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cc: DR Nielson
S Linner

STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

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DIVISION OF
OIL, GAS & MINING

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Attn: Susan Linner

Dear Dianne:

The Division has reviewed the recent addendum to the five year Mining and Reclamation Plan for Coastal States Energy Company's (Utah Fuel Company) Skyline Mine. Our page-specific comments are attached. From a wildlife perspective, the MRP seems to be adequate in all areas except the historical aspect of loss and recovery of the Eccles Creek fishery and big game/overland conveyor considerations.

We are aware of a company funded study that adequately identified necessary big game crossing points along the conveyor; this should be included in the MRP. Also, detailed drawings of the conveyor at the big game crossing points need to be included.

A detailed history of mine construction problems as they reflected sediment impacts to Eccles Creek needs to be part of the MRP. This document makes no mention of this problem although the mine was a key player in loss and recovery of the fishery.

Thank you for an opportunity to provide comment.

Sincerely,

William H. Geer
Director

Acting Director

Utah Division of Wildlife Resources' Review comments on the addendum to the five year Mining and Reclamation Plan (1986) as submitted by Coastal States Energy Company for their subsidiary Utah Fuel Company's Skyline Mine.

Page 2-47 to 48, 2.5.3 Mining Impact on Water Quality and Page 2-66 to 67, Project Impacts on the Fishery Resource -- The MRP suggests that suspended solids in Eccles Creek were minimized through regulatory requirements during construction. Unfortunately, this was not so as evidenced by a reduction of the cutthroat trout populations (numbers) and standing crop (pounds per acre of trout) by 1983 to 96% and 89% of the pre-impact levels, respectively. Substantial sediment increases in the stream due to mine and mine related construction was the mechanism that impacted the fishery. Peak impact years were 1981 through 1982. Fortunately, by the end of 1983, soil stabilization practices, primarily road surfacing and revegetation success, caused sediment loading to decrease and the trout population began to recover. After just three years (1984, 1985 and 1986) of maintained sediment control, the cutthroat trout population and standing crop measurements increased to levels of 78% and 88%, respectively, as compared to the pre-impact situation. The MRP should be modified to correctly portray the historical events. An unpublished but comprehensive report concerning this issue can be provided by UDWR at the applicant's request.

Page 2-64, first paragraph, 2.8, Aquatic Wildlife Resources (Eccles Creek) -- Without question, the aquatic life of Eccles Creek have adapted to "natural" fluctuation in sediment loads, but excessive man caused sedimentation virtually eliminated the fish population during mining construction. Efforts by the mine control sediments have now caused a situation where high quality habitat exists and the fishery has nearly recovered. The MRP must accurately document this situation.

Page 2-64, third paragraph -- Trout have upstream migration access in Eccles Creek to the entire length of stream (up to the U.S. Forest Service Boundary) below the Skyline Mine pad, and not just up to a zone of beaver dams above the Whiskey Creek confluence.

Page 2-70, Aquatic Monitoring Summary -- Results from UDWR fishery surveys should be viewed as an important part of the MRP. They should be included as tabular data along with the Benthic (Table 2.8-2) and sediment (Table 2.8-3) data.

Page 2-85 to 86, 2.9.2 -- UDWR in recent years has modified the term "crucial-critical" in regards to relative biological value of wildlife habitats or use areas to just "critical". The term "crucial" now only relates to a time of animal use. The definition remains the same.

The two aforementioned terminology modifications were made to more easily separate discussions that involved critical valued habitats or use areas from crucial time periods that are commonly associated with such sites. The applicant in editing the MRP may wish to make a similar change.

Page 2-90, first paragraph -- Seton, although a fine wildlife ecologist for his time, would not do well in modern application of elk management techniques using some of his 1927 philosophies. The applicant should eliminate the data that references Seton, 1927.

Page 2-86 through 2-91 (moose, elk and mule deer), Page 2-100 to 101 (overland conveyor) and Page 3-21 (overland conveyor) -- The MRP is not clear whether or not this five year application includes actual development of the 2.6 mile long overland conveyor system. If it is to be considered as a potential facility, the state-of-the-art knowledge concerning passage back and forth of big game animals relative to a conveyor structure should be appropriately documented in the MRP, especially in relation to the Skyline Mine. "Dalton, L.B. In Press. Big Game Passage of Large Diameter Overland Conveyor Systems. In Proceedings of Symposium, Issues and Technology in the Management of Impacted Western Wildlife, Glenwood Springs, Colorado, February 4-6, 1985. Thorne Ecological Institute, Boulder, Colorado" is the most comprehensive and current literature available. It can be provided by UDWR at the applicants request.

Page 3-23, Plate 3.2.3-3 Conveyor Profile, and Drawing No. 3.2.3-2 -- The MRP fails to specify the exact methodology and conveyor design to allow uninhibited passage of big game to habitats either side of the structure, specifically clearance beneath the conveyor at wildlife crossing points. Three meters is recommended. Wildlife crossing points must also be identified.

Page 2-97, (2.9.3) first paragraph -- Whitetailed prairie dogs, a prey species for blackfooted ferrets, historically inhabited an area along U.S. Highway 6 immediately west of the Scofield Junction (State Highway 96), Section 16, T 11 S, R 8 E, Utah County. Recent development of coal loadout facility by the Blazon Mine destroyed this remnant colony; it was situated upon the Wasatch Plateau. UDWR agrees with the applicant that no potential for blackfooted ferrets exists on the Skyline permit area.

Page 2-100 to 101 (Study Plan) -- This monitoring plan is for purposes of determining adequacy and use of crossing opportunity along the proposed conveyor for big game. The MRP should be clarified to the extent that this would be a monitoring plan and not mitigation.