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May 10, 1988

TO: Sue Linner, Permit Supervisor
FROM: Lynn Kunzler, Reclamation Biologist *ly K*
RE: Technical Deficiency Comments For SUFCO's Waste Rock Disposal Site Plan, Convulsion Canyon Mine, ACT/041/002, Folder #2, Sevier County, Utah

SUFCO's April, 1988 response (received April 27, 1988) to the Division's latest technical deficiency review has been reviewed. The following deficiencies still need to be addressed before the plan can be considered complete and adequate.

UMC 817.111 Revegetation: General Requirements - 1k

Section 4.6.1 (page 39) of the plan indicates seeding will be done using broadcast seeding methods (1st paragraph) and drilling and broadcast methods (2nd paragraph). Table 4.6.1-1 states that seed application will be by drilling. This needs to be clarified. Please note, the seeding rate listed on table 4.6.1-1 is acceptable for drill seeding, but would need to be increased if broadcast seeding is used. Please indicate how the seeding rate will be altered (i.e. 1.5 times the drill rate) for areas that are broadcast seeded.

UMC 817.114 Revegetation: Mulching and Other Soil Stabilizing Practices - 1k

Section 4.6.2 of the plan (page 39 - 41) needs to identify the rate (2000 lbs./ac. minimum) that straw mulch will be applied.

UMC 817.116 Revegetation: Standards for Success - 1k

Table 4.6.3-1 does not identify what years productivity will be measured, as identified in section 4.6.3 of the plan. It is recommended that productivity sampling only occur during the last two years of the liability period (years 9 & 10), when this data is needed for determining revegetation success. Please revise this table accordingly.

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