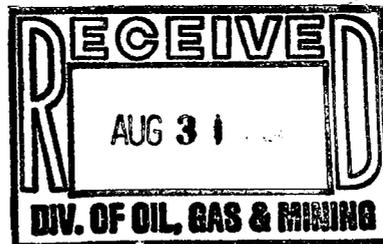


0037



August 26, 1994



Utah Coal Regulatory Program
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attention Mr. Daron Haddock

**RE: RILDA CANYON SURFACE FACILITIES, PACIFICORP, DEER CREEK
MINE, ACT/015/018, EMERY COUNTY, UTAH**

Dear Mr. Haddock:

#2

Copy RAM(all)

The following information is submitted pursuant to our telephone conversation and your fax transmittal regarding the initial review of the above referenced application.

Response to Mr. Paul Baker's Findings and Recommendations

Information regarding the Rilda Canyon Road is presented at Pages 2-218.3 through 2-218.7. Please replace the current Page 2-218.3 with the new pages transmitted herewith.

Baseline vegetation information regarding sample size adequacy appears to be a technical deficiency rather than a completeness issue. However, the following is offered in response:

Overstory (canopy) cover is additional information provided by the consultant who conducted the baseline vegetation survey. It is not identified as "required" information in the rules or the Division's Vegetation Guidelines. Additionally, the OSM publication A Survey of Techniques for Measurement of Herbaceous and Shrub Production, Cover and Density on Coal Lands in the West contains the following statement: "Canopy cover, as described in the literature, should not be used since it includes openings within the canopy. This approach often leads to an overestimation of cover values...". The request that overstory cover information meet sample size adequacy seems inappropriate. Regarding sample size adequacy for the mountain brush/salina wildrye reference area, additional

samples will be taken by the consultant. This will occur in early September and the information will be submitted to the Division for inclusion in the application.

A range condition and production survey will be conducted by Mr. George Cook of the SCS on August 29, 1994. The resulting information will be submitted to the Division. This commitment is stated on the enclosed Page 2-173.1

The requested additional information regarding the threatened and endangered plant survey is also found on the enclosed Page 2-173.1.

Response to Mr. Henry Sauer's Initial Completeness Review

Additional discussion regarding topsoil and vegetation removal is found on the enclosed Page 3-92.

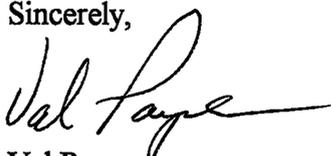
Riparian restoration/enhancement will be identified by the Forest Service in consultation with other concerned agencies. Presently, the Division of Wildlife Resources has made a recommendation regarding this matter and the Forest Service's EA contains a somewhat different recommendation. When an acceptable proposal is identified, the application will be modified as needed.

The required maps are found within the Rilda Canyon Lease Tract Application to which the reviewer was directed in the transmittal letter which accompanied this application and within the current Deer Creek MRP. Deficiencies regarding these maps appear to be technical rather than completeness issues.

In response to your direction Monday forenoon, the Public Notice was withdrawn from publication. Publication of the Notice in the August 30 issue of the newspaper is of critical importance. Therefore, I am faxing this information to you and request your immediate response regarding permission to publish.

I appreciate your willingness to discuss this information at various times during the week, to ensure that appropriate responses were prepared.

Sincerely,



Val Payne
Sr. Environmental Engineer

VP/dw
Enclosure

APPLICATION FOR PERMIT CHANGE

Title of Change: RILDA CANYON SURFACE FACILITIES
(ADDITIONAL INFORMATION)

Permit Number: ACT 10151018

Mine: DEER CREEK

Permittee: PACIFICORP

Description, include reason for change and timing required to implement:

- | | | |
|---|--|---|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 2. Change in the size of the Disturbed Area? <u>2.5</u> acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Will permit change include operations outside the Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 4. Will permit change include operations in hydrologic basins other than currently approved? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Does permit change result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 6. Does permit change require or include public notice publication? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 7. Permit change as a result of a Violation? Violation # |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 8. Permit change as a result of a Division Order? D.O.# |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 9. Permit change as a result of other laws or regulations? Explain: |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 10. Does permit change require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 11. Does the permit change affect the surface landowner or change the post mining land use? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 12. Does permit change require or include collection and reporting of any baseline information? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 13. Could the permit change have any effect on wildlife or vegetation outside the current disturbed area? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 14. Does permit change require or include soil removal, storage or placement? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 15. Does permit change require or include vegetation monitoring, removal or revegetation activities? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 16. Does permit change require or include construction, modification, or removal of surface facilities? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 17. Does permit change require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 18. Does permit change require or include certified designs, maps, or calculations? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 19. Does permit change require or include underground design or mine sequence and timing? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 20. Does permit change require or include subsidence control or monitoring? |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 21. Have reclamation costs for bonding been provided or revised for any change in the reclamation plan? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 22. Is permit change within 100 feet of a public road or perennial stream or 500 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 23. Is this permit change coal exploration activity <input type="checkbox"/> inside <input type="checkbox"/> outside of the permit area? |

