

April 11, 1989

TO: Rick Smith, Acting Permit Supervisor  
FROM: Bill Malencik, Reclamation Specialist  
SUBJECT: Blue Blaze Permit Review

*JAM 4/14/89*

In accordance with assignment of 3/27, comments for each assigned section are provided below.

A. General

771.23 General requirements for format and contents

Narrative information on page 10 of the Blue Blaze submission does not cover and address the pertinent parts as required by the regulation. Also some of the historical information does not reflect the current situation.

771.25 Permit fee

Permit fee of \$5.00 has been remitted as evidenced by Division receipt No 4255 dated March 27, 1989.

771.27 Verification of Application

Not found in the submission.

771.13,14,15, Identification of interests

16&17,19,20&21

Table of contents stated information is on page 12; however, could not be located.

783.12 General environmental resource information

This particular section was not included in the table of contents nor in the text.

783.19 Vegetation information (pages 4-6)

Vegetal information was covered but does not meet the requirements of the current regulations. Some of the requirements of this part of the regulations were to be covered as permit stipulations. Vegetal type maps were provided and identified as enclosures 6B and 6C.

784.17 Protection of Public Parks and Historic Places

This section was not included in the Table of Contents nor could it be located in the applications submission.

817.11 Signs and Markers

Section on signs and markers while it was include did not cover all the required parts of the current regulations.

817.95 Air Resources Protection

The section covers the essential information covered by the regulations. The applicant refers to a letter from State Health and seven stipulations that the operator agrees to implement.

817.111-117 Revegetation

The information provided on vegetation is very sketchy and does not meet current guidelines.

The following should be included:

Better description of the vegetation before mining.

Identify and provide protective measures for threatened or endangered plant species.

Information on the revegetation potential of areas to be disturbed by mining.

Reference areas were mentioned as the methodology to be used to measure revegetation success as a part of phase I bond

release. However, the area described does not appear to relate to the vegetal types in the disturbed area.

Wildlife habitat vegetal areas were not described. However, enclosure #7 showed Wildlife habitat areas.

#### 817.112 Use of Exotic Species

The text makes reference to native species in general terms and does not mention exotic species. However, table 10 lists the species and exotic species are included in the seed mix. Applicant lists species to be seeded and have it tied to reclamation goals and past mining land use.

#### 817.113 Timing

Method of seeding was referred to in table 10, however, when the seeding would be performed ie., spring or fall was not discussed.

#### 817.114 Revegetation: Mulching and other soil stabilization practices

The regulation excerpts were included in the applicants submission, but few specifics were provided. Many of the DOGM guidelines were developed after 1982. It appears that the material submitted in substance is the same as 1982 and must be updated to meet current requirements.

#### 817.115 Grazing

#### 817.116 Standards for Success

#### 817.118 Tree and Shrub Stocking for Forest Land

#### 817.133 Postmining Land Use

Needs to be covered in greater detail in terms of the vegetal management system that may be mutually agreed upon. Also, livestock trailing through the permit area needs to be explained. Discussion on the latter three items need to be expanded.