Cunningham Hill Reclamation Project LAC Minerals (USA) LLC

2020 REVEGETATION EVALUATION REPORT

DECEMBER, 2020



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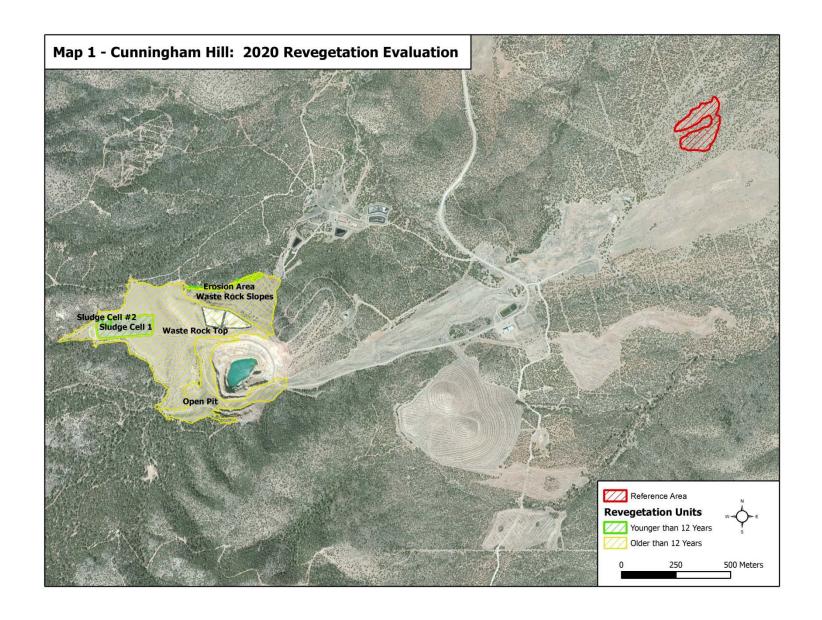
Cunningham Hill Reclamation Project

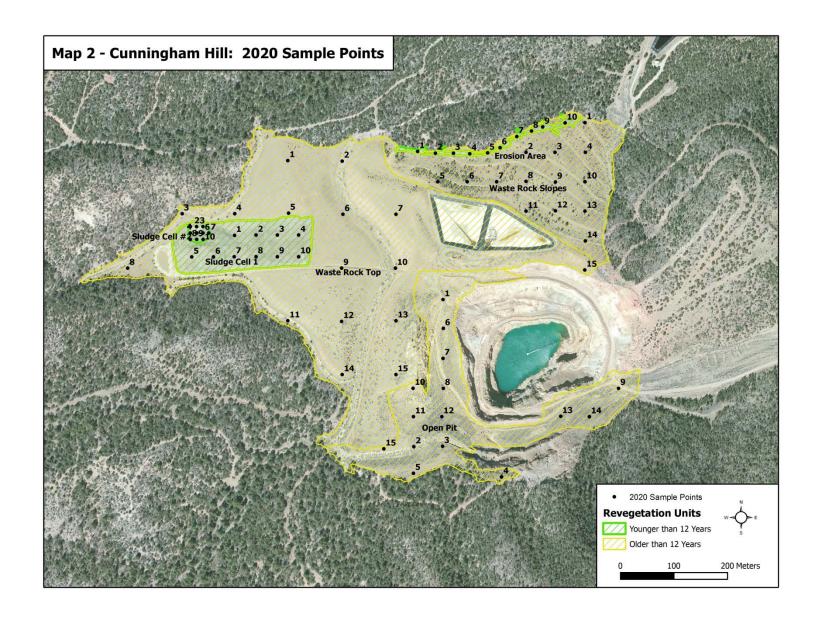
2020 REVEGETATION EVALUATION REPORT

1.0 INTRODUCTION

1.1 General

In 2020 LAC Minerals (USA) LLC's (LAC) retained Cedar Creek Associates, Inc. (Cedar Creek) to evaluate revegetation efforts across the mine site for monitoring purposes. A reference area, established and approved by the Mining and Minerals Division (MMD) in 1997, was sampled to facilitate comparison. Revegetation evaluation was conducted in accordance with the approved close-out plan for the Cunningham Hill Reclamation Project. Sampling was conducted on September 29, 2020 by or under the direct supervision of Cedar Creek's Senior Reclamation Ecologist, Mr. Jesse H. Dillon. Revegetation evaluation occurred in the following areas: Erosion Area, Sludge Cell Areas 1 and 2, Open Pit Area, Waste Rock Top Area, Waste Rock Slope Area, and Reference Area. Area locations are presented on Map 1; transect locations are noted on Map 2. Sampling methodologies are presented in Appendix A.





1.2 Precipitation

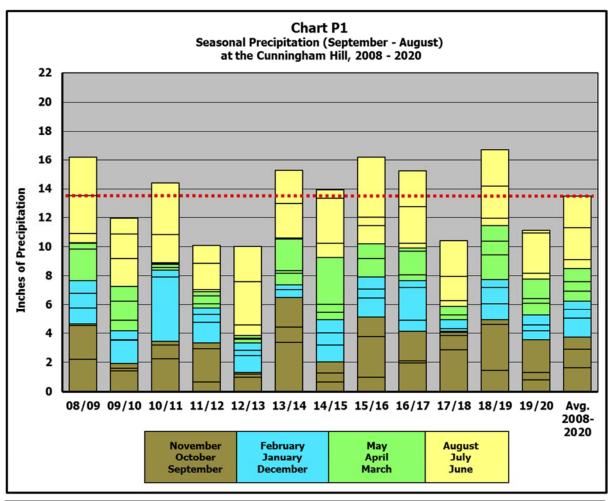
Table P presents precipitation accumulated annually at the Cunningham Hill Reclamation Project over the past 13 years. Chart P1 displays the seasonal precipitation over the historical record and Chart P2 displays 2019/2020 seasonal precipitation in comparison with the 12 year average. The overall average annual precipitation for the past 13 years is 13.36 inches while the monthly average precipitation levels ranges from 0.60 in April to 2.28 inches in August. This indicates that the growing season at Cunningham Hill Reclamation Project relies on monsoonal precipitation. Average winter precipitation is 2.52 inches while spring, summer, and fall averages 2.26, 4.95, and 3.75 inches, respectively.

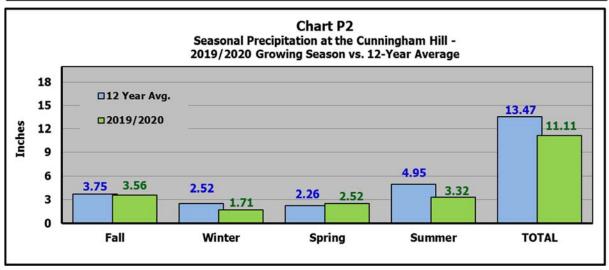
Examination of Chart P2 indicates that precipitation for the seasons prior to sampling can be considered slightly below average (2019/2020 precipitation was 82% of 12 year average). The winter and summer of the 2019/2020 growing season received below average precipitation with 68% and 67% of normal levels, respectively. Spring and fall precipitation was approximately average, at 111% and 95%, respectively. The month preceding sampling in September was well below average with 0.18 inches (8% of average) of precipitation for August; however July was above average with 2.74 inches (126% of average). Overall, conditions should be considered somewhat less favorable for the revegetation progress with plants exhibiting slightly below average production and vigor.

Table P - Ani	nual P	recipi	tation	at th	e Cun	ningha	am Hil	I, 200	8 - 20	20			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	0ct	Nov	Dec	Total
2008	1.52	0.95	0.33	0.27	0.47	0.73	2.07	3.85	2.21	2.34	0.11	1.13	15.98
2009	1.01	0.88	2.17	0.39	0.06	0.61	2.61	2.71	1.42	0.18	0.31	1.6	13.95
2010	0.03	0.64	0.72	1.36	1.01	1.91	1.7	1.07	2.23	0.95	0.28	4.45	16.35
2011*	0.03	0.45	0.2	0.21	0.07	0.04	1.92	3.58	0.65	2.29	0.38	1.44	11.26
2012*	0.54	0.47	0.3	0.53	0.31	0.15	1.82	1.22	0.97	0.23	0.08	1.18	7.80
2013*	0.37	0.49	0.28	0.08	0.17	0.72	3.02	2.46	3.38	1.05	2.08	0.55	14.65
2014*	0	0.33	0.78	0.20	2.17	0.08	2.35	2.32	0.65	0.60	0.78	1.15	11.41
2015*	0.86	0.89	0.52	0.59	3.22	1.01	3.07	0.60	0.98	2.78	1.36	1.34	17.22
2016*	0.64	0.82	0	1.27	1.04	1.22	0.59	4.17	1.95	0.14	2.03	0.78	14.65
2017*	2.29	0.47	0.4	1.66	0.19	0.33	2.53	2.48	2.87	0.98	0.20	0.08	14.48
2018^	0.18	0.61	0.33	0.00	0.65	0.39	1.67	2.46	1.45	3.16	0.34	1.11	12.35
2019^	1.12	0.56	1.71	0.95	1.05	0.51	2.22	2.55	0.78	0.50	2.28	0.63	14.86
2020^	0.37	0.71	0.85	0.30	1.37	0.40	2.74	0.18	0.69	0.87	0.21		8.69
2008-2020 Avg.	0.69	0.64	0.66	0.60	0.91	0.62	2.18	2.28	1.56	1.24	0.80	1.19	13.36

^{*}Precipitation data from Santa Fe Seton, NM NOAA Station- Closest proximity data available for dates listed

[^] Precipitation data from Santa Fe 15.7 SSW, NM NOAA Station - Closest proximity data available for dates listed





2.0 REVEGETATION STANDARDS

In accordance with Cunningham Hill's Closeout Plan, revegetated units, planted as shrubland or woodland with woody plants for wildlife habitat, must meet performance standards for ground cover, species diversity, and woody plant density. Revegetation efforts will be considered successful when all standards have been met at the end of the 12-year liability period.

