# Piñon Ridge Project
# Habitat Improvement Plan

Prepared by

**Edge Environmental, Inc.**

405 Urban Street, Suite 310
Lakewood, Colorado 80228
303-988-8844

Prepared for

**ENERGY FUELS RESOURCES CORPORATION**
44 Union Boulevard, Suite 600
Lakewood, Colorado 80228

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**Habitat Improvement Plan**
**Piñon Ridge Project**
**Energy Fuels Resources Corporation**

## Introduction

This Habitat Improvement Plan (HIP) has been prepared to support Energy Fuels Resources Corporation's (Energy Fuels') application to the Colorado Department of Public Health and Environment (CDPHE) for a Radioactive Material License (mill license) to construct and operate a uranium and vanadium processing mill in western Colorado (the Piñon Ridge Project or Project). The purpose of the HIP is to document the agreement for compensatory mitigation for wildlife resource impacts associated with the Piñon Ridge Project.

As part of the application to CDPHE, Energy Fuels submitted an Environmental Report (ER), which identified and analyzed potential environmental impacts, including potential impacts to wildlife resources. The Colorado Division of Wildlife (CDOW, 2008) focused its concern on the project-related direct and indirect loss of severe winter range for mule deer and elk and the loss of potentially suitable habitat and connectivity of potential and occupied habitats for Gunnison Sage-grouse. (While not directly applicable to this Project, these species' habitats are classified as Sensitive Wildlife Habitats under the Colorado Oil and Gas Conservation Commission rules, which apply to oil and gas activities.) A summary of the potential impacts to big game and Gunnison Sage-grouse is included in this HIP; the reader is referred to the ER for the detailed analyses.

Prior to submitting the mill license application to CDPHE, Energy Fuels met with CDPHE and CDOW to discuss the proposed Project and mitigation of potential ecological impacts. Based on those discussions, suggestions for compensatory mitigation were included in the ER. This HIP is based on the initial suggestions as well as additional discussions with CDOW during CDPHE's review of the application.

