

February 2, 1988

TO: File

FROM: Lynn Kunzler, Reclamation Biologist *LK*

RE: DOC Review, Utah Fuel Company, Skyline Mines, ACT/007/005, Folder #2, Carbon County, Utah

The Material submitted on September 21, 1987 in response to the Division's earlier review was reviewed for completeness and technical adequacy. Enumerated below are those issues that still need to be resolved.

UMC 783.19 Vegetation Information - lk

(Page 4-38) In discussing the vegetation reference areas that have been established and will be used for determining revegetation success, the MRP failed to reference the reference area for the wasterock disposal area. This needs to be added to the MRP.

Table 20 of the September 1982 vegetation and soils report does not address woody plant density for the riparian reference area. This data could not be found in any of the other reports as well. It appears from discussions elsewhere (Introduction of the December 1981 report) that this data was never collected. If this data was collected, please submit it. If not, please provide plans to collect and report this data during the 1988 field season.

UMC 783.20 Fish and Wildlife Information - lk

The Utah Division of Wildlife Resources Report on the History of Impacts and Recovery from Mining Related Activities on Eccles Creek has been made available to the applicant for inclusion in the MRP. This report should be added to the appendix.

The Division has received written comments from the Utah Division of Wildlife Resources regarding wildlife concerns (informational and mitigation plans). A copy of their comments are attached. Please review their comments and make sure their concerns are addressed in the MRP.

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UMC 784.13 Reclamation Plan: General Requirements - 1k

(Page 4-30) The applicant needs to demonstrate vegetation success and soil stability without the use of mulch on areas with slopes less than 10h:lv. Otherwise, mulch is required on all areas to be revegetated. The rate of straw mulch on slopes between 10h:lv and 3h:lv should be increased to a minimum of 1 ton per acre.

(Page 4-38) The MRP does not identify the reference area to be used to determine revegetation success at the wasterock disposal area.

(Pages 4-38 & 4-39) A 40-sample maximum sample size is acceptable for interim monitoring. However, sampling for bond release during the last two years of the liability period must meet sample adequacy tests for 90% confidence level with a 10% change in the mean. Also, Revegetated areas must be at least 90% of the cover, productivity and woody plant density standards for bond release. Please make these standards clear in the MRP.

cc: R. Hardin
S. Linner
1414/6-7