1. Vegetative Ground Cover Standard

Vegetative ground cover must meet at least one of the following two tests:

- a) the total vegetative ground cover (exclusive of annual species) in the revegetated unit equals or exceeds <u>75 percent</u> of the approved reference area's total vegetative ground cover (exclusive of annual species), with 90 percent statistical confidence; or
- b) the total vegetative ground cover (exclusive of annual species) in the revegetated unit equals or exceeds <u>50 percent</u> of the approved reference area's total vegetative cover (exclusive of annual species) with 90 percent statistical confidence, <u>and</u> predicted values of soil loss using the Revised Universal Soil Loss Equation (RUSLE) are equal to or less than the comparison "T" value, which essentially is the soil genesis rate in tons per acre per year.

2. Species Diversity Standard

Species Diversity Standard, as described in the close out plan, requires all non-annual (perennial and biennial) species that contribute at least 2% <u>relative</u> cover (composition) <u>or</u> at least 1% <u>average</u> cover must be tallied. Important species on revegetation units must be greater than 50% of the reference area's important species.

3. Woody Plant Density Standard

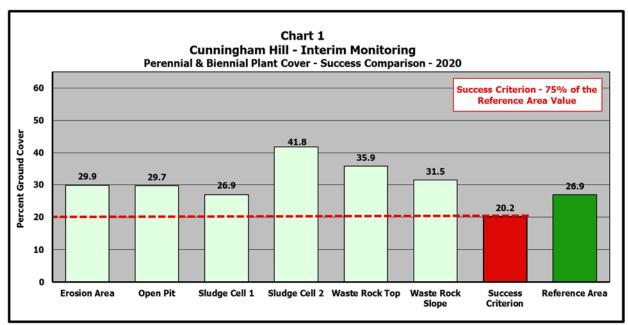
Woody Plant Density Standard requires the sampled area to exhibit 220 or more live woody plants per acre suitable for wildlife habitat.

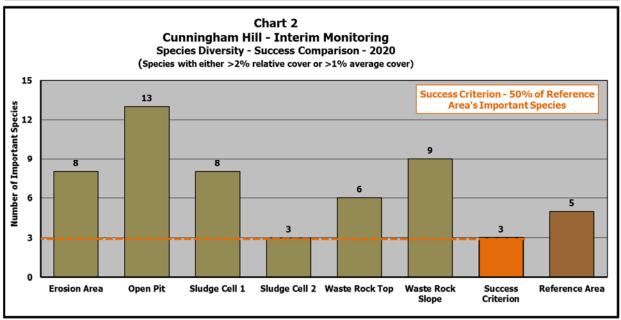
3.0 RESULTS

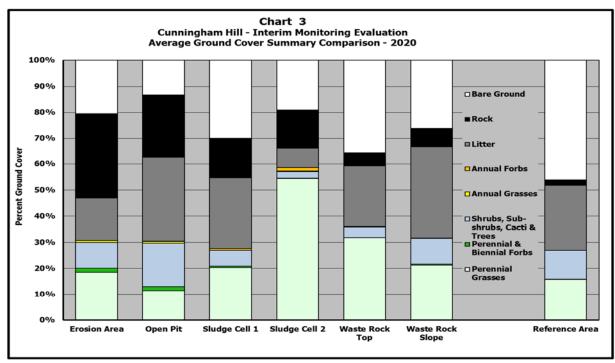
3.1 Summary

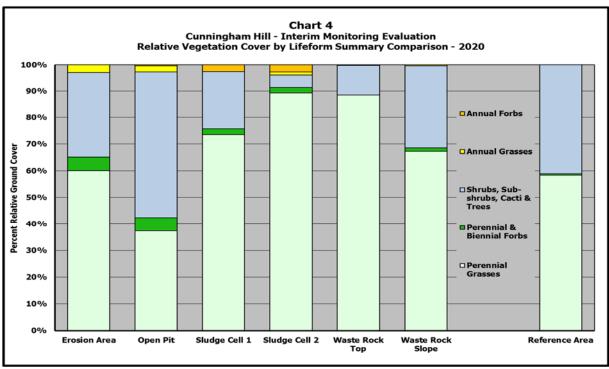
Ground cover data and associated species diversity collected from the Erosion Area, Open Pit Area, Sludge Cell's 1 and 2, Waste Rock Top and Slope Areas, and the Reference Area have been organized, summarized, and presented on a variety of tables and charts at the rear of this document.

Review of the 2020 revegetation evaluation results indicate that the Open Pit Area and the Waste Rock Top and Slope Areas are in excellent condition and readily pass bond release standards for ground cover and species diversity. The Sludge Cell 1, Sludge Cell 2, and Erosion areas are exhibiting favorable plant community development and are progressing toward bond release standards. Summary comparison data presented on Tables 1 - 3 as well as Charts 1 - 5 indicate that in response to LAC's revegetation effort, these areas show excellent revegetation establishment and perennial plant community development. Raw data can be found in Appendix B.









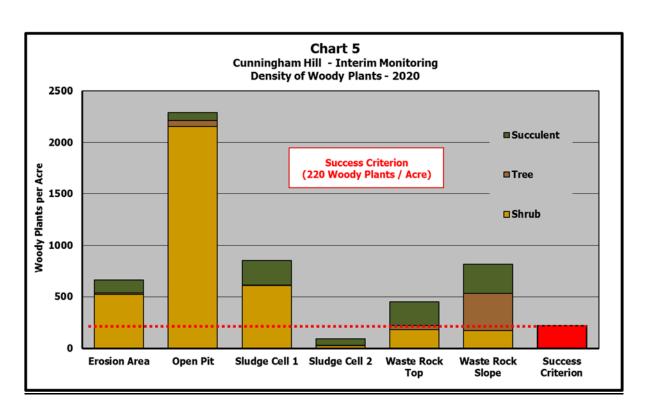
Ta	ble 1 Cunningha	am Hill - 2020							
	Average Cover Summ	ary - Interim Monitor	ing						
					Percent	Ground Cove	er Based on	Point-Interce	pt Samplin
		Area Sampled>	Erosion	Open Pit	Sludge Cell	Sludge Cell	Waste	Waste	Reference
	Scientific Name	Common Name	Area	Open Pit	1	2	Rock Top	Rock Slope	Area
Gra	sses and Grass - likes								7 0
Р	Agropyron dasystachyum	Thickspike wheatgrass	_	-	3.30	_	1.07	1.73	_
Р	Agropyron smithii	Western wheatgrass	0.40	0.67	3.00	3,80	2.73	0.60	-
Р	Agropyron spicatum	Bluebunch wheatgrass	-	-	-	-	-	0.87	-
P	Aristida purpurea	Purple three - awn	0.20	0.07	0.10	-	-	-	-
Р	Bouteloua curtipendula	Sideoats grama	1.90	5.93	2.50	0.70	16.80	4.73	-
Р	Bouteloua gracilis	Blue grama	11.80	2.07	6.50	33.80	9.67	4.27	15.60
P	Bromus inermis	Smooth Brome	-	0.07	0.20	0.20	1.47	0.20	-
A	Bromus japonicus	Japanese Brome	0.90	- 0.67	-	- 0.50	- 0.07	0.13	-
A P	Bromus tectorum Elymus cinereus	Cheatgrass Great basin wildrye	-	0.67 0.20	-	0.50	0.07	-	-
P	Hilaria jamesii	Galleta	1.40	0.47	_	_	0.07	8.07	0.07
P	Koeleria cristata	Prairie Junegrass	-	-	-	-	-	0.47	-
P	Muhlenbergia wrightii	Spike muhly	-	0.27	-	-	-	-	-
Р	Oryzopsis hymenoides	Indian Ricegrass	0.30	-	1.10	0.40	-	-	-
Р	Schizachyrium scoparium	Little bluestem	2.00	-	-	-	-	0.27	-
Р	Sitanion hystrix	Bottlebrush Squirreltail	0.50	0.93	-	-	-	-	0.07
Р	Sporobolus airoides	Alkali Sacaton	-	0.73	0.50	0.10	-	- 0.07	-
P .	Stipa neomexicana	New Mexico Feathergrass	-	-	3.10	0.10	-	0.07	-
Forl									
Р	Euphorbia sp.	Sandmat	-	0.07	-	-	-	-	-
Α	Ipomopsis longiflora	Flaxflowered ipomopsis	-	0.07	- 0.70	-	-	-	-
A B	Machaeranthera canescens Melilotus officinalis	Hoary tansyaster Yellow Sweetclover	-	0.07 0.27	0.70 0.30	0.10 0.20	-	0.07	-
D P	Penstemon palmeri	Palmer Penstemon	0.20	1.20	0.30	0.20	_	0.07	-
P	Petalostemon purpureum	Purple prairie clover	0.30	-	_	_	-	- 0.20	_
À	Salsola tragus	Russian Thistle	-	-	-	1.10	-	-	-
Р	Solanum elaeagnifolium	Silverleaf nightshade	-	-	-	0.30	-	-	-
Р	Sphaeralcea coccinea	Scarlet Globemallow	1.10	-	0.30	0.40	-	0.07	0.13
В	Tragopogon dubius	Yellow salsify		-		-	-	0.07	-
Shr	ubs, Sub-shrubs, Cacti & Tre	ees							
Р	Atriplex canescens	Fourwing Saltbush	3.10	-	-	1.50	-	-	-
Р	Berberis fremontii	Fremont's Barberry	-	-	-	-	-	-	0.20
Р	Brickellia californica	California Brickellbush	-	0.47	-	-	-	-	-
Р	Cercocarpus ledifolius	Curl-leaf Mtn. Mahogany	-	1.13	-	-	-	-	-
P	Cercocarpus montanus	Mountain Mahogany	-	0.20		-	-		-
P	Chrysothamnus nauseosus	Rubber Rabbitbrush	2.30	3.13	2.40	-	-	1.80	-
P P	Fallugia paradoxa Gutierrezia sarothrae	Apache Plume Broom Snakeweed	- 4.20	0.80 1.33	3.20	0.40	3.00	0.27 3.13	- 6.13
P	Juniperus monosperma	One-seed Juniper	4.20	0.67	3.20	- 0.40	0.53	3.33	2.53
Ė	Opuntia polyacantha	Plains Pricklypear	-	-	0.20	-	0.27		0.67
P	Opuntia spinosior	Walkingstick Cactus	-	0.07		-	-	0.27	1.20
P	Pinus edulis	Two-needle Pinyon	-	0.87	-	-	-		0.33
Р	Pinus ponderosa	Ponderosa pine	-	-	-	-	-	1.00	-
Р	Rhus trilobata	Skunkbush Sumac	-	8.07	-	-	-	-	-
P	Senecio flaccidus var. f.	Threadleaf Ragwort	- 0.20	-	0.20	- 0.20	- 0.27	-	-
P	Yucca glauca	Soapweed Yucca	0.20	-	_	0.20	0.27	-	-
		Total Plant Cover	30.80	30.47	27.60	43.80	35.93	31.60	26.93
		Rock Litter	32.70 16.10	24.20 32.13	15.40 27.10	13.20 22.20	4.93 23.40	7.13 35.13	2.07 24.87
		Bare ground	20.40	13.20	29.90	20.80	35.73	26.13	46.13
	Peren	nial & Biennial Plant Cover	29.90	29.67	26.90	41.80	35.87	31.47	26.93
		variance =	81.96	133.84	115.60	109.29	193.07	73.54	36.64
	Sampling Adequacy	n =	10	15	10	10	15	15	15
	Calculations:	n _{min} =	29.03	44.73	50.99	19.14	46.39	22.85	15.67

