

March 06, 2024

RE: Longmont Distel Operations, File No. M-1989-029, Technical Revision (TR-05) Response to Adequacy Review #1 Comments dated January 30, 2024.

Ms. Ridley,

The following discussion and attachments are submitted in response to Adequacy Review #1 comments prepared by the Division of Reclamation, Mining and Safety dated January 30, 2024 for the Longmont Distel Operations Technical Revision Request (TR-05).

- 1.) Item No. 3 on the TR-5 request letter from Holcim- WCR, Inc. states that reaches of the St. Vrain Creek would need to be dammed up to allow equipment to access topsoil piles. Please further clarify for the Division why damming of the creek is necessary to perform this work. What equipment is anticipated to be needed to complete stockpile reclamation? Additionally, in prior conversations, the Division and Holcim have discussed the potential need for a 404 permit. Please describe why this permit or any other permits would be needed to complete stockpile reclamation. Has Holcim contacted the appropriate agency/agencies to confirm or deny the need for such permits? Has the permitting process already begun?
 - Following the relocation of the St. Vrain River (post 2013 flooding), the new braided channels are currently within the former sand/gravel pit resulting in lose substrate bottoms providing minimal support for equipment crossings needed to perform further reclamation activities of the stockpiles. The equipment needed include a Caterpillar 740 GC (load weight ~150,000 lbs.), Caterpillar D6 Dozer (operating weight ~52,000 lbs.), and Caterpillar excavator 336 (operating weight ~81,000 lbs.). If reclamation activities were to occur, the introduction of offsite fill material and backfilling/compaction of said material would need to occur resulting in considerable fill within the perennial St. Vrain River braided channels and adjacent wetlands. To protect the compacted access routes, a pump around system would be required within the water crossings, thus interrupting protected habitat for Species of Special Concern (e.g. Iowa darter, Common shiner, and Stonecat). At this time, the only Nationwide Permit available for mining activities has a threshold impact of ½ acre. The reclamation of the stockpiles and access roads would exceed the ½ acre limitation, thus triggering the need for an Individual Permit and formal consultation with U.S. Fish and Wildlife Service. No formal permitting has occurred.
- 2.) Please clarify for the Division if the access road which may be used by Holcim (highlighted in white on the 'Distel Stockpile Map') is within the currently approved permit boundary.
 - The proposed access road highlighted in white on the 'Distel Stockpile Map' is located within the currently approved DRMS permit boundary. Please reference the attached 'Longmont Distel DRMS Boundary' .kmz file.



- 3.) The Division accepts Holcim's proposal to not create the three ponds as outlined on the reclamation map. Should Holcim obtain an updated Substitute Water Supply Plan (SWSP) for the site which reflects this change, please commit to providing a copy of this document to the Division when it becomes available.
 - Holcim will obtain an updated Substitute Water Supply Plan that reflects the changes following mining/processing completion, reclamation activities, and will provide DRMS a copy when available.
- 4.) Please clarify for the Division what the red and yellow polygons shown on the 'Distel Stockpile Map' represent. Will these features be amended in some way as part of this proposed change in the Reclamation Plan?
 - The red polygon represented in the attached 'Distel Stockpile Map' is a berm the City of Longmont requested to be removed in order to allow flow of the river along a more naturel route and prevent scouring during high flow events of the eastern boundary. Access will occur from a northern route where no water crossings are required. The yellow polygon represents overburden piles that are proposed to be flattened a reseeded. Access will occur from a northwestern route where no water crossings are required.
- 5.) Please provide the Division assurance that the proposed changes to the Reclamation Plan, with specific regard to the change in revegetation due to removal of ponds and riparian areas from the plan, are in alignment with the requirements of the City of Longmont's Open Space Master Plan for the St. Vrain River corridor. The site's currently approved Reclamation Plan states that this master plan includes the development of wetlands, ponds, and upland meadows at the site.
 - Jim Krick Comments: The City of Longmont is in agreement that the creation of naturally varied habitats, including wetlands, riparian corridors, and uplands by the 2013 flood are desirable and meet the requirements of the City. The City feels that the disturbance of these habitats that would be caused by building ponds would be detrimental and unnecessary.
- 6.) Please submit an updated Exhibit F Reclamation Plan Map which reflects the proposed Reclamation Plan revisions, i.e. removal of ponds, no tree or shrub plantings, etc.
 - Reference the attached revised Exhibit F.1 Reclamation Plan Map.
- 7.) Submit an updated Exhibit E, Reclamation Plan narrative which reflects the changes proposed in this TR request. What is the proposed type of replacement vegetation and ecologic environment for areas previously planned to be wetlands and ponds? If there are any proposed changes to the currently approved seed mix, please submit this information as well.
 - Reference the attached revised Exhibit E Reclamation Plan narrative.



