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UNITED STATES DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
ECOLOGICAL SERVICES  
1311 FEDERAL BUILDING  
125 SOUTH STATE STREET  
SALT LAKE CITY, UTAH 84138-1197

(ES)

December 6, 1983

Dr. Dianne Nielson, Director  
Division of Oil, Gas & Mining  
State of Utah  
Salt Lake City, Utah

J. Smith  
File ACT/007/007  
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DIVISION OF  
OIL, GAS & MINING  
JIM

DEC 15 1983

Dear Dr. Nielson:

Jim Munson, Fish and Wildlife Service (FWS) biologist, attended a predesign meeting on November 4, 1983 for Kaiser Steel Company's plans for development of coal leases in the C canyon area near their Sunnyside mine. Also in attendance were representatives from the Company, Utah Division of Oil, Gas & Mining (DOGM), and Division of Wildlife (DWR). Several alternative mining schemes were discussed. The FWS would most support development through existing tunnels to minimize surface disturbance in C canyon.

The plan of development should include a discussion of wildlife resources that could be affected by the proposal. Wildlife resident and game species discussions should be coordinated with the DWR. The FWS has the responsibility to insure that adequate protection is provided for migratory birds and raptors. The FWS and Bureau of Land Management (BLM) through the Federal Coal Management Program recognizes twenty-two Migratory Bird Species of High Federal Interest in the Uinta-Southwestern Coal Region (Table 1). Inventories for those species should be conducted within 1/4 mile of proposed developments. Additionally, we recommend that all cliffs be surveyed for nesting raptors within 1 km of proposed developments. Also, water resources in the area are severely limited and all available surface water sources should be identified.

The plan should include a section of proposed mitigation for the wildlife and habitat losses that could be expected from the developments. We recommend that mitigation be concurrent with developments to insure the integrity of wildlife resources in the area throughout the life of the project. For example, if surface water resources will be disrupted, other sources should be developed for wildlife and vegetation dependent on it. The reclamation plan should stress wildlife habitat as a major goal and plant species selection and diversity should reflect that goal.

We strongly recommend that every reasonable precaution be taken to prevent or minimize surface disturbance in the relatively pristine C canyon. If it is not feasible to develop the resource totally through existing facilities, then the next best alternative would be to move coal through existing tunnels to the Sunnyide facility and only construct those facilities absolutely necessary to transport coal miners to a C canyon portal. This would eliminate the majority of the surface disturbance from conveyors, stockpiles, machinery, and building, and would eliminate the need for coal trucks frequenting the C canyon area.

This concludes our comments on the predesign meeting. Please feel free to contact our office if you have any further questions.

Sincerely yours,



Field Supervisor  
Ecological Services

cc: DWR, SLC, UT  
DWR, Price, UT  
OSM, Denver, CO  
BLM, Price, UT  
RO/ HR, Denver, CO