^{*} P - Perennial, B - Biennial, A - Annual

Relative Cover Summa	ary (Composition) - Into	rim Moni	toring					
Relative Cover Sullilling	ary (composition) - inte	ilili Molli	toring	Percent	Ground Cove	er Based on	Point-Interce	ept Samplii
	Area Sampled>	Erosion	Open Pit		Sludge Cell	Waste	Waste	Reference
Scientific Name	Common Name	Area	•	1	2	Rock Top	Rock Slope	Area
asses and Grass - likes								
Agropyron dasystachyum	Thickspike wheatgrass	-	-	11.96	-	2.97	5.49	-
Agropyron smithii	Western wheatgrass	1.30	2.19	10.87	8.68	7.61	1.90	-
Agropyron spicatum	Bluebunch wheatgrass	-	-	-	-	-	2.74	-
Aristida purpurea	Purple three - awn	0.65	0.22	0.36	-	-	-	-
Bouteloua curtipendula	Sideoats grama	6.17	19.47	9.06	1.60	46.75	14.98	-
Bouteloua gracilis	Blue grama	38.31	6.78	23.55	77.17	26.90	13.50	57.9
Bromus inermis	Smooth Brome	-	0.22	0.72	0.46	4.08	0.63	-
Bromus japonicus	Japanese Brome	2.92	-	-	-	-	0.42	-
Bromus tectorum	Cheatgrass	-	2.19	-	1.14	0.19	-	-
Elymus cinereus	Great basin wildrye	-	0.66	-	-	-	-	-
Hilaria jamesii	Galleta	4.55	1.53	-	-	0.19	25.53	0.2
Koeleria cristata	Prairie Junegrass	-	-	-	-	-	1.48	-
Muhlenbergia wrightii	Spike muhly	-	0.88	-	-	-	-	-
Oryzopsis hymenoides	Indian Ricegrass	0.97	-	3.99	0.91	-	-	-
Schizachyrium scoparium	Little bluestem	6.49	-	-	-	-	0.84	-
Sitanion hystrix	Bottlebrush Squirreltail	1.62	3.06	-	-	-	-	0.2
Sporobolus airoides	Alkali Sacaton	-	2.41	1.81	0.23	-	-	-
Stipa neomexicana	New Mexico Feathergrass	-	-	11.23	0.23	-	0.21	-
bs								
Euphorbia sp.	Sandmat	_	0.22	_	_		_	_
Ipomopsis longiflora	Flaxflowered ipomopsis	_	0.22		_	_		_
Machaeranthera canescens	Hoary tansyaster	_	0.22	2.54	0.23	_		_
Melilotus officinalis	Yellow Sweetclover	-	0.88	1.09	0.46		0.21	-
Penstemon palmeri	Palmer Penstemon	0.65	3.94		-	_	0.63	_
Petalostemon purpureum	Purple prairie clover	0.97	-		_	_	-	_
Salsola tragus	Russian Thistle	-	-	-	2,51		-	-
Solanum elaeagnifolium	Silverleaf nightshade	_	_	_	0.68	_		_
Sphaeralcea coccinea	Scarlet Globemallow	3.57	_	1.09	0.91	_	0.21	0.!
Tragopogon dubius	Yellow salsify	-	-	-	- 0.51	-	0.21	-
rubs, Sub-shrubs, Cacti & Tre							0.21	
Atriplex canescens	Fourwing Saltbush	10.06	_		3.42	_	-	-
Berberis fremontii	Fremont's Barberry	-	-	_		-	_	0.
Brickellia californica	California Brickellbush	-	1.53	_	-	-	_	_
Cercocarpus ledifolius	Curl-leaf Mtn. Mahogany	-	3.72	-	-	-	-	-
Cercocarpus montanus	Mountain Mahogany	_	0.66	_	_	-	_	_
Chrysothamnus nauseosus	Rubber Rabbitbrush	7.47	10.28	8.70	_	-	5.70	_
Fallugia paradoxa	Apache Plume	-	2.63	-	-	-	0.84	-
Gutierrezia sarothrae	Broom Snakeweed	13.64	4.38	11.59	0.91	8.35	9.92	22.7
Juniperus monosperma	One-seed Juniper	-	2.19		-	1.48	10.55	9.4
Opuntia polyacantha	Plains Pricklypear	-	-	0.72	-	0.74		2.4
Opuntia spinosior	Walkingstick Cactus	_	0.22	_	_	-	0.84	4.
Pinus edulis	Two-needle Pinyon	-	2.84	_	_	-	-	1.
Pinus ponderosa	Ponderosa pine	-	-	-	-	-	3.16	-
Rhus trilobata	Skunkbush Sumac	_	26.48		_	_	-	
Senecio flaccidus var. f.	Threadleaf Ragwort	_	-	0.72	_	_	_	
Yucca glauca	Soapweed Yucca	0.65	-	- 0.72	0.46	0.74		
Number of Species with >								
MULLINEL OF SPECIES WILL >	∠ /U NCIALIVE CUVEF	8	13	8	3	6	9	5

^{*} P - Perennial, B - Biennial, A - Annual

Tab	ole 3 Cunningham	Hill - Vegetation	n Densit	y - 202	0			
	Woody Plant Densi	ty Summary - In	terim M	onitorin	ıg			
							Live Stem	s per Acre
Lifeform		Area Sampled>	Erosion Area	Open Pit	Sludge Cell 1	Sludge Cell 2	Waste Rock Top	Waste Rock Slope
	Scientific name	Common Name						_
S	Atriplex canescens	Fourwing Saltbush	186.2	59.4	85.0	28.3	43.2	45.9
S	Brickellia californica	California Brickellbush	-	8.1	8.1	-	78.2	-
S	Cercocarpus ledifolius	Curl-leaf Mtn. Mahogany	-	54.0	-	-	-	-
S	Cercocarpus montanus	Mountain Mahogany	4.0	59.4	-	-	-	2.7
S	Chrysothamnus nauseosus	Rubber Rabbitbrush	311.6	1,044.1	509.9	-	51.3	97.1
S	Fallugia paradoxa	Apache Plume	12.1	45.9	4.0	-	2.7	18.9
Т	Juniperus monosperma	One-seed Juniper	-	24.3	4.0	4.0	27.0	137.6
Su	Opuntia polyacantha	Plains Pricklypear	52.6	24.3	105.2	16.2	148.4	126.8
Su	Opuntia spinosior	Walkingstick Cactus	4.0	37.8	28.3	4.0	45.9	107.9
Т	Pinus edulis	Two-needle Pinyon	12.1	27.0	-	-	13.5	134.9
Т	Pinus ponderosa	Ponderosa pine	-	2.7	-	-	-	83.6
Т	Quercus gambelii	Gambels oak	-	8.1	-	-	-	2.7
S	Rhus trilobata	Skunkbush Sumac	-	884.9	-	-	2.7	2.7
S	Senecio flaccidus var. flaccidus	Threadleaf Ragwort	8.1	-	-	-	2.7	5.4
Nx	Ulmus pumila	Siberian elm	-	-	-	-	2.7	-
Su	Yucca glauca	Soapweed Yucca	72.8	13.5	109.3	44.5	35.1	54.0
		Shrub (S)	522.0	2,155.6	607.0	28.3	180.8	172.7
	Life Form	Tree (T)	12.1	62.1	4.0	4.0	40.5	358.8
	LIIC I OI III	Succulent (Su)	129.5	75.5	242.8	64.7	229.3	288.7
		Noxious (Nx)	-	-	-	-	2.7	-
	Total Woody Plants per Acre	(Excluding Noxious)	663.7	2,293.2	853.9	97.1	450.6	820.2
S	mple Adequacy Calculations	n =	10	15	10	Total	15	15
Ja	inple Adequacy Calculations	n _{min} =	245.86	71.38	349.49	Count	161.71	64.72



3.2 Erosion Area

The Erosion Area was sampled with 10 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 30.8%, of which 29.9% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 32.7%, 16.1%, and 20.4%, respectively. Total vegetative cover (exclusive of annual species) for Erosion Area exceeds the ground cover performance criterion (29.9% vs. 20.2% [75% of Reference Area Cover]). A total of 22 species were observed in the Erosion Area (Table A1), 8 of which are considered "important" species, exceeding the species diversity performance criterion (8 vs. 3 [50% of Reference Area "Important" Species]). Dominant taxa were blue grama (*Bouteloua gracilis*), broom snakeweed (*Gutierrezia sarothrae*), and fourwing saltbush (*Atriplex canescens*) with 11.8%, 4.2%, and 3.1% cover, respectively. Review of Table 3 and Chart 5 reveal that woody plant density (excluding noxious species) on this unit was 663 woody plants per acre. Dominant woody plants were rubber rabbitbrush (*Chrysothamnus nauseosus*) with 311 plants per acre and fourwing saltbush (*Atriplex canescens*) with 186 plants per acre. The Erosion Area exceeds the woody plant density performance criterion (663 live stems per acre vs 220 live stems per acre). These results indicate that the Erosion Area currently passes all bond release performance criteria for revegetation.



