



**State of Utah**  
 DEPARTMENT OF NATURAL RESOURCES  
 DIVISION OF OIL, GAS AND MINING

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May 3, 1994

TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist *PPB*

RE: Permit Renewal Postmining Land Use Issues, U. S. Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

## SUMMARY

U. S. Fuel Company previously proposed to reclaim the roads in the South and Middle Forks of Miller Creek to an unimproved condition. The basis for not fully reclaiming the roads was that they were needed for the postmining land uses of grazing, recreation, and wildlife. The proposed plan included justifications for the grazing land use but not for recreation or wildlife.

U. S. Fuel is now proposing that the roads would be left in their improved condition. To protect wildlife from disturbance during crucial times in the late fall through early spring, the gates would be locked.

Although the proposed plan adequately addresses the requirements for retaining the roads, it does not justify leaving them in their current, improved condition.

## ANALYSIS

U. S. Fuel has proposed that the roads in the South and Middle Forks of Miller Creek be left in the current condition to support the postmining land use of grazing. The roads are paved to a width of 24 feet, and the shoulders are about five to fourteen feet wide.

R645-301-553.400 says that cut-and-fill terraces may be allowed by the Division where roads are required for the approved postmining land use, in which case the final grading may include a terrace of adequate width to ensure the safety, stability, and erosion control necessary to implement the postmining land-use plan. It is clear from this regulation that the size of the terrace that may be left for the roads should be of adequate width for the road but that the Division may not allow a width greater than what is needed.

The roads are to be used primarily for access to lands used for grazing. Although the proposed additions to the plan include mention of possible logging operations, logging is not an approved postmining land use. U. S. Fuel has not shown that this use is feasible. The



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question, then, becomes whether roads used for grazing operations need terraces as wide as those presently being used for the mine haul roads. Unimproved roads used for ranching operations in Utah are generally one lane roads about fifteen feet wide.

In considering what degree of development may remain after reclamation, the Division must decide what roads are needed for the postmining land use, how the roads would be used, and how comparable roads in unmined areas are used. Making a comparison to unmined land in the area is implicit in the rules because the land use is being restored to what existed prior to any mining.

Canyons near Hiawatha without coal mines include Serviceberry Creek, Mud Water, Los Angeles, Seeley, Corner, First Water, Second Water, Bob Bishop, Bob Wright, Cedar Creek, Chris Otteson Hollow, and Fish Creek. According to 1978 and 1979 U. S. G. S. topographic maps and highway maps of Utah, none of these canyons has a paved road and only three have roads through any significant portion of their lengths.

Besides the requirements in R645-301-353.400 for reducing the road width to what is necessary for the postmining land use, R645-301-358 requires that the operator minimize disturbances to fish and wildlife and related environmental values. By committing to lock the gates during the late fall through early spring, U. S. Fuel has addressed the problem of disturbances to wildlife during crucial winter periods. However, the plan to leave the paved roads would not minimize disturbances to related environmental values, in other words habitat. Reducing the road widths and establishing vegetation in these areas would provide additional habitat and forage. According to Division calculations of road lengths, reducing the road widths to fifteen feet from the current widths would result in about 9.5 acres of additional area being vegetated.

## **RECOMMENDATION**

U. S. Fuel needs to commit to reclaim the roads in the South and Middle Forks of Miller Creek to the width and condition necessary to support the grazing postmining land use.



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TO: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Hydrologist *SMT*

RE: Renewal Response, Division Order 92A, U.S. Fuel Company, Hiawatha Mines, ACT/007/011, Folder #2, Carbon County, Utah

## SUMMARY

U.S. Fuel Company submitted a revised reclamation plan for the mine roads. U.S. Fuel's plans to keep all canyon roads as they are currently. This means that they would not remove the pavement in reclamation. All drainage structures would also remain.

## ANALYSIS

There is much maintenance required for the canyon road at the Hiawatha Mines. Particularly, the road ditch that runs along the north side of the Middle Fork road has needed much work to keep it from eroding the side slope. Currently there are rock check dams in place to decrease the energy in the water flow that have been effective at controlling this erosion; however, diapason of soil has nearly covered these check dams in a relatively short period (implemented in August 1992). U.S. Fuel must design a plan that would stabilize the ditch and require less maintenance over a long period for this ditch if they plan to leave the road for the postmining land use.

An other alternative is to remove the pavement leaving behind only a gravel or dirt road. Drainage off an unpaved road could be better controlled to avoid erosion. A dirt or gravel road would be more proper for the proposed postmining land use of livestock and wildlife grazing because it would include less disturbance and require less maintenance.

## RECOMMENDATION

I recommend that U.S. Fuel explore the removal of the pavement from the canyon roads, because the unimproved road would be more suitable for use in the postmining land use. A paved road is more disturbance than is necessary for the post mining land use. (See Paul Baker's memorandum dated May 3, 1994.) However, if U.S. Fuel is allowed to leave



the pavement after reclamation, they must consider designing and implementing a plan to stabilize the drainage ditches on a long term basis.

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