



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Color Country District - Kanab Field Office  
669 S. Highway 89 A  
Kanab, UT 84741



C/025/005 Incoming  
cc: Joe  
Dana

IN REPLY REFER TO: 6840

LLCO04000

October 5, 2015

Joe Helfrich  
Division of Oil, Gas and Mining  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

RECEIVED

OCT 13 2015

DIV. OF OIL, GAS & MINING

The Kanab, Field Office of the Bureau of Land Management (BLM) has had the opportunity to again review the Coal Hollow Mitigation Project located on BLM lands adjacent to the Coal Hollow Mine near Alton, UT cooperatively on a site tour 9-23-15.

The tree debris has not been scattered according to the stipulations as specified by the State of Utah Division of Wildlife Resources (UDWR). Many of the trees have been lopped, but not scattered. According to the stipulations, the scatter should be no deeper than 24 inches, and well scattered. Stump height should not exceed 6 inches, and no piece of debris should be longer than 4 feet. Our range staff did review the project again and would like to see the project finished. We realize the value that the removal of invaded pinyon and juniper in lekking and brooding habitat has to benefit sage grouse in the Alton area, and we appreciate the opportunity to work cooperatively to manage opportunities for off-site mitigation to benefit grouse in the area. Range conservationist John Resse did meet with the contractor on site and explain the stipulations to the contractor. If all work were similar to exhibit 4 all stipulations would be met. That is evident in Exhibit 4 adjacent to the spoils pile, exhibits 1-3 show locations where additional work is required. Enclosed you will find documentation collected 9-23-15 regarding stump height and debris scattered on site. Please refer to the standards listed below.

The standard contracting stipulations include the following:

### Typical State of Utah – Lop and Scatter specs. R. Boswell Feb 2014

**Work Limits:** Only areas shown on the Project Map will be treated. The project areas will be flagged and/or described verbally. This area consists of trees in varying densities and sizes. Much of the project area has very sparse tree densities and consists of young small trees. Some areas have dense patches of very old mature trees.

Cutting shall be performed in an organized systematic manner as determined in the pre-work conference.

**Cutting:** This is a “lop and scatter” contract. Pinyon and juniper trees less than 20” in diameter within the project boundaries shall be completely severed from the stump(s). **No live limbs shall be left on the**

**stump of cut trees.** All main branches or stems shall be cut from the trunk of the tree to meet scattering requirements.

Additional treatment specifications:

1. Cut material will be lopped and scattered so that slash height does not exceed 24" above the ground.
2. Cut material left on site shall not exceed 48" in length.
3. Cut material will be spread in ephemeral washes and draws where possible to help reduce erosion.
4. Live browse species such as Bitterbrush, Oak, or Mahogany, shall not be cut or damaged.
5. Only established roads shall be used. No overland travel by vehicle will be allowed.
6. Trees identified as bearing trees, or any tree blazed or tagged to mark the line of any Government survey, shall not be cut or destroyed under penalty of the law. Trees with reference tags will be left uncut.
7. Ponderosa Pine shall not be cut or damaged.

**Equipment Requirements:**

The Contractor shall furnish chainsaws on a fully-operational basis, with competent, fully-qualified operators, and shall meet the following specifications:

1. Must provide a minimum of a 10-man crew.
2. Be capable of cutting live or dead pinyon and juniper trees up to twenty (20) inches in diameter at six (6) inches above ground level on the uphill side.
3. Equipment shall be free of fluid leaks and be in good operating condition.
4. Equipment shall be washed before entering and exiting federal and state lands. All soil and plant parts shall be removed to prevent the spread of noxious weeds in and out of the project area.

BLM would like to insure that the final product on site meets these stipulations as presented by UDWR. A final inspection of the project site by BLM and or UDWR staff when the additional work has been completed will determine project completion.

Sincerely,



Harry Barber  
Field Office Manager  
Kanab Field Office