Photo 1. Erosion Area - 2020

3.3 Open Pit Area

The Open Pit Area was sampled with 15 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 30.5%, of which 29.7% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 24.2%, 32.1%, and 13.2%, respectively. Total vegetative cover (exclusive of annual species) for Open Pit Area exceeds the ground cover performance criterion (29.7% vs. 20.2% [75% of Reference Area Cover]). A total of 31 species were observed in the Open Pit Area (Table A1), 13 of which are considered "important" species, exceeding the species diversity performance criterion (13 vs. 3 [50% of Reference Area "Important" Species]). Dominant taxa were skunkbush sumac (*Rhus trilobata*), sideoats grama (*Bouteloua curtipendula*), and rubber rabbitbrush with 8.0%, 5.9% and 3.1% cover, respectively. Review of Table 3 and Chart 5 reveal that woody plant density on this unit was 2,293 woody plants per acre (excluding noxious species). Dominant woody plants were rubber rabbitbrush and skunkbush sumac and with 1,044 and 884 plants per acre, respectively. The Open Pit Area significantly exceeds the woody plant density performance criterion (2,293 live stems per acre vs 220 live stems per acre). These results indicate that the Open Pit Area currently passes all bond release performance criteria for revegetation.



Photo 2. Open Pit Area - 2020

3.4 Sludge Cell 1 Area

The Sludge Cell 1 Area was sampled with 10 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 27.6%, of which 26.9% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 15.4%, 27.1%, and 29.9%, respectively. Total vegetative cover (exclusive of annual species) for Sludge Cell 1 Area exceeds the ground cover performance criterion (26.9% vs. 20.2% [75% of Reference Area Cover]). A total of 21 species were observed in the Sludge Cell 1 Area (Table A1), 8 of which are considered "important" species, exceeding the species diversity performance criterion (8 vs. 3 [50% of Reference Area "Important" Species]). Dominant taxa were blue grama with 6.5% cover, thickspike wheatgrass (*Agropyron dasystachyum*) with 3.3% cover, western wheatgrass (*Agropyron smithii*) with 3.0% cover, new mexico feathergrass (*Stipa neomexicana*) with 3.1% cover and broom snakeweed with 3.2% cover. Review of Table 3 and Chart 5 reveal that woody plant density on this unit was 853 woody plants per acre (excluding noxious species). The dominant woody plant was rubber rabbitbrush with 509 plants per acre. The Sludge Cell 1 Area significantly exceeds the woody plant density performance criterion (853 live stems per acre vs 220 live stems per acre). These results indicate that the Sludge Cell 1 Area currently passes all bond release performance criteria for revegetation.



Photo 3. Sludge Cell 1 Area - 2020

3.5 Sludge Cell 2 Area

The Sludge Cell 2 Area was sampled with 10 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 43.8%, of which, 41.8% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 13.2%, 22.2%, and 20.8%, respectively. Total vegetative cover (exclusive of annual species) for Sludge Cell 2 Area significantly exceeds the ground cover performance criterion (41.8% vs. 20.2% [75% of Reference Area Cover]). A total of 19 species were observed in the Sludge Cell 2 Area (Table A1), 3 of which are considered "important" species, this does not exceed the species diversity performance criterion (3 vs. 3 [50% of Reference Area "Important" Species]). Blue grama was the dominant taxon contributing 33.8% cover. Review of Table 3 and Chart 5 reveal that woody plant density on this unit was 97 woody plants per acre (excluding noxious species). The dominant woody plant was soapweed yucca (*Yucca glauca*) with 44.5 plants per acre. The Sludge Cell 2 Area does not exceed the woody plant density performance criterion (97 live stems per acre vs 220 live stems per acre). These results indicate that the Sludge Cell 2 Area is still progressing towards passing bond release performance criteria for revegetation.



Photo 4. Sludge Cell 2 Area - 2020

3.6 Waste Rock Top Area

The Waste Rock Top Area was sampled with 15 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 35.9%, of which 35.8% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 4.9%, 23.4%, and 35.7%, respectively. Total vegetative cover (exclusive of annual species) for Waste Rock Top Area significantly exceeds the ground cover performance criterion (35.8% vs. 20.2% [75% of Reference Area Cover]). A total of 20 species were observed in the Waste Rock Top Area (Table A1), 6 of which are considered "important" species, exceeding the species diversity performance criterion (6 vs. 3 [50% of Reference Area "Important" Species]). Dominant taxa were sideoats grama, blue grama, and broom snakeweed with 16.8%, 9.6%, and 3% cover, respectively. Review of Table 3 and Chart 5 reveal that woody plant density on this unit was 450 woody plants per acre (excluding noxious species). Dominant woody plants were plains prickly pear (*Opuntia polyacantha*) and california brickellbush (*Brickellia californica*) with 148 and 78 plants per acre, respectively. The Waste Rock Top Area significantly exceeds the woody plant density performance criterion (450 live stems per acre vs 220 live stems per acre). These results indicate that the Waste Rock Top Area currently passes all bond release performance criteria for revegetation.



Photo 5. Waste Rock Top Area - 2020

3.7 Waste Rock Slope Area

The Waste Rock Slope Area was sampled with 15 cover transects in 2020 (see Map 2). Examination of Table 1 indicates that total plant cover was 31.6%, of which 31.4% was expressed as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 7.1%, 35.1%, and 26.1%, respectively. Total vegetative cover (exclusive of annual species) for Waste Rock Slope Area significantly exceeds the ground cover performance criterion (31.4% vs. 20.2% [75% of Reference Area Cover]). A total of 29 species were observed in the Waste Rock Slope Area (Table A1), 9 of which are considered "important" species, exceeding the species diversity performance criterion (9 vs. 3 [50% of Reference Area "Important" Species]). Dominant taxa were galleta (*Hilaria jamesii*), sideoats grama, and blue grama with 8.0%, 4.7 %, and 4.2% cover, respectively. Review of Table 3 and Chart 5 reveal that woody plant density on this unit was 820 woody plants per acre (excluding noxious species). Dominant woody plants were one-seed juniper (*Juniperus monosperma*) and two-needle pinon (*Pinus edulis*) with 137 and 134 plants per acre, respectively. The Waste Rock Slope Area significantly exceeds the woody plant density performance criterion (820 live stems per acre vs 220 live stems per acre). These results indicate that the Waste Rock Slope Area currently passes all bond release performance criteria for revegetation.



Photo 6. Waste Rock Slope Area - 2020

3.8 Reference Area

The approved reference area was sampled with 15 cover transects in 2020 (Map 2). Examination of Table 1 indicates that total plant cover was 26.9%, consisting entirely as perennial and biennial cover. Rock, litter, and bare ground exposure exhibited cover values of 2.0%, 24.8%, and 46.1%, respectively. Dominant taxa were blue grama, and broom snakeweed, with 15.6%, and 6.1% cover, respectively. A total of 10 species were observed in the reference area (Table A1), 5 which are considered "important" species.



Photo 7. Reference Area - 2020

4.0 RECOMMENDATIONS

Based on the results of this evaluation it is clear that all revegetation areas are exhibiting plant community development as expected. Therefore, Cedar Creek recommends that future monitoring efforts incorporate the smaller, younger areas (Erosion, Sludge Cell 1, and Sludge Cell 2) into the larger areas they are contained within. The Erosion area (0.72 acres) seeded in 2009 can be absorbed into the Waste Dump Slope area (14.43 acres) seeded in 1992. The Sludge Cell 1 (5.43 acres) and Sludge Cell 2 (0.33 acres) areas seeded in 2008 and 2011 respectively can be absorbed into the Waste Dump Top area (44.62 acres) seeded in 1992.

5.0 REFERENCES CITED

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Appendix A

Sampling Methods

Appendix A - Sampling Methods

INTRODUCTION

Cedar Creek's sampling protocols involve a concentration upon ground cover* to facilitate repeatable future statistical comparisons among treatment areas (or unique revegetation units) and over time. A concentration on ground cover is recommended for a multitude of reasons. First, concentration on a single variable of plant ecology facilitates improved comprehension and comparability over time and among treatment scenarios. Second, ground cover data, especially when determined using a very precise method such as the point-intercept procedure, provides some of the most important information regarding community variability that ecologists can evaluate. Such data facilitate the determination of the true species composition, relative health (condition), and successional status of the sampled area. Furthermore, the same data can be utilized to develop the additional variables of frequency and species composition if desired. Third, strong inferences can be developed with other reasonably correlated variables such as production when species composition is factored into the analysis. Fourth, ground cover is a preferred variable for monitoring because cover data can be readily obtained in a statistically adequate and cost-effective manner (using the proper procedures), has broad application for evaluation (including erosion control modeling), precisely reflects species' dominance of a given area, and when collected using bias-free techniques such as the point-intercept procedure is one of the most repeatable variables among independent observers. Finally, cover is the primary variable indicated for use by the company's Closeout Plan for determination of successful revegetation.

However, in addition to ground cover sampling, MMD and hence the Closeout Plan, require evaluation of woody plant density. In this regard, it was determined most appropriate to monitor the progress of woody plant establishment and development (for wildlife habitat considerations) utilizing density belts as detailed in Section A-3.

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^{*} To avoid confusion, the term "ground cover" is utilized to indicate the variable of non-overlapping foliar cover (the percent of the ground occupied by all above ground live plant material) in addition to the ground surface covered by litter or rock. Non-overlapping means that only that cover which would be wetted by a light mist would be counted as opposed to that plant material which would not get wet due to overshadowing plant material. In this manner, total ground cover cannot exceed 100%. Other forms of "cover" would include: basal cover (the percent of the ground surface occupied by the living base of plants), crown or canopy cover (the percent of the ground occupied by the canopies of plants), or overlapping foliar cover (the percent of the ground occupied by all plant material allowing for overlapping vegetation - i.e., such cover can exceed 100%). Non-overlapping foliar cover is preferred because of its inherent repeatability among observers, resulting data are directly applicable to erosion control modeling efforts, and significant precedent has already been set in the industry. In contrast, the determination of the live portion of the base of a plant (as necessary for basal cover) becomes increasingly difficult given life forms such as certain bunch grasses and sod-formers.

A-1 Sample Site Selection / Location

As indicated in the revised Closeout Plan, sample site location for the reclaimed areas suggests use of a systematic procedure initiated in an unbiased manner for each unique revegetation unit investigated as well as the reference area. In this manner, "representation" from the entire reclaimed unit is "forced" rather than risking the chance that significant pockets are entirely missed, or over-emphasized, as may occur in strictly random sampling. This systematic procedure also provides proportionate representation from across the reclaimed unit for such characteristics as aspect and slope. An example of this procedure is indicated on Figure 1 and the actual results on Map 2.