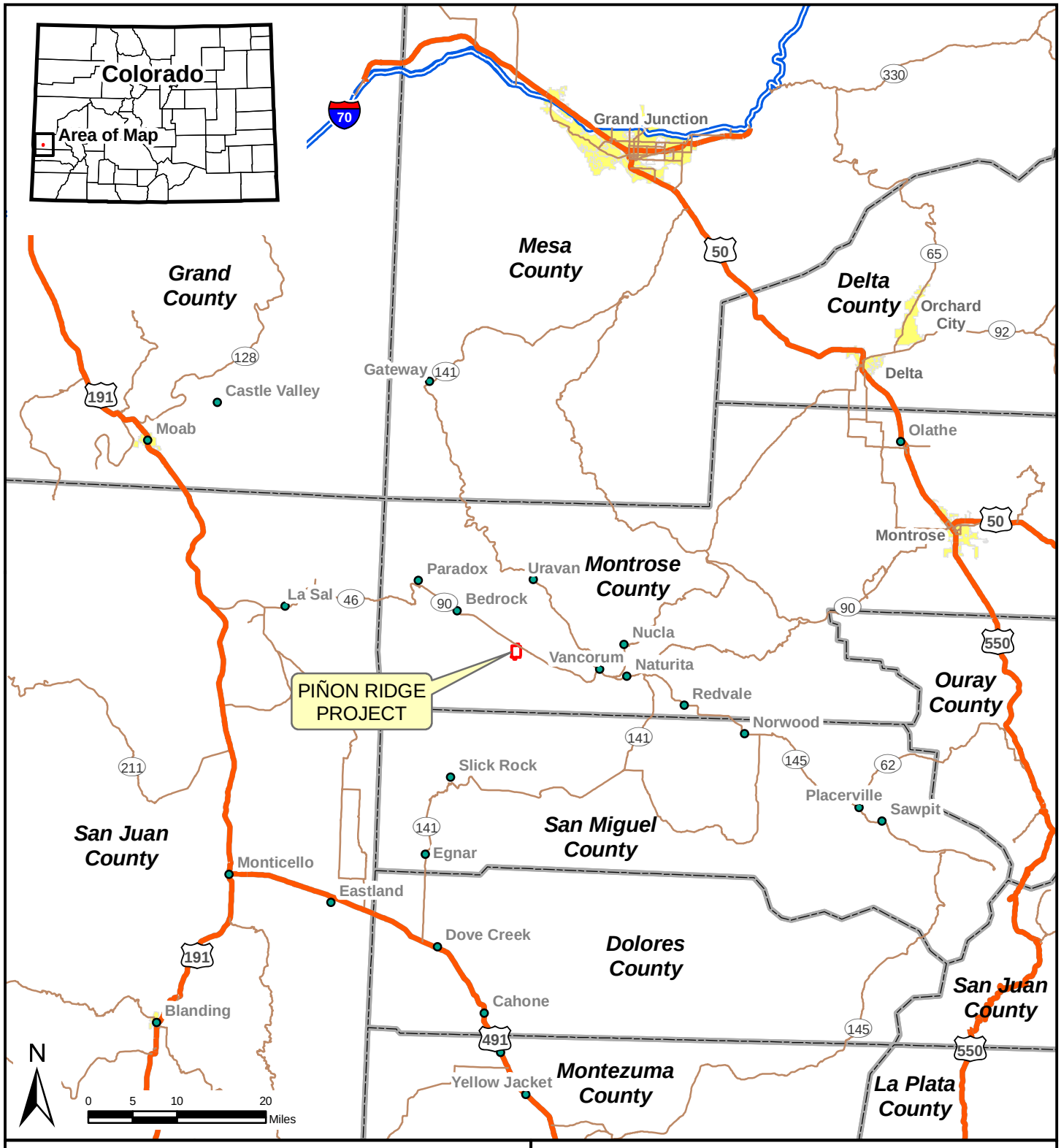
## Project Summary

Energy Fuels proposes to construct and operate the Piñon Ridge Project to process uranium/vanadium ore mined from its existing nearby operations and from area mines owned and operated by other entities in order to produce both uranium oxide concentrate and vanadium oxide concentrate and to dispose of the resulting processing wastes in on-site tailings cells. The property boundary (Project Site) for the Project encompasses approximately 880 acres in Montrose County, Colorado and is located approximately 12 miles west of Naturita and approximately 7 miles east of Bedrock, along State Highway (SH) 90 (see Map 1).

The entire property boundary (see Map 2) would be (and currently is) fenced with barbed wire except for the portion of the property on the north side of SH 90 and