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U.S. FISH AND WILDLIFE SERVICE
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

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September 13, 1982

**DIVISION OF
OIL, GAS & MINING**

MEMORANDUM

TO: Acting Deputy Administrator, Office of Surface Mining
Technical Service Center West
Denver, Colorado
Attention: Don Henne

FROM: Field Supervisor, Ecological Services
U.S. Fish and Wildlife Service
Salt Lake City, Utah

SUBJECT: Belina Mine Complex, Valley Camp Coal Co.,
Review and Revisions

The following represents our comments on the Belina Mine Complex plan and responses to other comments by the Valley Camp Coal Co.

Sec 784.21 (p. 30). The Fish and Wildlife Service (FWS) does not accept the applicant's assertion that Goshawks and Cooper's hawks can tolerate a substantial amount of human disturbance. A few examples may demonstrate that an individual hawk has adapted, but a generalization that every Cooper's hawk or Goshawk can adapt to human disturbance, especially during breeding and incubation periods, is unacceptable. Our recommendations on avoiding these disruptions is included later in the text.

Sec. 784.21. The applicant has stated its commitment to the Utah Division of Wildlife Resources (UDWR) wildlife protection plan. This plan, however, is generic and does not address the issues endemic to the specific mine plan area. The following recommendations discuss specific issues and mitigation or enhancement techniques.

1. The FWS recommends that every precaution be taken to prevent further degradation of Eccles Creek and its tributaries. Road and railroad construction, and stream channelization have caused sediment problems in this important cutthroat trout spawning area. Sediment ponds should be redesigned and constructed to prevent overflows after snowmelt. Since cutthroat spawn in spring, when the water temperature approaches 50° F, this time period is critical. Snow removed from the portal area should be stored above the sediment ponds to prevent additional sediment from reaching the stream. This may require redesigning the ponds to accommodate the additional capacity.

Steps should immediately be taken to begin revegetating the area along Eccles Creek and the steep slope along the Whiskey Canyon tributary. Using rock and rubble along the steep slopes as well as jute or nylon netting could help establish early vegetation on the slopes. Hand planted tubelings, use of water catchments and reducing competition on the sites from animals or invading plants are other important techniques to consider where applicable. A diverse, native plant establishment is preferred for long-term wildlife benefits.

2. The proposed design and construction method of the overland conveyor appears to be well thought-out and beneficial to wildlife. The FWS supports the intention to hand drill the post holes and to install the towers by helicopter and overhead crane from existing roads. This development would minimize surface disturbance and reduce the vehicle traffic on the mine haul road to the load-out facility. Furthermore, the structure would not prevent terrestrial wildlife from movement across the canyons.

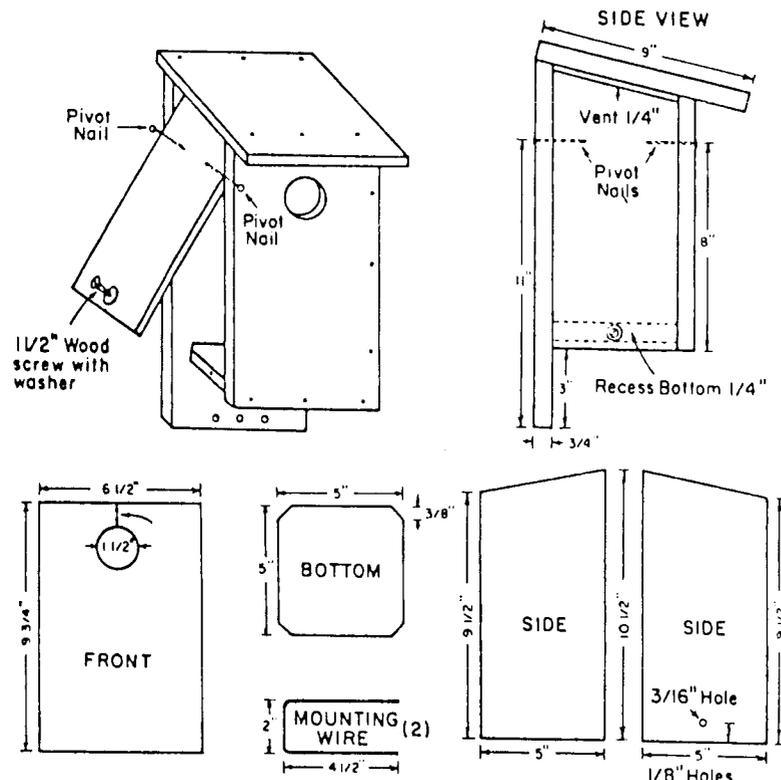
We would recommend that as few trees as possible be removed for construction, stressing that the trees with the active Cooper's hawk and Goshawk nests be avoided. We suggest the applicant restrict activity within .25 miles of the nest sites between April 15 and July 15 to prevent disturbance to the nesting raptors. Additionally, we recommend that no construction or related activities occur between January 1 and March 15 to avoid conflicts with wintering moose in the area.

During our August 9, 1982, meeting, Mr. Whiteside of Valley Camp Coal Co. expressed a genuine interest in wildlife enhancement at the Belina mine area. Therefore we suggest consideration of the following recommendations for their benefit to wildlife and improvement of wildlife habitat at the mine.