The systematic procedure for sample location occurred in the following stepwise manner. First, a fixed point of reference was selected for each area to facilitate location of the systematic grid in the field. Second, a systematic grid of appropriate dimensions (e.g., 125' X 125') was selected by Cedar Creek to provide a minimum number of coordinate intersections within the reclaimed unit that could then be used for the initial set of sample sites. Third, a scaled representation of the grid was overlain on computer-generated field maps of each facility extending parallel to major compass axes. Fourth, unbiased placement of this grid was controlled by selection of two random numbers to be used as coordinates to establish a sampling starting point. Fifth, utilizing a handheld compass and pacing techniques or a handheld GPS, all of the initial sample points for each area were located in the field. The result of this activity is provided on Map 2. If the initial systematic samples had not been sufficient to provide an adequate ground cover or woody plant density sample for bond release evaluations, an "intergrid" would have been selected to provide additional systematically determined sample points.

The reference area to be utilized for comparison to the reclaimed areas was selected from an undisturbed area typical of the soils and other physical attributes of the reclaimed area (see Map 1). This area was approved by MMD on September 2, 1997. More important, however, is that this is one of the few areas sufficiently sizable (6.84 acres) in the project area that is dominated by a natural grassland community, the most appropriate and representative target for reclaimed communities. A few scattered junipers occur within the reference area but are exempted from sampling if mature. The other communities in the project area (primarily piñon - juniper woodland) are overwhelmingly dominated by woody species that take decades, perhaps centuries, to evolve. Furthermore, reference areas comprised of these "woody" communities would defeat certain fundamental assumptions necessary for a valid comparison the most primary of which is equivalence or similarity of form and function. In any event, sample site selection in the reference area occurred in a manner very similar to that for the reclaimed areas. The only difference being that the occasional mature junipers were specifically avoided as they are not representative of the grassland community. In this regard, where a ground cover transect intercepted a mature tree (greater than 5 feet in height), the cover transect was interrupted at the "drip line" of the

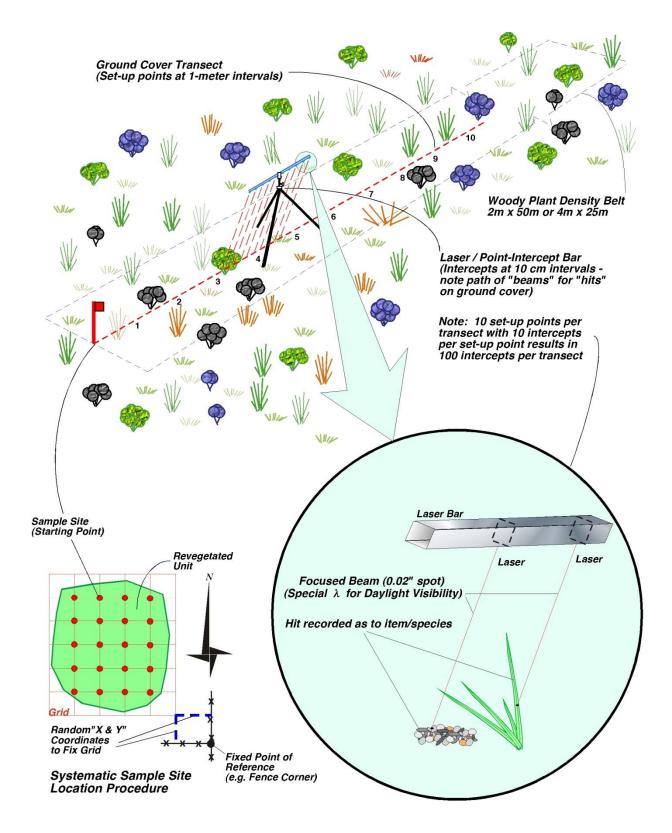


Figure 1
Sampling Procedure at a Systematic Sample Site Location

tree canopy and then resumed on the opposite side. Immature trees (less than 5 feet tall) that were intercepted by the cover transect were recorded along with all other vegetation. This process was deemed appropriate as young trees also occur in the reclamation.

A-2 <u>Determination of Ground Cover</u>

Ground cover at each sampling site was determined utilizing the point-intercept methodology (Bonham 1989) as illustrated on Figure 1. This methodology has been utilized for range studies for over eighty (80) years, however, Cedar Creek utilizes new state-of-the-art instrumentation which it has pioneered to facilitate much more rapid and accurate collection of data. Implementation of the technique for the sampling effort occurred as follows: First, one transect of 10 meters length was extended from the starting point of each sample site toward the direction of the next site to be sampled. Then, at each one-meter interval along the transect, a "laser point bar" was situated vertically above the ground surface, and a set of 10 readings recorded as to hits on vegetation (by species), litter, rock (>2mm), or bare soil. Hits were determined at each meter interval by activating a battery of 10 specialized lasers situated along the bar at 10 centimeter intervals and recording the variable intercepted by each of the narrow (0.02") focused beams (see Figure 1). In this manner, a total of 100 intercepts per transect were recorded resulting in 1 percent cover per intercept. This methodology and instrumentation facilitates the collection of the most unbiased, repeatable, precise, and cost-effective ground cover data possible. Furthermore, the point-intercept procedure has been widely accepted in the scientific community, especially the mining industry, as the protocol of choice for vegetation monitoring and bond release determination.

A-3 Determination of Woody Plant Density

Woody plant density at each sampling site was determined using fixed length / width belt transects extended from the starting point of each sample site toward the direction of the next site to be sampled. Each belt was a total of 100 m² and were either 2 meter by 50 meter or 4 meter by 25 meter, depending on the size of the unit. All live shrubs, sub-shrubs, cacti and trees rooted within the boundaries of these belts were counted and classified according to species. Determination of whether or not a plant could be counted was dependent upon the location of its main stem or root collar where it exited the ground surface with regard to belt limits. Entire plants rather than stems were counted to provide a more accurate representation of actual woody plant density.

A-4 Sample Adequacy Determination

Ground cover sampling within the reclaimed areas as well as the reference area was conducted to a minimum of 10 or 15 initial transects. Woody plant density sampling within the reclaimed areas sampled for interim monitoring were co-located with ground cover transects. From these preliminary efforts, a sample mean and standard deviation for total non-overlapping vegetation ground cover and woody plant density were calculated. These parameters were calculated in the field to insure collection of an adequate sample and once again by computer during final data analyses for each area. Sampling continued until an adequate ground cover or woody plant density sample, \mathbf{n}_{\min} , had been collected in accordance with the Cochran formula (below) for determining sample adequacy, whereby the population would be estimated to within 10% of the true mean (μ) with 90% confidence. Sampling to these limits facilitates a very strong estimate of target populations. Cochran's formula was utilized as it is the procedure indicated for use in the new Section 4.4 of the Closeout Plan as well as in MMD's regulatory guidelines. Sample adequacy was calculated for informational purposes as achieving an adequate sample is not required for interim monitoring evaluations.

When the inequality $(\mathbf{n_{min}} \le \mathbf{n})$ is true, sampling is adequate and $\mathbf{n_{min}}$ is determined as follows:

$$n_{min} = (t^2 s^2) / (0.1 \bar{x})^2$$

where: n = the number of actual samples collected (initial size = 10 or 15)

t = the value from the two-tailed t distribution for 90% confidence with n-1 degrees of freedom;

 s^2 = the variance of the estimate as calculated from the initial samples;

 \bar{x} = the mean of the estimate as calculated from the initial samples.

A-5 Testing for Success

Following statistically adequate sampling, the comparison process is initiated by calculating the mean ground cover value for non-annual plants only (non-annual ground cover, or "NAGC") for each revegetated unit and the reference area. The test for revegetation success for ground cover includes the following steps.

<u>Step 1</u>: The first step is to determine whether the mean NAGC of the revegetated unit(s) $(\overline{x}_{(rv)})$ exceeds 75 percent of the mean NAGC for the reference area $(\overline{x}_{(co)})$. If $\overline{x}_{(rv)} \ge 0.75$ $(\overline{x}_{(co)})$, then the ground cover test has been passed and the soils are assumed to be stable.

<u>Step 2</u>: If the mean NAGC of the revegetated unit equals or exceeds 50% (but is less than 75%) of the mean NAGC for the reference area, then a "gray area" determination will be conducted to evaluate soil stability. The evaluation of soil stability using the RUSLE model is detailed in subsection 4.4.4 of the closeout plan.

