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STATE OF UTAH
NATURAL RESOURCES & ENERGY
Wildlife Resources

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FILE

ACT/015/004 #2

J. Smith
Mary

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Douglas F. Day, Division Director

Copy to:
Steve
Mary

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APR 20 1984

DIVISION OF OIL
GAS & MINING

April 4, 1984

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

JIM

APR 23 1984

Dear Dianne:

The Division has evaluated Beaver Creek Coal Company's Response to the Draft Technical Analysis (RDTA) dated January 24, 1984.

Enclosed are the Division's specific comments and recommendations. Generally, the company has failed to adequately address specific comments that OGM raised concerning protection and mitigation of wildlife habitat on Beaver Creek's Huntington #4 mine property.

Thank you for the opportunity to review the RDTA.

Sincerely,

Douglas F. Day
Director

DFD:db

Enclosure

UTAH DIVISION OF WILDLIFE RESOURCES'
REVIEW COMMENTS ON THE RESPONSE TO THE DRAFT TECHNICAL ANALYSIS
OF BEAVER CREEK'S HUNTINGTON #4 MINE

Stipulation UMC 817.97-(1-6)-SC

No. 4. Beaver Creek's response (Sec. 10.5.1.2; p. 10-67) that subsidence of the cliffs in this area is "possible ..." but "... unlikely" does not address the specific question of protecting the cliffs from such subsidence. Specific measures for preventing such an occurrence should be outlined as requested.

No. 6. The applicant has not committed to the replacement of drinking water or riparian-wetland habitat at seeps and springs in 3.4.8.3 should they be interrupted by mining. The discussion of large mammals in sec. 10.5.1.1, p. 10-66, ignores the fact that many wildlife species, far less mobile than deer and elk, would be negatively impacted by the loss of resources associated with any springs or seeps. The Division considers all springs and seeps critical habitat and would expect mitigation should depletion or interruption of flows occur.

Stipulation 817.111-117-(1-2)-SC

No. 2 (Sec. 3.4.5., p. 3-34, Table 3-1). The Division recommends that rubber rabbitbrush (Chrysothamnus nauseosus var. albicaulis) be eliminated from the seed mixture. Rabbitbrush is an invader species and will establish itself without seeding.

p. 3-34a, Table 3-2: Tree Seedling Stocking Rates. The Division recommends that pinyon pine and Rocky Mountain juniper be eliminated from the seedling stocking rate. Wildlife needs would be better served by replacing juniper and pinyon pine with equal plantings of big sagebrush and bitterbrush and maintaining the proposed 310 plants/ac.