TO: Neal Starkebaum
Assistant Director
Community Development Department
Gunnison County

FROM: James O. Cochran
Wildlife Conservation Coordinator
Gunnison County

DATE: January 12, 2012

SUBJECT: Sage-grouse Habitat Site Specific Analysis
Pre-Application Conference Request
Seaglass Holding Corporation
Represented by Minex Exploration

Location: West of County Road 26; Approximately 8.25 miles south of Blue Mesa Reservoir
Section 4, 9 and 10 T47N R3W
Parcel No.: None (Public Land)

Applicant/Proponent: Seaglass Holding Corporation
12 North Washington St.
Montoursville, PA 17754

Represented by: Minex Exploration
Greg Schifrin
120 E. Lake Street, Suite 401
Sandpoint, ID 83864

Agencies/Departments/Personnel: James O. Cochran, Gunnison County Wildlife Conservation Coordinator; Allen Moores, Gunnison County Department of Public Works; Neal Starkebaum, Gunnison County Department of Community Development; Lucas Martin, District Wildlife Manager, Colorado Parks and Wildlife

Notes: The applicant submitted a Gunnison Sage-grouse Pre-application Conference Request for exploration drilling on mining claims located in the Rudolph Hill and Goose Creek (Sapinero Mesa) areas. The Rudolph Hill locations are not within mapped Gunnison Sage-grouse habitat.

The proposed activity is not within 0.6 miles of a Gunnison Sage-grouse lek. It is within mapped Gunnison Sage-grouse Occupied Habitat. An onsite assessment was conducted on January 4, 2012.

Three drill sites, located generally west of County Road 26 on Sapinero Mesa, are proposed. The southerly site has been disturbed, with drilling activity having been

completed. We were notified by the Bureau of Land Management (BLM) that the applicant has complied with all Federal requirements. No NEPA review was required. I consulted with BLM Gunnison Field Office Manager Brian St. George and BLM Geologist Dave Lazorchak on my recommended permit conditions and Gunnison Sage-grouse issues.

There are four Gunnison Sage-grouse leks located approximately one mile north of the proposed drill sites. Mr. Martin indicated that grouse have been observed during lekking season distributed in a manner that indicates the leks are part of a "lek complex" that may not be completely mapped. The sage-grouse habitat in the area of the drill sites is in apparent good condition with minimal fragmentation, largely caused by two track roads. Habitats observed included mating (spring), nesting, late summer/fall, and winter. In short, this area is excellent Gunnison Sage-grouse habitat that is used by the bird. The area also provides important habitat for other wildlife species including elk and deer. This is one of the areas that provided critical winter range for these species during the extreme snow winter of 2007-2008, and likely helped prevent an even larger mortality of grouse, elk and deer.

The disturbed site, labeled as Drill Site #5 on the site map submitted, was approximately ½ acre in size. It was stripped of vegetation, including sagebrush. A reclamation pond, which had been observed by County staff in November, had been filled in. Hydrocarbon (oil) contamination was evident on the site. A small amount of trash, which appeared to be remnants of oil sorbent pads, was noted. Drill mud and/or concrete were evident. A dozer had pushed topsoil out into the sagebrush.

The two-track road into the site, from CR 26, was heavily compacted by equipment and vehicle travel. Fragmentation of habitat is a concern and, in this case, would best be addressed through compensatory mitigation. Because of the issues associated with the County requiring surface disturbing activities associated with that type of reclamation on Federal lands, I have not recommended that the County pursue that mitigation.

No evidence of reclamation efforts, such as seeding or scarifying, was evident, beyond filling and leveling. Drill sites #4 and #5 are located on windblown knobs with minimal soil cover and sparse black sagebrush as the primary plant type. Drill site #3 appears to be located in a depression with slightly more soil depth. Mr. Lazorchak noted that the site is actually located on the two-track road. Drill sites #3 and #4 did not appear to be disturbed and were located using the coordinates provided by the applicant. Access to drill sites #4 and #5 was by "closed" two-track road (BLM Travel Management Plan, 2010). Access to drill site #3 was by "open" two-track road. No barriers or signage indicating road status was noted.

Conservation measures for Gunnison Sage-grouse should be implemented to avoid and/or minimize direct impacts to grouse and their habitats. Because the project is on Federal lands, I have limited my recommendations to non-surface disturbing activities with the exception of the area already disturbed by the proponent. I recommend that the

following conditions be applied to any permits/authorizations approved by Gunnison County for this project:

To avoid direct impacts to Gunnison Sage-grouse:

1. During the period March 15 to May 15 annually, no exploration activities shall be allowed. This shall include any access to the sites, whether direct exploration is involved or not. County Road 26 is closed to motorized access during this period. No exception for this activity shall be authorized.

2. Per Section 11-106 G.3.d.1. of the *Gunnison County Land Use Resolution,* dogs and cats must be kept under appropriate control, by means which may include kenneling or other physically secure methods to ensure that negative effects to wildlife from pets do not occur.

To avoid/minimize impacts to Gunnison Sage-grouse habitat:

1. Any equipment brought onto the site must be cleaned prior to transport to the site to remove all dirt, plant parts and material that may carry noxious weed seeds onto the property and/or adjacent areas. Noxious weeds shall be those specified as State of Colorado List A, B or C plants. Of particular concern relative to sage-grouse is "cheatgrass", *Bromus tectorum*. Equipment shall be inspected in Gunnison or a pre-arranged staging area by a representative of Gunnison County.

2. All disturbed areas shall be reclaimed by grading, scarifying and reseeding. The seed mix shall be approved by the Gunnison Field Office of the Bureau of Land Management. *(the mix proposed by the applicant in the Land Use Change application submitted to Gunnison County is not acceptable)* Proof of approval, and final seed mix formula shall be provided to the Gunnison County Department of Community Development prior to application. Any mulch used shall be State of Colorado certified as weed-free. All piles of dirt, rock and/or plant material shall be raked out prior to seeding. No contaminated areas (hydrocarbons or other) that will prevent growth of desirable plants are allowed.

James O. Cochran,
Wildlife Conservation Coordinator
Gunnison County

cc: Applicant
Allen Moores, Gunnison County Public Works Department
J Wenum, Colorado Parks and Wildlife

Lucas Martin, Colorado Parks and Wildlife
Nathan Seward, Colorado Parks and Wildlife