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August 28, 1989

TO: Richard V. Smith, Permit Supervisor

FROM: Brent A. Stettler, Reclamation Biologist *Brent*

RE: Review of Cottonwood/Wilberg Waste Rock Storage Facility Permit Application Package, Utah Power and Light Company, Cottonwood/Wilberg Mine, ACT/015/019, Folder #2, Emery County, Utah

UMC 783.19 Vegetation Information--(BAS/WJM)

(a) Please provide information, adequate to predict the potential for re-establishing vegetation.

Please elaborate on your description of cover transects, provided on page 8-6, and clarify "random and regular placement of sampling plots."

In the introduction of Chapter 8, please provide a table or narrative, stating the acreage of each vegetation type to be disturbed and total acreage of proposed disturbance.

The applicant must include in the PAP a statement of range site condition and productivity for all vegetation types occurring at the waste rock storage facility.

UMC 784.13 Reclamation Plan: General Requirements--(BAS/WJM)

(b)(1) Please provide a reclamation timetable similar to the one in the Division's "Revegetation Guidelines", Appendix A.

(b)(5)(v) Please provide a commitment to have all straw, hay or seed used at the waste rock storage facility inspected by a state Department of Agriculture inspector.

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UMC 784.15 Reclamation Plan: Postmining Land Use--(BAS/WJM)

(a) & (b) Please discuss postmining land use in Chapter 10, per the requirements of this section.

UMC 784.21 Fish and Wildlife Plan--(BAS/WJM)

(a)(1) The PAP must address the concern that big game migration corridors may be disrupted by the waste rock storage facility, or that deer/highway mortality may increase as a result of increased traffic.

The applicant proposes to clear and reseed 15 acres of pinyon/juniper habitat as compensation for taking 25 acres out of production as mule deer winter range. The Division of Wildlife Resources (DWR) recommends that three acres be enhanced for each acre disturbed, because the winter range is critical-valued and additionally, as compensation for talus deposition in Newberry Canyon. Please augment your mitigation plan to satisfy DWR concerns.

(b)(1) Please discuss the occurrence of canyon sweetvetch on or near the permit area. Please reference the page and map numbers on this subject from the Cottonwood/Wilberg Permit Application Package (PAP).

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

(b) Please provide a commitment in the PAP to report to the Division the presence of any threatened and endangered plant or animal, or any bald or golden eagle, which has not been previously reported.

UMC 817.112 Revegetation: Use of Introduced Species--(BAS/WJM)

Please justify the use of introduced species in both interim and final revegetation seed mixes, per the requirements of this section.

UMC 817.113 Revegetation: Timing--(BAS/WJM)

(a) Please include a commitment in the PAP to seed immediately after final site preparations and during the first normal period for favorable planting conditions.

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UMC 817.114 Revegetation: Mulching and Other Soil Stabilizing Practices-(BAS/WJM)

(a) Please provide a commitment in the PAP to mulch and anchor that mulch at the rate described on page 3-10, on any topsoiled area where seeding will not occur for a month or longer.

UMC 817.116 Revegetation: Standards for Success-(BAS/WJM)

(a) Reference areas must be permanently and visibly staked in the field. The PAP (page 3-12) must provide such a commitment.

The applicant must commit to reassessment of all reference areas every five years.

(b) Please revise revegetation success standards to correspond to the soon-to-be-adopted Rules. On page 3-12, under 3., sample adequacy must be satisfied for the parameter of productivity. Please change the confidence interval from 80 percent to 90 percent, on page 3-12 under 4., and on 3-13 under 6.

djh
cc: H. Sauer, DOGM
B. Malencik, DOGM, PFO
AT68/4-6