the southwestern most corner. The area inside the Mill License Boundary (see Map 2), which consists of 307.8 acres (see Table 1), would be fenced with an 8-foot chain-link fence topped with three strands of barbed wire and would include the following project components at full build-out: the Mill, three tailings cells, 20 evaporation ponds, an ore pad, and ancillary facilities such as roads, stormwater diversions, mill offices, and laboratories.

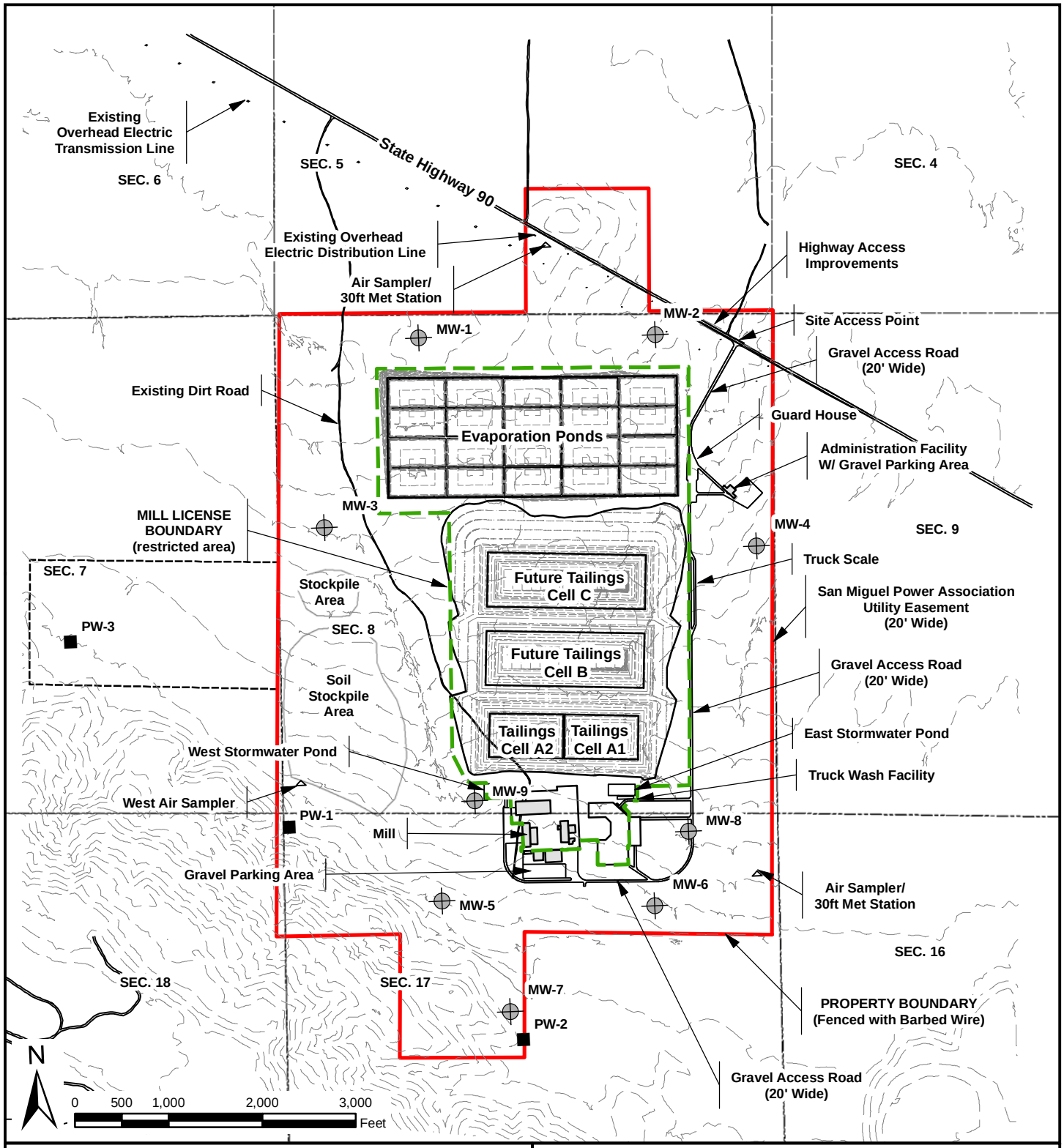
Disturbance outside the Mill License Boundary would total 106.8 acres (see Table 1) and would include a soil stockpile, a topsoil stockpile, pipelines, and access roads (see Map 2). The 49.3 acres listed as "Other" in Table 1 include areas that would be bordered by roads and effectively removed as wildlife habitat during the life of the Project.