Appendix B

Raw Data

	Observed Species	nam Hill - 2020							
	Observed Species	 					•		
		Area Sampled>	Erosion Area	Open Pit	Sludge Cell	Sludge Cell	Waste Rock Top	Waste Rock Slope	Reference Area
	Scientific Name	Common Name	Aica			2	ТОР	Slope	Alea
Gra	sses and Grass - likes								
Р	Agropyron dasystachyum	Thickspike wheatgrass			Х		Х	Х	
Р	Agropyron smithii	Western wheatgrass	X	х	X	X	X	Х	1
P	Agropyron spicatum	Bluebunch wheatgrass						X	L
Р	Aristida purpurea	Purple three - awn	Х	Х	X				
Р	Bouteloua curtipendula	Sideoats grama	X	х	X	X	X	Х	1
P	Bouteloua gracilis	Blue grama	X	X	X	X	X	X	Х
Р	Bromus inermis	Smooth Brome		Х	Х	Х	X	Х	1
Α	Bromus japonicus	Japanese Brome	X					Х	1
Α	Bromus tectorum	Cheatgrass		X		X	X		
Р	Elymus cinereus	Great basin wildrye		Х					l
Р	Hilaria jamesii	Galleta	X	X			Х	Х	х
Р	Koeleria cristata	Prairie Junegrass						X	
Р	Muhlenbergia wrightii	Spike muhly		х					1
P	Oryzopsis hymenoides	Indian Ricegrass	X		X	X			l
P	Schizachyrium scoparium	Little bluestem	Х					X	
P	Sitanion hystrix	Bottlebrush Squirreltail	X	X					Х
P	Sporobolus airoides	Alkali Sacaton		х	Х	X			l
P	Stipa neomexicana	New Mexico Feathergrass			Х	Х		Х	L
For	bs								
Р	Euphorbia sp.	Sandmat		Х			1		
A	Ipomopsis longiflora	Flaxflowered ipomopsis		x					i
A	Machaeranthera canescens	Hoary tansyaster		x	х	x			i
B	Melilotus officinalis	Yellow Sweetclover		X	1 x	x		Х	
Р	Penstemon palmeri	Palmer Penstemon	X	x	^	^		x	i
P	Petalostemon purpureum	Purple prairie clover	X	_ ^				^	i
À	Salsola tragus	Russian Thistle				Х			
P	Solanum elaeagnifolium	Silverleaf nightshade				x			i
Р	Sphaeralcea coccinea	Scarlet Globemallow	Х		x	x		x	х
B	Tragopogon dubius	Yellow salsify						X	
	rubs, Sub-shrubs, Cacti & Tre			1	- L				
							,		
Р	Atriplex canescens	Fourwing Saltbush	X	Х	Х	X	Х	X	
P P	Berberis fremontii	Fremont's Barberry					v		Х
P	Brickellia californica	California Brickellbush		X	X		Х		
P P	Cercocarpus ledifolius Cercocarpus montanus	Curl-leaf Mtn. Mahogany Mountain Mahogany	x	X				х	i
P	Chrysothamnus nauseosus	Rubber Rabbitbrush	X	x	х		х	X	i
<u>Р</u> Р	Fallugia paradoxa	Apache Plume	X	X	X		X	X	
P	Gutierrezia sarothrae	Broom Snakeweed	X	X	X	х	X	X	х
P P	Juniperus monosperma	One-seed Juniper	^	X	X	X	X	X	X
P	Opuntia polyacantha	Plains Pricklypear	X	X	X	X	X	X	X
P	Opuntia spinosior	Walkingstick Cactus	X	X	x	X	x	X	X
P	Pinus edulis	Two-needle Pinyon	X	X	1 ^	^	x	X	X
P	Pinus ponderosa	Ponderosa pine		X				X	
P	Quercus gambelii	Gambels oak		X	1			x	
P	Rhus trilobata	Skunkbush Sumac		X			х	X	
P	Senecio flaccidus var. f.	Threadleaf Ragwort	Х				X	X	
Nx	Ulmus pumila	Siberian elm	^				x	^	
P	Yucca glauca	Soapweed Yucca	X	х	х	X	x	х	
			22		1 24		20	20	40
	1	Total Species Encountered	22	31	21	19	20	29	10

^{*} P - Perennial, B - Biennial, A - Annual, Nx - Noxious * Includes species found in both Cover & WPD transects

Ta		am Hill - Vegetati	on	Cov	ver	- 2	020)							
	Erosion Area - Ray	w Data					Pe	ercent	t Gro	und (Cove	· Base	ed on Point	-Intercent	Samplin
Gras	sses and Grass-likes	Transect No.—>	1	2	3	4	5	6	7	8	9	10	Average Cover	Relative Cover	Freq.
)	Agropyron smithii	Western wheatgrass		_	1	1		Ī	2		_	_	0.40	1.30	30
5	Aristida purpurea	Purple three - awn			2	1			~				0.40	0.65	10
)	Bouteloua curtipendula	Sideoats grama		6	6						2		1.90	6.17	40
·	Bouteloua gracilis	Blue grama		7	1	2	14	22	22	29	5	3	11.80	38.31	100
١	Bromus japonicus	Japanese brome	13	′		-	17	~~	22	2		7	0.90	2.92	20
` >	Hilaria jamesii	Galleta				2		8	4	_		′	1.40	4.55	30
)	Oryzopsis hymenoides	Indian Ricegrass		1				٦	1	1			0.30	0.97	30
•	Schizachyrium scoparium	Little bluestem	5	4	3				1	*	8		2.00	6.49	40
)	Sitanion hystrix	Bottlebrush Squirreltail	,	l ']		2		3		"		0.50	1.62	20
Fort	Penstemon palmeri	Palmer Penstemon			1 2	1	1	1	1	1			0.20	0.65	10
,	•				2						3		0.20	0.65	10
ר ס	Petalostemon purpureum Sphaeralcea coccinea	Purple prairie clover Scarlet Globemallow			2	8		1			٥		1.10	3.57	30
	ubs, Sub-shrubs, Cacti & Tree														
)	Atriplex canescens	Fourwing Saltbush					21					10	3.10	10.06	20
)	Chrysothamnus nauseosus	Rubber Rabbitbrush			3							20	2.30	7.47	20
	Gutierrezia sarothrae	Broom Snakeweed		2	6	15	13				5	1	4.20	13.64	60
)	Yucca glauca	Soapweed Yucca				2							0.20	0.65	10
														Mean	
		Total Plant Cover	23	20	26	30	50	31	32	32	23	41		30.80	
		Rock		42	41	10	3	35	19	26	67	19		32.70	
		Litter	6	11	9	27	18	5	24	28	3	30		16.10	
		Bare ground	6	27	24	33	29	29	25	14	7	10		20.40	
	Total P	erennial & Biennial Cover	23	20	26	30	50	31	32	30	23	34		29.90	
	Sample Adequacy					1.83			n =	10					
	Calculations					81.9			_{nin} =						
	Diversity	No. (>2%		•					Bienn Verag	•			8		

^{*} P - Perennial, B - Biennial, A - Annual

Та	ble A3 Cunningh	am Hill - Vegetati	on	Cov	ver	- 2	020)												
	Open Pit - Raw Da	ta																		
	•											Pe	ercen	t Gro	und (Cove	r Bas	ed on Point	-Intercept	Samplin
		Transect No.—>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Average	Relative	Frea.
Gras	sses and Grass-likes																	Cover	Cover	нец.
P	Agropyron smithii	Western wheatgrass						T				Π	7		1		2	0.67	2.19	20
Р	Aristida purpurea	Purple three - awn							1									0.07	0.22	7
Р	Bouteloua curtipendula	Sideoats grama		2		15	38			2		10					22	5.93	19.47	40
P	Bouteloua gracilis	Blue grama		3	2		1	1			9				9		6	2.07	6.78	47
Р	Bromus inermis	Smooth Brome				1												0.07	0.22	7
Α	Bromus tectorum	Cheatgrass							1			6	3					0.67	2.19	20
P	Elymus cinereus	Great basin wildrye		3														0.20	0.66	7
Р	Hilaria jamesii	, Galleta							1		2					4		0.47	1.53	20
Р	Muhlenbergia wrightii	Spike muhly													4			0.27	0.88	7
P	Sitanion hystrix	Bottlebrush Squirreltail			3											11	†	0.93	3.06	13
Р	Sporobolus airoides	Alkali Sacaton		2	1							4	4					0.73	2.41	27
Forbs P Euphorbia sp. Sandmat 1 0.07 0.22 7																				
P	Funhorhia sp.	Sandmat		1						1	1						1	0.07	0.22	7
А	Ipomopsis longiflora	Flaxflowered ipomopsis		1														0.07	0.22	7
Δ	Machaeranthera canescens	Hoary tansyaster		1		1												0.07	0.22	7
В	Melilotus officinalis	Yellow Sweetclover				<u> </u>				1			1			2		0.27	0.88	20
P	Penstemon palmeri	Palmer Penstemon	7					6	3	-			1		2	-		1.20	3.94	27
Shru	ubs, Sub-shrubs, Cacti & Tree	es																		
P	Brickellia californica	California Brickellbush						1			T 7						Т	0.47	1.53	7
P	Cercocarpus ledifolius	Curl-leaf Mtn. Mahogany						5	10	2	′							1.13	3.72	20
P	Cercocarpus montanus	Mountain Mahogany						١	10	3								0.20	0.66	7
Р	Chrysothamnus nauseosus	Rubber Rabbitbrush	12		6				-	-	7			9		13	+	3.13	10.28	33
P	Fallugia paradoxa	Apache Plume	12		"				8		′	4				13		0.80	2.63	13
P	Gutierrezia sarothrae	Broom Snakeweed			6		8		"		1	"	3				2	1.33	4.38	33
ı P	Juniperus monosperma	One-seed Juniper			-	-					+	-			10		-	0.67	2.19	7
г Р	Opuntia spinosior	Walkingstick Cactus									1				10			0.07	0.22	7
ı D	Pinus edulis	Two-needle Pinyon				13				ĺ	*							0.87	2.84	7
P	Rhus trilobata	Skunkbush Sumac				15	 	6	5	22	9	20		40	11	8	+-	8.07	26.48	53
	7.0.00 0.00000			_							1 -	1 = 0						0.07	Mean	
		Total Plant Cover	19	12	18	30	47	18	29	30	36	44	18	49	37	38	32		30.47	
		Rock	60	28	35	12	1	48	44	38	3	39	12	8	16	8	11		24.20	
		Litter	21	43	33	26	35	30	27	30	49	9	32	43	43	47	14		32.13	
		Bare ground	0	17	14	32	17	4	0	2	12	8	38	0	4	7	43		13.20	
	Total F	Perennial & Biennial Cover	19	11	18	29	47	18	28	30	36	38	15	49	37	38	32		29.67	
	Sample Adequacy	Calculations				٧.	rion	<i>t</i> =	1.76			n =		13						
					No							_{nin} – Bienn			- 1	.3				-
	Diversit	у					•					/erac			-					
	- Perennial R - Riennial A - A					J			J. J		, U A 1	u <u>e</u>	,0							

