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DIVISION OF WILDLIFE RESOURCES

EQUAL OPPORTUNITY EMPLOYER

DOUGLAS F. DAY  
Director

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APR 16 1982

April 5, 1982

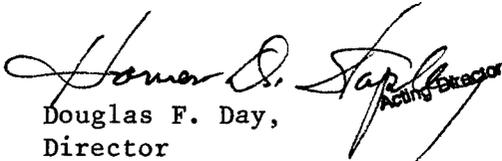
Mr. Cleon B. Feight, Director  
Division of Oil, Gas and Mining  
State Capitol  
Salt Lake City, Utah

Dear Jack:

Enclosed are the Division's reviews of the Mining and Reclamation Plans for Utah Power and Light Company's Deer Creek, Wilberg and Des-Bee-Dove mines.

Thank you for an opportunity to review these plans.

Sincerely,

  
Douglas F. Day,  
Director

Enclosure

RECEIVED  
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DIVISION OF  
OIL, GAS & MINING

UTAH DIVISION OF WILDLIFE RESOURCES' COMMENTS ON  
THE MINING AND RECLAMATION PLAN (MRP) FOR UTAH  
POWER AND LIGHT COMPANY'S DES-BEE-DOVE MINE

Volume I, Page 2-108: The list of plant species to be utilized in interim vegetation establishment does not include forbs. Table 3 and 4 suggest forbs were assumed to have existed in the area; tables 6 and 8 demonstrate that forbs do in fact exist within the area. Since forbs are an important component in a shrubland community to be utilized by wildlife, the Division of Wildlife Resources suggests planting of forbs in addition to grasses and shrubs. Forbs are important during the interim period.

Volume II, Page 2-122: "Mitigation and management plans"

A. To reduce deer vehicle-vehicle collisions

1. Reduce speeds on haul roads to 50 MPH

A reduction of 5 MPH below the legal speed is not sufficient to materially reduce deer/vehicle collisions. A suggested speed of 35-40 MPH would accomplish more to reduce collisions. This speed would probably be prudent from a safety standpoint in the canyon where the mine is located.

2 and 3. In addition to the stated limitations and suggestions one more should be added. Employees should be advised that collisions can be avoided by watching the side of the road where the deer came from. If more deer are following the one that just crossed the road they can be observed and precautionary action taken. It is a common tendency to watch the animal that is crossing the roads, then running into the animal which is following.

4. (Also Volume II, Page 4-31). Reinforce the value of deer to employees should be changed to reinforce the value of all wildlife to employees. This can be accomplished by use of the "coal mining and wildlife" training program that the Division of Wildlife Resources has made available to all coal mines.

Volume II, Page 4-14: Revegetation following cessation of mining in the pinyon-juniper community indicates pinyon pine will be revegetated at a rate of 200 plants/acre. Performance standards of UMC 817.97 demand that the revegetated area be returned as it was or make it better if practical. The Division of Wildlife Resources feel that pinyon pine can be left out of the revegetation plan and the amount of shrubs in the plan increased in planting density to compensate for the pines. The area would be more beneficial to foraging big game ungulates if the pines were omitted.

Volume II, Page 4-30: Following this page in the plan is a close if not actual copy of Utah Wildlife Resources' Fish and Wildlife Plan submitted to Utah Power and Light by Larry Dalton. This plan is included in the final reclamation plan with no explanation. If the suggested contents of the plan are to be incorporated in final reclamation, a few changes need to be made. The plan should be separately identified as the plan UP&L wishes to adopt and the verbiage in the plan needs to be changed from "could be" to "would be", "can" to "will", etc.