Attach 3 complete copies of proposed permit change as it would be incorporated into the Mining and Reclamation Plan.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Val E Payne VAL E PAYNE SR. ENV. ENGINEER 8/26/94
 Signed - Name - Position - Date

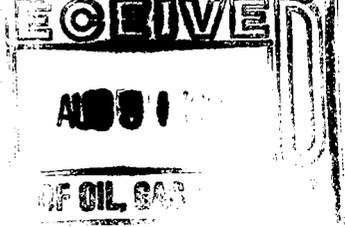
Subscribed and sworn to before me this 26th day of August, 1994.
Shelby M. Hunt
 Notary Public

My Commission Expires: November 19, 1996
 Attest: STATE OF _____ COUNTY OF _____
Shelby M. Hunt



NOTARY PUBLIC
SHELBY M. HUNT
 15 North Main St.
 Huntington, Utah 84306
 My Commission Expires
 November 19, 1996
STATE OF UTAH

Received by Oil Gas & Mining



ASSIGNED PERMIT CHANGE NUMBER

Vegetation information for the Rilda Canyon Surface Facility area is found at pages 2-173.2 through 2-173.47. The Rilda Canyon Vegetation Map, CE-10885-EM, is found in Packet 2-15A.

Several surveys have been conducted for Threatened, Endangered and Sensitive (TES) plant species associated with the Rilda Canyon Facility proposal.

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Val Payne, Biologist for Applicant, reviewed Forest Service publication Threatened, Endangered, and Sensitive Species of the Intermountain Region (1991) and determined that twenty (20) TES plant species are listed as "known/suspected" to occur on the Manti-La Sal National Forest. According to Utah Endangered, Threatened and Sensitive Plant Field Guide (1991) ten (10) TES plants "occur or might occur" in the Manti-La Sal Forest. Only four (4) of the ten plants "occur/might occur" on the Price District. A review of the habitat requirements for the four species indicated that only two (2) species, Hedysarum occidentale var. canone and Hymenoxys helenioides are potentially found in the area of the Rilda Canyon Surface Facilities. Surveys for these plants have been conducted annually, during the summer months (June, July and August) since 1992, in the project area. Neither species has been observed.

A SCS range condition and production survey will be conducted on 8/29/94. This information will be submitted to the Division for inclusion in the application.

The primary land uses in Rilda Canyon are wildlife habitat, recreation and grazing. These will continue during operation of the facilities and following final reclamation.

Public access to Rilda Canyon is via Emery County Road 00306 (see pages 2-218.4 and 2-218.5) and USFS Forest Development Road 246. Emery County has approached the Forest Service to annex the "upper portion" of the Rilda Canyon road (FDR 246) into the County Road system (see pages 2-218.6 and 2-218.7). A Forest Development Trail provides access to the Left Fork.

The Rilda Canyon Facility Access Road will begin at the terminus of the public road and follow the Forest Development Trail along the north side of the Left Fork to the facility pad. Public access will remain available throughout operation and following reclamation of the Rilda Canyon Facilities. Only approximately 1.5 acres, associated with the facilities pad and the topsoil pile, will be restricted from public access during operation of the facility.

The Rilda Canyon Facilities are located on Manti La Sal National Forest lands. All public uses, consistent with the Forest Land Resource Management Plan will remain available during operation and following reclamation of the facilities.

No Prime Farmlands exist in the area of the Rilda Canyon Surface Facilities (see pages 2-218.1 and 2-218.2).



Emery County Road Department

P.O. Box 889
Castle Dale, Utah 84513

Phone (801) 381-5450 or 381-2550
Fax (801) 381-5239

March 18, 1994

Energy West Mining Company
15 West Main
Huntington, Utah 84528

Dear Mr. Payne:

Regarding your inquiry concerning Emery County Road #306 I submit the following:

1. The road in question was commonly known as Ridley Canyon probably earlier than our November 2, 1901 map.
 - a. It was commonly used by local citizens for cattle grazing and timber harvesting.
 - b. Mining claims appear to have developed at some subsequent period of time as fuel needs were recognized in the developing Huntington settlement.
2. The road seems to have been well established to within ½ mile of the forks (North Emery collection system) in 1901 then continues on as a trail.
3. For decades the county has participated in the road maintenance in one way or other (for various reasons) including coal mining.
4. Sometime in the early 30's a dispute developed between property owners and citizens utilizing Rilda Canyon Road. Apparently J.B. Johnson wanted to setup a toll across his portion of property. It went to court wherein it was "Hereby adjudged and decreed a public highway" on the 17th day of June 1935 by Judge Dilworth Wooley of the Seventh Judicial District.
5. One might reasonably assume that the county was more regularly involved in maintenance from that time on through the present.
6. In approximately 1987 I was involved in a bridge structure inventory and could not identify the source who constructed the present mud sill type bridge structure which was on top of a then still visible pole type bridge (obviously very old). I conferred with Brent Barney of the Forest Service regarding the bridge. He agreed that the bridge deck appeared to be a forest type but the steel "T" beams suggested otherwise. The forest indicated that the bridge was not constructed by them. I then contacted Co-Op Mine who emphatically denied any association with the county's bridge or roadway. The bridge, I feel, is vintage late 1950's or early 1960's and has been commonly used by citizens including North Emery Water Users, ranchers and coal interests. Because of the diverse public use we did not pursue abandonment of the road or bridge. The county authority then stems from several decades of public use combined with the adjudication of 1935 (on part of the road) and county maintenance.

