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Norman H. Bangarter
Governor
Dee C. Hansen
Executive Director
Timothy H. Provan
Division Director

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

1596 West North Temple
Salt Lake City, Utah 84116-3195
801-533-9333

*Big mine full
route to L. Beaton
ce P. Gumbrecht*

RECEIVED
MAY 21 1990

DIVISION OF
OIL, GAS & MINING

May 15, 1990

*Act 15/019
#2*

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Dear Dianne:

The proposal for Utah Power and Light's waste rock disposal site at the Cottonwood/Wilberg Mine site has been reviewed by the Division. Inclusive, the disposal site, sediment pond and access road will disturb a total of 25 acres.

The plan proposes 15 acres of mitigation for the 25 acre disturbed area (page 9-6). The Division recommends a 3:1 ratio of mitigation for the disturbed areas, which in this case amounts to 75 acres. The area can be chained or bulldozed, as appropriate, and seeded. For seeding, we recommend the enclosed revegetation prescription.

In addition, the installation of two water developments is expected to mitigate for the loss of 32 acres of habitat due to cliff spalling. Guzzlers can be used to fulfill this requirement. Placement of one guzzler is suggested within the 75 acres of mitigation, and the other at a previously chained area downslope from the Des-Bee-Dove Mine. The water developments will serve to increase the habitat quality of the area as present water sources are limited to ephemeral and intermittent streams. This is beneficial since the area provides critical valued deer winter range.

Chapter 9 (page 9-1) states that the area is ranked by the DWR as high priority deer winter range. This needs to be corrected as the DWR ranks the area as critical deer winter range.

Thank you for the opportunity to provide comment.

Sincerely,

Timothy H. Provan
Acting Director

Timothy H. Provan
Director

Table 1. Revegetation prescription for disturbed areas within critical or high-priority valued deer and elk winter range.

(1) Disturbed areas should be double ripped. (2) Fertilizer (0-16-8) at a rate of 100 lb/acre should be disked into the topsoil mass prior to seeding. (3) The seed mix should be drilled, followed by an identical application hydrosprayed as a slurry to incorporate more seed mix, tacifier (60 lb/acre), wood fiber mulch (2,000 lb/ acre), and nitrogen fertilizer (33-0-0 distributed at a rate of 100 lb/acre). (3a) If a drill/hydrospray technique is not utilized, the pounds of pure live seed/acre in the seed mix should be doubled and then drilled. After seed application, nitrogen fertilizer (33-0-0 distributed at a rate of 100 lb/acre) should be broadcasted. (4) Seeding should occur following a permanent killing frost which is usually after October 15.

Plant Material	Pounds of Pure Live Seed/Acre
Smooth brome (<u>Bromus inermis</u> -southern variety)	1.5
Alkali Sacation (<u>Sparobolus alroides</u>)	1
Russian wildrye (<u>Elymus junceus</u>)	1
Indian ricegrass (<u>Oryzopsis hymensides</u>)	0.5
Piute orchardgrass (<u>Dactylis glomerata</u>)	1.5
Utah sweetvetch, out of hull (<u>Hedysarum germinale</u>)	1.5
Alfalfa (<u>Medicago sativa</u> - ladak)	1.5
Small Burnett (<u>Sanguisorba minor</u>)	1
Yellow sweetclover (<u>Melilotus officinalis</u>)	0.5
Palmer penstomen (<u>Penstemon palmer</u>)	0.5
Lewis flax (<u>Linum lewisii</u>)	1
Antelope bitterbrush (<u>Purshia tridentata</u>)	0.5
*Wyoming big sagebrush (<u>Artemisia tridentata wyomingensis</u>)	0.5 (20% purity)
*Great Basin sagebrush (<u>A. t. tridentata</u>)	0.5 (20% purity)
*Mountain sagebrush (<u>A. t. vaseyana</u>)	0.5 (20% purity)
Fourwing saltbush (<u>Atriplex canescens</u>)	1
Winterfat (<u>Ceratoides lanata</u>)	0.5
TOTAL	15

*These species should not be drill seeded and should only be hydrosprayed in the slurry or broadcast over the surface after drilling of other seed.