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June 5, 1990

Mr. Fred Phearson
Department of Health
Division of Environmental Health
388 North 1460 West
Salt Lake City, UT 84116

Attn: Steve McNeal

Ref: UPDES Permit Application No. UT-0023604

Dear Mr. Phearson:

In regards to Utah Power and Light's proposal to discharge mine water as per their UPDES Permit No. UT-0023604 into Deer Creek and Meetinghouse Canyons, the Division has some concerns. As understood, anywhere from 6 to 12 cfs could be discharged into each drainage during the interim of mining. Post mining discharges are projected to be a continuous 1 to 3 cfs into Meetinghouse Canyon, also. There could be an advantage to such flows in the drainages if the potential for the establishment of a fishery were to be realized. However, neither drainage is capable of sustaining the aforementioned flows within the confines of their present streambed morphology.

Mine water discharge would likely cause severe erosion of either stream channel and subsequent increase in sediment load to Huntington Creek. Brown and rainbow trout, along with a host of nongame species, comprise the fishery in Huntington Creek (Class III fishery). There is some natural reproduction of the fish. Increased sedimentation would be detrimental to the success of the fishery. There is also the concern for increased salinity to the Colorado River system.

One alternative is to discharge directly from mine facilities into Deer Creek and Meetinghouse Canyons. However, due to the Forest Service's and Bureau of Water Pollution Control's anti degradation policy, the water at either portal may have to be piped across Forest Service land and released into the drainages below their boundaries. Regardless of discharge point, the possibility of severe erosion in the stream reaches below the forest boundary is likely. The alternative for direct discharge into Deer Creek and Meetinghouse Canyon, either above or below the Forest Service boundary, would require stabilization of the stream channels to handle as much as 12 cfs flow. A consultant should be called in, at UP&L's expense, to assess the feasibility of such a proposal.

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In addition, the Meetinghouse Canyon portal is situated on a steep slope. If direct discharge to the stream is the selected alternative, it is recommended that a waterway be drilled and cased from within the mine to the streambed. This will eliminate the risk of erosion on the slope.

Another alternative that would avoid erosion impacts and the potential for significant salinity increases would be to pipe the discharges clear to Huntington Creek. It could reasonably handle the increased flows due to existing streambed morphology. The streambed in Meetinghouse Canyon for this scenario would still need to be stabilized to handle up to 3 cfs of post mining discharge. Also, salinity increases from the 3 cfs flow needs to be assessed.

If a scenario that allows development of a fishery in the Deer Creek or Meetinghouse drainages is selected, and sediment along with salinity concerns are met, an additional concern would be with the possibility of the mine temporarily shutting down. Subsequently, flows to the creeks would be halted and the fishery would be devastated. To avoid this dilemma, we recommend development of a pond, or series of ponds, in the upper part of either canyon. Water from the ponds would be released into either drainage and would sustain the fishery. Such a pond(s) could prove beneficial as a facility to treat mine water discharges, also.

Regardless of a selected alternative, substantial surface disturbance will result, e.g. earth work for placement of a pipeline, or earth work for design of adequate stream channels. Sediment control during precipitation events and ultimate reclamation must be considered.

Fred, UP&L's proposal appears to be a significant environmental issue that exceeds routine parameters used to assess UPDES permits. At a minimum, an Environmental Assessment should be performed. It is not unreasonable to expect that an Environmental Impact Statement may be needed to fully assess the project. The permit application does not fully explain or evaluate project alternatives, impacts or mitigation. Thus, a decision on this permit should be delayed until a complete environmental evaluation can be made. It seems that UP&L is in need of professional help beyond that available in state government. If requested, the Division can recommend consulting firms capable of assisting UP&L evaluate their proposed discharges relative to streambed morphology in Deer Creek and Meetinghouse Canyons.

Thank you for the opportunity to provide comment.

Sincerely,


Timothy Provan
Director