As shown in Table 1, total Project disturbance within and outside the Mill License Boundary would be 414.6 acres.




**MAP 1**

**General Location**




# MAP 2

## Site Plan

**Table 1**
**Disturbance within and outside of Mill License Boundary**

| | Disturbance within Mill License Boundary (acres) | Disturbance outside of Mill License Boundary (acres) | Total Disturbance (acres) |
|---|---|---|---|
| Mill Components[1] | 307.8 | --- | 307.8 |
| Soil Stockpile | -- | 45.9 | 45.9 |
| Topsoil Stockpile | -- | 6.0 | 6.0 |
| Pipelines and Access Roads | -- | 5.6 | 5.6 |
| Other | -- | 49.3 | 49.3 |
| **Total Disturbance** | **307.8** | **106.8** | **414.6** |

[1] Includes Mill, three tailings cells, up to 20 evaporation ponds, and ore pad.

## Potential Impacts to Sensitive Wildlife Habitats and Wildlife

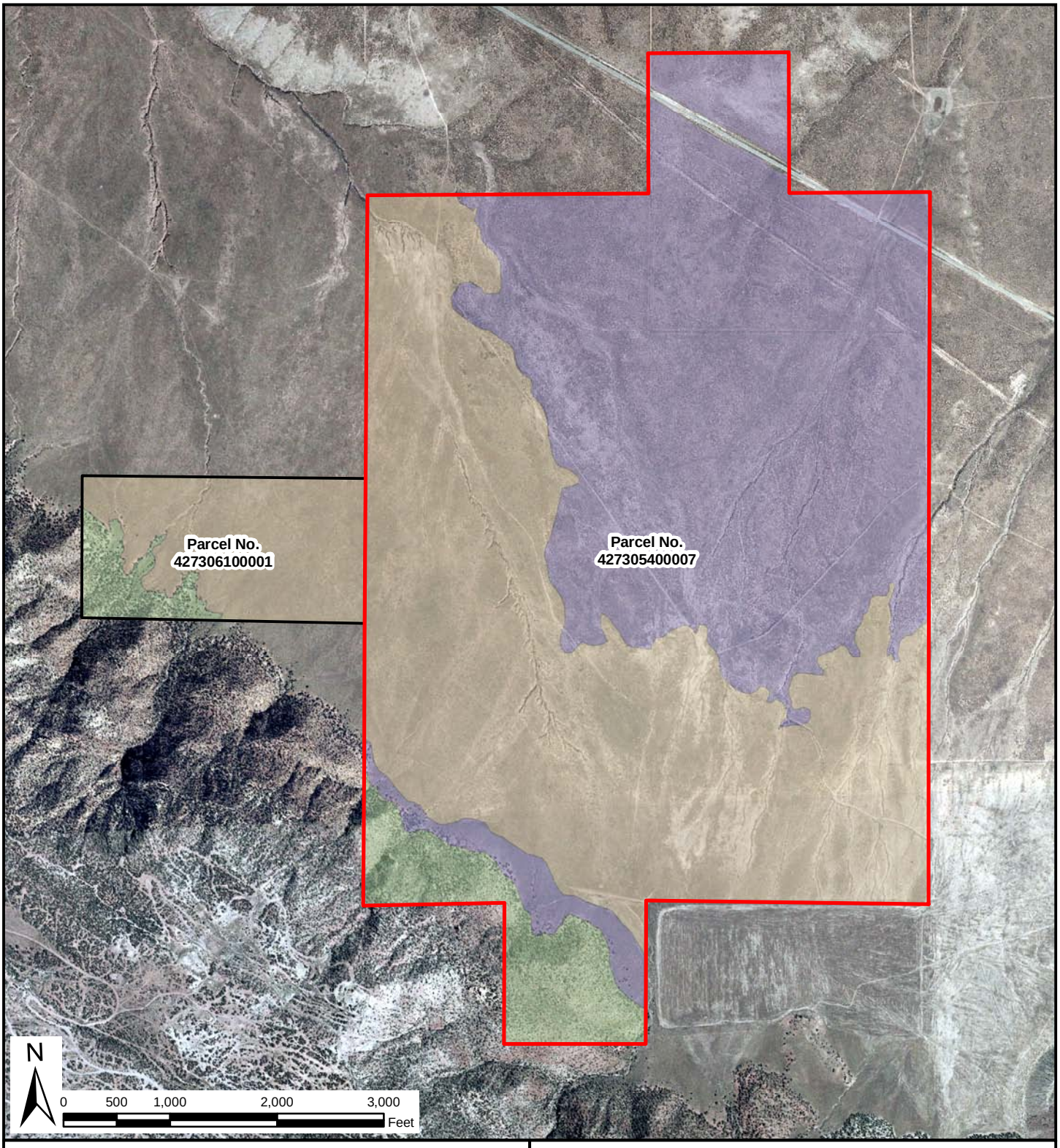
### Potential Habitat Impacts

Three dominant vegetation communities are located within the Project Site and include 1) pinyon-juniper vegetation along the bluffs in the southwest portion of the Project Site, 2) big sagebrush habitat located in a narrow strip adjacent to the pinyon-juniper habitat and on the northeast half of the Project Site, and 3) a mixed grassland habitat located in the central portion of the Project Site between both big sagebrush habitats (see Map 3). According to the former landowner, existing grasslands was sagebrush-dominated in the past, but sagebrush was removed by mechanical means and the area has since taken on a more native grassland appearance. Invasive downy brome (*Bromus tectorum*), also known as cheatgrass, is prevalent on the Project Site, especially in the mixed grassland and in the understory of the shrubland community. Russian Knapweed and Russian thistle are also present and are being sprayed according to the Project's Weed Control Plan (provided to CDPHE as part of mill license application). Table 2 provides the acreage and percent of total area of the three dominant vegetation communities within the Project Site.

**Table 2**
**Acreage and Percent of Total Area of the Three Dominant Vegetation Communities within the Site**

| Dominant Vegetation Community | Acres | Percent of Total Area |
|---|---|---|
| Pinyon-Juniper Woodland | 50.72 | 5.8 |
| Big Sagebrush | 427.20 | 48.5 |
| Mixed Grasslands | 402.08 | 45.7 |
| **Total** | **880.00** | **100.0** |

The majority of the development within the Mill License Boundary would affect big sagebrush shrublands, removing approximately 236.5 acres. Approximately 71.3 acres of mixed grasslands would be affected. No pinyon-juniper would be removed. Disturbance outside the Mill License Boundary would be approximately 46.1 acres and would include 8.8 acres of big sagebrush habitat and 37.3 acres of mixed grassland habitat. Disturbance that would be revegetated (soil stockpile and pipelines) would be approximately 60.7 acres and would include 2.3 acres of big sagebrush and 58.4 acres of mixed grasslands (see Table 3).




Property Boundary
Well Field Boundary

**Dominant Vegetation Communities**

Pinyon-Juniper Woodland
Big Sagebrush
Mixed Grasslands

## MAP 3

## Dominant Vegetation Communities

Table 3 provides the acres of habitat removed within the Mill License Boundary and outside the Mill License Boundary for each dominant vegetation type within the property boundary. The amounts of impacted big sagebrush and mixed grasslands are minor compared to the extent of each vegetation type within the region surrounding the Project Site. For example, there are 70,396 acres dominated by big sagebrush vegetation and 29,119 acres of grass/forb rangeland (corresponding to mixed grasslands) that have been identified with the San Miguel Basin Gunnison Sage-Grouse Conservation Area (Gunnison Sage-Grouse Rangewide Steering Committee, 2005), within which the Project Site is located. Consequently, the Project would impact 0.4 percent of sagebrush and 0.6 percent of grasslands in this portion of the San Miguel Basin Gunnison Sage-Grouse Conservation Area.

**Table 3**
**Acreage and Percent of Site Impacts**

| Dominant Vegetation Community | Disturbance within Mill License Boundary [1] (acres) | Disturbance Outside Mill License Boundary – Long-Term [2] (acres) | Disturbance Outside Mill License Boundary – Short-Term [3] (acres) | Total Disturbance within Property Boundary (acres) | Total Type within the San Miguel Basin (acres) | Percentage of Vegetation Type Disturbance by Proposed Action |
|---|---|---|---|---|---|---|
| Pinyon-Juniper Woodland | 0.0 | 0.0 | 0.0 | 0.0 | 6,050 | 0.0 |
| Big Sagebrush | 236.5 | 8.8 | 2.3 | 247.6 | 70,396 | 0.4 |
| Mixed Grasslands | 71.3 | 37.3 | 58.4 | 167.0 | 29,119 | 0.6 |
| **Total** | **307.8** | **46.1** | **60.7** | **414.6** | **--** | **--** |

[1] Includes Mill, three tailings cells, up to 20 evaporation ponds, an ore pad, and ancillary facilities such as roads and parking lots.
[2] Includes ancillary facilities such as roads, parking lots, guard house, and administrative buildings outside the Mill License Boundary.
[3] Includes soil stockpiles and pipelines outside the Mill License Boundary that would be revegetated after disturbance.

