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July 8, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Susan M. White, Reclamation Biologist *SMW*

RE: Permit Change Application - Gentry Mountain Air Shaft, Cyprus-Plateau Mining Company, Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

SYNOPSIS AND ANALYSIS

Cyprus-Plateau Mining Company submitted an application to construct the Gentry Mountain Air Shaft. My concerns with the application proposal are enumerated below. The Operator must clarify these concerns prior to approval.

1. No detail or justification is provided as to why topsoil is not to be removed from the "surface trail access" and the "pre-existing reclaimed road".
2. The "surface trail access" must be ripped or otherwise explain in the permit why ripping is, or may not be, necessary.
3. The "pre-existing reclaimed road" must be restored to the previously undisturbed condition, not as stated "the current condition as of June 1992".
4. All disturbed areas must meet a cover, production, and shrub density requirement (assuming grazing and wildlife post-mining land use). The Division's Vegetation Information Guidelines state that disturbed areas of less than 1 acre do not require a reference area, however a success standard must be established. Please propose those standards.

In developing the standards for the disturbed area, general baseline information must be provided to determine if the shrub vegetation type at almost 10,000 feet is similar to the mountain shrub vegetation type at

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8,000 feet. Information such as species, cover, shrub density, and production is needed to determine success standards for bond release.

5. The Operator should be aware that Smooth Brome and Red Fescue are aggressive introduced species and may in time exclude other plants and thus reduce vegetative diversity.

RECOMMENDATION

The above noted concerns must be addressed prior to approval.

mbm
cc: H. Sauer
GENTRYMT.SW