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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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Orig mine file
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August 16, 1990

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

Dear Dianne:

In response to the Blue Blaze Coal Company's Mine Plan, the Division has the following comments.

Revegetation plans for disturbed areas should incorporate a diverse seed mixture that includes at least six species each of grasses, forbs, and shrubs. The seed mix prescribed on 3-55 (Table 3-3) is lacking in forb species. At least three more species should be added: Northern sweetvetch (Hedysarum boreale), Longleaf phlox (Phlox longifolia), Porter licoriceroot (Ligusticum porteri), Trailing daisy (Erigeron flagellaris), and Pacific aster (Aster chilensis) could be included. In addition, containerized stock should be planted at a rate of 2,500 plants/acre instead of the proposed 1,200 plants/acre (Page 3-56, Table 3-3).

Runoff from disturbed areas at the mine site will be collected in a sedimentation pond located just below the disturbed areas. Page 7-56 states that collected sediment will be cleaned from the pond as necessary. However, in accordance with UMC 187.45, sediment should be removed from the pond when the volume of sediment accumulates to 60 percent of the design storage volume.

The value of the mine area to wildlife should include critical elk summer range. The mine plan currently ranks elk summer range as high-priority valued (10-20). Plate 10-6 should also be adjusted to show critical elk summer range in the area now mapped as high-priority elk summer range.

Seeps or springs providing flow during periods when wildlife are present represent a critical valued resource to all of the local area's wildlife. The mine plan (10-55) stipulates that there is no plan to replace water lost due to disturbance of springs or seeps because of the abundance of alternative water sources in the vicinity.

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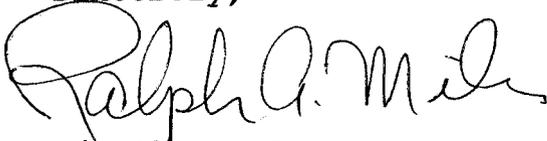
Most wildlife have small and limited home ranges. As a result, when one of these critical valued aquatic resources is lost, the animal does not have the physical capability of "packing his bag" and moving to another area of acceptable habitat. Those few species that have such a physical capability usually find the home ranges in adjoining areas already filled to capacity. It is for that reason that the Division holds firm to the philosophy that each and every seep and spring is a critical resource for wildlife.

In the event that coal mining results in disturbance that impacts the flows at seeps and springs, mitigation is anticipated. An impact would be deemed substantial if the daily flow from a seep or spring was reduced by 50 percent or more. Mitigation that would be expected is simply the replacement of the water. Unquestionably, there would be many techniques that could achieve this goal: guzzlers are considered to be the most effective technique. They should be fenced with a 3-rail/pole fence having a maximum height of 42 inches. Clearance between the ground and the bottom pole, as well as space between the top two poles, should be at least 14 inches. This will allow passage of wildlife while disallowing domestic livestock.

Although bald eagles are not known to nest in the project area, there are two currently used nesting sites in Utah along the Colorado River. Page 10-25 (paragraph 3) must be corrected as it gives only historical reference to bald eagles nesting in Utah.

Thank you for the opportunity to review and provide comment.

Sincerely,



for
Timothy H. Provan
Director