



STATE OF UTAH  
NATURAL RESOURCES  
Wildlife Resources

1596 West North Temple • Salt Lake City, UT 84116-3154 • 801-533-9333

ACT/007/018  
orig memo file  
cc S Linner  
Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
William H. Geer, Division Director

November 20, 1986

RECEIVED  
NOV 21 1986

DIVISION OF  
OIL, GAS & MINING

Dr. Dianne R. Nielson, Director  
Utah Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt lake City, UT 84180-1203

Attn: Susan Linner

Dear Dianne:

The Division has evaluated Sunedco Coal Company's October 24, 1986 response to Determination of Completeness Review for a Mining and Reclamation Plan at their Soldier Canyon mine. Mitigation for impacts to wildlife still need to be strengthened. The following is offered for your consideration.

Division of Wildlife Resources' comments provided 11-17-86, remain valid. Note that the applicant is now discussing mitigation (page 4-79 as revised 10-24-86) to critical value deer winter range. At this point in time, they are only committing to 3 acres of enhancement as compensation for 22.2 acres lost. Such would be unacceptable and our earlier recommendations for 66 acres enhanced remains valid.

Thank you for an opportunity to review and provide comment.

Sincerely,

William H. Geer  
Director



STATE OF UTAH  
NATURAL RESOURCES  
Wildlife Resources

Norman H. Bangerter, Governor  
Dee C. Hansen, Executive Director  
William H. Geer, Division Director

1596 West North Temple • Salt Lake City, UT 84116-3154 • 801-533-9333

November 17, 1986

RECEIVED  
NOV 21 1986

DIVISION OF  
OIL, GAS & MINING

Dr. Dianne R. Nielson, Director  
Utah Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

Attn: Susan Linner

Dear Dianne:

The Division has evaluated Sunedco Coal Company's August 8, 1986 permit application additions for a Mining and Reclamation Plan at their Soldier Canyon mine. Mitigation for impacts to wildlife need to be strengthened. The following is offered for your consideration.

Page 3-250, 3.10.4 and Page 4-76, Replacement of high value habitats.  
Post SMCRA -- The mine has or will destroy 22.2 acres of shrub/grass/juniper vegetation type (Page 3-171 and 3-172) for development of sewage lagoons and a waste rock disposal area. The impacted areas are of critical value to wintering mule deer and produce 1,200 lb/acre of understory forage (Page 3-185). Loss of critical valued habitat is substantial and requires mitigation. It is recommended that the company develop a 66 acre vegetation enhancement project in an area proximal to the proposed rock waste disposal site. This would represent 3 acres enhanced for each acre lost. Such a project must be committed to in its entirety during the first year of permit approval. Although the company will only impact two to three acres per year, the mitigation must occur prior to damage due to critical valued nature of the winter range.

Page 4-64, 4-66 and 4-67 -- If subsidence or other mine related impacts diminish daily flows by 50% at any seep or spring, the water must be replaced for use by wildlife. Guzzlers are an acceptable form of mitigation.

Page 4-75, Timing of major disturbances -- Due to the critical nature of the waste rock disposal area, construction should be disallowed between December 1, and April 15. This will avoid impacts to wintering big game.

Dr. Dianne Nielson  
Attn: Susan Linner  
Page 2  
November 5, 1986

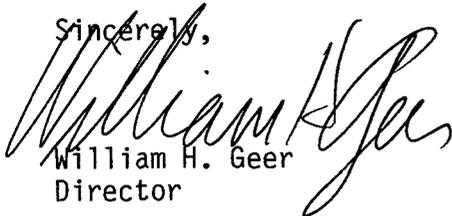
Page 5-32, 5.5.4 -- If tests determine fertilizing amenities are needed to prepare the soil for planting, the following technique is recommended. Phosphate (P) and potassium (K) elements should be disced into the top soil mass. Fifty percent of the nitrogen (N) requirement should be broadcast at the time of seeding and the remaining 50% the following fall.

Note that only nitrogen fertilizer should be broadcast. The MRP identifies an intent to broadcast all soil amendments on page 5-92, last paragraph, and phosphorus on page 5-59, second paragraph.

As per our April 30, 1986 comments (Page VI-1 through VI-6), the MRP does not identify wildlife training in their training schedule.

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,



William H. Geer  
Director