Enclose copy w/Attached letter to OSM. Thx. JIM

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO—UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

IN REPLY REFER TO: (ES)

October 9, 1981

RECEIVED
OCT 15 1981
DIVISION OF
OIL, GAS & MINING

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

Dear Mr. Feight:

This letter is written in response to your request that the Fish and Wildlife Service (FWS) assist in determining hazardous distribution lines on coal mine lands of Utah. This request was made because large numbers of eagles and other raptors have been electrocuted on distribution lines throughout Utah. Moreover, various state and federal regulations require mining companies to design powerlines safe for raptor use.

During the week of August 24-28, 1981, Ron Joseph of my staff met with representatives from eight of nine mining companies near Price, Utah, to conduct a field examination of distribution lines traversing coal tract areas. A comprehensive examination of all mine site powerlines will be completed by February 1982 and you will be notified by letter after FWS completes its examination. Consequently, this letter pertains only to the nine companies addressed below.

In general, hazardous powerline configurations were observed in valleys rather than in canyons where most mining activity is located. Many of the lines maintained by coal companies do not meet raptor electrocution preventive standards. However, they do not pose a threat to eagles and other raptors because, with few exceptions, the lines are not being used by raptors. While inspecting powerlines with company personnel, segments of potentially hazardous distribution lines were walked to determine the extent of raptor use. No sign of raptor excrement or prey remains were noted on the crossarm or at the base of the pole of any coal company powerlines.

Several factors account for the relative low incidence of raptor use of mine site powerlines. Distribution lines in canyons with mining activity receive little raptor use because birds prefer to perch on the dominant, most prevalent perch site. These consist mainly of rocky outcroppings and trees near the rim of a canyon. The majority of raptors in canyon habitat use thermals and updrafts which provide them with an energy efficient means of "riding" air currents over ridges and high meadows during foraging activities. In addition, most powerlines parallel mining roads which are generally located at the bottom of the canyon.

Hence, they are not the most elevated perch site and their close association with vehicle disturbance and mining activities renders them of little value to raptors. Furthermore, live and dead coniferous trees are usually quite numerous in the canyons near Price and raptors prefer to perch on natural structures rather than powerpole crossarms. Some of the higher elevation mine electrical lines are located between 8,000 and 8,500 feet. These do not pose a serious threat to raptors during the winter because heavy snowfall at these elevations reduces raptor activity as prey becomes scarce.

Utah Power and Light (UP&L) rather than coal companies are responsible for the safety maintenance of line configurations on Bureau of Land Management (BLM) administered lands near Price. My raptor biologist suspects that the majority of lines which are electrocuting eagles in Central Utah are located in the relatively flat sagebrush valleys. These lines are operated and maintained by UP&L and are not within the permit boundaries of the mines examined. For example, Kaiser Steel obtains its energy from a UP&L line in Clark Valley. The 46 kV line in this valley poses an electrocution threat to raptors because the habitat is considerably different from the canyon topography and raptors are more inclined to use the line as a perch. This is due to a lack of natural elevated perch sites. Raptor electrocutions are compounded along this line as migrant eagle populations increase during the winter months. FWS will examine the powerline this winter and if eagle carcasses are collected we will meet with UP&L to insure that the configuration is modified. We do not expect a problem with Kaiser Steel but we will also inspect their lines since it is in close proximity to the Clark Valley line.

All existing lines were examined for the following companies:

1. Beaver Creek Coal Company lines for Gordon Creek Number 2, 3 and Huntington Canyon Number 4. FWS does not recommend altering the design of any lines.

2. Kaiser Steel obtains its energy from a UP&L line in Clark Valley. FWS does not recommend modifying the Kaiser line; however, it will be examined this winter since a 46 kV line in Clark Valley is a threat to eagles.

3. Soldier Creek Mining Company line was examined and FWS does not recommend configuration modification.

4. The U.S. Steel Company mines were examined and FWS found no evidence to recommend modifying its powerlines.

5. The Plateau Mining Company lines were examined for the Star Point mine. Its lines do not pose a threat to raptors. However, a 13.2 kV line maintained by UP&L supplying power to the Star Point Mine will be examined this winter since it crosses sagebrush habitat.

6. Blazon Company Number 1 mine also appears safe for raptors. The mine is located above 8,000 feet and would receive little raptor use.

7. Valley Camp mine is above 8,000 feet and we suspect that it also poses no problem since very few raptors winter at this elevation.

8. U.S. Fuel lines at Hiawatha were examined on foot and by automobile. Due to their locations at the bottom of the canyon and close proximity to roads and mine sites, they are rarely used by raptors. FWS does not recommend any modification of their lines.

9. All existing lines of Price River Coal Company mines were examined. These include the lines at mine Numbers 3, 5, and 6. We do not recommend modifying any of these lines.

In closing, FWS does not expect a raptor electrocution problem on any of the forementioned coal company lines. Consequently, we do not recommend modifying any lines at this time. However, FWS will spot check these lines in February to determine the extent of use by wintering raptors. Specific poles could be modified if an isolated case of an eagle electrocution occurs on any companay lines. Increased measures could be taken to correct any unexpected "hot spots" should they develop.

Powerline maps for each company are located at our Salt Lake City office. Ron Joseph would be available to meet with members of your staff if you would like line locations transmitted to your maps.

Sincerely yours,

Robert M. Jacobsen

Acting Area Manager