0044

# State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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cc: MAW
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DIVISION OF
OIL GAS & MINING

June 22, 1993

Mr. James Carter, Director
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attention: Pamela Grubaugh-Littig
Permit Supervisor

Dear Pam:

The Division of Wildlife Resources has reviewed Cyprus Plateau Mining Corporation's application for an Incidental Boundary Change (IBC) associated with their Star Point Mine (Federal Lease UTU-64263). We have the following comments regarding this application.

Our primary concern is the impact on wildlife of any subsidence that may occur within the IBC. Subsidence can directly impact wildlife through the destruction of such habitat components as nest and roost sites, burrows, dens, and water sources. A wide variety of wildlife inhabits the proposed IBC area including deer, elk, black bears, blue grouse, raptors, and many small mammal and bird species. Any impacts to the habitat in this area will affect these wildlife populations.

We recommend that, prior to the approval of this application, Cyprus commit to including the IBC area in current subsidence monitoring programs. This should include the ground and surface water monitoring plan because, although no surface waters or springs are located within the IBC, subsidence can affect adjacent ground and surface waters. Water is a critical habitat component for wildlife. Mining within the IBC should not cause a reduction in the quality or quantity of water available to wildlife. Should subsidence result in a 50 percent or greater reduction in any water source, mitigation measures should be implemented to replace lost habitat values.

Cyprus has participated in annual raptor surveys of the current mining operation and permit areas. We recommend that the IBC area continue to be included in these annual surveys. This will help identify raptor nest locations and detect any impacts to these sites that may be associated with mining activities.

As no additional surface facilities are associated with the proposed IBC, we anticipate no significant impacts to wildlife other than those associated with subsidence. Including the IBC area in a subsidence monitoring plan will help identify and minimize any impacts to wildlife populations and their habitats.

We appreciate the opportunity to review this action. If you have any questions regarding our comments, please contact Ken Phippen, Regional Habitat Manager (637-3310).

Sincerely,

Timothy H. Provan
Director