1. Big game habitat would improve by allocating all available animal units per month (AUM) on the leased and fee lands for wildlife. The entire mine plan area has been designated high-value summer range for deer and elk by the UDWR. Furthermore, creek drainages in the area have been classified as critical moose winter range.
2. Ponderosa pine, fir, and aspen snags 14 inches diameter at breast height (dbh) or greater, are important habitat features for the western bluebird, Williamson's sapsucker and Grace's warbler, species of high federal interest, that may be found in the Belina mine area. By preserving those snags, habitat for those birds can be maintained.
3. Where snag density is low, bluebird boxes can be constructed to attract nesting western bluebirds (Figure 1). Western bluebirds are most attracted to areas of large, scattered trees with a grass-forb early succession understory.

This concludes our comments and recommendations on the Belina Complex Mine plan review and revisions. If you have any further questions regarding our comments or have need of assistance, please contact one of our Energy Operations staff at Salt Lake City, telephone 801-524-5649.

cc: DOGM/SLC
UDWR/SLC
UDWR/Price
RO/AE
Reading File
Official File
JMunson:wls



11. Plans for a side-opening nesting box

Dimensions shown are for boards $\frac{3}{4}$ " thick.

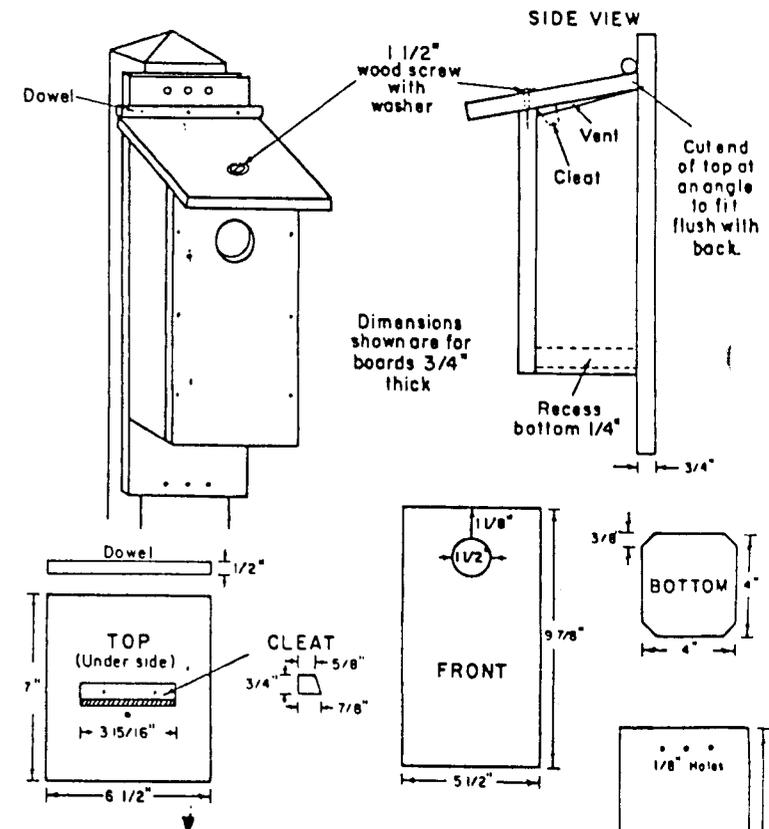
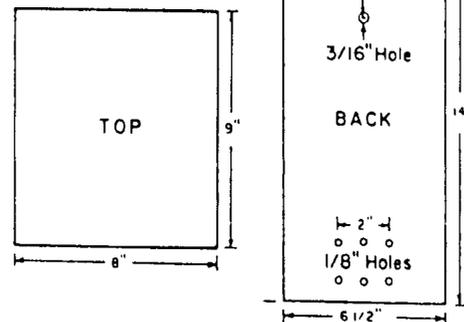
Use $1\frac{3}{4}$ " galvanized siding nails or aluminum nails.

Pivot nails must be located exactly opposite each other as shown for proper opening of side board.

Cut top edges of front and back boards at slight angle to fit flush with top board.

Cut $\frac{3}{8}$ " off each corner of bottom board as shown.

Insert bottom board so that the grain of the wood runs from front to rear of box.



10. Plans for a top-opening nesting box

Use $1\frac{3}{4}$ " galvanized siding nails or aluminum nails, $\frac{1}{4}$ " for dowel.

Drill $\frac{3}{32}$ " holes in dowel for easy nailing.

With top in place, hold cleat in exact position for nailing by reaching through bottom of box before bottom board is attached.

Cut $\frac{3}{8}$ " off each corner of bottom board as shown.

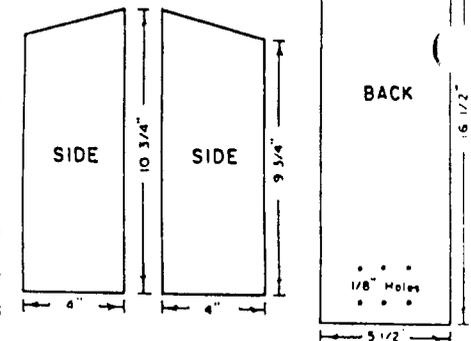


FIGURE 1: From Zelany, L. 1976 The Bluebird.