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MAR 24 1986

Moab District
Price River Resource Area
P. O. Drawer AB
Price, Utah 84501

DIVISION OF
OIL, GAS & MINING

6514
(U-066)

Mr. Martin P. Holmes
Manager, Permits & Regulatory Compliance
Kaiser Coal Corporation
102 South Tejon, Suite 800
Colorado Springs, Colorado 80901-2679

MAR 21 1986

Dear Mr. Holmes:

This letter will serve to summarize and document wildlife concerns discussed in a preplanning meeting and field trip on March 7 over Kaiser Coal Corporation's development of B and C canyon properties, or Kaiser's #5 mine. Also discussed will be concerns on the proposed county access to these properties. A list of participants in the meeting is included as attachment 1.

Resource values that could potentially be impacted by Kaiser Coal's proposed development include mule deer critical winter and winter range, big game migration patterns, and raptor nesting habitat, including golden eagles, prairie falcons and redtail hawks. Map 1 and 2 shows the distribution. Listed below are the potential impacts to these resources and recommendations regarding these impacts.

Mule Deer Critical Winter Range and Winter Range Areas:

Proposed location of access routes and facilities will result in displacement of mule deer from critical winter range as well as actual loss of habitat for the life of the mine.

- a. Quantify impacts in terms of total areas affected.
- b. Determine methods to minimize impact including consideration of off-site mitigation measures.

Big Game Migration Patterns:

Placement of facilities in C canyon including portals, access routes, bath house, parking area, etc., could potentially affect big game traditional movement patterns, principally mule deer and elk.

- a. Initiate studies to determine the importance of C canyon for migration movements. Studies may include belt transects and/or radio telemetry.
- b. Evaluate alternative sites for placement of facilities, such as the mouth of B and C canyons approximately .25 miles below proposed site.

Raptor Nesting Habitat:

The B and C canyon complex represents excellent habitat for cliff nesting raptors as does much of the permit area. Placement of facilities within close proximity to nest sites (if present) could result in failed nesting attempts or total abandonment of the nesting territory.

a. Conduct an aerial survey for nesting raptors of all nesting habitats within the permit area. The survey shall be conducted by trained professionals within the field approved by the Authorized Officer. A representative of the Authorized Officer will assist in conducting the aerial survey.

b. Utilize the baseline inventory data to establish monitoring studies to be conducted during the life of the Kaiser #5 Mine. Such studies should include annual status and production of raptor nests within the permit area and cliff nesting habitat failure from subsidence or other mining related activities.

Migratory Birds of High Federal Interest:

The presence of migratory birds of high federal interest should be determined for the B-C canyon area.

a. Conduct inventories in the spring-summer nesting period. Efforts may be combined with belt transects for monitoring big game movement patterns.

General Wildlife Habitat Protection Practices For Non-Game Wildlife Populations:

The B-C canyon area provides habitat to numerous non-game bird and other wildlife species. Construction activities often result in unnecessary impacts to these species.

a. In conjunction with other wildlife work, identify habitat features of notable importance to these species (ie. snags suitable for cavity nesting).

b. Discuss specific design to avoid potential impact to these habitat features.

For a discussion of the proposed vehicle access to B and C canyon properties, see attachment 1, a letter to Carbon County Commissioners discussing primary wildlife issues associated with the access route.

Sincerely yours,

/S/ DENNIS J. WILLIS

Area Manager

Retiring

cc: U.S. Fish & Wildlife Services
Ecological Services, Attn: Field Supervisor
2960 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

Utah Division of Wildlife Resources
Southwestern Regional Supervisor
455 West Railroad Avenue
Price, Utah 84501

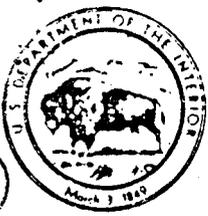
State of Utah Natural Resources Oil Gas & Mining
Permit Supervisor, D. Wayne Hedberg
Attn: Kathy Mutz
355 W. North Temple
3 Triad Center Suite 350
Salt Lake City, Utah 84130-1203

Kaiser Coal Corp.
Attn: Charly McGlothlin
P.O. Box 10
Sunnyside, Utah 84539

DHlls:lp:3/21/80:Mag II

Meeting @ Kaiser Coal March 7, 1986

Alan Czarnowsky	ACZ Inc	(303) 879-6260
Kathy Mutz	DOG M	801-532-5340
Bruce Waddell	USFWS	801-524-5649
David L Mills	BLM Price Office	801 637-4584
Martin P. Holmes	Kaiser	(303) 475-7005
Conrad Parrish	ACZ	303-879-6260



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
Price River Resource Area
P. O. Drawer AB
Price, Utah 84501

2810
(U-066)

Mr. Lee Semken
Chairman, Carbon County Commission
Carbon County Courthouse
Price, Utah 84501

