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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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October 2, 2012

TO: Internal File

THRU: James Owen, Lead *JO*

FROM: Ingrid Campbell, Environmental Scientist III *IC*

RE: Channel Repair Plan, Plateau Mining Corporation, Star Point Mine, Permit C/007/0006, Task ID #4196

## **SUMMARY:**

On September 25, 2012, the Division received an application from Plateau Mining Corporation (PMC) to repair two reclamation channels within the Star Point Mine Permit area that were damaged due to excess runoff and erosion caused by the Sealy Fire. The channels were located in a reclaimed area that the Division had granted phase II bond release on in 2008.

This application is recommended for approval.

**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**RECLAMATION PLAN**

**REVEGETATION**

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

**Analysis:**

**Revegetation: General Requirements**

The excess erosion caused by the fire and associated damage are categorized as a natural disaster pursuant to R645-301-357.340: Natural Disasters and Illegal activities occurring after phase II bond release. Therefore, the permittee is allowed to reseed and revegetate the entire permit area, if needed, without restarting the extended liability period. Most of the vegetation within the reclaimed disturbed areas, however, was not damaged by the fire. Vegetation within the permit area but not within the disturbed area was damaged and will be restored by the permittee in consultation with the US Forest Service.

The application includes information on the revegetation of areas disturbed by the channel repair. In accordance with R645-301-353.100-.400: the seed mix is comprised of species that include diverse grasses and forbs which are native to the area or introduced species that are desirable for this project. The seedmix will be planted at a rate of 35.4 pounds per acre which is consistent with the extent of cover of the natural vegetation in the area. (These seeding rates follow the recommendations from local seed supply companies.) The seedmix is comprised of species capable of controlling erosion. Many of the species are excellent for use on disturbed areas. These species are also compatible with the approved post mining land use of grazing, wildlife habitat and recreation. The plants selected have the same seasonal characteristics of growth as the original vegetation, are capable of self regeneration, are compatible with the plant and animal species in the area, and meet the requirements of Utah and federal seed and noxious plant laws or regulations. The application states that the seed mix will not contain weed seed in excess of 0.5% of the aggregate weight of pure live seed.

**Revegetation: Timing**

The areas disturbed by the channel repair work will be seeded after September 15 and before November 15 after Division approval for the application. This timing is consistent with R645-301-354 and is during the first normal period for favorable planting conditions after replacement of the plant growth medium.

### **Revegetation: Mulching and Other Soil Stabilizing Practices**

Seeding will be accomplished through hydroseeding or broadcast seeding depending on the accessibility of the area. A small amount of wood fiber mulch will be used if hydroseeding. Access to the repairable sites will be through the channel bottom in order to reduce damage to previously revegetated areas. Therefore, the disturbed non-channel areas to be revegetated will be minimal.

### **Revegetation: Standards For Success**

Access to the repairable sites will be through the channel bottom in order to reduce damage to previously revegetated areas. Therefore, the disturbed non-channel areas to be revegetated will be minimal. According to R645-301-357.340, this repair work will not restart the extended liability period. The standards for success are the same as they were previous to this natural disaster. Revegetation of previously reclaimed, non-channel areas will be minimal so the revegetation should not affect the reclaimed area averages, and should still be able to meet success standards.

### **Findings:**

The application is considered adequate to meet the requirements of this section.

### **RECOMMENDATIONS:**

This application is recommended for approval.