^{*} P - Perennial, B - Biennial, A - Annual

able A4 Cunningh	am Hill - Vegetati	on	Cov	ver	- 2	020)							
Sludge Cell 1 - Ray	w Data													
						Pe	ercent	t Gro	und (Cove	Base	ed on Point	-Intercept	Sampli
asses and Grass-likes	Transect No.—>	1	2	3	4	5	6	7	8	9	10	Average Cover	Relative Cover	Fred
Agropyron dasystachyum	Thickspike wheatgrass		17	9	4		1	ŀ	1	2		3.30	11.96	50
Agropyron smithii	Western wheatgrass	20	10		'				*	_		3.00	10.87	20
Aristida purpurea	Purple three - awn	20	10			1						0.10	0.36	10
Bouteloua curtipendula	Sideoats grama			10	8	1					7	2.50	9.06	30
Bouteloua gracilis	Blue grama			10	"	12	22	17	8	6	′	6.50	23.55	50
Bromus inermis	Smooth Brome			2								0.20	0.72	10
Oryzopsis hymenoides	Indian Ricegrass			_			2				9	1.10	3.99	20
Sporobolus airoides	Alkali Sacaton	5					-					0.50	1.81	10
Stipa neomexicana	New Mexico Feathergrass								6	11	14	3.10	11.23	30
Machaeranthera canescens Melilotus officinalis Yellow Sweetclover Machaeranthera canescens Yellow Sweetclover Melilotus officinalis Yellow Sweetclover Melilotus officinalis Yellow Sweetclover Melilotus officinalis														
		3	4						2					
Sphaeralcea coccinea	Scarlet Globemallow				1				3	1	1	0.30	1.09	30
rubs, Sub-shrubs, Cacti & Tree	2S											I	L	
Chrysothamnus nauseosus	Rubber Rabbitbrush	6					2		4	12		2.40	8.70	40
Gutierrezia sarothrae	Broom Snakeweed	6	6	1	1	1	3		3	1	10	3.20	11.59	90
Opuntia polyacantha	Plains Pricklypear		2									0.20	0.72	10
Senecio flaccidus var. f.	Threadleaf Ragwort									2		0.20	0.72	10
													Mean	
	Total Plant Cover	40	39	22	14	14	29	17	25	35	41		27.60	
	Rock		4	4	3	67	21	19	11	12	8		15.40	
	Litter	44	38	34	43	1	20	34	23	20	14		27.10	
	Bare ground		19	40	40	18	30	30	41	33	37		29.90	
Total I	Perennial & Biennial Cover	37	35	22	14	14	29	17	25	35	41		26.90	
Sample Adequacy				t =	1.83	31		n =	10					
Calculations			arian					_{nin} =						
Diversity	No. (>2%		•					Bienni Verac	•			8		

^{*} P - Perennial, B - Biennial, A - Annual

Ta	ble A5 Cunningh	am Hill - Vegetati	on	Cov	/er	- 2	020)							
	Sludge Cell 2 - Ray														
							Pe	ercent	t Gro	und (Cover	r Base	ed on Point	-Intercept	Samplin
Gras	ses and Grass-likes	Transect No.—>	1	2	3	4	5	6	7	8	9	10	Average Cover	Relative Cover	Freq.
		Maria de la calacida						145	17				2.00	0.60	- 20
P	Agropyron smithii	Western wheatgrass			6	_		15	17				3.80	8.68	30
P	Bouteloua curtipendula	Sideoats grama				3	2	2	1.0				0.70	1.60	30
P	Bouteloua gracilis	Blue grama		29	33	28	39	17	19	23	63	46	33.80	77.17	100
P	Bromus inermis	Smooth Brome	1			1			_				0.20	0.46	20
Α	Bromus tectorum	Cheatgrass							5				0.50	1.14	10
P	Oryzopsis hymenoides	Indian Ricegrass					1	1			2		0.40	0.91	30
Р	Sporobolus airoides	Alkali Sacaton								1			0.10	0.23	10
P	Stipa neomexicana	New Mexico Feathergrass									1		0.10	0.23	10
Forbs A Machaeranthera canescens Hoary tansyaster 1 0.10 0.23 10															
A Machaeranthera canescens Hoary tansyaster 1 0.10 0.23 10															
В	Melilotus officinalis	Yellow Sweetclover					2						0.20	0.46	10
Α	Salsola tragus	Russian Thistle							11				1.10	2.51	10
P	Solanum elaeagnifolium	Silverleaf nightshade								3			0.30	0.68	10
Р	Sphaeralcea coccinea	Scarlet Globemallow							1	3			0.40	0.91	20
Shru	ıbs, Sub-shrubs, Cacti & Tree	es													
P	Atriplex canescens	Fourwing Saltbush				7		8					1.50	3.42	20
Р	Gutierrezia sarothrae	Broom Snakeweed				1	2		1				0.40	0.91	30
Р	Yucca glauca	Soapweed Yucca								2			0.20	0.46	10
	,													Mean	
		Total Plant Cover	42	29	39	40	46	43	54	33	66	46		43.80	
		Rock		37	23	14	13	5	6	2	4	10		13.20	
		Litter		15	13	17	20	30	29	49	9	26		22.20	
		Bare ground		19	25	29	21	22	11	16	21	18		20.80	
		-													
	Total P	Perennial & Biennial Cover	42	29	39	40	46	43	38	29	66	46		41.80	
	Sample Adequacy Calculations					1.83	_		n =		_				
	Calculations			rian					_{nin} =						
	Diversity	No. (>2%		•					Bienni Verag	•			3		

^{*} P - Perennial, B - Biennial, A - Annual

Га		m Hill - Vegetati	on	Cov	ver	- 2	020)												
	Waste Rock Top - R	aw Data										Pe	rcent	t Gro	und (Cove	r Bas	ed on Point	-Intercept	Samplin
ara:	sses and Grass-likes	Transect No.—>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Average Cover	Relative Cover	Freq.
)	Agropyron dasystachyum Agropyron smithii	Thickspike wheatgrass Western wheatgrass	2	6	33											16		1.07 2.73	2.97 7.61	7 20
))	Bouteloua curtipendula Bouteloua gracilis Bromus inermis	Sideoats grama Blue grama Smooth Brome	18 6	4 1 7	37	8	11 28	8	40	31	6 21	13	49	9 27	2	23	4	16.80 9.67 1.47	46.75 26.90 4.08	93 67 20
ort	Bromus tectorum Hilaria jamesii	Cheatgrass Galleta		1				1										0.07 0.07	0.19 0.19	7
	None												0.00	0.00	0					
Shr	ubs, Sub-shrubs, Cacti & Trees															_		_		
	Gutierrezia sarothrae Juniperus monosperma Opuntia polyacantha	Broom Snakeweed One-seed Juniper Plains Pricklypear		11	1		7	7 4	1		7	1	6	1	4	2	1	3.00 0.53 0.27	8.35 1.48 0.74	67 13 20
	Yucca glauca	Soapweed Yucca								3						1		0.27	0.74	13
		-																	Mean	
		Total Plant Cover Rock Litter Bare ground	4 19	0 27 43	71 0 24 5	3 18 50	2 12 40	5 33 39	2 26 31	0 41 23	36 0 25 39	40 20 18	1 12 32	3 26 34	8 32 42	0 12 46	6 24 43		35.93 4.93 23.40 35.73	
	Total Per	rennial & Biennial Cover	26	29	71	29	46	23	41	36	36	22	55	37	18	42	27		35.87	
	Sample Adequacy Ca	alculations		$t = 1.7613$ $n = 15$ Variance = 193.07 $n_{min} = 46.39$																
	Diversity			(•					ienni erag	•			6				

^{*} P - Perennial, B - Biennial, A - Annual

Table A7 Cunningh Waste Rock Slope	am Hill - Vegetati - Raw Data	<u>on</u>	Co	ver	- 2	020)												
						,						_	_	_	_	_	ed on Point	-Intercept	Samplin
	Transect No.——>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Average Cover	Relative Cover	Freq.
rasses and Grass-likes																	COVE	COVE	
Agropyron dasystachyum	Thickspike wheatgrass														26		1.73	5.49	7
Agropyron smithii	Western wheatgrass		2							1		4	1			1	0.60	1.90	33
Agropyron spicatum	Bluebunch wheatgrass										9		4				0.87	2.74	13
Bouteloua curtipendula	Sideoats grama	13	8	10	19		7		5			3				6	4.73	14.98	53
Bouteloua gracilis	Blue grama		1			7	1	2	7	13	3	5		17		8	4.27	13.50	67
Bromus inermis	Smooth brome						3										0.20	0.63	7
Bromus japonicus	Japanese brome		2														0.13	0.42	7
Hilaria jamesii	Galleta		13	5		4	16	8	17	21	18		19			l	8.07	25.53	60
Koeleria cristata	Prairie Junegrass													2		5	0.47	1.48	13
Schizachyrium scoparium	Little bluestem								4								0.27	0.84	7
Stipa neomexicana	New Mexico Feathergrass		1														0.07	0.21	7
forbs See Melilotus officinalis Yellow Sweetclover 1 0.07 0.21 7																			
Melilotus officinalis	Yellow Sweetclover													1			0.07	0.21	7
Penstemon palmeri	Palmer Penstemon											3					0.20	0.63	7
Sphaeralcea coccinea	Scarlet Globemallow							1									0.07	0.21	7
Tragopogon dubius	Yellow salsify		1														0.07	0.21	7
hrubs, Sub-shrubs, Cacti & Tre	es																		
Chrysothamnus nauseosus	Rubber Rabbitbrush	3													24		1.80	5.70	13
Fallugia paradoxa	Apache Plume											4					0.27	0.84	7
Gutierrezia sarothrae	Broom Snakeweed	6	10		7		1					6			2	15	3.13	9.92	47
Juniperus monosperma	One-seed Juniper	14		12	1							9		15			3.33	10.55	27
Opuntia spinosior	Walkingstick Cactus	1				2					1					l	0.27	0.84	20
Pinus ponderosa	Ponderosa pine							15									1.00	3.16	7
																		Mean	
	Total Plant Cover	37	38	27	26	13	28	26	33	35	31	34	24	35	52	35		31.60	
	Rock		9	5	1	32	9	21	4	1	2	9	0	0	0	12		7.13	
	Litter	34	40	39	42	14	36	33	41	25	41	30	55	36	36	25		35.13	
	Bare ground	27	13	29	31	41	27	20	22	39	26	27	21	29	12	28		26.13	
Total	Perennial & Biennial Cover	37	36	27	26	13	28	26	33	35	31	34	24	35	52	35		31.47	
Sample Adequacy	Calculations						ce =		4			22.8							
Diversi	ty			No. (>2°			tant								9				

