



There are several items under the revegetation plan that we believe should be clarified. First of all, the reclamation plan indicates that no back-filling would be required. The removal of materials from the mine portal has left a semi-high wall situation. These areas cannot be recontoured for revegetation without a lessening of the slope. This would require additional vegetation disturbance unless back-filling of these slopes to some reasonable degree was to be accomplished.

There has not been any top soil set aside for revegetating the area on the completion of operation. At one point in the report, they suggest they dig top soil from the canyon bottom for use in revegetation; however, there is no discussion of the impact of removal of the top soil in the canyon bottom area. This certainly should be clarified, and in fact, we question that this would be a desirable approach to excavate an additional area in this canyon to acquire top soil.

The plan indicates there will be soil compaction on the areas as they are reclaimed. The method of compaction and the degree should be clarified. Too much soil compaction can be detrimental to proper revegetation.

The planting mixtures listed in the plan have been provided by the Forest Service. We question the planting mixture proposed since there are only grasses included, and they are all non-native types of vegetation. The pre-mining vegetation consisted of trees, shrubs, and forbs in addition to the grasses. We recommend the mining plan be modified to include a vegetational planting program that includes native species and a spectrum of the various plant types, such as trees, shrubs, and forbs.

The mining plan should be modified to reflect the fact that disturbed areas also include the roads used for the mine. Therefore, it would be expected that these areas would be rehabilitated at the completion of their use, and we recommend that at the time of abandonment, the option to obliterate the mine haul roads should be maintained as a part of the reclamation plan. Access to this mine area may not be desirable from a game management standpoint.

One of the problems occurring in some areas is the increased collision of mine traffic with wildlife, particularly the large game species. According to the mine plan, the road from the Huntington Canyon highway to the mine portal has been designed for a speed of 25 mph. We would recommend that this speed be stipulated in the mine plan and the road so posted. There seems to be a correlation between the speed of vehicles and the incidence of collisions of game species. The larger haul vehicles which are normally traveling at a slow speed in the neighborhood of 25 mph are not having a great incidence of wildlife collisions as are those vehicles traveling at higher speeds. Also, during those times of the year when deer are concentrating in the vicinity of the haul

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roads, it would be desirable to eliminate as much vehicle movement during the dawn and dusk hours when these animals are most active. Of course, limitations of vehicular movement at night would also aid in the prevention of road kills of wildlife.

We understand the road to Swisher No. 4 portal is not in compliance with the Office of Surface Mining Regulations because of excessive grade. To meet grade requirements would cause considerable additional disturbance of native terrain. The Fish and Wildlife Service would recommend that a variance to this particular regulation at this mine be granted to preclude any additional degradation of habitat.

The creek in Mill Fork Canyon which provides access to the mine portal is being subjected to some pollution from coal particles. This may be coming from one of two sources. First, it may be coming from the haul trucks traveling down the canyon spilling coal on the road which is then washing into the creek. We would recommend all haul trucks leaving the load-out area be covered and remain covered until they reach the unloading facility. Second, the coal that is appearing in the creek may be resulting from runoff of the load-out areas. This could be corrected through the installation of proper runoff control facilities in those areas.

In Exhibit 30, we found no mention of settling ponds to be established in the location just below the load-out area. The mine plan does include plans for the construction of these sedimentation ponds. During our last visit to this mine area in November, we could not find that such a structure is in existence or in the process of being constructed. We recommend that some method be initiated to prevent the deposition of coal materials from the mine yard or load-out area in the drainage area since this creek is tributary to Huntington Creek which does contain a viable trout fishery.

The discussion provided in the mining plan for the Swisher Coal Company C.V. spur unit train load-out area is not up to par to what should be expected for future presentations. However, the impacts to wildlife resources appear to be limited. The buildings and railroads have been placed in an area of low-quality wildlife habitat and has not infringed on agricultural-type lands of higher wildlife value. Sedimentation ponds will be built on the low end of the yard area to prevent any runoff from the work area entering the Price River drainage. There will be a recontouring of a refuse pile at the completion of need. A specific reclamation program for this area is lacking. However, because of the nature of its development, the life of this particular facility may be indefinite and discussions of reclamation be inappropriate. This point should be made clear in their presentation; and if this is not a true fact, then a reclamation plan for this area should be included in the mining plan.

This completes our comments regarding the Swisher Coal Company No. 4 Mine. We want to thank the Office of Surface Mining for providing the opportunity to review and provide comments for your consideration. We would welcome the opportunity to participate in any exercise like this in the future.

cc: Regional Office  
DMR  
Office, Oil, Gas, and Mining ✓  
Forest Service  
Official File  
Reading File

CDJohnson/aie: 12-12-78