

March 4, 1986

TO: Coal File

FROM: *jm* John J. Whitehead, Permit Supervisor/Reclamation
Hydrologist

RE: Status Change on Class I Road, Beaver Creek Coal
Company, Gordon Creek #3 and #6 Mine, INA/007/017, #2,
Carbon County, Utah

This memo is to document a decision regarding the Class I haul road which traverses from the main Gordon Creek Road up Coal Canyon to the Gordon Creek #3 Mine site.

Section 3.2.10 of the reclamation mine plan for the above-noted mine proposes to downgrade the Class I road to a Class II road in accord with the proposed postmining land use. Some concern has been voiced during the review that UMC 817.150 and .156 do not specifically allow the status of a road to be changed from Class I to Class II.

No regulation prohibiting the downgrading of Class I roads to Class II roads exists in the Utah program assuming a change in use of the road has occurred and it is no longer used for coal haulage. Further, the proposed postmining land use in this case does not involve activities which would necessitate retention of the road at Class I standards. Lastly, to downgrade the road to Class II is consistent with environmentally sound practices to minimize the extent of disturbed area.

Based on the above items, it is concluded that downgrading of the Class I road leading to the Gordon Creek #3 Mine site to a Class II is appropriate and within the framework of the Utah regulations. It should be stressed that compliance with all applicable Class II road retention regulations must be achieved. This will likely involve a narrowing of the road with subsequent reclamation of the unused section.

The substance of the above supporting items and conclusions were discussed with Barbara Roberts on February 13, 1986 and is consistent with her informal reading on the matter.

btb
cc: Dan Guy
Lowell Braxton
Pam Grubaugh-Littig
Wayne Hedberg
Sue Linner

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