^{*} P - Perennial, B - Biennial, A - Annual

Га		am Hill - Vegetati	on	Cov	/er	- 2	020)												
	Reference Area- Ra	w Data										Da		L Cua		Carra	. Doo	ed on Point	Intercent	Camal
		Transect No.——>	1	2	3	4	5	6	7	8	9	10	11		13	_	15	Average	Relative	
ra	sses and Grass-likes																Cover	Cover	Freq.	
	Bouteloua gracilis	Blue grama	26	6	13	15	20	22	10	19	4	17	10	22	23	8	19	15.60	57.92	100
	Hilaria jamesii	Galleta													1			0.07	0.25	7
	Sitanion hystrix	Bottlebrush Squirreltail				1												0.07	0.25	7
r	bs																			
	Sphaeralcea coccinea	Scarlet Globemallow															2	0.13	0.50	7
ır	ubs, Sub-shrubs, Cacti & Trees	s																		
	Berberis fremontii	Fremont's Barberry			3													0.20	0.74	7
	Gutierrezia sarothrae	Broom Snakeweed	8	2	13	6	4	8	6	2	1	8	9	5	6	1	13	6.13	22.77	10
	Juniperus monosperma	One-seed Juniper		17						8	9	4						2.53	9.41	27
	Opuntia polyacantha	Plains Pricklypear		1		2			5								2	0.67	2.48	27
	Opuntia spinosior	Walkingstick Cactus													2	16		1.20	4.46	13
	Pinus edulis	Two-needle Pinyon			5													0.33	1.24	7
																			Mean	
		Total Plant Cover	34	26	34	24	24	30	21	29	14	29	19	27	32	25	36		26.93	
		Rock	0	3	0	1	0	2	0	9	1	0	2	2	10	1	0		2.07	
		Litter	-	14	39	27	29	12	39	10	35	6	18	15	20	39	36		24.87	
		Bare ground	32	57	27	48	47	56	40	52	50	65	61	56	38	35	28		46.13	
	Total Po	erennial & Biennial Cover	34	26	34	24	24	30	21	29	14	29	19	27	32	25	36		26.93	
	Cample Adequates (Salaulationa						t =	1.76	13		n =	15							
	Sample Adequacy C	aicuiations				Va	rian	ce =	36.6	64	nn	nin =	15.6	57						
	No. of Important Perennial or Biennial Sps. = 5 (>2% Relative Cover or >1% Average Cover)																			

^{*} P - Perennial, B - Biennial, A - Annual

Ta	Table A9 Cunningham Hill - Vegetation Density - 2020													
	Erosion Area - Raw	Dat	ta											
												Sampling Method	: 2m x 50m Belt Transects	
	Species	1	2	3	4	5	6	7	8	9	10	Total Count	Per Acre	
S	Atriplex canescens				1	2	15	20		3	5	46	186.16	
S	Cercocarpus montanus			1								1	4.05	
S	Chrysothamnus nauseosus								4	24	49	77	311.61	
S	Fallugia paradoxa								3			3	12.14	
Su	Opuntia polyacantha	1			4	6	2					13	52.61	
Su	Opuntia spinosior	1										1	4.05	
Т	Pinus edulis	3										3	12.14	
S	Senecio flaccidus var. flaccidus	2										2	8.09	
Su	Yucca glauca			12	6							18	72.84	
	Total	7	0	13	11	8	17	20	7	27	54	164	664	
	Total by Lifeform		Sıı	Shr ccule	ub (S	-				No		ree (T) = 12.14 s (Nx) = 0.00		
			Su	ccule	יונ (ס	u) –	149.	50		INO	A IOU	3 (14A) - 0.00		
	Sample Adequacy Calc.	t =	1.68	35	nmin = 245.86									

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious

Та	ble A10 Cunningh	nam	Hil	I - \	/eg	eta	tior	ı De	ensi	ity ·	- 20	20							
	Open Pit - Raw Dat	a															Sampling Method:	2m x 50m Belt Transec	
	Species	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Count	Per Acre	
S	Atriplex canescens	1		4						1	6	8	2				22	59.4	
5	Brickellia californica			1							1	1					3	8.1	
5	Cercocarpus ledifolius						4	2	6	3				1	4		20	54.0	
5	Cercocarpus montanus	1					6	3	2	7			1	1	1		22	59.4	
5	Chrysothamnus nauseosus	46	25	37	46	12	1	26	3	49	3	48	26	21	39	5	387	1,044.1	
5	Fallugia paradoxa		3				1	1	7	1				1	3		17	45.9	
-	Juniperus monosperma				2			2	1	3			1				9	24.3	
u	Opuntia polyacantha			3		2			2	1	1						9	24.3	
u	Opuntia spinosior			4	1			1				4	4				14	37.8	
Γ	Pinus edulis				2	6	2										10	27.0	
Г	Pinus ponderosa												1				1	2.7	
Г	Quercus gambelii		3														3	8.1	
5	Rhus trilobata		33		1		35	29	50	22	5	4	13	78	56	2	328	884.9	
u	Yucca glauca				2							3					5	13.5	
	Total	48	64	49	54	20	49	64	71	87	16	68	48	102	103	7	850	2,293.2	
	Total by Lifeform	Shrub (S) = 2,155.6 Tree (T) = 62.1										Su	ccule	nt (S	u) =	75.5 Noxiou	Noxious (Nx) = 0.0		
	Sample Adequacy Calc.	t = 1.685 mean = 56.67											Vä	ar. =	nin = 71.38				

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious

Ta	Table A11 Cunningham Hill - Vegetation Density - 2020													
	Sludge Cell 1 - Rav	v Da	ta											
												Sampling Method	: 2m x 50m Belt Transects	
	Species	1	2	3	4	5	6	7	8	9	10	Total Count	Per Acre	
S	Atriplex canescens				2		1	1	17			21	85.0	
S	Brickellia californica						2					2	8.1	
S	Chrysothamnus nauseosus		2	4	9	14	7	4	67	15	4	126	509.9	
S	Fallugia paradoxa										1	1	4.0	
Т	Juniperus monosperma										1	1	4.0	
Su	Opuntia polyacantha	10	1	12			1	2				26	105.2	
Su	Opuntia spinosior	3	4									7	28.3	
Su	Yucca glauca	1	6	3	5		5	4	3			27	109.3	
	T.1.1	144	40	10	1.0		4.6	4.4	07	45		244	952.0	
	Total	14	13	19	16	14	16	11	87	15	6	211	853.9	
	Total by Lifeform	Τ		Shi	ub (s	s) =	607.	0			Т	ree (T) = 4.0		
	.oca. by Enclorin		Su	ccule	nt (S	(u) =	242.	8		No	xiou	s(Nx) = 0.0		
		-												
	Sample Adequacy Calc.	t =	1.68	35		me	an =	21.1	0		va	ar. = 548.1 n	nmin = 349.49	

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious

Ta	ble A12 Cunningh	am Hill - Vegeta	tion Density - 2020				
	Sludge Cell 2 - Raw	Data					
		Sampling Met	hod: 2m x 50m Belt Transects				
	Species	Total Count	Per Acre				
S	Atriplex canescens	7	28.3				
Т	Juniperus monosperma	1	4.0				
Su	Opuntia polyacantha	4	16.2				
Su	Opuntia spinosior	1	4.0				
Su	Yucca glauca	11	44.5				
	Total	24	97.1				
	Total by Lifeform Shi	rub (S) = 28.3	Tree (T) = 4.0				
	Succule	nt (Su) = 64.7 No	xious (Nx) = 0.0				

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious

Ta	ble A13 Cunningh Waste Rock Top - R				/eg	eta	tio	1 De	ensi	ity -	- 20	20						
	•																Sampling Method:	2m x 50m Belt Transects
	Species	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Count	Per Acre
S	Atriplex canescens							1				2	8	4		1	16	43.2
S	Brickellia californica			24				5									29	78.2
S	Chrysothamnus nauseosus		1	2							2		5	4	3	2	19	51.3
S	Fallugia paradoxa															1	1	2.7
Т	Juniperus monosperma	1					1							7	1		10	27.0
Su	Opuntia polyacantha	10	2	4	2	6	6		2	6	1	1	1	9		5	55	148.4
Su	Opuntia spinosior	4	1				2	1		4			2	1	1	1	17	45.9
Т	Pinus edulis								4					1			5	13.5
S	Rhus trilobata								1						l		1	2.7
S	Senecio flaccidus var. flaccidus		1														1	2.7
Nx	Ulmus pumila			1													1	2.7
Su	Yucca glauca				1			2	1	6						3	13	35.1
		ī																
	Total	15	5	31	3	6	9	9	8	16	3	3	16	26	5	13	168	453.2
	Total by Lifeform	180	.8	1	ree ((T) =	40.5		Su	ccule	nt (S	(u) =	229.3 Noxiou	s (Nx) = 2.7				
Sample Adequacy Calc. t = 1.685 mean = 11.20															Vä	ar. =	71.5 nn	nin = 161.71

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious

Ta	Table A14 Cunningham Hill - Vegetation Density - 2020																	
	Waste Rock Slope -	Ra	w C	ata	1													
																	Sampling Method:	2m x 50m Belt Transects
	Species	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Count	Per Acre
S	Atriplex canescens	1		1							3	1	3	2	1	5	17	45.9
S	Cercocarpus montanus									1							1	2.7
S	Chrysothamnus nauseosus	16			5							5		2	3	5	36	97.1
S	Fallugia paradoxa						4		1					1		1	7	18.9
Т	Juniperus monosperma	12	4	3	5	4	1	4	2		6		4	3	2	1	51	137.6
Su	Opuntia polyacantha	5	1	9	9	4			1		2	3	5	2	3	3	47	126.8
Su	Opuntia spinosior	2	1	4		14					7	1	4	5		2	40	107.9
Т	Pinus edulis	2	3	2	3	4	2	6	3	1	6	5	3	2	4	4	50	134.9
Т	Pinus ponderosa	5	1		3		5	11	3	1		1			1		31	83.6
Т	Quercus gambelii	1															1	2.7
S	Rhus trilobata									l					1		1	2.7
S	Senecio flaccidus var. flaccidus	2															2	5.4
Su	Yucca glauca			7				2	1	4						6	20	54.0
	Total	46	10	26	25	26	12	23	11	7	24	16	19	17	15	27	304	820.2
	Total by Lifeform	172.	.7	7	ree (T) =	358.	8	Suc	ccule	nt (S	u) =	288.7 Noxiou	Noxious (Nx) = 0.0				
			<u> </u>	(.	-,		-		(,	223	_			(0	,		,
Sample Adequacy Calc.											7				Vä	ar. =	93.6 nn	nin = 64.72

^{*} S - Shrub, T - Tree, Su - Succulent, Nx - Noxious