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July 25, 1989

TO: Richard V. Smith, Permit Supervisor

FROM: Brent A. Stettler, Reclamation Biologist Brent

RE: Review of Technical Deficiency Response, Beaver Creek Coal Company, C. V. Spur Coal Processing and Loadout Facility, ACT/007/022, Folder No. Two, Carbon County, Utah

UMC 817.97 Protection of Fish, Wildlife, and Related Environmental Values-(BAS)

(b) Eighteen apparently new line transects appear on revised Plate 9-1. These must be identified in the legend, and differentiated from the five transects which were carried over from the previous generation of Plate 9-1.

The applicant will please identify on Plate 9-1 all vegetation types occurring outside the permit boundary on the south and west sides.

(c) The applicant must describe on page 10-27, recent Division of Wildlife Resources recommendations for powerline modification. Page 10-27 must also specify which poles will be modified and what safeguards will be implemented.

UMC 817.100 Contemporaneous Reclamation-(BAS)

Appendix 9-1, page 19 indicates that a seed mix consisting of cereal grains was used during the previous permit term. The applicant must not depart from the approved seed mixes, unless an amendment is filed. If further wildlife enhancement work is anticipated, the mix should be included in Chapter Three and the enhancement plan described in Chapter Ten. Justification for use of introduced species must be provided in order to satisfy UMC 817.112. The applicant must either omit or expand on the text presented on page 9-1A-19 (second to last paragraph). In the latter case, a specific seed mix should be referenced and the enhancement plan described.

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UMC 817.111 Revegetation: General Requirements-(BAS)

(a) Tables 3-1, 3-2, and 3-3 must specify that all seeding rates will be pure live seed.

In light of the fact that the shrub standard is 6283 per acre (Table 9-8), rate of shrub seeding (Table 3-2) is believed to be too low to achieve bond release standards. The applicant should increase the rate of shrub seeding and/or commit to supplemental plantings of shrubs sufficient to meet bond release standards.

The applicant will please correct misspelled plant names from all seed mixes.

UMC 817.116 Revegetation: Standards for Success-(BAS)

(b) The applicant did not update revegetation success standards as requested. The standards identified on page 3-58 are adequate for the present time, but must be updated when Utah's new coal rules take effect.

(c) The applicant will please revise the text on page 3-62b to replace the statement that "reclaimed areas will be monitored at least every three years..." with a commitment to monitor revegetation according to the schedule identified on the same page. The text must additionally state that the applicant will use methods approved by the Division and will meet sample adequacy requirements.

djh
AT9/65-66