Potential Impacts to Gunnison Sage-Grouse and Big Game

Gunnison Sage-Grouse. In the San Miguel Basin Gunnison Sage-Grouse Conservation Area, which includes the Project Site, habitat occupied by Gunnison Sage-grouse is only 45 percent of all habitat that could potentially be occupied, including former habitat that is vacant. There are 41,360 acres of presumably suitable habitat in the San Miguel Basin that is classified as vacant or of unknown use. Less than 7 percent of identified vacant habitat is dominated by sagebrush (Gunnison Sage-grouse Rangewide Steering Committee, 2005). An additional 62,000 acres in the San Miguel Basin Gunnison Sage-Grouse Conservation Area was identified as potential sage grouse habitat but only 34 percent of that is currently dominated by big sagebrush (Gunnison Sage-grouse Rangewide Steering Committee, 2005). Consequently, the sagebrush vegetation in Paradox Valley has high potential value to Gunnison Sage-grouse. Construction and operation of the Project would impact 247.6 acres of big sagebrush, which would reduce the amount of available sagebrush within Paradox Valley.

Although the big sagebrush shrubland at the Project Site and within the Paradox Valley is potential habitat (San Miguel Basin Sage Grouse Working Group, 1998), the Project Site and vicinity is not within currently occupied Gunnison Sage-grouse habitat. The Project Site is within a corridor, partially vegetated by pinyon-juniper woodlands, that separates occupied Gunnison Sage-grouse habitat in Dry Creek Basin from potential habitat in the East Paradox Valley (CDOW, 2008). Overall range for Gunnison Sage-grouse is approximately 1.5 miles south of the Site within the Dry Creek Basin, although the closest lek is farther than 11 miles south and wintering habitat is 12 miles south of the Project Site.

The Project could potentially hinder re-establishment of Gunnison Sage-grouse populations in East Paradox Valley during operations. In general, sage-grouse are sensitive to disturbance from roads and noise during breeding (Braun et al., 2002). Females avoid nesting and utilizing brood-rearing habitats in areas with high levels of human presence related to oil and gas industrial activities (Holloran, 2005). The traffic and noise associated with operations and traffic on SH 90 could similarly affect Gunnison Sage-grouse if they do occupy habitats in the Paradox Valley.

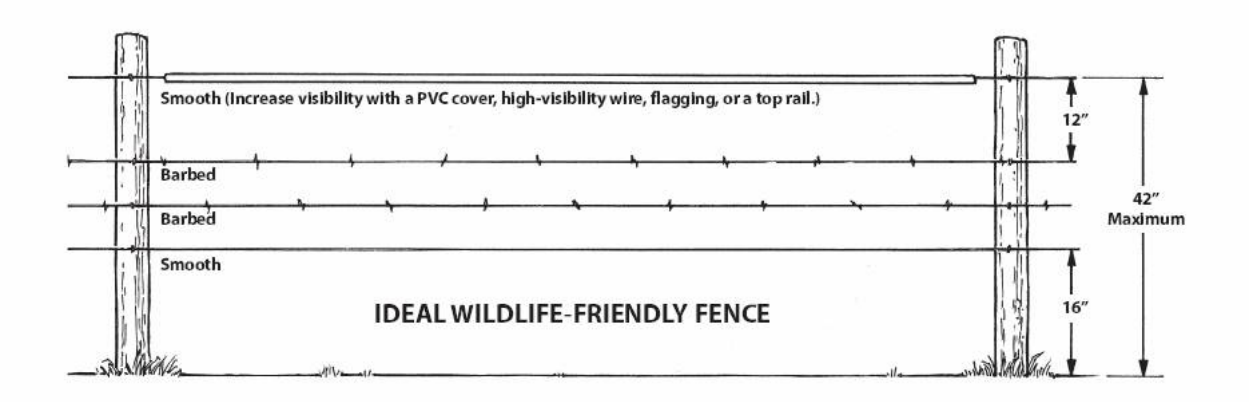
Big Game. The entire Project Site is within mule deer overall range, mule deer winter range, and mule deer severe winter range. CDOW (2009) defines severe winter range as an area that supports 90 percent of the animals when annual snow depths are maximal and/or temperatures are minimal in the two worst winters out of ten. The Project Site is also utilized by elk as winter range, as a winter concentration area, and as severe winter range. Winter concentration areas are parts of winter range where densities of animals are at least 200 percent greater than the surrounding winter range densities during an average of five winters out of ten. Approximately 415 acres of these big game winter ranges will be unavailable for use following Project construction.

