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DIVISION OF WILDLIFE RESOURCES

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May 7, 1993

DIVISION OF  
OIL GAS & MINING

Mr. Dale L. Harber  
Manti-LaSal National Forest  
Ferron Ranger District  
P.O. Box 310  
Ferron, Utah 84523

Dear Dale:

The Division of Wildlife Resources (DWR) has reviewed Pacificorp's proposed exploration drilling program on the Trail Mountain Mine permit area. We have the following comments and recommendations regarding this project.

The DWR participated in an on-site inspection of the proposed drill sites in November of 1992. At that time, we identified issues with which we were concerned. These issues centered around drilling during the critical big game winter and parturitions seasons, drilling within 0.5 miles of active raptor nests, and minimizing the amount of road construction. After a review of the current drilling plan, it appears that these issues were addressed to some degree. However, we feel that the following recommendations will further minimize the impacts of this drilling program on local wildlife and wildlife habitat.

A specific starting date for this project was not given in the drilling plan. Well Nos. TMTN-12 through TMTN-15 occur in an area classified as high-priority deer summer range. It is likely that deer use this area during the fawning season. We would recommend that activity associated with these four wells be postponed until after July 5 in order to minimize impacts to deer during the crucial parturition season.

Moving the location of TMTN-15 from Section 26 to Section 1 and the proposed raptor survey of the cliff areas should minimize any impacts to raptors. We would urge that tree species such as aspen, fir and spruce be left undisturbed during the construction or improvement of the proposed access roads. These provide potential nest sites for species such as goshawks, red-tailed hawks, and three-toed woodpeckers. We support the proposed surveys for species of special concern.



Mr. Dale L. Harber

May 7, 1993

We fully support the outlined reclamation of all well pads and new access roads. We would like to see at least three browse species added to the seed mix proposed for revegetation. The area does provide critical winter range for elk and deer. Browse species are often the only forage available to wintering big game in deep snow. We encourage the addition of mountain mahogany, Utah serviceberry and bitterbrush at the rate of 2 lbs./acre for each species. This will also increase the overall seed rate to around 20 lbs./acre which is more satisfactory for broadcast seeding. We would also recommend the use of fertilizer, unless soil tests have been conducted and found that fertilizer is not necessary. We suggest that reseeding of the disturbed areas occur in the fall.

The area of the proposed drilling project is heavily used during the big game hunting seasons. Unless some measures are implemented to protect the reclaimed areas, hunter vehicles will likely damage the areas being reclaimed. We recommend that some type of barriers be utilized which will prevent vehicle access on the reclaimed roads and drill pads. Additionally, if all of the drill sites do not fall within the area closed to livestock grazing for watershed protection purposes, the establishment of seeded species would also be enhanced by the control of livestock grazing on reclaimed areas. We urge that reclaimed areas be monitored for successful vegetative establishment with follow-up treatments applied if necessary.

We appreciate the opportunity to remain involved with this project. Please contact me if you have any questions regarding our comments or if we can be of additional assistance.

Sincerely,



Kenneth W. Phippen  
Regional Habitat Manager

SR/lcl

Copy: Ralph Miles, DWR  
Val Payne, Pacificorp  
Pamela Grubaugh-Littig, DOGM