

6.3.4 EXHIBIT D

Reclamation Plan

Post reclamation land use of the Russell Gulch Reclamation Project (RGRP) will be raw land zoned Rural Residential (no rezoning required), consistent with neighboring property. The proposed interior road will be a value add, used as access to a future building site for a single-family residence or similar use.

The (RGRP) will consist of the circuit equipment necessary for reclamation and an interior road terminating onto Virginia Canyon Road, Central City, CO. The approximate size of site disturbance is estimated to be less than 1.0 acres, this includes grading for the circuit work area, an interior road and the footprints of existing mine working piles to be processed and removed. When all of the existing mine working piles have been processed/removed, the equipment will be removed from the site. The interior road and graded worksite will remain as permanent features post project and reclamation completion. Testing of soil remaining under tailings piles will be conducted at project completion to determine the acidity level of the soil (amendments/organics will be added to topsoil if acidic). Topsoil will be dispersed across remaining footprints of current tailings piles to a depth of 12" (this area is estimated to be 0.7 acres). Topsoil will be purchased from *APC Landscape Supply* located at 15550 W 44th Ave, Golden, CO. Revegetation will consist of spreading a seed mix provided by NRCS (approved species found in table below) and covered with weed free straw and woody material (felled trees will be chipped/mulched onsite and dispersed). The road will be maintained and re-graded as desired by the owners of the property. NRCS has been consulted regarding revegetation and will assist in coordinating an appropriate seed mix. A seed mix plan from NRCS is attached below. From NRCS *"Based on the dominant soils and Major Land Resources Areas (MLRA) of this property the expected dominant species are cool season bunchgrasses followed by cool season rhizomatous grasses. The subdominant species are shrubs (sprouters) and mixed conifer. Grass, in association with minor amounts of woody plants such as sagebrush and snowberry and several forbs, accounts for most of the vegetive cover. However, due to the history of fire suppression, there are far more conifers in this expected MLRA. Please see the attached PDF (below) for the list of expected grass species. A seed mix with any of these species would be ideal."*

Reclamation costs (both direct and indirect) are estimated to be minimal (less than \$10,000), due to the amount of planned surface disturbance and no pit/cut creation. The tailings footprints will be graded to match the natural topography of the area as material is removed.

Following the project's completion, the intent is to sell the property as land, ready for Rural Residential development (for which it is currently zoned). In the event the property owner, CRS LLC and Russell Gulch LLC, chooses not to sell the property, the owner will accept the property with reclamation and use the property for personal use.

Functional/Structural Groups Sheet

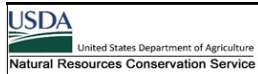
State: CO Office: Longmont FO Ecological Site: Mountain Loam Site ID: R048AY228CO

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 “Potential²” 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.



Grass Seeding Planned, Applied, and Cost Worksheet

ECS - 05 - 01

Cooperator	Greg Smith	Date	4/3/25
Tract/Field No	Gilpin Co	Acres	0.70
Soil Survey Area	Mountain Loam	Map Unit (s)	MLRA 48A
Contract No.	N/A	CIN	N/A

Seeding dates	Oct 1 to Apr 30	Program	CTA
Seedbed preparation	No Till	Planned Seed rate	Non-irrigated broadcast (40 seeds/sq ft)
Drill type	broadcast spreader	Acres to be seeded	Applied SD ---
Planting depth-Drill spacing (in)	1/4		0.70

Planned fertilizer application (lb/ac)	N	P ₂ O ₅	K ₂ O
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Planned weed control activities	Description
	Date(s)

Planned residue cover or mulch	Type
	Amount (lb/ac)
	Application method

A **Nutrient Management Plan** is not required for the establishment of vegetative conservation unless fertilizer is applied.

Attach WIN-PST Soil-Pesticide
Interaction Risk Report
for all chemical suppression activities

[Plant Materials Technical Note 59](#)

Changes to the recommendations require NRCS approval for payment.

Alternative grasses if not in stock: Letterman's needlegrass (ACLE9) Achatherum lettermanii, western wheatgrass (PASM) Pascopyrum smithii, Parry's oatgrass (DAPA2) Danthonia parryi, nodding brome (BRAN) Bromus anomalus

(PLS = Pure Live Seed)

Common Name		Genus, species (Required)	Recommended Cultivar (Required)	% of Seed Mix (required)	Total PLS LBs in Mix (sds/ac x Acres) / Seeds/Lb	PLS Seed Rate (lbs / ac)	Targeted PLS Seeds /Sq-Ft
Native	Introduced						
	C - cool season						
	Bunch or bunchgrass	Rhizomatous or sodformer					
Forb	Legume						
Early	Mid	Late	Pollinator Assist				

100.00%

1	Fescue, Arizona (Redondo) PA	NCB	<i>Festuca arizonica</i>	Broadcast	30.00%	0.89	1.27	12.00
2	Fescue, Idaho (Joseph) PA	NCB	<i>Festuca idahoensis</i>	Broadcast	20.00%	0.54	0.77	8.00
3	Wheatgrass, Slender (San Luis) PA	NCB	<i>Elymus trachycaulus</i>	Broadcast	15.00%	1.26	1.80	6.00
4	Muttongrass PA	NCB	<i>Poa fendleriana</i>	Broadcast	10.00%	0.06	0.09	4.00
5	Muhly, Mountain PA	NCB	<i>Muhlenbergia montana</i>	Broadcast	5.00%	0.04	0.06	2.00
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Other Grass/forb species not in List	INIT.	<<< Initial that each unlisted species has been cleared with the State Office for this seed list						
21 Buckwheat, Sulphur-flower E, M	NF	<i>Eriogonum umbellatum</i>	Broadcast	5.000%	0.3	2.00	2.00	
22 Balsamroot, Arrowleaf	NF	<i>Balsamorhiza sagittata</i>	Broadcast	5.000%	1.0	2.00	2.00	
23								
24								
25								

Shrubs (add shrub seed to grass - forb seed mix)

A Sagebrush, Mountain Big (Hobble Creek)	N	<i>Artemisia tridentata vaseyana</i>	Broadcast	5.0000%	0.062	0.0883	2.00000
B Antelope Bitterbrush (Maybell) E, M	N	<i>Purshia tridentata</i>	Broadcast	5.0000%	7.92	11.3143	2.00000
C							

Other Shrub species not in List INIT. <<< Initial that each unlisted species has been cleared with the State Office for this seed list

D							
E							

40.000

Seeding Rate (seeds/sq ft) >>> 40

100.0000%

† **Certified Seed** is required for all NRCS cost share programs

‡ Complete a **Tree and Shrub Establishment 612 Job Sheet** for bare-root shrub plantings

	Lbs	lbs/ac	sds/ sq-ft
Grasses, Forbs	4.13	7.99	36.00
Shrubs	7.98	11.40	4.00
Total	12.11	17.30	40.00

Certified Planner Amanda Interpreter

Date 4/3/2025