

April 28, 1987
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TO: File

FROM: Lynn Kunzler, Reclamation Biologist *LK*RE: Review of Permit Renewal Application Submitted
April 13, 1987, Andalex Resources Inc., Centennial Project,
ACT/007/019, Folder #2, Carbon Co. Utah

I have reviewed ARI's response (received 4/13/87) to the Division's January 21, 1987 Determination of Completeness Review. Several of the 1/21/87 comments were incompletely addressed, or not addressed at all. The following comments must be addressed before the plan can be considered complete and adequate. (Underscored text are comments from the 1/21/87 DOC review.)

UMC 783.19 Vegetation Information - LK

A demonstration that the data were collected during a year of normal or better precipitation (see DOGM Vegetation Information Guidelines for the Range Site Method).

Additional Comments:

This was not addressed in the MRP. Precipitation data for the Price weather station supplied to DOGM by the National Oceanographic and Atmospheric Administration (NOAA) was reviewed to determine whether vegetation data was collected during a 'normal' precipitation year, as defined in DOGM's Vegetation Information Guidelines (criteria for use of the range site method for determining revegetation success requires vegetation data to be collected during a 'normal' year). While precipitation for the period October 1980 to June 1981 equalled 100% of the average for this same October-June period, precipitation for May (.54"), June (.16") and July (.22") 1981 was only 75%, 23% and 26% of the average for each month, respectively.. This does not meet the criteria for a 'normal' precipitation year. Therefore, the use of rangesites for determining revegetation success cannot be approved, and reference areas (or other suitable success standard) will need to be employed. If reference areas are used, the following will need to be done: Select and permanently mark in the field appropriate reference areas (DOGM can assist in the selection process), change appropriate sections in the mine plan to show that reference areas will be used for the revegetation success standard, and have the SCS evaluate the range condition of the reference area(s) on a 5-year basis (during the 1987 field season and the field seasons prior to submitting the permit renewal application,).

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Page 90 refers to Table IV-7 for a list of important vegetation species. Table IV-10 on page 91 appears to be the referenced material. Please correct.

Additional Comments:

No change - this comment was not addressed and is still valid.

The acreage of disturbance for each range site needs to be provided as well as the total acreage disturbed. The current plan identifies seven acres (page III-25 & IV-92), 24.25 acres (page 12 (immediately preceding page IV-94 which will be referred as page 93a hereafter)), and 20.66 acres (Page 1 of Vegetation study) of disturbance. DOGM staff planimetered Map 34 and found 33.9 acres. Please clarify.

Additional Comments:

Page III-25 was revised to read approximately 33 acres. None of the other comments were addressed and are still valid.

UMC 783.22 Land Use Information - LK

Grazing lands and wildlife habitat are considered renewable resources lands. Impacts to these resources will require mitigation. Statements contrary to this on page 42 must be corrected.

Additional Comments:

No change - this comment was not addressed and is still valid.

UMC 784.13 Reclamation Plan: General Requirements - LK

(b)(5) Submission of DOGM's Draft Revegetation Guidelines does not constitute a revegetation plan. A specific plan must be supplied.

Section 5.1, Schedule of Revegetation (page IV-92) must be revised to show seeding will occur late fall (after October 1) and that tree and shrub transplants will be planted the following spring.

While the applicant plans mulch (page IV-93), the type(s) of mulch, the areas to be mulched and the rate of application must be identified.

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The applicant must provide specific details on the revegetation monitoring plan, i.e. what parameters will be measured, frequency & timing of samples for each parameter, etc. and at what level will reclamation be determined to be progressing in a satisfactory manner during early monitoring.

Additional Comments:

These comments were addressed only by the applicant stating that DOGM guidelines would be followed. This does not constitute a specific revegetation plan as required. The previous comments are still valid and must be addressed.

UMC 784.21 Fish and Wildlife Plan - LK

A specific fish and wildlife plan must be included in the permit application. 33.9 acres of disturbance (as digitized from map 34 by DOGM staff) is a significant impact on deer winter range and needs to be mitigated. The operator needs to document how compliance with special stipulation #7 has been achieved. What is the posted speed limit on unpaved sections of the road? Are swareflex reflectors being used? Other appropriate wildlife mitigation/enhancement that should be included in the Fish and Wildlife plan include: an employee education/awareness training program, design/construction of powerlines in accordance with raptor protection technology, and restoration/enhancement of wildlife habitat features.

Additional Comments:

The applicant has provided a verbatim copy of recommendations from the Utah Division of Wildlife Resources (DWR) for mitigation of wildlife impacts for the fish and wildlife plan. Is it the intent of ARI to implement all DWR recommendations? If so, this needs to be made clear in the MRP.

The applicant has not addressed how compliance with special condition #7 was achieved. This is still needed.

cc: Sue Linner
Dave Darby
0463R/56-58