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STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

*orig mine file
w/ L. Bracken
WB*

Norman H. Bangerter, Governor
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ACT/015/021

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Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

DIVISION OF
OIL, GAS & MINING

Attn: John Whitehead

Dear Dianne:

The Division has evaluated Trail Mountain Coal Company's November 21, 1986 updated Mining and Reclamation Plan for Tract 2 lease addition to the Trail Mountain Mine.

Page 22, Second paragraph - Are there areas where potential subsidence from mining could impact an existing cliff raptor nest? If so, the MRP must identify such and mitigation methodology. To date no nests are known in Tract 2. If a raptor nest were to occur, loss due to subsidence is considered to be substantial.

Appendix 7-E, Macro Invertebrate Study (Cottonwood Creek) - The differences in substrate and vegetation overstory between the two sample sites is substantial. This diminishes our ability to evaluate differences between control and experimental (potential impact area) data. The small number of replicate samples would also confound an evaluation if the control and experimental sites were more closely matched.

Considering that control and experimental sites each showed diversity indices suggestive of polluted systems and the biotic index showed the experimental and control to be slightly stressed, mining is not likely a measurable influence on the stream system. As a result, we concur with the author that additional studies relative to mining are not necessary.

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,

William H. Geer
William H. Geer
Director