



United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

Supervisor's Office
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File Code: 2820-4

Date: May 2, 2003

Mary Ann Wright
Associate Director
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, UT 84114-5801

*Incoming
4/07/05
Copy Mary Ann,
Bison*

RE: Subsidence of Burnout Canyon (Lawrence Reservoir Lease Modification), Canyon Fuel Company, LLC, Skyline Mine, C/007/005-AM03E.

Dear Mary Ann:

We reviewed the application and have the following comments:

The permit application fails to address impacts that could occur to the lower portion of Burnout Canyon Creek proposed for longwall mining. Subsidence resulting from the proposed longwall mining along the streambed could result in a negative or reverse gradient, resulting in pools and/or loss of fish spawning habitat. Canyon Fuel Company must establish a stream monitoring and mitigation plan to quantify impacts and mitigate effects to Burnout Creek prior to mining.

The Flat Canyon FEIS determined that the subsidence from full-extraction of two coal seams under low gradient reaches of perennial streams in the Flat Canyon Tract on National Forest System lands could cause negative gradients affecting riparian vegetation and fish habitat and the associated erosion of the stream channels. Additionally the Flat Canyon FEIS determined the Burnout Canyon study is only pertinent to sustained stream gradients of greater than 5-7%. There is presently no specific information presented for the lower portion of Burnout Canyon, the amount of subsidence expected, or the projected stream gradient changes to determine the potential effects.

The Stream Monitoring and Mitigation plan must include detailed stream (thalweg) profiles with photographic documentation (before and after subsiding the area) of stream channel changes, as well as flow monitoring. The plan must also include measures (actions) needed to minimize stream channel erosion and restore altered fish habitat and/or riparian vegetation. The plan must also tie with the current monitoring required for the upper reaches of Burnout Creek that include gradient monitoring and photographic documentation of changes. In addition, fish and macroinvertebrate population studies must be extended to determine if there are any effects to the aquatic ecosystem.

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MAM*



Mary Ann Wright

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If you have any questions contact Aaron Howe or Carter Reed at the Forest Supervisor's Office in Price, Utah.

Sincerely,


MELISSA BLACKWELL
Acting Forest Supervisor

cc:

Sally Wisely, BLM Utah State Director

D-2/3

Dan Meadors, Canyon Fuel Company, LLC, Skyline Mine

Derris Jones, UDWR, Price Office