- 8.) Please provide the Division with a .kmz or shapefile which outlines the currently approved permit boundary. Alternately, you may provide a table of coordinates for the vertices of the permit boundary.
 - Reference the attached 'Longmont Distel DRMS Boundary' .kmz file.

If you have any questions regarding the TR application and adequacy comment responses, please feel free to contact me at 702-379-4623.

Sincerely,

at you and the

Wyatt R. Webster Environmental & Land Manager

6.0 EXHIBIT E – RECLAMATION PLAN

This revised reclamation plan includes remaining permitted properties following Acreage Reduction Approval (AR-01) on September 13, 2018 of the Sherwood and Peschel properties. All reclamation activities will remain the same as in the Amendment 3 (AM-03) application from September 28, 2000 with the exception of the following revisions. The final land use and layout of the reclaimed areas has been developed in conjunction with Longmont Parks and Recreation and the landowners to ensure compatibility with the long term planning goals of the area.

6.1 Reclaimed Landform

The remainder of the currently disturbed areas, approximately 164 acres, will be reclaimed as upland meadows. The proposed layout of the upland meadows is illustrated in the revised Exhibit F.1. Reclamation topography will be dependent on post-mining activities and may vary.

The four remaining overdurben/topsoil stockpiles identified as green polygons in City of Longmont's January 16, 2024 letter currently within the St. Vrain River corridor will remain. The red polygon is a berm the City of Longmont requested to be removed in order to allow flow of the river along a more natural route and prevent scouring during high flow events of the eastern boundary. Access will occur from a northern route where no water crossings are required. The yellow polygon represents overburden piles that are proposed to be flattened and reseeded with upland seed mix. Access will occur from a northwestern route where no water crossings are required. Should Holcim require use of the access road, white polygon, Holcim will reclaim after use with upland seed mixture identified in Table 6.2.

Tree planting, shrub planting, ponds, and wetland creation will not occur as called out in Amendment 3. All remaining disturbance areas will be seeded with current upland seed mixture identified in Table 6.2.

Table 6.2

Common Name	Approx			
Species	Approx.	0/ 5 1 4	No. DL O/80	DLO LLA
"Variety"	Seeds/Lb	<u>% of Mix</u>	No. PLS/ft2	PLS Lb/Acr
Cide Oate Orene	404000	7.00	400	1.0
Side Oats Grama	191000	7.00	100	1.6
Bouteloua curtipendula				
"Vaughn"				
	005000	40.00	100	
Blue Grama	825000	10.00	100	0.5
Bouteloua gracilis				
Native or Alma or Bad River or Hachita				
Buffalograss	56000	10.00	100	7.7
Buchloe dactyloides				
"Native"				
Inland Saltgrass	520000	3.00	100	0.2
Distichlis spicata				
Canada Wildrye	115000	10.00	100	3.7
Elymus canadensis				
'VNS''				
Squirrel Tail	192000	5.00	100	1.1
Elymus elymoides	1			
VNS"	1			
Slender Wheatgrass	159000	5.00	100	1.3
Elymus trachycaulus	10000	5.00	100	1.3
San Luis"				
San Luis				
	144000	2.00	400	0.0
Indian Ricegrass	141000	2.00	100	0.6
Oryzopsis hymenoides				
"Paloma"				
Western Wheatgrass	110000	3.00	100	1.1
Pascopyrum smithii				
"Arriba"				
Alkaligrass	1200000	2.00	100	0.0
Puccinellia nuttalliana				
Native				
Little Bluestem	260000	5.00	100	0.8
Schizachyrium scoparium				
"Cimarron or Pastura"				
Alkali Sacaton	1758000	3.00	100	0.0
Sporobolus airodes		0.00	100	0.0
'Salado''				
Salado				
Cand Drana and	5208000	2.00	100	0.0
Sand Dropseed	5298000	2.00	100	0.0
Sporobolus cryptandrus				
'Native''				
Fringed Sage	4536000	2.00	100	0.0
Artemisia frigida				
-				
Rocky Mtn. BeePlant	65900	3.00	100	1.9
Cleome serrulata				
Purple Praire Clover	300000	5.00	100	0.7
Dalea purpurea	500000	5.00	100	0.7
Dalea pulpulea				
Hain Caldon Astar	200240	2.00	100	0.3
Hairy Golden Aster	280340	2.00	100	0.3
Heterotheca villosa				
On the still set	404000		100	
Gayfeather	194000	3.00	100	0.6
Liatris punctata				
Yellow Coneflower	1230000	5.00	100	0.1
Ratibida columnifera				
Scarlet Globemallow	500000	3.00	100	0.2
Sphaeralcea coccinea				
Rabbitbrush (Rubber)	400000	3.00	100	0.3
Chrysothamnus nauseosus	-00000	5.00	100	0.3
engeenannae naaeooaa				
	1			
Wood's Rose	51000	2.00	100	1.7



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