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June 22, 1981

DIVISION OF  
 OIL, GAS & MINING

MEMORANDUM

TO: Regional Director, Office of Surface Mining  
 Denver, Colorado  
 Attention: Shirley Lindsay

FROM: Acting Area Manager, Fish and Wildlife Service  
 Salt Lake City, Utah

SUBJECT: Mine Plan Review - Star Point Mine

The mine plan addresses most issues of concern to the Service, however, portions of the plan have not been completed. Inventories planned for 1981 should address most of these voids. Some of the more important aspects of the plan are addressed below.

Endangered Species:

Treatment of data and planned inventories for the most part appear adequate. Relative to black-footed ferrets, further discussion is needed. Table 10-6 indicates that the primary indicator species of their possible presence, white-tailed prairie dogs, occurs on site. It is not clear whether they occur near areas of potential disturbance, or how abundant they are. The need for additional surveys and development of possible mitigation would depend on the results of the prairie dog survey. Similarly, impacts from proposed mining and mitigation for plant species can not be addressed until a determination of their presence and location has been made.

Raptor Nesting And Migratory Bird Species of High Federal Interest

Although planned, a raptor survey has not been completed for the mine site or proposed areas of disturbance. Generally, we recommend that for areas to be disturbed, a survey should be completed covering the area of disturbance plus a buffer of at least 1 km. Some variance to this would be possible depending upon the type, location, and timing of the disturbance.

Surveys for migratory bird species of high federal interest have not been adequate. Surveys planned by Plateau Mining Company (PMC) for 1981 may address these species.

Surveys showing the location and amount of use of proposed areas of disturbance by bald and golden eagles need to be completed. Winter concentration areas, roost sites, etc. should be identified if they exist.

General Comments:

The Service does not agree with statements in the mine plan to the effect that, since the mine has been in place for some time, there are not additional impacts associated with its operation. Production has increased and technology has changed. Depending upon future lease acquisition, production could double. Meanwhile, wildlife production has been, for the most part, lost from 125 acres of actual disturbance. Areas surrounding the site have been impacted to varying degrees depending upon the species involved. Mitigation in terms of compensation for these continuing losses has not been addressed.

Mitigation for the new areas of expansion has been partially addressed. For example, methods to mitigate mule deer winter range by enhancement of adjacent range is suggested. Methods, size of areas, and location need to be better developed in the plan. Other forms of mitigation or mitigation for other species were largely unaddressed such as enhancement of certain areas by water development, wildlife habitat plantings or vegetation manipulation, replacement of lost nesting cavities by nest boxes, and so forth. It should be made clear that the existence of adjacent equivalent habitat may reduce the overall significance of the impacts, but not to eliminate the impact. Approximately 200 acres are being directly taken out of production for a lengthy period of time.

Conversely, it should be noted some benefits may accrue from the sedimentation ponds, depending upon how long water is available during the year, water quality and adjacent cover.

Relative to revegetation efforts (page 3-121), it was unclear whether the criteria of 80 percent at the end of 5 years referred to original canopy coverage, original species abundance or neither. We are aware that plants not native to the site may be beneficial to wildlife, but are concerned that for the long haul, the plants that occur on the site before disturbance, are the best choice for permanent revegetation.

This completes our review of the mine plan for completeness. Please contact us if you have any questions.

*William R. White*

cc: DWR, SLC  
DWR, Price  
VGM, SLC