Dear Mr. Semken:

We have reviewed your proposed access route for a county road (Kaiser Steel Corporation) to B Canyon. Your proposed route has merit, however we would like to propose an alternate route that would minimize impacts to mule deer winter range. The proposed alternative is shown on the attached map (figure 1). Reasons for selecting this alternate route are as follows:

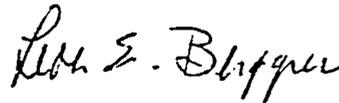
- a. The BLM proposed route would reduce impacts associated with displacement of mule deer. Alternative 2, the county's first choice travels through a habitat area providing both thermal and escape cover and forage in close proximity to each other. This association of habitat components is more important and supports a higher density of mule deer than habitat where only one component (ie forage) is available. The BLM proposed route travels through habitat which provides only one component, forage. The nearest cover averages 0.5 miles distance from the proposed route. This is generally recognized as a distance too great to be traveled under normal conditions by wintering mule deer on a daily basis.
- b. The route would reduce mule deer vehicle collisions. Due to the close proximity of cover and forage in the area of alternate route 2 a much greater likelihood of deer-vehicle collisions exists than in the area of the BLM proposed route. Mule deer generally travel less than 0.25 miles from cover when feeding, therefore, mule deer would cross the BLM proposed route less frequently than the alternate 2 route.
- c. The route would result in less surface disturbance than alternate 2. The route utilizes to a large extent an existing trail where surface disturbance has already occurred.

Please review our proposed alternate route and let us know if you have any major problems with it. Also enclosed are the minimum wildlife inventory requirements for the route that is selected. If you have any questions regarding specific requirements please contact David Mills, wildlife biologist, on my staff.

As soon as a route is selected you can file the right-of-way application. We will then meet with you to discuss the Plan of Operations required for the project.

Please contact me or Mark Mackiewicz if you have any questions.

Sincerely yours,



Leon E. Berggren
Area Manager

Enclosures (4)

- 1-Map
- 2-Inventory Requirements
- 3-Survey Guidelines
- 4-Evaluation Sheet

cc: Mr. Charley McGlothlin
Kaiser Steel Corp.

Minimum Wildlife Inventory Requirement for
Carbon County B Canyon Access

1. Conduct raptor nesting inventory of all wildlife habitat within one (1) mile of proposed access routes (legal description) listed below, map in figure 1. Inventory efforts should be targeted for tree, ground and cliff nesting habitats. Species known to nest in the area include golden eagles, prairie falcons, redtail hawks, ferruginous hawks and burrowing owls.

T. 15 S., R. 13 E., N $\frac{1}{2}$ Sec. 1, Secs. 3, 4 & 5, N $\frac{1}{2}$ Sec. 8, N $\frac{1}{2}$ Sec. 9, N $\frac{1}{2}$ Sec. 10;

T. 15 S., R. 14 E., N $\frac{1}{2}$ Sec. 6;

T. 14 S., R. 13 E., Secs. 14 & 15, S $\frac{1}{2}$ Sec. 16, SE $\frac{1}{4}$ Sec. 20, Secs. 21, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 35 & 36;

T. 14 S., R. 14 E., SW $\frac{1}{4}$ Sec. 30, Sec. 31.

a. Inventory shall be conducted by aerial survey during the nesting season when young of target species are 2 to 6 weeks old, May 15 to June 15. (Ground surveys, generally less productive than aerial surveys, may be substituted under the following condition: Entire inventory area must be surveyed three times on consecutive days).

2. Conduct prairie dog town inventory of all habitat within one (1) mile of proposed access routes (same legal description as item 1). Inventory work shall be conducted during periods in which burrows can be distinguished, less than 5 inches of snow cover. At minimum, the following data shall be collected for each town.

a. Total acres of habitat occupied by burrows.

b. Acres of habitat occupied by active burrows.

c. Count of active burrows.

3. Conduct black-footed ferret clearance on all prairie dog towns or complexes located within 0.5 miles of the proposed access route. Inventory procedures prepared by the U.S. Fish and Wildlife Service (attachment 1) shall be followed. Report survey findings on standard survey forms, also attached.

4. Conduct mule deer use evaluations on the proposed access routes. Evaluation will consist of pellet group transects along selected areas of each proposed access route (2 per route as shown in figure 1). Each transect shall parallel the route and will consist of 100 10 square meter plots spaced approximately 15 feet apart. Counts of both total pellet groups encountered and current years pellet groups shall be recorded on forms provided, attachment 2. Belt transects for track counts may be substituted for winter determinations of use but must be coordinated with the Authorized Officer.

5. Minimum standard for inventory work.

a. Inventory work shall be conducted by a qualified wildlife consultant, approved by the Authorized Officer of the BLM.