In addition to the Project, traffic to and from the Project Site will pass through areas where mule deer traditionally cross roads, presenting potential conflicts between mule deer and motorists (CDOW, 2009) during summer as well as winter. Access to the Project Site on SH 90 from its junction with SH 141 west of Naturita is through a mule deer winter concentration area until 2.4 miles east of the Site. In addition, most of the access to the Site on SH 141 and SH 145 in Montrose County is through mule deer winter concentration areas, and all access routes, even those within Mesa and San Miguel counties, pass through extensive portions of mule deer winter range. CDOT has documented vehicle-related mortality of mule deer and elk during winter within the crossing zones and at other locations on SH 90 proximate to the Site (Znamenacek, 2009). Increased traffic to the Project Site could potentially result in increases in mule deer and elk mortality.

**Applicant-Proposed Mitigative Measures**

Included in the ER are Energy Fuels' proposed measures to protect and mitigate for impacts to big game and other wildlife. These measures are reiterated below.

- Recreational hunting would not be allowed on-site. Energy Fuels would encourage its employees and contractors to report any incidents of poaching immediately to the CDOW, such as through the program "Operation Game Thief." Energy Fuels would place "No Hunting" signs on the property boundary.
- Energy Fuels would maintain the existing barbed wire perimeter fencing around the property boundary. To permit big game passage to the extent possible, fence would be no taller than 42 inches with at least 12-inch spacing between the top two wires to minimize big game entanglement with the fence (see figure below copied from CDOW's Fencing with Wildlife in Mind). The top and bottom wires would be smooth. The top wire would be flagged or covered with PVC or would be a top rail or high-visibility wire (white wire) to increase visibility. Bottom wire would be at least 16 to 18 inches off the ground to allow passage of young deer and elk. If domestic cows with calves are present in adjacent pastures and calf penetration is an issue, fencing could be designed so that the bottom wire could be lowered although bottom wires 16 inches off the ground would hold livestock. Energy Fuels would visually inspect and maintain the fence, as needed, so that wires are taut to minimize entanglement.




- Risks of collisions of project-related vehicles with big game and other terrestrial wildlife would be reduced but not eliminated with the majority of ore, reagent, and fuel deliveries scheduled during daylight hours.
- The site would be revegetated with species that are palatable for livestock and wildlife. Weeds would be controlled to maintain native vegetation.
- Energy Fuels would develop and implement a Weed Control Plan to minimize potential impacts and expansion of noxious weeds (CDOW, 2008).
- Weed-free sedimentation barriers would be used.
- The soil stockpile would be revegetated during the first growing season to minimize infestation of invasive and noxious weeds.
- Revegetation would occur during the first growing season following closure.
- Energy Fuels would conduct weed control monitoring and implement weed control measures, as necessary, on a biannual basis (spring and fall) to limit the occurrence of noxious weeds on the property. The program would start prior to construction and continue until the site is successfully reclaimed. Records would be kept of the weed surveys and herbicide applications.
- Employees would receive environmental awareness training during project orientation. Energy Fuels would provide information about: native wildlife, including ESA-listed species, BLM sensitive species and Colorado State special status species, and terrestrial wildlife within the site and vicinity; species' sensitivity to various kinds of impacts; consequences of poaching; and information about federal and state wildlife laws.
- Energy Fuels would erect an 8-foot chain-link fence topped with three strands of angled barbed wire around the tailings cells and evaporation ponds to eliminate entry of larger terrestrial wildlife. A fine mesh wire fence or hardware cloth apron extending 2 feet below the ground surface would be buried around the outside perimeter of the chain-link fence to minimize or eliminate burrowing animals from entering tailings cells and evaporation ponds. Fine mesh fencing extending to 3 feet above ground around the inside perimeter of the chain-link fence would be placed to prevent smaller, ground-dwelling wildlife (i.e., pocket gophers and other rodents, lizards, and snakes) from entering tailings cells and evaporation ponds. Energy Fuels would inspect the fence daily, and repair, as necessary.
- Bird netting would be placed over the evaporation pond to prevent birds and other wildlife species from accessing wastewater solutions (i.e., raffinate). Netting would be securely fastened to the pond-top perimeter to seal off access to the ponds at ground-level (USFWS, 2009).

- Bird balls would be used in the ponded portion of tailings cells to disguise the tailings solution and prevent birds from landing on the tailings solution (USFWS, 2009).
- Energy Fuels would follow measures in their *SPCC Plan* (Energy Fuels, 2009a) and *Material Containment Plan* (Energy Fuels, 2009b) which include methods to contain spills and prevent oils/chemicals from reaching Waters of the U.S.
- To minimize attracting bats and disrupting bat feeding behaviors, Energy Fuels would utilize monochromatic orange sodium lamps that do not attract insects or bats, except in those locations where health, safety, or security considerations require additional lighting. Night lighting would be the direct cut-off variety that point down and minimize lateral light glare.
- Energy Fuels would conduct burrowing owl surveys using the CDOW survey protocol (CDOW, 2007) prior to construction and soil storage site use. If this species is present, Energy Fuels would maintain a 328- to 984-foot (100 to 300 meter) disturbance buffer around nest burrows to prevent possible disturbance to adjacent burrows and foraging habitat (Colorado Partners in Flight, 2000). Energy Fuels would avoid affecting occupied burrows until vacated. If destruction of potential burrows is unavoidable, Energy Fuels would consider creating artificial burrows away from impacted areas (see Marks and Ball, 1983).
- Energy Fuels would minimize fugitive dust on adjacent burrowing owl foraging habitat from access roads and milling operations through application of chemical dust suppressants and/or water on the roads and pads.
- Vegetation removal would occur prior to May 15 or after July 15 to avoid take of migratory bird species, nests, or eggs (BLM, 2007).
- Energy Fuels would require that contractors install raptor-safe transmission lines and they would be inspected to determine if raptor perch deterrents are warranted.
- Energy Fuels would use bear-resistant containers and collect refuse frequently to minimize potential for conflicts with bears at the site.

