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cc Pam G/L

AB

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

RECEIVED
NOV 08 1990

Reply to: 2820

Date: November 6, 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:

We reviewed the subject amendments and have some concerns. The proposed facilities lie on a tract of private surface/private coal within the boundaries of the Manti-La Sal National Forest. Our concerns are related to visual quality and public safety along the Cottonwood Canyon Road and potential impacts to the 1/4 mile stretch of Cottonwood Creek which crosses National Forest System lands below the mine. The northern portion of this area lies within the permit area on Federal Lease U-0829986. Our comments are as follows:

1. The existing coal processing method and facilities have resulted in a coal dust problem which has been one of our continuing concerns. The new coal handling and loadout facility utilizing covered conveyors should significantly decrease the amount of coal dust transported off-site by wind and tracking by coal trucks. We are, however, concerned that the 600 ton storage/loadout bin may not be adequate to prevent continual use of the emergency open coal pile. The system should be adequately designed to provide enough storage so that the open stockpile is used only when the main loadout is shut down for repairs or during other emergency situations. Another option which should be considered is to construct a stacking tube at the open coal area with reclaim tunnels to eliminate the need to load coal by front-end loaders. In addition, the flop gate chute should be covered.

Pam: in reviewing this we may need to weigh USFS's authority on private land, all be it inside a forest, against these desires as stated. We clearly want their buy in here. I'd suggest you call Cortez Reel and discuss with him. LJB 11-8

2. The existing sewage system consists of a septic tank and leach field. No information is provided to determine if the system is adequately designed to handle the additional demand (up to 100 people). We are concerned that the system might be overloaded, resulting in pollution of Cottonwood Creek. The Department of Health needs to review the system to make this determination.
3. It is our understanding that the macroinvertebrate study in Cottonwood Creek has been discontinued. Considering that additional riparian vegetation will be removed, monitoring needs to be resumed to detect impacts to Cottonwood Creek and take appropriate measures to mitigate them before resource damage occurs.
4. The new facilities need to be painted a color that is consistent with the other facilities and minimize visual impacts.
5. Refer to Appendix 7-13, page 3. The sand used to bed the culvert must have adequate plasticity to prevent piping around the inlet. In addition, a cutoff structure needs to be constructed to prevent piping.
6. Refer to Appendix 7-13, page 4. Rocks greater than 3 inches in diameter should not be placed within 1 foot of the culvert.

These items must be adequately addressed before the amendments can be approved. If you have any questions, please contact us at the Forest Supervisor's Office in Price, Utah.

Sincerely,



Aaron L. Home
FOR

GEORGE A. MORRIS
Forest Supervisor