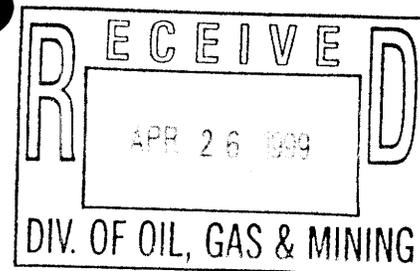




State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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15 April 1999

Lowell Braxton, Director
Division of Oil, Gas, & Mining
1594 W. North Temple #1210
PO Box 145801
Salt Lake City, UT 84114-5801

ACT/007/033 #2
Mary Ann, Pam,
Daron

RE: Wildcat Coal Loadout Permit

Dear Lowell,

The Division of Wildlife Resources has reviewed the permit documents for the Wildcat Coal Loadout and have the following comments:

The location of the Wildcat Loadout is on High Priority big game winter range and adjacent to our Gordon Creek Wildlife Management Area. The area immediately around the loadout is heavily used by wintering big game. We are concerned about the number of big game animals killed by truck traffic on the road to and from the coal loadout. Vehicle speed is the determining factor in the majority of wildlife-vehicle collisions. We request that haul truck speed be regulated to 45mph to minimize collisions.

Additionally, we are concerned about the coal fines which blow off the coal piles and cover surrounding areas. We have identified an area of approximately 60 acres around the loadout which have markedly darker soils and in which the sagebrush is in poor condition. We believe that this is due to the coal fines which have blown off the piles and coat both the snow and soils. We believe there are two factors which affect sagebrush. First, the blackened snow melts more quickly, which in turn causes the ground to dry out earlier in the season. Secondly, the coal fines darken the soils, which leads to an increase in soil temperature to a level that the sagebrush cannot tolerate.

As mitigation for this impact we would be interested in seeding into the area a mixture of salt desert shrub species which are more temperature and drought tolerant, but would still provide quality browse for wintering big game. We suggest that several small plots (<3 acres) be tested first to see if such a seeding would work in this area. Thank you for your consideration of these comments. If you have any questions regarding these comments, please call Chris Colt (Habitat Biologist) at 435-636-0279.

Sincerely,

Miles Moretti
Regional Supervisor