

ACT/007/004  
F.#2

0041

January 28, 1988

To: File

From: Lynn Kunzler, Reclamation Biologist *LK*

RE: Revised Mid Permit Term Review Comments, Castlegate Coal Company, Castlegate Mines, ACT/007/004, Folder #2, Carbon County, Utah

A review of the above referenced plan has revealed several areas of concern. Before the plan can be considered complete and adequate, the following comments must be addressed.

A review of the above referenced MRP has revealed several areas of concern which must be corrected before the MRP can be considered complete and technically adequate. These comments were discussed with Mr. Richard Allison of Castlegate Coal Company on January 20, 1988. His response and comments made in the meeting should resolve many of the comments listed below:

UMC 783.18 Climatological Information - LK

Data in Chapter 11 is acceptable, however, pages in this chapter are not numbered making reference to this data difficult. Please number all pages in an orderly manner.

UMC 783.19 Vegetation Information - LK

There is no productivity data (or report from the Soil Conservation Service) for the Barn Canyon Grass-Sage, Dry Canyon Mountain Brush and Crandall Canyon Pinyon-Juniper reference areas.

Reference areas are adequate for current permitted disturbance only. Any new disturbance may require additional vegetation sampling and establishing new reference areas before disturbance.

The acreage listed for Barn Canyon does not add up to the reported total. Please clarify the acreage discrepancy. Table 9.4 headings are scrunched together, making this table very difficult to read. Please redo this table.

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Appendix B is referenced in the MRP, yet it was not submitted. As determined with Castle Gate Coal Company in a meeting on January 20, 1988, this appendix is the computer-generated data sheets that was appended to the Mariah Associates' report. The reference needs to reference this report and the fact that it is in DOGM files vs. in the MRP. Page 88 references a letter to be inserted. Where is this letter? Page 8 references vegetation maps with scales of 1"=1000ft. (permit area), 1"=400ft. (Hardscrabble & Sowbelly Canyons, Crandall Canyon, and Castle Gate Prep Plant disturbed areas) and 1"=100ft. (Crandall Canyon Leach Field). These maps were originally prepared by Mariah Associates and with the exception of the 1"=100ft map (which is only of the leach field area in Crandall Canyon) must be inserted in the MRP. The map (9-1) in the plan (scale 1"=2000ft.) is not adequate.

This section is difficult to follow since both data and discussion contained therein relates to that portion of the old mine plan (Price River Coal Company's Price River Complex) that was retained by the Parent Company now known as the Eastern Reserves. This data and discussion needs to be eliminated from the plan.

UMC 783.20 Fish and Wildlife Information - LK

Fish and wildlife information is generally complete and adequate. However, several references are made in Chapter 10 to Price River Coal Company. These need to be changed to Castlegate Coal Company. Also, pages in Chapter 10 are not uniquely numbered.

UMC 783.22 Land Use Information - LK

While most land use information is found in chapter 4, information regarding type(s) of past mining, extent of mining, seams mined and approximate dates of past mining are found in Chapter 5. This information should be either moved to chapter 4, or a reference to the material in chapter 5 needs to be made in chapter 4. Also, page numbers in this section are not unique.

UMC 784.13(b)(5) Revegetation Plan - LK

The revegetation plan presented in the MRP does not constitute a plan as required by the Division. Please review and revise to assure the MRP has a specific revegetation plan that, at a minimum, contains:

- (i) A schedule for revegetation, including approximate dates (month & year) for each major step in revegetation.

Areas scheduled for revegetation during various years should be identified on a map. For example, reclamation of an old refuse disposal area in Hardscrabble canyon is to commence in 1989 - where is this located? Is this the Goose Island area reclaimed in 1985? When will the #4 beltline and the shop/maintenance area be reclaimed?

- (ii) Species and amounts per acre of seeds and/or seedlings. The proposed plan is nothing more than a laundry list of species that are believed to be adapted to the general habitat conditions of the permit area. Many of the species listed are not available commercially nor does it appear likely that they would be available in the foreseeable future in commercial quantities. Many of the species are introduced species for which the plan lacks sufficient documentation that they meet the criteria of UMC 817.112.
- (iii) A description of planting and seeding methods. If different methods will be used at different locations, this needs to be identified on a map or other suitable format.
- (iv) Mulching techniques, including type of mulch(es), rate(s) of application and how the mulch will be anchored. All areas to be seeded will require mulching or other acceptable soil stabilizing practices (page 57 indicates that there will be areas that mulch will not be used). Again, areas where different mulch treatments or other soil stabilizing practices are to be employed needs to be identified on a map.
- (v) The proposed plan does not discuss irrigation or pest and disease control. If none are planned, it should be stated so in the revegetation plan.
- (vi) Please correlate the seed mix(es) and/or revegetated areas (disturbed areas) with the appropriate vegetation reference area that will be used to determine revegetation success.

The discussion on pages 79-81, while containing several points of general range management, is generally not applicable to mine reclamation where topsoil has been stripped and stockpiled for long periods of time, not saved at all, or where substitute materials are to be used and should therefore, be removed from the plan.

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Please refer to the Division's Draft Revegetation Guidelines to aid you in developing a suitable revegetation plan.

UMC 784.15 Postmining Land Use - LK

Undeveloped land is a condition, not a land use as identified in Chapter 4 (page 2). References in chapters 5, 9 identify grazing as the primary land use and chapters 4, 9 and 10 also identify wildlife habitat as an important land use. Chapter 9 (pages 78 & 79) identifies the goal of reclamation as range and wildlife habitat. Please correct this discrepancy.

UMC 784.21 Fish and Wildlife Plan - LK

The operator needs to provide a commitment to promptly report to the Division any threatened or endangered species (plant or animal) of which he becomes aware of that have not been previously reported to the Division (see UMC 817.97(b)).

The operator needs to provide a commitment to the Division not to use persistent pesticides unless approved by the Division in advance (see UMC 817.97(d)(7)).

The operator needs to provide a commitment to the Division to prevent, control and suppress range, forest and coal fires not approved by the Division (see UMC 817.97(d)(8)).

The operator has not address plans to design, construct, utilize and maintain all transportation systems (i.e. roads, railroads, conveyors, etc.) and support facilities required for operation of the mine to minimize impacts to fish and wildlife.

The letter from letter from the U.S. Fish and Wildlife Service regarding the adequacy of raptor protection on existing power lines should be included in the MRP.

cc: S. Linner  
D. Darby  
1255R/48-51