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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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Southeastern Region
455 West Railroad Avenue
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OK 12/20/91 ACT 1007/034
cc D. Haddock

December 10, 1991

Dianne Nielson
Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180

Re: New Vegetation Test Plot Development, Soldier Creek Coal Company, Banning Siding Loadout, Carbon County, Utah

Dear Dianne:

After review of the PAP Amendment to Soldier Creek Coal Company's Banning Siding Loadout in Carbon County, I feel the following comments are in order. Overall, I was pleased with the new test plot design and methodology. The design is scientifically sound and results will represent the site well. The seed mixture used is appropriate for the site and, weather permitting, the test results should be positive.

I do have a couple of concerns regarding the test plots. Seed was apparently ordered up to a year in advance. This in itself presents no problems; however, if the seed was actually shipped a year in advance and then stored, there would be a significant decrease in viability. This would result in poor test results. Seed used in revegetation should be shipped as close to the use date as possible.

Secondly, the area of the loadout is high priority yearlong antelope range. The seed prescription contains only two forb species. Forbs are important in the spring and summer diets of pronghorns and, therefore, more forbs should be included. Possibilities are Euphorbia spp., Lotus spp., or Eriogonum spp. If the test plots are successful, adding more forbs to the prescription should be considered.

I am pleased with the new test plots and the effort the Division of Oil, Gas, and Mining has made to supervise the effective reclamation of the loadout site. Please contact Ken Phippen, Regional Habitat Manager (637-3310) if we can be of further assistance in this matter.

Thank you for keeping us informed of changes and allowing us to update our information.

Sincerely,

Timothy H. Provan
Director

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DIVISION OF
OIL GAS & MINING