Monitoring

Every 5 years, prior to renewing the mill license with the CDPHE, Energy Fuels would conduct surveys at the Project Site and immediate vicinity for Threatened, Endangered, and Candidate Species, BLM Sensitive Species, and State of Colorado Species of Special Concern, as well as for wildlife. The potential species present would be determined by a qualified biologist using information provided by the Bureau of Land Management (BLM), CDOW, and the U.S. Fish and Wildlife Service. A summary of the survey results would be submitted to the CDPHE as part of the license renewal application.

Revegetation monitoring of disturbed areas would be conducted following seeding of disturbed areas. Disturbed areas are considered satisfactorily revegetated when the vegetative cover is sufficient to minimize erosion. Energy Fuels would conduct a weed survey of the Project Site in the spring and in the fall and would implement subsequent weed control measures to minimize the occurrence and spread of noxious weed species. Weed survey results would be reported to the CDPHE in the annual report along with measures and practices employed for weed control including Pesticide Application Records.

**Compensatory Mitigation**

As suggested by CDOW, for compensatory mitigation to offset the loss of the 415 sagebrush-dominated acres, Energy Fuels would purchase fee title to, obtain a conservation easement on, or purchase a renewable long-term lease on approximately 415 acres of similar habitat in the East Paradox valley floor between the Dolores River and Dry Creek on private lands prior to

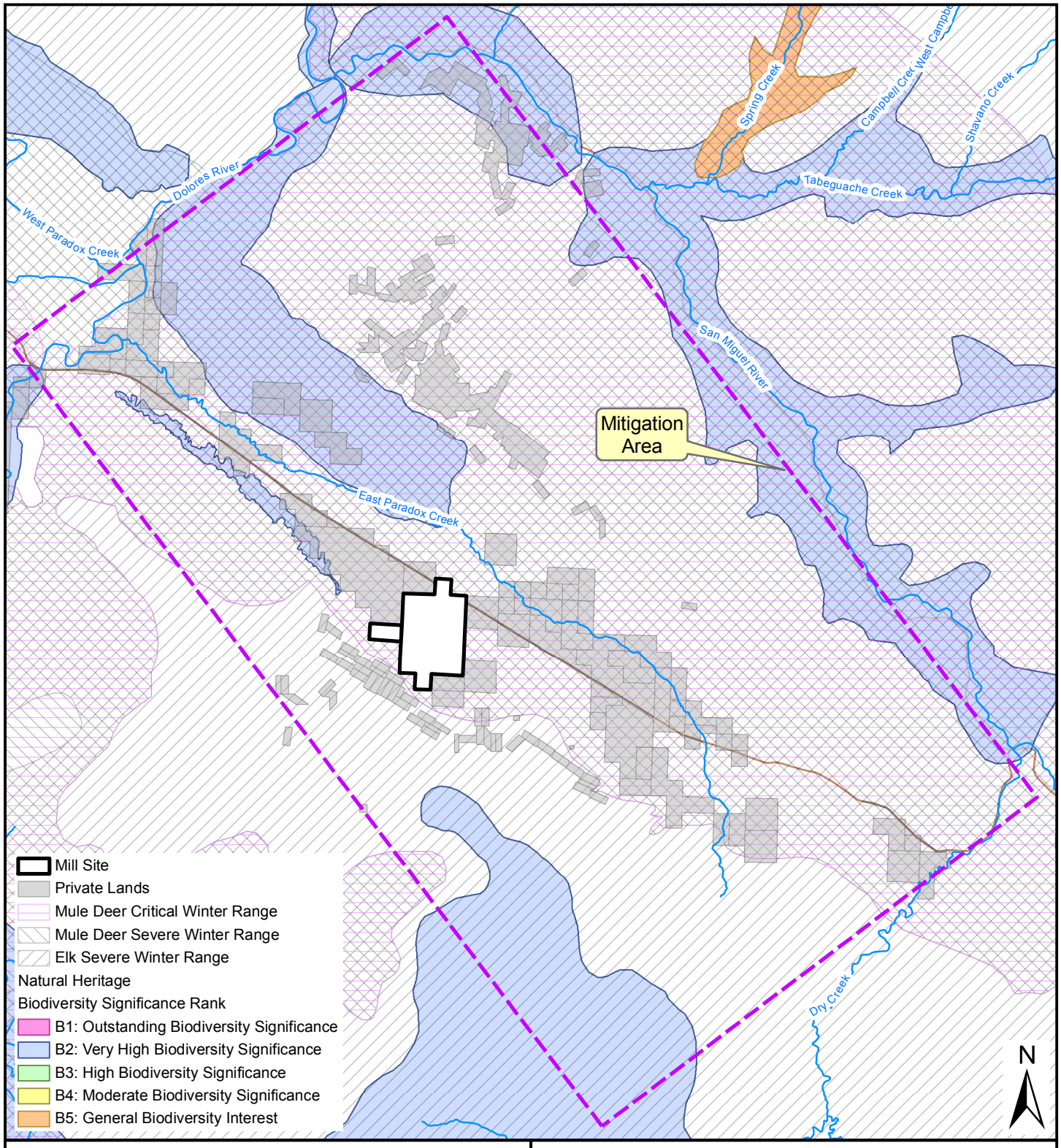
construction. Private lands located within this area are shown on Map 4. The mitigation site would be fenced to exclude domestic livestock and livestock grazing would be prohibited as would public access and development (i.e., roads, buildings, etc.).

