



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dr. G. A. (Jim) Shirazi, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

September 21, 1983

Mr. Allen D. Klein, Administrator
Western Technical Center
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

RE: Utah Division of Wildlife
Resources Comments on
Determination of Completeness
Valley Camp of Utah, Inc.
Belina Complex
ACT/007/001, Folder No. 2
Carbon County, Utah

Dear Mr. Klein:

Please find enclosed a copy of the Utah Division of Wildlife Resources' comments relative to their review of Valley Camp of Utah, Inc.'s Mining and Reclamation Plan for the Belina Complex in Carbon County, Utah. If you or your staff have any questions, please call Lynn Kunzler or Tom Tetting of my staff.

Sincerely,

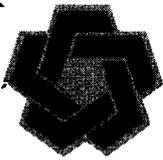
A handwritten signature in black ink, appearing to read 'James W. Smith, Jr.', written in a cursive style.

JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/btb

Enclosure

cc: Steve Manger, OSM, Denver
T. Tetting, DOGM
L. Kunzler, DOGM
S. Storrud, DOGM



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Wildlife Resources

1596 West North Temple • Salt Lake City, UT 84116 • 801-533-9333

File ACT/007/001
Folder No. 2

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Douglas F. Day, Division Director

Copy to Tam T.,
Shannon, Lynn
Copy OSM-Denver

September 14, 1983

Mr. Jim Shirazi, Director
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

JIM
SEP 21 1983

Attention: James Smith

RE: Final Determination of Completeness of the MRP for the Belina Mine Complex

Dear Jim:

The Division in a final review of the Mining and Reclamation Plan at the Belina Mine Complex has identified some areas of concern.

It seems that the long culvert in Eccles Creek that provides crossing and access to the Belina Mines has not been specifically addressed for removal at the time of abandonment of the facilities. Additionally, we are concerned for reclamation of the landslide area that resulted from excess soil moisture, due to inappropriate snow removal techniques in 1977 and 1978. This area has yet to be satisfactorily reclaimed.

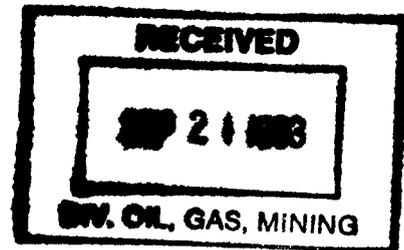
The company has retained the services of a consulting firm (EIS) to assist with finalization of their MRP. The consultant has requested the Division's input. Enclosed for your information is a copy of the consultant's request and the Division's reply.

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,


Douglas F. Day
Director

Enclosures





ENVIRONMENTAL INDUSTRIAL SUPPLY

P.O. Box 358 - Elmo, Utah 84521 - Telephone (801) 653-2606

Mel Coonrod - Reclamation Specialist
Hydro Seeding & Planting - Field Consultants
Complete Reclamation Supplies

August 30, 1983

Mr. Larry Dalton
Utah Division of Wildlife Resources
110 Railroad Ave.
Price, Utah 84501

REF: Conversation of August 26, 1983

Dear Larry:

I have been retained by Valley Camp Mining Co. to assist in formulating a response to an ACR of the Valley Camp Mine located in Whiskey Gulch.

One of the principal concerns is the potential impact to big game movements with the implementation of an over land conveyor. Mr. Whitesides has indicated that the conveyor will be constructed as per the UDWR guidelines. In essence, that a minimum of 60% of its length will have an unobstructed clearance from conveyor to ground of 3 meters. Mr. Whiteside also indicated that a diagram of the proposed conveyor was sent to the Division office for review.

A second concern deals with mapping of big game migration routes in the area of the mine with critical and high priority habitats indicated for each of the following species: elk, deer, and moose. The assumption has been made by OSM that this data is available from your office. Based on our conversation, I understand that migration routes are not precisely known for this area, and that only trends of movement have been formulated.

Any assistance you could give me and/or Valley Camp on these areas would be greatly appreciated.

Upon my completion of the draft plan, I would also like to request a meeting with you and your staff so that we might review the document to see if it is in line with the recommendations of UDWR.

Sincerely,

Melvin A. Coonrod

MC/njc

cc: Trevor Whiteside - Valley Camp



DIVISION OF WILDLIFE RESOURCES

DOUGLAS F. DAY
Director

EQUAL OPPORTUNITY EMPLOYER

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

Reply To SOUTHEASTERN REGIONAL OFFICE
455 West Railroad Avenue, Box 840, Price, Utah 84501
(801) 637-3310

September 8, 1983

Melvin A. Coonrod
Reclamation Specialist
E. I. S.
P. O. Box 358
Elmo, Utah 84521

Dear Mel:

In response to Valley Camp's request concerning the Division's position relative to the conveyor plan for the Belina Mine Complex, the following is offered.

