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DIVISION OF OIL, GAS AND MINING

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May 29, 1996

TO: File

THROUGH: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist

Re: Administrative Completeness Review, Proposal to Culvert Crandall Creek, Genwal Resources, Inc., Crandall Canyon Mine, Section 032, Fold #2, Emery County, Utah

On May 24, 1996, I met with Randy Gainer of Genwal Resources, Inc., and Patrick Collins of Mt. Nebo Scientific to discuss the administrative completeness review for the proposal to culvert a portion of Crandall Creek. Previously, I had identified several areas that were incomplete in the application. These dealt with baseline vegetation information, wildlife habitat enhancement, and approval to move the Forest Service road. Mr. Gainer documented the meeting in a letter to you dated May 28, 1996.

As discussed in the letter, the Forest Service road will not be moved. The statement on a map that the road would be moved was a mistake.

The current plan does contain some baseline vegetation information, but it is inadequate for the purposes of establishing a revegetation success standard for spruce/fir/aspen areas. Genwal committed in the meeting and in the letter to you to collect the needed information during the growing season this summer. For the present, however, the application does contain some information about the spruce/fir/aspen areas even though it is inadequate. Therefore, the application could be considered administratively complete but technically inadequate.

The plan also contains some baseline woody plant density information, but it is old and may no longer represent the amount of woody plants at the site. Again, the plan could be considered administratively complete but technically deficient.

Genwal included with the letter a list of potential habitat enhancement measures they have discussed with the Forest Service and Wildlife Resources. The May 28 letter says these will be incorporated into Appendix 3-8 when the final mitigation measures are approved. Most



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of the measures proposed are contingent on approval from other agencies or private land owners, so Genwal cannot now commit to specific plans. Providing this list and committing to perform those of highest priority is sufficient for the administrative completeness review. Genwal will need to continue to work with appropriate agencies and land owners to refine these plans before culvert installation is approved.

With the further information and clarifications Genwal has provided, the biology and general contents sections of the culvert installation permit revision application can be considered administratively complete.