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DIVISION OF WILDLIFE RESOURCES

EQUAL OPPORTUNITY EMPLOYER

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

DOUGLAS F. DAY  
Director

Sim

July 16, 1981

Mr. Cleon B. Feight, Director  
Division of Oil, Gas and Mining  
1588 West North Temple  
Salt Lake City, Utah 84116

Dear Jack:

The Division has reviewed the Mining and Reclamation Plan (MRP) for Blazon Company's Blazon No. 1 Mining Project. The review comments are enclosed.

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

Sincerely,

*Douglas F. Day*  
Douglas F. Day  
Director

Acting Director

Enclosure

UTAH DIVISION OF WILDLIFE RESOURCES' REVIEW COMMENTS ON THE MINING AND RECLAMATION PLAN (MRP) PROPOSED BY BLAZON COMPANY FOR THE BLAZON NO. 1 MINE

*JSM: SPRINGS*

Page III-3, 3.2.5 - The MRP does not demonstrate that the support towers, serving the mine plan area are safe of raptors.

*W. J. Smith*

Page III-15 and 14, 3.4.3.2 - The MRP does not discuss potential negative impacts to flows at seeps and springs due to subsidence.

Page III-16 and 17, 3.4.6.1 - Impacts to wildlife will also include a zone, specific to each individual specie, that surrounds the mine plan area that the animals may no longer utilize due to disturbance by man.

Page III-17, 3.4.6.3 - To whom will reports relative to roadkills of wildlife be submitted. Also, at what interval will these reports be made.

Page A-26 through A-28 (Revegetation) - The MRP is not definitive in just how much seed or which species of vegetation will be utilized in final reclamation work. There are no forbs in the seed mixture. Since the area to be reclaimed is summer range for big game, a diverse forb mixture should be part of the seed perscription. Planting rates for seedlings of trees and browse should be at a rate of at least 400 plants per acre for each class of vegetation.

Chapter 7 - The MRP fails to discuss mitigation plans relative to snow removal and road maintenance that will preclude snow contaminated with coal particles or other mine related debris from reaching any perennial stream.

Chapter 9 - The MRP is currently lacking in habitat information that the applicant was directed to provide as per the guidelines for such issued on 6/11/80 by OGM.

Chapter 10 - The fish and wildlife resource information is deficient as compared to that the applicant was directed to provide as per the guidelines for such issued on 6/11/80 by OGM. The Division of Wildlife Resources can provide much of that information upon the applicant's request. However, raptor surveys and surveys for other avifauna having high federal interest will require the services of a consultant.

The Fish and Wildlife Mitigation Plan presented in the MRP is a verbatim copy of the Division of Wildlife Resources' recommendations to the applicant. If the applicant intends to adopt each recommendation, this section of the MRP will need some modification to show it to be a definitive plan. For example, descriptions such as "must be", "could be" and "need to be" accomplished must be changed to read "will be" or "shall be" accomplished.

UTAH DIVISION OF WILDLIFE RESOURCES' REVIEW COMMENTS ON THE MINING AND RECLAMATION PLAN (MRP) PROPOSED BY BLAZON COMPANY FOR THE BLAZON NO. 1 MINE

- Page III-3, 3.2.5 - The MRP does not demonstrate that electric transmission support towers, serving the mine plan area are safeguarded for protection of raptors.
- Page III-15 and 14, 3.4.3.2 - The MRP does not discuss mitigation for potential negative impacts to flows at seeps and springs due to subsidence.
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