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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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ACT/007/006 #2
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JUN 25 1992

DIVISION OF
OIL GAS & MINING

June 23, 1992

Mr. Charles J. Jankiewicz
U.S. Forest Service
Price Ranger District
599 West Price River Drive
Price, Utah 84501

Dear Charles:

The Division of Wildlife Resources (DWR) has reviewed Cyprus Western Coal Company's proposed readjustment on Federal Coal Lease SL-031286 west of Wattis. We have included in our review the proposed stipulations outlined by the Forest Service for management of mining operations. DWR has the following comments regarding the proposed readjustment.

We would like to emphasize the importance of the lease area to a wide variety of wildlife. Deer, elk and moose utilize critical summer range found in the vicinity. Fawning and calving takes place in aspen, aspen/conifer, and mountain brush habitats. Raptor species such as golden eagles, red-tail hawks, goshawks, American kestrels, and a number of owl species utilize suitable habitat within the lease area. Black bears, mountain lions, small mammals, and numerous bird species are also found at this locality. Because of the importance of this area to wildlife, DWR would like to see as little surface disturbing activity as possible in this area.

We would support readjustment of this lease with the application of the special stipulations outlined. Application of these stipulations will help minimize impacts to local wildlife populations. We strongly support those stipulations calling for inventory and monitoring programs. DWR is particularly concerned with the effects of subsidence on wildlife. Subsidence should be monitored and any impacts to nesting raptors or water sources avoided.

Streams, seeps, and springs support riparian habitat, provide drinking water for wildlife, and provide habitat for fish and other aquatic life. Riparian zones are high quality wildlife habitat and, in the lease area, these zones provide critical habitat for the area's developing moose population. Each and every water source is an important resource for wildlife and

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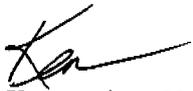
terms of the readjustment should include protection and enhancement of these sources. Readjustment of the lease with the application of the Special Stipulations would provide for this protection. We emphasize that Stipulation #17 be included to protect water sources that experience a depletion of flow that exceeds 50% of normal flow.

There are a number of golden eagle and other raptor nests in the lease area. Subsidence can result in the loss of nests due to escarpment failure. Annual raptor surveys should be continued to monitor the activity of nests and any impacts of subsidence. The inclusion of Special Stipulation #9 would provide measures to minimize and mitigate losses if there is any indication of habitat damage due to subsidence.

Within the lease the importance of habitats to deer and elk, as well as many other species, makes it imperative that Stipulation #14 be included in the terms of readjustment. Closure during crucial seasons of the year is an effective way to minimize the impacts of disturbance on wildlife.

In summary, we support readjustment of this lease with the inclusion of all of the Special Stipulations outlined in the scoping document. We appreciate the opportunity to provide comments on this action. DWR supports your efforts in managing mining operations for the protection of natural resources such as wildlife. If you have any questions regarding our comments, please feel free to contact me.

Sincerely,



Kenneth W. Phippen
Regional Habitat Manager

SR/lcl

Copy: Ralph Miles, DWR
Pamela Grubaugh-Littig, DOGM