

October 16, 1987

TO: File

FROM: Lynn Kunzler, Reclamation Biologist *LK*

RE: Vegetation Test Plots, Valley Camp of Utah, Inc., Belina Complex, ACT/007/001, Folder #2, Carbon County, Utah.

On September 28, 1987, Mr. Barry Barnum of Valley Camp called the Division to notify us that their contractor was on site to install the vegetation test plots at the Belina Mine Site and the Utah #2 site as required by permit conditions #5 and #6. Since the Division had not yet received the seed from the Plant Materials Center in Meeker Colorado, we questioned what seed was being used and whether the plan was being followed (testplots were scheduled for first week of October). Mr. Barnum indicated that the contractor had assured him that he had obtained all the species and the proper rates as indicated on the August 28, 1987 design for the test plots. However, he said he would have the contractor discontinue work until the Division could be on site the next day.

On September 29, 1987, James Leatherwood and Lynn Kunzler of the Division met with Mr. Barnum on site. The contractor was not there. Mr. Barnum indicated that the Belina testplot had been seeded and mulched but not fertilized. Upon inspection of the site, it was noted that seed was mixed in with the mulch and that introduced species that were not in the approved mix had been used. Samples of the mulch were collected for the state seed lab to analyze as per species present.

Mr. Barnum indicated that the contractor was ready to seed and mulch the Utah 2 site when he had been stopped and suspected that the seed had also been mixed with the mulch. Samples of the mulch taken from the hydromulcher contained seed and were sent to the State seed lab for analysis. Mr. Barnum was instructed not to allow the mulch to be applied until results of the samples were obtained.

Mr. Barnum was informed that possible enforcement action may be taken since the plan (as per the August 28, 1987 design) was not followed in that fertilizer had not been applied before seeding (results of the soil samples had not been received which were to be the basis of the type and rate of fertilizer application), seed was applied with the mulch and that probably the wrong species were used.

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Memo to File
ACT/007/001
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On October 1, 1987, the State seed lab informed the Division verbally of a preliminary list of species encountered in the mulch samples. Ten species had been indentified, including seven introduced species. Only two of the species (both native) were on the approved seed mix (Final report of analysis and summary attached). The seed lab requested that the Division accompany their inspector to resample the sites to obtain an 'official sample' since it appeared that state and federal seed statutes were violated. Mr. Barnum was then notified that the mulch in the hydromulcher could not be used on the Utah #2 site and that the Belina site would need to be redone.

On October 5, 1987, Lynn Kunzler of the Division and Carl Bott, Seed Inspector for the State Department of Agriculture visited the site and obtained the 'official samples' for the Dept. of Agriculture. Mr. Barnum was told at this time that due to the large number of introduced species found in the samples taken from the Belina Site, The plot would need to be redone. If testplots are not installed according to plan, OSM will not accept them as meeting the requirements of permit conditions #5 and #6. Since it would be near impossible to remove the applied mulch and seed, a new site will need to be approved for the testplot.

Attahcments

cc: B. Barnum (w/attach.)
C. Bott (w/attach.)
R. Holbrook (w/attach.)
J. Leatherwood
S. Linner
H. Shepherd (w/attach.)

1255R/35

Summary of Seed Analysis Report 0258
Species In Applied Mulch Sample
Belina Testplot

3 - Crested Wheatgrass**	6 - Slender Wheatgrass
6 - Thickspike Wheatgrass*	3 - Western Wheatgrass (?)*
2 - Slender or Western Wheatgrass	
2 - Western or Thickspike Wheatgrass*	
5 - Indian Ricegrass	1 - Orchard Grass**
1 - <u>Poa canbyi</u> (?)*	7 - <u>Poa pratensis</u> *
2 - <u>Russian Wildrye</u> **	5 - <u>Smooth Brome</u> **
6 - Rye**	1 - Wheat**
3 - Fescue sp.**	3 - <u>Lolium</u> sp.**
1 - Alfalfa**	1 - <u>Small Burnett</u> **

* Species from approved seed mix for Belina testplot.

** Introduced Species not on approved list.

Of the 16 species represented, ten species (62.5%) are introduced species that were not approved and only four species (25%) are from the approved seed list.

Summary of Seed Analysis Report 0259
Species in Hydromulcher
Utah #2 Testplot

3 - Crested Wheatgrass**	4 - Slender Wheatgrass
2 - Thickspike Wheatgrass*	1 - Western Wheatgrass (?)*
6 - Indian Ricegrass	7 - Orchard Grass**
5 - Smooth Brome**	1 - Wheat**
1 - <u>Stipa</u> sp.	1 - <u>Lolium</u> sp.**
1 - Yarrow	1 - Alfalfa*
2 - Sweetclover*	1 - Sagebrush*

* Species from approved seed mix for Utah #2 testplot.

** Introduced Species not on approved list.

Of the 14 species represented, five species (35.7%) are introduced species that were not approved and five species are from the approved seed list.

SEED ANALYSIS REPORT 0258
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Dry 2B:

- 6 Rye
- 1 Wheat
- 5 Indian Ricegrass
- 1 Alfalfa
- 2 Crested Wheatgrass
- 3 Western Wheatgrass
- 6 Thickspike Wheatgrass
- 1 Russian Wildrye
- 1 Inert Smooth Brome

SEED ANALYSIS REPORT 0258
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Dry 1B:

1 Small Burnett

1 Orchardgrass

SEED ANALYSIS REPORT 0258
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Dry 3B:

- 4 Smooth Brome
- 3 Ryegrass species (Lolium)
- 3 Fescue species
- 7 Poa pratensis
- 1 Poa (canbyi)?
- 1 Russian Wildrye
- 1 Crested Wheatgrass
- 6 Slender Wheatgrass
- 2 Slender or Western Wheatgrass
- 2 Western or Thickspike Wheatgrass

SEED ANALYSIS REPORT 0259
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Hydromulcher RF:

- 2 Indian Ricegrass
- 2 Slender Wheatgrass
- 1 Alfalfa
- 1 Agropyron species (probably smithii)
- 1 Inert Crested Wheatgrass
- 1 Thickspike Wheatgrass

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SEED ANALYSIS REPORT 0259
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Lynn Kunzler #5804

Hydromulcher LF:

- 1 Smooth Brome
- 1 Empty Floret of Smooth Brome
- 2 Orchardgrass
- 1 Wheat
- 1 Indian Ricegrass
- 1 Perennial Ryegrass
- 1 Sagebrush
- 1 Thickspike Wheatgrass
- 1 Unfilled Stipa sp.

SEED ANALYSIS REPORT 0259
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Hydromulcher RR:

- 1 Indian Ricegrass
- 1 Crested Wheatgrass
- 1 Smooth Brome

SEED ANALYSIS REPORT 0259
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Hydromulcher L Rear:

- 3 Orchardgrass
- 1 Sweet Clover
- 1 Unfilled Slender Wheatgrass
- 1 Crested Wheatgrass

SEED ANALYSIS REPORT 0259
UTAH STATE DEPARTMENT OF AGRICULTURE

Lynn Kunzler #5804

Hydromulcher U #3:

Center

- 2 Indian Ricegrass
- 1 Smooth Brome
- 1 Empty Smooth Brome
- 2 Orchardgrass
- 1 Sweet Clover
- 1 Sagebrush
- 1 Slender Wheatgrass
- 1 Yarrow

- 1 Smooth Brome
- 1 Empty Smooth Brome
- 1 Orchardgrass
- 1 Sweet Clover
- 1 Sagebrush