife. How can this stance be taken by CPW? The job of the Colorado Department of Parks and Wildlife is to defend and protect wildlife and their habitat. The Douglas Mountain Plateau is the only natural, accessible, and undeveloped alluvial plateau in Clear Creek County. It is a unique geological feature, unspoiled by development, which supports many wildlife species and therefore, should be protected. We are urging CPW to take a firm stance and contact the Department of Reclamation, Mining, and Safety before December 18<sup>th</sup>, 2018, to deny the Douglas Mountain Ranch Mining Project.

Best Regards from Friends of Clear Creek