CDOW's mitigation goal for the Project Site is to increase the carrying capacity of similar, adjacent habitats so that displaced wildlife can remain in the general area. To accomplish this, once the site is acquired, Energy Fuels would propose improvements for CDOW's approval that would increase the quality of habitat on the mitigation site. Improvements would likely include restoration of shrubs, increasing desirable understory species, and reducing the widespread weed problems found in the area.

CDOW provided the following guidelines for habitat improvements to increase the carrying capacity of the mitigation property.

- It is assumed the removal of domestic livestock grazing would leave additional forage for wildlife use. The amount and quality of this forage would be assessed. If the mitigation property was intact ecologically and a good native plant community present, it is CDOW's opinion that livestock removal alone could compensate for up to 50% of the habitat values lost on the Pinyon Ridge Mill site.
- Even if the habitat on the mitigation property is largely intact ecologically, the overall carrying capacity should be doubled in order to fully compensate for the habitat lost at the mill site. If the removal of domestic livestock grazing counts 50% towards this goal, the remaining 50% increase in habitat quality/carrying capacity will have to be achieved through habitat improvements. In combination (grazing removal and treatments), these actions should result in roughly doubling the carrying capacity of the mitigation tract.
- If the habitat across the entire mitigation tract is in poor condition, the entire mitigation tract may have to undergo habitat treatment in order to effectively double the animal carrying capacity.
- Surface control over the mitigation tract should be purchased by Energy Fuels prior to the start of mill construction within the Mill License Boundary. Implementation of habitat improvements should begin within one year of the start of mill construction. If necessary, these improvements could be phased in over a 5-year period and would continue until the habitat quality/animal carrying capacity has been doubled.
- The mitigation tract would remain under the control of Energy Fuels during the life of the mill and during any activities associated with final shutdown and reclamation. When Energy Fuels has been released from any further bonding or permit obligations by the CDPHE, the mitigation tract could be sold or donated to a non-profit entity (such as a land trust) for long term stewardship.

Energy Fuels may work with Partners for Western Conservation (PWC) and/or other local or national land trusts to identify potential parcels in the East Paradox valley floor. Upon acquisition of a CDOW-approved mitigation site, Energy Fuels would, with approval from CDOW, complete a baseline vegetation survey of the site. Based on the survey results, PWC or other land trusts may also be involved in proposing and implementing (following CDOW approval) habitat improvement projects for the site that would double the overall habitat quality and/or animal carrying capacity. Third-party expertise in the form of consultants or other agencies (BLM or NRCS) may be brought in to help determine the adequacy of proposed improvement projects. Treatments and monitoring could then begin and, if necessary, be phased in over several years until the forage production goal has been reached. CDOW would determine when the goal has been met.




# MAP 4

## Private Lands within the Limits of the Mitigation Area

Following mill site reclamation of the 415 acres, approximately 158 acres, associated with the tailings cells, would remain fenced and unavailable to wildlife. CDOW provided that in order to mitigate for this permanent loss of wildlife habitat, Energy Fuels could choose to do one of the following:

- If Energy Fuels has purchased the mitigation property, it may donate a permanent conservation easement or donate in fee, this property to a non-profit entity that would protect the conservation values of the mitigation parcel in perpetuity.
- If Energy Fuels has obtained a long-term lease on the mitigation property that would be allowed to expire once bonding/reclamation requirements for the mill site have been met, habitat improvements would be conducted on otherwise undisturbed portions of the mill site property as part of the final reclamation process. The acreages involved would be commensurate with the amount of habitat lost to the fenced tailings cells (i.e., approximately 158 acres) and designed to effectively double forage production and/or wildlife carrying capacity of the acreage. A 4-strand wire, wildlife-friendly fence would be maintained around the mitigation area, and livestock would be excluded from the mitigation area in perpetuity.

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