

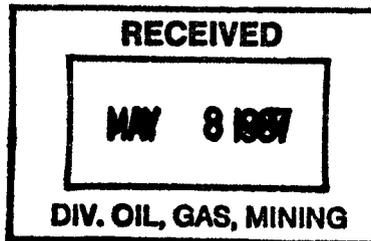
J. Whitehead

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501



Reply to: 2820

Date: May 4, 1987

Richard M. Holbrook
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

file in 87
D15/009 #2

J. Whitehead

Dear Rick:

We have the following comments regarding the midterm review for the Trail Mountain Mine, Tract 1:

1. The Tract 1 and Tract 2 Mine and Reclamation Plans should be consolidated into one Mine and Reclamation Plan to eliminate the duplication and confusion.
2. The current spring monitoring plan for Tract 1 should be updated to reflect the monitoring plan as developed in the Tract 2 Mine and Reclamation Plan.
3. Chapter 3, Page 3-44, Habitat Loss

The plan states: The surface facilities have seriously encroached upon and altered the stream. The riparian community at the portal and load-out area has been lost and the stream, Cottonwood Creek, filled with sediments. This is best exemplified by the macroinvertebrate communities above and below the portal and loading impact area. The macroinvertebrate community above the mine is in fairly good condition as evidenced by the diversity and numbers of species present (Table 1, Chapter x). The macroinvertebrate community below the mine is indicative of a low quality habitat and shows signs of stress (Table 2, Chapter x). The community stress could be due to low water flows, but since water flow is essentially constant in both areas, the community stress is likely due to sedimentation from the mine operation. This is also stated in the Tract 2 PAP.

The Final Report, Cottonwood Creek Macroinvertebrate Assessment for the Trail Mountain Coal Company by Dennis K. Shiozawa (Appendix, 11, Tract 2 PAP) concludes that the impact of the Trail Mountain Mining operation is negligible. This inconsistency needs to be resolved. If the operation is seriously impacting the creek, actions must be taken to reverse this trend.

4. It is evident that windblown dispersion and vehicular tracking of coal dust outside of the project area is occurring. The road surface and shoulders are often covered with coal dust. The coal dust deposited onto the road surface and shoulders downstream from the project area is easily washed and blown into Cottonwood Creek. Trail Mountain Coal Company must take appropriate action to minimize this occurrence.

If you have any question regarding our comments, please contact the Forest Supervisor's Office in Price, Utah.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

cc:
L. Braxton - DOGM
D-2
C. Reed