



STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

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orig mine file
c.c.l. Brantson
by K. Mutz
Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
William H. Geer, Division Director

AC 7/007/006

June 22, 1987

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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: Kathy Mutz

Dear Dianne:

The Division has evaluated Plateau Mining Company's "New Lands Application" revision for the Star Point Mines. The following comments for that Mining and Reclamation Plan should be considered as additional to our May 8, 1987 comments. A recent field inspection of the potential subsidence/wetland area by Larry Dalton has formulated the following assessment.

The stream bottom lies predominately on bedrock in a deeply "V", steep gradient canyon. Wetlands along the stream average one foot either side of the wetted stream channel. The wetland, which grows on a soil mantle that is only about two inches deep, is characterized by a grass/forb vegetation complex.

Woody wetland plants are in evidence about 3 feet above the channel but are not supported by the stream's flow. Subsurface flows (seepage) seem to be the water source for these woody plants. The thin soil mantle at the stream's edge probably precludes development of woody vegetation.

The stream supports a limited and low population of macroinvertebrates, but no fish life or potential for such exists in the subsidence zone. There is potential for fish below the permit boundary, but none are known to exist.

The potential subsidence area represents a high valued parturition zone for deer and elk.

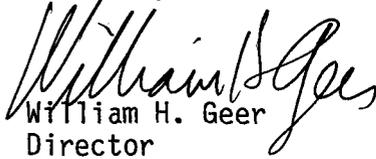
Dianne, the questions of whether or not subsidence will (1) dry up the creek and eliminate the grass forb wetland complex, or (2) dry up subsurface flows and eliminate the woody wetland vegetation are difficult to assess. If the stream is lost or reduced by 50% of its average daily flow, four 200 gallon guzzlers should be installed by the company adjacent to the stream bottom. They should be spaced about 400 feet apart within the impact zone. If

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wetlands are lost, monitoring by the company should determine the extent of loss and an equal amount of wetlands should be developed off site. The Division's Desert Lake Waterfowl Management Area could be advantaged for off-site mitigation, if it becomes necessary.

Thank you for an opportunity to review and comment on this project.

Sincerely,


William H. Geer
Director