

6.3.2 EXHIBIT B

Site Description

The Russell Gulch Reclamation Project (RGRP) will be located on the East Leavenworth Lode Claim (approx. 4 acres), along Virginia Canyon Road. The elevation of the site is approximately 9,200 ft. The parcel is three-quarters of a mile West of Central City Pkwy. Less than 1.5 acres of surface disturbance is planned, which includes an interior road installation and site grading, both will be long term value adds for the property. The land cover is a mix of existing mine working piles (approx. 25%), evergreen forest (>65%), and herbaceous (<10%).

The Soils in the reclamation area are Arents dump mine complex, rock outcrop and resort-cathedral complex/ The NRCS web soil survey and soil series descriptions are provided herein. On site, there are no visible steep slopes, faults or drainage other than on tailings piles. There are no streams, springs, lakes, stock water ponds, ditches, reservoirs and aquifers that would receive drainage directly from the affected area.

The only permanent man-made structures within 200ft of the affected area is Virginia Canyon Road which is maintained by Gilpin County Public Works. No other structures are within 200 ft of the parcels' perimeter. An access/driveway/culvert permit was issued to the project by Public Works on November 14th, 2024 (included in this application).

The East Leavenworth Claim is not located in a conservation district, per data identified at Colorado Association of Conservation Districts. This has been discussed with DRMS and cross checked at the following sources:

- <https://www.coloradoacd.org/conservation-districts.htm>
- <https://ag.colorado.gov/conservation/cscb>

Storm water run-off from the road leading from the main road to the reclamation circuit will be directed via waddles and ditches as to ensure any/all drainage silts remain on private property and do not impact the city/county road whatsoever. The (RGRP) will have zero impact on the hydrologic balance. The ditches will converge with the culvert and drainage system of Virginia Canyon Road. An interior road is anticipated to be installed and will be permitted through Gilpin County prior to installation. There is no surface water on the property. Neither surface nor groundwater will be encountered, intercepted or impacted and the circuit does not discharge process water. To that end, in no way will the (RGRP) have any effect on roads, roadside ditches, existing landscape or structures.

Comments were received from Colorado Parks and Wildlife, applicant will be mindful and abide by these recommendations throughout the life of the reclamation project. Specifically, as it relates to invasive weeds, erosion mitigation, regrading, and revegetation. For erosion mitigation,

silt fencing and wattles will be installed as appropriate along downslope edge of disturbed areas (road, worksite, tailings, temporary material stockpiles. When the tailings pile is fully removed, the remaining soil will be tested by a third-party lab for acidity levels. The applicant will add amendments as required to neutralize the acidity. For disturbed tailing piles, once removed the ground will be regraded to blend into the existing topography. A minimum of 12" of clean (seedless/weedless) fill with soil amendments will be placed over all disturbed areas previously occupied by tailings. These areas will be revegetated with native grasses and forbs seed mix (seed species and planting schedule provided below) to be provided by National Resources Conservation Service (NRCS). These areas will be covered with weed free straw and woody material (by chipping the downed trees during road installation). For invasive weed management, applicant will visually monitor the site for any indication of invasive weed species. A dedicated invasive weed visual inspection will be conducted monthly on the property by the applicant. Upon identification, the applicant will manually remove weeds from the site. If for some reason, invasive weeds become unmanageable with manual removal, approved herbicides (Milestone or Plateau as appropriate) will be sprayed on existing/visible invasive weeds. A sprayer will be borrowed from the Extension Office in Blackhawk, CO which is available due to a grant from the CO Dept. Of Agriculture. The following list of noxious weeds in Gilpin County that will be monitored were found at <https://gilpin.extension.colostate.edu/programs/natu/noxious-weeds/>.

List A (Eradication Required):

1. Myrtle Spurge (*Euphorbia myrsinites*)

List B (Control Required):

1. Canada Thistle (*Cirsium arvense*)
2. Common Tansy (*Tanacetum vulgare*)
3. Wild Caraway (*Carum carvi*)
4. Cheatgrass (*Bromus tectorum*)
5. Diffuse Knapweed (*Centaurea diffusa*)
6. Spotted Knapweed (*Centaurea stoebe*)
7. Leafy Spurge (*Euphorbia esula*)
8. Musk Thistle (*Carduus nutans*)
9. Oxeye Daisy (*Leucanthemum vulgare*)
10. Scentless Chamomile (*Matricaria perforata*)
11. Yellow Toadflax (*Linaria vulgaris*)

List C (Regulated Species):

1. Common Mullein (*Verbascum thapsus*)
2. Poison Hemlock (*Conium maculatum*)

Watch List Species:

1. Hoary Alyssum (*Berteroa incana*)

Optimal Seeding Dates

Provided by NRCS

Table 2. Seeding Dates for Conservation Plantings by Major Land Resource Areas (MLRAs) within Colorado

MLRA	Cool Season Plants		Warm Season Plants	
	Dormant-Spring	Summer	Dormant-Spring	Summer
E 48A&B	Oct. 15 to Apr. 30	Jun. 15 to Jul. 15	Oct. 1 to Apr. 30	Jun. 15 to Jul. 15

