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File ACT/015/009

To: Jim

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U.S. Fish and Wildlife Service
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125 South State Street
Salt Lake City, Utah 84138-1197

March 3, 1982

DIVISION OF
OIL, GAS & MINING

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JIM

MAR 10 1982

MEMORANDUM

TO: Acting Deputy Administrator, Technical Service Center West
Office of Surface Mining
Denver, Colorado
Attention: Shirley Lindsay

FROM: Acting Area Manager, Fish and Wildlife Service
Salt Lake City, Utah

SUBJECT: Mine Plan Review, Trail Mountain Mine, Natomas Trail Mountain
Coal Co. (ACT/015/009)

The Trail Mountain Mine Plan was reviewed for completeness and technical adequacy. Since the plan is for a mine that has been operating under the current design for the last six years, it was reviewed accordingly. Current mining activities and reclamation were emphasized.

In Section 9.7 (pp. 9-30) two options of reclamation are proposed, one using existing soil, the other using supplemental soil to augment the existing soil. The plan does not explain where the supplemental topsoil would be purchased. This option could create another problem by reducing the productivity of the site where topsoil was taken. Therefore, the Fish and Wildlife Service (FWS) would support the first option, using existing soil.

Wildlife information in Chapter Two was quite detailed and well presented. Assumptions on raptor use of the area, however, are in error. The wildlife plan refers to a one-half km radius from the nest to disturbance for adequate protection for golden eagles (10-53). The FWS recommends a one km buffer radius for planning purposes. When a conflict exists, however, this agency inspects the site to determine if these generalized buffer zones could be altered.

The methodology section of the wildlife plan (10-5) notes that field observations were conducted from April through July and the area was covered at close intervals "to flush...raptors". This technique of locating raptors is not acceptable. Furthermore, even if it were effective, which we question, egg incubation could be disrupted. Several raptor species common to the area such as, prairie falcon (Falco mexicanus); golden eagle (Aquila crysaetos); and red-tailed hawk, (Buteo jamaicensis), may be incubating during April and May. This method should not be employed in future studies at the mine site.

On page 10-53 of the plan, reference is made to the lack of golden eagle nests and the relatively few eagle observations in the mine plan area. Further presumptions are made from this data or lack of data concerning this quality of eagle habitat.

In May and June 1981, the FWS conducted a raptor inventory of the Wasatch Plateau. Six golden eagle nests, including one nest that fledged an eaglet in 1981 were found in the first canyon to the southeast of the current development. On December 12, 1981, Ron Joseph and Jim Munson, FWS Biologists, revisited the site to determine if conflicts existed. While at the mine plan area three golden eagles were observed.

It was determined that, under the current mining operation, there was no impact to the eagles using these nests. Should further surface developments occur in Section 36, nesting activities may be affected.

In Section 3.4.7 of the plan, air quality problems, mainly from dust, are discussed as are mitigating measures to be employed. While visiting the site in December 1981, it was evident the practices used were ineffective. Road watering needed to be at closer intervals or more permanent control such as road oil should be applied.

This completes our technical review of the Trail Mountain Mine Plan. Any further questions, concerning this review should be directed to Jim Munson, U.S. Fish and Wildlife Service, (801) 524-6271. We appreciate the opportunity to comment on this mine plan.

cc: BUE, SLC
DWR, Price
✓ ECK, SLC

William R. White