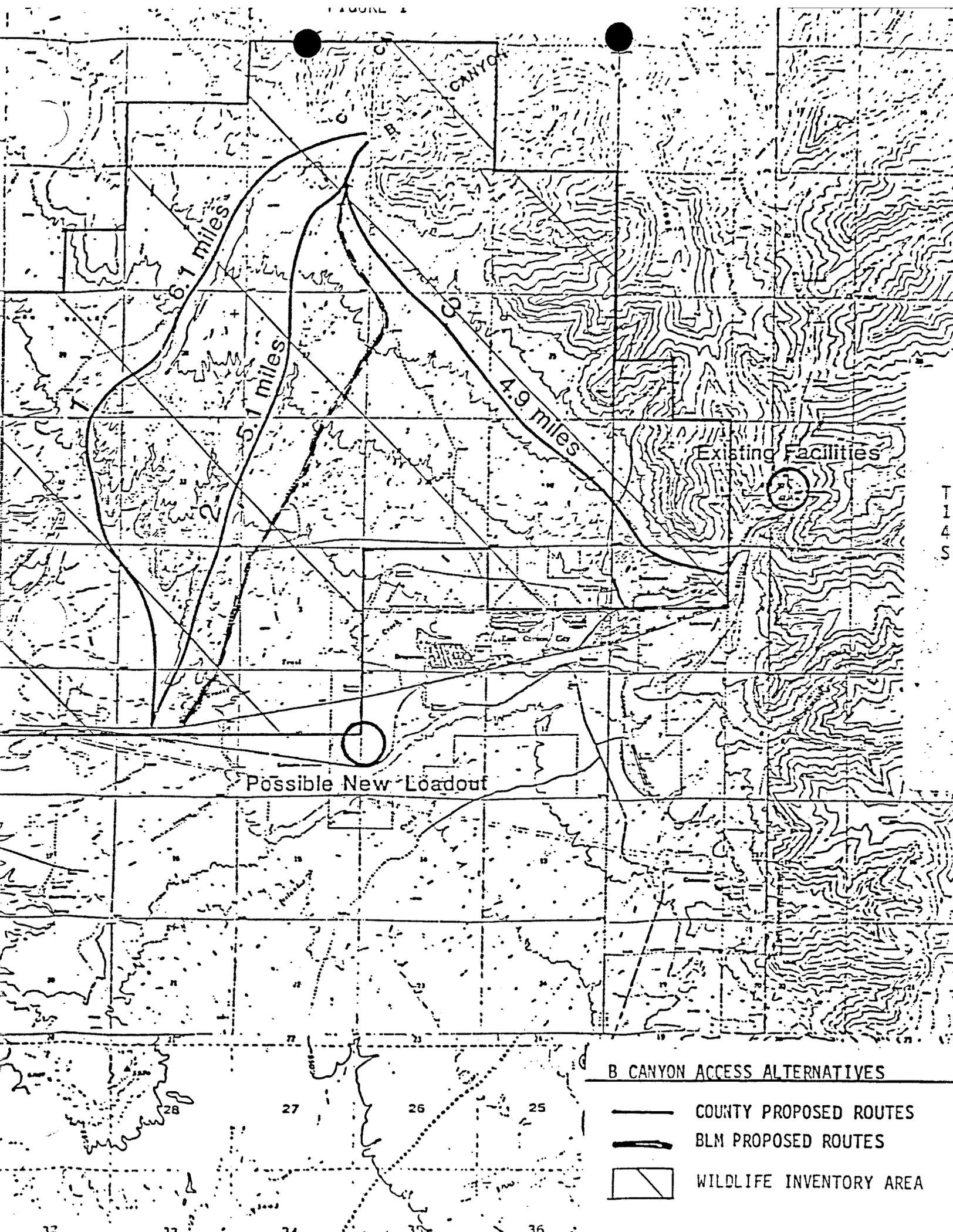
b. All inventory work shall be closely coordinated with the Authorized Officer. Specific coordination elements include; initiation of inventory, completion of inventory, significant finding (particularly with respect to black-footed ferret survey).

NOTE: Some inventory work has been completed in the project area and may be obtained from the Price River Resource Area Wildlife Biologist.

c. Report all inventory findings to the Authorized Officer, on forms provided with a detailed description documenting work completed. Use 7.5 minute topographic maps as base map showing all raptor nests and prairie dog towns.

d. Modifications or alternatives to the prescribed inventory procedures must be approved by the Authorized Officer.

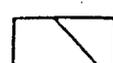
FIGURE 2



Existing Facilities

Possible New Loadout

B CANYON ACCESS ALTERNATIVES

-  COUNTY PROPOSED ROUTES
-  BLM PROPOSED ROUTES
-  WILDLIFE INVENTORY AREA

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S