

April 7, 2021

Zane Luttrell  
Cornerstone Materials LLC  
23628 Uncompahgre Road  
Montrose, CO 81403



1313 Sherman Street, Room 215  
Denver, CO 80203

**RE: Blue Creek Staging Area, File No. M-2021-016, Special (111) Operation Application Adequacy Review (01)**

Mr. Luttrell:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced application in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before the application can be considered for approval.

1. Rule 6.3.2 Exhibit B – Site Description Section (a) requires you to submit a description of the soil characteristics for the area of the proposed operation. With your submittal you have included a regional soil survey for the Gunnison area and several neighboring counties. Please submit an NRCS soil report for the specific area where the project is located.
2. Rule 6.3.2 Exhibit B – Site Description Section (d): Due to the project area location adjacent to Black Canyon National Park where sensitive wildlife species and habitats may be located, there is cause for concern that critical or important wildlife habitats or wildlife species could be impacted by the operation. Please contact the local Colorado Parks and Wildlife (CPW) office for recommendations for limiting impacts to critical or important wildlife habitats or species by the operation, and submit the CPW recommendations to the Division.
3. Rule 6.3.3 Exhibit C – Mining Plan Section (b): For topsoil/plant growth medium that will not be reapplied on a graded area immediately after salvage, please specify how the topsoil will be stockpiled and stabilized with a vegetative cover or other means until used in reclamation.
4. Rule 6.3.4 Exhibit D – Reclamation Plan Section (1)(b): Specify the maximum gradient of reclaimed slopes (horizontal:vertical). If the Application proposes slopes steeper than 3:1, the Operator/Applicant must include a justification that supports steeper slopes for the proposed post-mining land use, and demonstrates compliance with the applicable performance standards of Rule 3.1.
5. Pursuant to Rule 6.3.4 (1)(c)(iii) your Reclamation Plan states the grass, forb, shrub and tree species to be planted and the applicable quantities. Due to concerns of the National Park Service (NPS) for the project to create potential for spread of invasive weeds into Black Canyon National Park, NPS has requested that only native or sterile plants be used for



revegetation. Please confer with the local soil conservation district for recommendations for the reclamation seed mix, and submit their recommendations to the Division.

Please submit your response(s) to the above listed issue(s) by Friday, April 09, 2021 in order to allow the Division sufficient time for review.

The Division will continue to review your application and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please contact me.

Sincerely,



**Dustin Czapla**  
Environmental Protection Specialist  
Division of Reclamation, Mining and Safety  
Phone: (303) 866-3567, ext. 8188  
dustin.czapla@state.co.us