Revegetation Species Recommendation

Provided by NRCS

Functional/Structural Groups Sheet

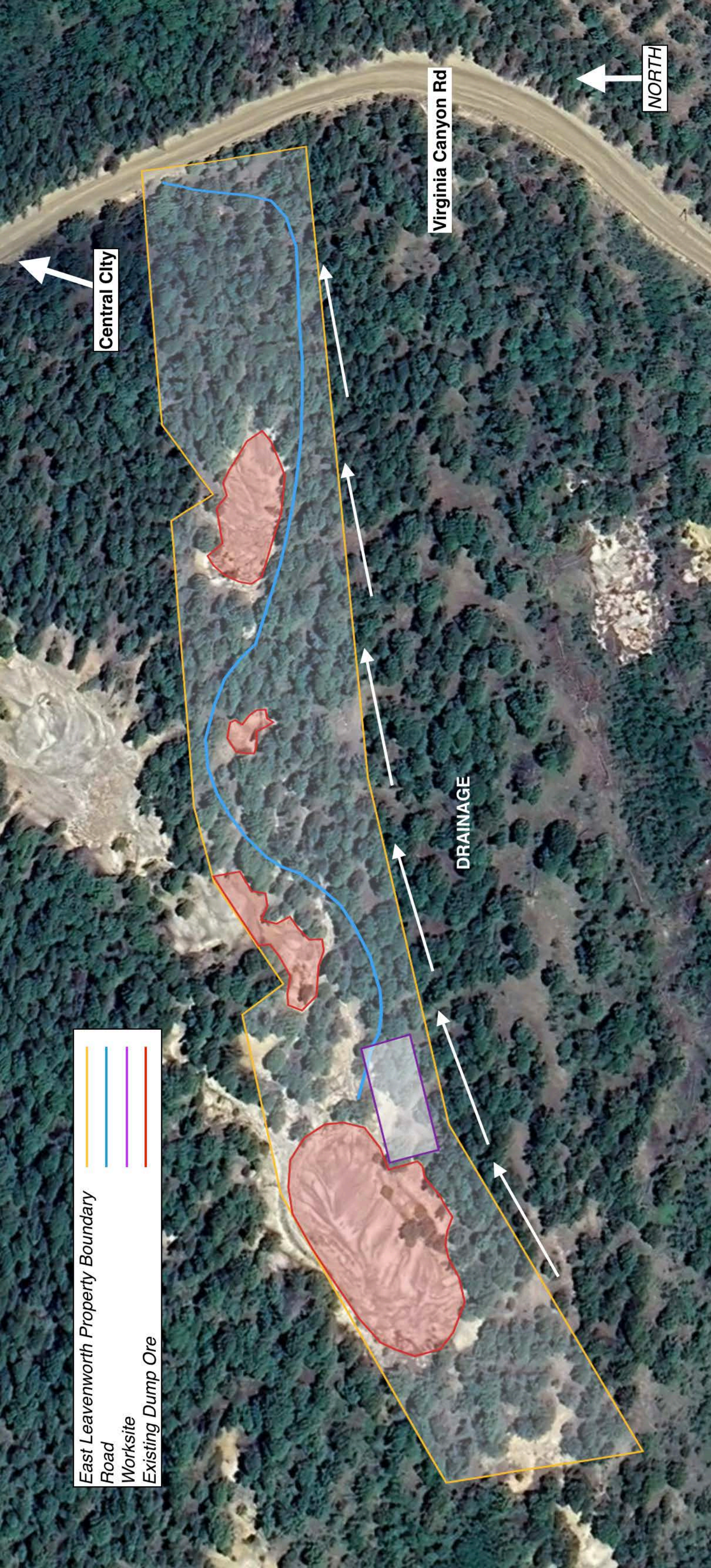
State: CO Office: Longmont FO Ecological Site: Mountain Loam Site ID: R048AY228CO

Observers: A. Interpreter Date: 12/18/24

Functional/Structural Groups			Species List for Functional/Structural Groups
Name	Potential ¹	Actual ²	Plant Names
Cool season bunchgrass	D		Idaho and/or Arizona fescue, bluebunch wheatgrass, needlegrasses, native bluegrasses, nodding brome, mountain brome
Cool season rhizomatous grass	S		Western wheatgrass
Shrubs – sprouters	S		Rabbitbrush, snowberry, serviceberry, bitterbrush, Gambel oak
Shrubs – non-sprouters	S		Big sagebrush, black sagebrush
Forbs	S		Western yarrow, lupine, bluebells, buckwheat, Indian paintbrush, balsamroot, cinquefoil, scarlet gilia, asters, daisy
Sedges	M		Elk sedge, threadleaf sedge
Noxious Weeds			
Invasive Plants			
Biological Crust ³			

Indicate whether each “structural/functional group” is a **Dominant (D)** (roughly 40-100 % composition), a **Sub-dominant (S)** (roughly 10-40% composition) a **Minor Component (M)** (roughly 2-5% composition), or a **Trace Component (T)** (<2% composition) based on weight or cover composition in the area of interest (e.g., “Actual²” column) relative to the “Potential¹” column derived from information found in the ecological site/description and/or at the ecological reference area.

Biological Crust³ dominance is evaluated solely on **cover** not composition by weight.



- East Leavenworth Property Boundary
- Road
- Worksite
- Existing Dump Ore

Central City

Virginia Canyon Rd

DRAINAGE

NORTH