



October 31, 2000

Gary Gray  
 GENWAL COAL COMPANY  
 195 North 100 West  
 P.O. Box 1420  
 Huntington, UT 84528

**RE: Topsoil Piles - Sediment Control**

Dear Mr. Gray:

You asked me to comment on the plant cover of four (4) topsoil piles located near Crandall Canyon Mine. It was your objective to have the vegetation sampled on these four piles to provide evidence to show adequate erosion control from the established vegetative cover to warrant removal of the sediment control structures (straw bales and silt fences).

We visited these sites on October 27, 2000. Although it was too late in the growing season to sample the vegetation by quantitative methods accurately, qualitative data were recorded. Photographs of each pile were also taken on the same day. In my opinion most, if not all, of the piles have cover that meets or exceeds the cover of the adjacent undisturbed plant communities. The only exception may be Topsoil File No. 4. A portion of this pile was seeded more recently and the cover was not as high as the other piles. The following cover estimates were recorded using qualitative methods:

<u>Topsoil Pile No.</u>	<u>Cover Estimate</u>
1	80%
2	75%
3	60%
4	60%
	45% (more recent seeding)

In summary, all the piles (with the possible aforementioned exception) should have greater total cover when compared to the native, undisturbed plant communities in the area. With this in mind, erosion control using the established cover should be adequate to control erosion without the silt fences and straw bales. I will sample these topsoil piles again early in the growing season of 2001 to provide quantitative data that should verify this statement.

Please call is you have questions or comments.

Sincerely,

Patrick D. Collins, Ph.D.  
 Botanist/Environmental Consultant