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DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor

FROM: Lynn Kunzler, Senior Reclamation Biologist *LK*

RE: Draft Technical Analysis, Valley Camp of Utah, Inc., Belina Complex, ACT/007/001, Folder #2, Carbon County, Utah

Summary:

A technical review of Valley Camp's plan (received March 23, 1990) has been completed. Contained herein is the write-up for biology and land use. While several deficiencies exist, they could easily be addressed. However, this submittal was to be copies to send to other agencies. In cross checking, data has been removed from the MRP that addressed some of the concerns listed below. The operator needs to replace the missing data. Since some of the deficiencies are considered baseline data, the operator must address them prior to permit approval.

Analysis:

R614-301-300. Biology

Vegetation/Revegetation:

(Refer to page 75 of the MRP) The fourth paragraph refers to fertilizing after seeding and mulching. Fertilization should be incorporated into the soils (see page 71) and therefore should be applied before seeding and mulching.

The operator has not provided a specific time schedule for each major task for the revegetation operations.

Page 71 refers to making a determination of in-place (parent material) soils as to their desirability as a plant growth medium. This needs to be revised to correctly reference the current testplot program established by Mt. Nebo Scientific to determine suitability of these materials.

The operator needs to discuss the long-term stabilization or use of material removed from the sediment pond at the Valcam site.

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Fish and Wildlife:

(Refer to Avifauna and Raptor Plan on page 66, and 67) The first paragraph infers that studies will be completed in the future. It is the Division's understanding that these studies were completed. The operator needs to change the tense of this paragraph and cite the completed study.

The last paragraph of this section references a report by the U.S. Fish and Wildlife Service regarding the need for raptor protection on powerlines. This report (contained in the previous submittal) has been removed from the March 23, 1990 submittal. This report is considered baseline data and must be included in the MRP (or appendix).

R614-301-400. Land Use

The land use section identifies a premining and postmining land use of rangeland. This conflicts with the revegetation section that identifies the land use as wildlife habitat and rangeland. The land use chapter needs to be corrected to correctly identify the wildlife habitat value of the land use.

The operator had stated that he would show the boundaries of the county zoning areas. While this was not done, the areas have been discussed in text. Also, the MRP must contain a description of allowable activities (uses) under each zoning classification. This is considered baseline data and must be provided prior to permit approval.

Recommendations:

The operator needs to adequately address these concerns prior to permit approval.

cc: B-Team
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