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August 13, 1981

Mr. Mel Coonrod
Environmental Coordinator
Plateau Mining Company
P.O. Drawer PMC
Price, Utah 84501

RE: Vegetation Studies
Starpoint Mine
ACT/007/006
Carbon County, Utah

Dear Mr. Coonrod:

As per our telephone conversation enclosed is a copy of the Apparent Completeness Review comments pertinent to the vegetation study and the revegetation plan (UMC 783.19 and UMC 784.13). These comments will also be in the review that will be sent in the near future.

Please submit six (6) copies of the response for inclusion into the Mining and Reclamation Plan.

If these comments are not clear as to what is needed, feel free to contact me.

Sincerely,

LYNN M. KUNZLER
RECLAMATION BIOLOGIST

LMK/te

cc: Wayne Hedberg

Enclosure

APPARENT COMPLETENESS REVIEW

PLATEAU MINING COMPANY
Starpoint Mine
ACT/007/006

UMC 783.19

The applicant is referred to Office of Surface Mining's Apparent Completeness Review dated April 21, 1981 and Utah Division of Oil, Gas and Mining's Apparent Completeness Review dated June 6, 1981. The following information is still lacking from the Mining and Reclamation Plan and Supplements 1 and 2:

1. (OSM Paragraph #1) - This minimum requirement of the randomization of plot placement along the transect needs to be met. If it was, so indicated by explanation of the method.

2. (OSM Paragraph #2) - Cover and density for the breakout aspen reference area should be sampled at the 90% confidence level.

3. (OSM Paragraph #3) - A map of the permit area (scale 1" = 500' or larger, UMC 771.23(j)) is needed that delineates all areas of disturbance, areas proposed to be disturbed, each vegetation type and the location of each reference area.

4. The map of the proposed waste pile expansion area submitted with Supplement #2 is lacking legal descriptions and as such is not functional. Please revise this map to meet the requirements of UMC 783.19(b).

5. The area (in acres) of each vegetation type in the permit area and percent of the permit area is needed along with the area of disturbance in each vegetation type and the total area of present and proposed disturbance.

6. A species list should be supplied for each of the communities discussed in the July, 1981, vegetation study for the Unit Train Area, Seeley Canyon Breakout Area, Gentry Mountain Shaft Area and the South Portal Area.

7. A discussion on the effects of mining on the vegetation and mitigation and management should be supplied. *(page 4-16 mentions this will be in the 1981 report. On page 13 (inc 6) of supplement #2 it refers to the MRP).*

8. (OSM Paragraph #7) - Shrub density refers to the number of stems (plants) per unit of area and this measurement should be distinguished from cover in the Mining and Reclamation Plan. A statement of productivity for the 3 community types at the proposed waste pile site should be provided as well as a reference for the production data reported for the Unit Train, Seeley Canyon, Gentry Mountain and South Portal Areas.

9. (OSM Paragraph #9) - The response to this paragraph in Supplement #1 is not sufficient. "The standards to be used to evaluate the plant communities...should be specifically addressed." These standards should be in accordance to UMC 817.116.

10. A comparison between the reference areas and the disturbed areas should be submitted i.e., cover, density (by a T-test), composition (by a similarity index), exposure, slope and soils.

UMC 784.13 - Reclamation Plan: General

At a minimum, the Mining and Reclamation Plan must include:

(b)(1) A detailed timetable for the completion of each major step in the reclamation plan.

(5) A detailed plan for revegetation should be included for each community type including: a schedule, species, amounts, methods, mulching techniques, kind and amount, irrigation, pest and disease control (if any); and measures used to determine success. Hydroseed mulching as described on page 59 is not appropriate for semi-arid areas and should not be used unless success can be demonstrated for the Plateau Mine area.

The applicant should address the methods and seed mixes used for temporary stabilization as required under UMC 817.114.

The applicant should relate seed mixtures to postmining land-use (range and wildlife) and justify the inclusion of any introduced species in the seed mixtures in accordance with UMC 817.112.

Stocking rates for shrublands and noncommercial forests must be based on the density measurements of the reference areas (UMC 817.117).

If fish and wildlife is to be a primary or secondary postmining land-use, then the requirements of UMC 817.97(d)(9) must be met as well as the standards of UMC 817.116.

What is the postmining plan for the Lion Deck portal road (page 3-104)? This plan should conform with the commitments to reclamation made at the Board Hearing on the road of June and July, 1979 or show justification for leaving it.