FILE ACT/015/004 #2

Copy to: Steve Mary

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UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138-1197

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APR 17 1984

DIVISION OF OIL GAS & MINING

(ES) April 13, 1984

MEMORANDUM

TO: Acting Deputy Administrator
Office of Surface Mining
Denver, Colorado
ATTN: Mark Humphrey

FROM: Assistant Field Supervisor
Ecological Services

SUBJECT: Review of Mining and Reclamation Plan - Huntington Canyon No. 4 Mine, Beaver Creek Coal Company, UT 0004, Regarding Response to Technical Adequacy

This response constitutes the results of our review of the Company's response to the Technical Analysis of the Mining and Reclamation Plan (MRP) for the Huntington Canyon No. 4 Mine, Beaver Creek Coal Company. Our analysis addresses those issues raised in our letter of September 30, 1983 that may not yet be resolved.

The Fish and Wildlife Service (FWS) would appreciate a review by your office of the Company's response to Division of Oil, Gas and Mining's stipulation UMC 817.97-4-SC. The Company states there will be no impact to the cliffs from subsidence. These cliffs provide valuable nesting substrate for raptors. Is there the potential that ground movement caused by subsidence will fracture or otherwise cause cliff failures and accelerate structural decomposition? If so, the Company should address this issue. We must rely on your expertise to evaluate their response.

The Company should modify map 10-8 to reflect the presence of golden eagle nests as per our last letter. The Company should indicate on this map, as they have for other species, the general location of the nest by indicating the buffer zone within which they will modify their surface activities, if any exist, during the period February 1 - July 1.

Regarding stipulation UMC 817.97-6-SC, the Company should state they will replace lost water from springs and seeps interrupted due to their activities. Although there may be disagreement on whether every wet spot should be mitigated, the FWS believes that if sources of wildlife drinking water are lost that affect their distribution, e.g. 0.125 mile radius, or support lush vegetation in the range of 0.25 acre or more, provisions should be made to mitigate those impacts. Mitigation could include guzzlers, wells, and riparian enhancement.

This completes our review of the Company's response to Technical Adequacy. Please do not hesitate to call us if clarification is required or changes in the MRP require additional review.

cc: DWR, Price, Utah
DWR, Salt Lake City, Utah
RO (HR), Denver, Colorado
DOGM, Salt Lake City, Utah