



April 22, 2021

Justin Raglin  
Cripple Creek & Victor Gold Mining Company  
P. O. Box 191  
Victor, CO 80860

**RE: Cresson Project, Permit No. M-1980-244  
Technical Revision 126 (TR-126)  
Adequacy Review #1**

Dear Mr. Raglin:

On April 8, 2021, the Division of Reclamation, Mining and Safety received the TR-126 Technical Revision application for the Cresson Project 112d-3 Hard Rock Reclamation Permit (M-1980-244). TR-126 was submitted to clarify some tree planting issues that were raised in the AM-13 adequacy review.

In AM-13, CC&V committed to planting approximated 150 trees and/or shrubs per acre on the north- and east-facing slopes. The trees and shrubs currently planted include Gooseberry at about 50 plants per acre, Wood Rose at about 50 plants per acre, Engelmann Spruce at about 25 plants per acre and Bristlecone Pine at about 25 plants per acre (AM-13, Exhibit E, page 4). These numbers may vary depending on plant availability at time of reclamation. The locations of the tree plantings are shown on Drawing F-1 of AM-13.

The following questions address adequacy issues and missing information in TR-126 that are needed to complete the application. This information needs to be addressed and/or received before the Division can approve the revision.

- 1) CC&V proposes to plant trees 3-5 seasons after the establishment of a successful grass, forb and shrub community (page 2). According to the CSFS Planting Guide (included with the application), the site should be prepared by cultivating just before tree planting to eliminate the grasses because grasses take the much needed moisture away from the newly planted seedlings.
  - a. Please clarify why the trees will be planted 3-5 years after the establishment of the grass plant community.
  - b. Fabric mulch is highly recommended by CSFS to control grasses around the saplings. How will the grasses be managed around the tree saplings?
- 2) Young trees are very susceptible to desiccation and need regular watering. According to the



CSFS publication "Trees for Conservation: Planning, Planting & Care" (page 13) ([https://static.colostate.edu/client-files/csfs/pdfs/trees\\_for\\_conv\\_scr.pdf](https://static.colostate.edu/client-files/csfs/pdfs/trees_for_conv_scr.pdf)), first year seedlings require 1 gallon of water per week; second year, 2 gallons, and so forth. Does CC&V have a watering plan for the trees listed in TR-126?

- 3) CC&V committed to a success criteria of 50% or greater after the third growing season over a square acre (page 2). This standard means that each acre will have to be measured and meet the 50% success standard. Plant community composition can be highly variable over a landscape and therefore it may be difficult for each acre to meet the standard. The Division suggests that the 50% standard be applied for each tree planting area to allow for variability across the landscape.
- 4) Transplanting of aspen trees is included in Exhibit E, Section 1.5.1 of AM-13. Aspens have different planting criteria and locations than the tree species discussed in TR-126. For clarity and to prevent confusion, please include these additional tree plantings details in TR-126. The goal here is to have the criteria for all tree plantings in one location of the permit record. Please note, the approved aspen transplanting plan is not the subject of this revision and the aspen plan will not be subject to adequacy questions in this review.

Please note that the decision date for this revision is May 8, 2021. If you are unable to provide satisfactory responses to any inadequacies prior to this date, it will be your responsibility to request an extension of time to allow for continued review of this application.

If you have any questions, please contact me at (720) 774-0040 or [brock.bowles@state.co.us](mailto:brock.bowles@state.co.us).

Sincerely,



Brock Bowles  
Environmental Protection Specialist

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