

Date: October 30, 2017

To: Michael A. Cunningham, Environmental Protection Specialist
Colorado Division of Reclamation Mining and Safety
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, CO 80203

RECEIVED

OCT 31 2017

Re: City of Golden, Empire Pit No. M-1977-534-AR01
Reclamation Permit Partial Release Request Consideration

**DIVISION OF RECLAMATION
MINING AND SAFETY**

Dear Mr. Cunningham:

We object to a partial release of reclamation permit M-1977-534-AR01 and ask for help in completing the reclamation of the Guanella gravel area used by City of Golden as per the approved Reclamation Plan. What areas are covered in the Partial Request, we have not seen any map or description defining the area? We have not been contacted or shown by Golden that their obligations have been met. Other than late spraying weeds after they had already gone to seed and placing rocks in some eroded ditches, there has been no further reclamation of the site by the City of Golden.

The reclamation process of the soil and of the vegetation of the Site has not been successful, nor yet completed by Golden. The salt contaminated areas and ruts still persists, see picture 1.

The grass seed sown has only grown into a sparse vegetation cover with many weeds present. It is certainly not comparable to adjacent pasturelands, see picture 2. Grass has reestablished itself under and outside the fence where the reclamation was not done, see picture 3. The Kochia weeds were not on the approved reseeding mixture called for in the reclamation plan. The sparse grass has not had horizontal stratification in the last three years and reclamation should not take 3 years to be complete.


The top soiling material, which was spread as a thin layer on the gravel has disappeared rather than having 4" – 6" top soil, as required on page 11 and 12 of reclamation plan, with natural loam and humus that can sustain plant life. It also still contains foreign materials such as, stones greater than one inch, asphalt, salt and weeds see picture 4 and 4a.

The post reclamation land use for the eastern (Phase II) reclamation area was explicitly set forth as pasture land- not range land- in the approved reclamation plan and other documents incorporated therein, by reference. See Picture 5 with 6 and 6a to compare adjacent pasture top soil.

We appreciate Golden's spraying of weeds and this must continue until the invasive weeds are eliminated and the species included in the Reclamation Plan have become established to a reasonable degree. We appreciate the opportunity to bring our concerns and observation to you.

Sincerely,


Glenda Guanella


Sally Guanella Buckland

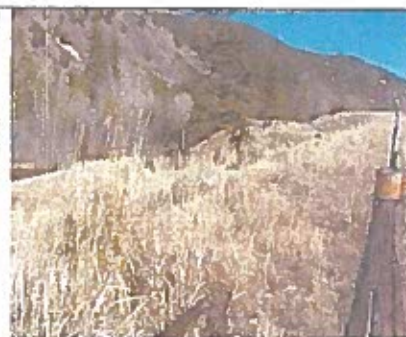
8 Pictures attached



Picture 1 Salt Contamination



Picture 2 Adjacent Pasture



Picture 3
Adjacent re-growth



Picture 4 Asphalt



Picture 4a Asphalt



Picture 5 Reclaimed Top Material



Picture 6 Adjacent Top Soil



Picture 6a Adjacent Top Soil