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U.S. FISH AND WILDLIFE SERVICE
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

September 2, 1983

JIM
SEP 20 1983

MEMORANDUM

TO: Acting Deputy Administrator
Office of Surface Mining
Denver, Colorado
Attention: Don Henne

FROM: Field Supervisor, Ecological Services
Fish and Wildlife Service
Salt Lake City, Utah

SUBJECT: Review of Gordon Creek No. 2 Mine Plan, Beaver Creek Coal
Company (UT-0010, 0042 & 0043)

WESTERN TECHNICAL CENTER
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OSM-WTC

We have reviewed the Gordon Creek No. 2 mine plan for completeness and technical adequacy. We have, for the most part, found the plan complete and adequate in reference to the wildlife section and mitigation plan.

The mine and reclamation plan is well organized and has good quality wildlife maps within the text for easy reference. Habitat categories are well defined and the Company recognizes the importance of riparian habitat and has made a commitment to its protection (pp. 10-28 and 10-89).

A correction should be made in the fish and wildlife monitoring section and (10.7) of the plan. Page 10-94, number (3) states that the Fish and Wildlife Service (FWS) will conduct "spring surveys of the site... to identify any potentially active raptor nests". That information is incorrect. Service funding levels precludes this office from engaging in this type of activity. All necessary surveys and monitoring programs are the responsibility of Beaver Creek Coal Company.

A second issue that should be addressed in the plan is snow removal from the mine development area and the coal haul road. The FWS recommends that all snow removed should be stored above the sediment ponds (the ponds should be designed to handle additional storage) to prevent additional siltation or coal sediments from contaminating the affected drainages.

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In conclusion, we have generally found the Gordon Creek No. 2 Mine and Reclamation Plan to be a good model to review other mine plans by. The Company has "done their homework" well and should be commended for it. Adequate literature review and site-specific inventories have been included. The mitigation plan addresses its commitments to wildlife issues specific to the mine plan area.

This completes our review of the Gordon Creek No. 2 Mine plan. We recommend approval of the plan in regards to meeting fish and wildlife needs. Please feel free to contact the FWS, Energy Operations staff in Salt Lake City, Utah (FTS-588-5649) if you have any further questions. Thank you for the opportunity to comment on the plan.



cc: OSM, Denver
DWR, SLC
DWR, Price
RO/HR, Denver