As you know, our primary concern in the area of the Belina Mine Complex is for mule deer, rocky mountain elk, and moose. Essentially, for these animals to migrate or make uninhibited use of habitats on either side of the conveyor, underpass opportunity as determined by random measurement must provide a minimum of 3 meters unobstructed clearance between the ground and the conveyor along 60 percent of its length. The engineering drawings seems to indicate that such will be the case. It is important that no facilities associated with the conveyor system, such as electrical service or the return belt system, be any closer to the ground than 3 meters. These specifications as recommended by our Division, take into account the growth of vegetation beneath the conveyor or the accumulation of snow at certain times of the year. Snow and vegetation each represent intrusions into the passage window that would affect movement of the game animals.

In regards to your questions concerning the ranking of the quality of habitat for big game proximal to the Belina Mine Complex, the following is offered.

The area essentially represents high valued summer range for big game. It is specifically ranked as being of high priority value to deer and elk. Moose may also use the area, especially the riparian bottoms, for winter range. Thus, the riparian areas are ranked as being of critical value.

Unquestionably, parturition (birthing) by all of the big game animals takes place in and around the mine complex area. The limited areas used during this crucial period would be of critical value to maintenance and survival of the populations.

To date, the Division has no understanding of big game migration routes in the immediate area of the mine complex. Winter ranges for deer and elk are somewhat remote from the mine complex area. Essentially, they lie 7 or 8 miles to the northeast and/or the southeast. Therefore, it must be assumed that the general movement of deer and elk away from the summer ranges that surround the mine complex must be either northeast or southeast. Their specific paths of movement are unknown. It is not deemed essential that these paths need to be known as long as the conveyor provides adequate opportunity for unrestricted movement of these animals. Our experience and the research that we have conducted shows that if the specifications suggested by the Division are met, in terms of providing the minimum clearance between the ground and the conveyor, then these animals will be allowed unobstructed migration and daily movement.

Reclamation of the Belina Mine Complex must give consideration to the streams involved. Of concern on Eccles Creek will be the removal of the long culvert that provides a crossing point for accessing the mine. At the time the culvert is removed, temporary sediment control structures must be constructed within the stream. These structures could be represented by straw bales staked within the stream such that they impound water and create a slow zone in which the sediments can be trapped. These temporary sediment traps must be removed immediately upon removal of the culvert. The sediments should then be disposed at an approved land fill.

In Whiskey Gulch the concern will be for re-establishment of a stream channel in the area that is now covered by the pads on which the mining facilities have been developed. Essentially, Whiskey Gulch does not provide for fish habitat upstream from the point where the stream is now covered by the sediment control structure. Therefore, it is recommended that the pond, at abandonment of mining, be appropriately modified and retained as a pond habitat to benefit wildlife, especially salamanders. The pad areas, however, should be reclaimed such that good quality macroinvertebrate habitat will be developed within the stream. As you know, the macroinvertebrates that would drift downstream into the lower segments of Whiskey Gulch and Eccles Creek would be utilized by the trout as a food source. It is probable that Whiskey Gulch now supports some fishes from its confluence with Eccles Creek upstream to approximately the area where it is inundated by the sediment control structure. Flows of water and gradient are the limiting factors for trout within Whiskey Gulch. Enclosed for your use are a myriad of examples of stream habitat improvement structures that you may wish to incorporate within the reclamation plans for the Whiskey Gulch area.

Melvin A. Coonrod
September 8, 1983
Page 3

Mel, the Division's primary concern relative to the mine reclamation plan for the Belina Mining Complex is for interim and final reclamation. The Division remains concerned for the amount of sediments, primarily silts, that are moving off of the steep slopes below the access road and into Eccles Creek. Of primary concern is that area which slipped during the landslides of 1977 and 1978. Although this area shows some recovery, due to the mine's reclamation efforts, there still needs to be considerable reclamation activity on this slope. It is recommended that deep-rooted species, such as shrubs and trees, be planted. It is also recommended that areas, if any, where the grass forb cover has not been successfully established be re-vegetated this fall. Similar recommendations follow for any other raw soil areas associated with the mine area.

Thank you for an opportunity to review your preliminary plan.

Sincerely,



John Livesay, Supervisor
Southeastern Region

JL:LBD:db

cc: Darrell Nish
Trev Whiteside