

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

RECEIVED
NOV 16 1990

Reply to: 2820

Date: November 16, 1990

DIVISION OF
OIL, GAS & MINING

Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Amendments (Culvert Extension, ACT/015/009-90E, Loadout, ACT/015/009-90F, Portal, ACT/015-009-90G, Bathhouse and Powder Magazine, ACT/015/009-90H), Folder #2, Emery County, Utah

Dear Lowell:

On November 13, 1990, we received a copy of Beaver Creek Coal Company's letter, dated November 8, 1990, which responds to the Forest Service comments. Please reference our comment letter to the Division, dated November 6, 1990. We have reviewed the responses and have the following comments and remaining concerns:

1. Storage/Loadout Bin - Beaver Creek Coal Company adequately addressed this comment. They stated that the proposed facility is the first phase of planned expansion. Additional facilities, such as a larger loadout bin and construction of a stacking tube will be considered in the future as production and company economics dictate. We, therefore, recommend approval of the system as proposed.

It is our intent to minimize impacts to Forest resources and resource uses in the mine vicinity. We encourage the operator to properly plan the proposed and future facilities in advance to provide for the least disturbance of the Cottonwood Creek drainage, and mitigate impacts to visual quality and other resources. Measures taken to minimize impacts must be considered along with economic considerations.

2. New Bath House/Sewage System - Our comment has been adequately addressed. We need a copy of the Department of Health determination in regard to the adequacy of the system for our records.
3. Macroinvertebrate Study - Macroinvertebrates are specifically identified in the Manti-La Sal N.F. Land and Resource Management Plan as management indicator species used to monitor the effectiveness of management activities. The culvert extension could have adverse

effects on the macroinvertebrate population in Cottonwood Creek if not properly constructed. The downstream mitigation plan was developed to offset the loss of riparian habitat which will occur when the culvert is extended. The macroinvertebrate study is essential in determining the extent of impacts and the effectiveness of the downstream mitigations. We need to know how effective they are to adequately mitigate cumulative impacts to Cottonwood Creek and improve mitigation efforts for future operations.

The culvert extension will cover the original upper macroinvertebrate sampling site and eliminate the opportunity to make direct comparisons to the original baseline study. The baseline needs to be re-established.

4. Facility Colors - This comment has been adequately addressed. Beaver Creek Coal Company has committed to use appropriate colors.
5. Culvert Bedding - This comment has been adequately addressed. Beaver Creek Coal Company stated that sand used for bedding will have adequate plasticity and that the inlet structure will have adequate protection from piping.
6. Culvert Backfill - This comment has been adequately addressed. Beaver Creek Coal Company has made a commitment to prevent placement of material which contains rocks greater than 3 inches in diameter within 1 foot of the culvert. The Division should ensure compliance by conducting inspections during installation.

Another concern which was not documented in the original letter is that the sediment pond capacity must be adequate to control sediment for the existing and additional surface disturbance. The Division has responsibility to ensure that the sediment pond is adequate.

The amendments should be approved upon commitment by Beaver Creek Coal Company that macroinvertebrate monitoring will be initiated prior to extension of the culvert.

If you have any questions, please contact us at the Forest Supervisor's Office in Price, Utah.

Sincerely,


for
GEORGE A. MORRIS
Forest Supervisor