Mr. Val Payne
March 18, 1994
Page 2

7. Active county maintenance is from the Highway 31 connection to the springs used by North Emery Water Users. The grader turnaround is very visible and it is apparent where our active maintenance ends.
8. The state recognizes this as a valid county roadway including the bridge.
9. The earliest county road log available to me is 1968 wherein the road is called Rilda Canyon #H-23, 2.0 miles long.
10. The 1973 county road log names this road Rilda Canyon and Trail Canyon #306, 2.3 miles long. the Trail Canyon .3 miles across highway 31 was added to the original 2.0 miles (of Rilda Road) and labeled road #306.

It is not the counties intention to relinquish any authority regarding the roadway or the bridge; in fact it is our intent to improve the existing road with culverts, gravel and rip rap (as needed) including a new bridge structure. This of course is long over due and is a much needed improvement. I am particularly pleased to see the bridge replaced and I'm sure North Emery Water Users and the "citizens" in general will be pleased with the new gravel and culverts. We intend to stay on the present alignment except at the bridge crossing where we shift the new structure a little to the west for better road alignment and attachment to Highway 31.

If I can be of further assistance please call.

Sincerely,

Rex Funk,
Road Supervisor

RF/ls

a/16.94



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May 9, 1994

Mr. Charles Jankiewicz/Price Ranger
U. S. Forest Service
599 Price River Drive
Price, Utah 84501

Dear Mr. Jankiewicz:

Enclosed please find three (3) sets of blue prints for Rilda Canyon Road #306 situated in Huntington Canyon. We currently recognize this roadway in two portions; upper and lower. The lower portion begins at Highway 31 and ends at North Emery Water Users collection system and the upper portion begins at the collection system and ends at the Forks.

The scope of maintenance on the lower portion will be of a routine nature where the road bisects Forest Service jurisdiction consisting of:

1. Blading and sloping of the existing roadway to a consistent 20' width (currently averages 16'-20') crowning of the existing road in preparation for 6" of Permazyme treated road base. The alignment will not be changed; we will stay on top of the old road template.
2. Several culvert crossings will be installed and engineered to eliminate the north shoulder scour and erosion while presenting minimal impact to the servient estate. Of course our engineers (J&T Engineers) will work closely with your engineers to achieve optimum results for your processes. The repaired shoulder will be armored with small rock where the worse problems have been.
3. The small stream encroachment against the existing roadway will of necessity need rip rap. This will be on the south edge of the road and identified on the enclosed drawings. Mark Page has been contracted and permits are being processed.
4. The termination zone will be at the North Emery Water Users Collection system and a proper road access will be constructed at that point.

Letter to Charles Jankiewicz
May 10, 1994
Page Two

As mentioned we view the above items as essential maintenance and look forward to your co-operation and assistance. In an earlier conversation with Brent Barney and Aaron Howe, Emery County desires permanent easement for the already mentioned lower portion of Rilda Canyon Road.

At the April 20th Commission meeting, Commissioners approved annexation for the upper portion of Rilda Canyon to the Forks, in the vicinity of the Energy West proposed fan portal. They feel that the diverse public uses already recognized on the upper portion of road sufficiently justifies a request to the Forest Service for annexation. Of course this arrangement is subject to Forest Service approval and a subsequent easement agreement. We are therefore requesting road construction and permanent easements for the upper Rilda road. We have directed J&T Engineers to survey and design a roadway which is shown on the attached blueprints.

We recognize that there are several "hoops" to jump through (NEPA & etc.) to acquire permanent easements and would appreciate your assistance to that end. I have also instructed J&T Engineering to provide you with surveys and legal descriptions for both the lower and upper portions of Rilda Canyon Road in hope that both can ultimately be combined into one agreement with the Forest Service. We have enjoyed years of good relationship with the Forest Service and look forward to many more. The descriptions will be sent to you very soon. Thank you for your help.

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enclosure
cjw

29.94

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The topsoil will be redistributed during final reclamation.

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RF/ljs

a/16.94



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Several surveys have been conducted for Threatened, Endangered and Sensitive (TES) plant species associated with the Rilda Canyon Facility proposal.

Stanley L. Welsh, Endangered Plant Studies, Inc., Orem, Utah, conducted a survey of the powerline corridor and adjacent areas on September 20, 1992. He concluded that "no plant species listed as endangered or threatened, and none cited as sensitive, were discovered on or adjacent to the corridor".

Robert M. Thompson, Botanist for the Manti-La Sal National Forest, addressed TES plant species occurring in the Manti-La Sal National Forest and determined that the project would have no effect on any of the species. This is reported in the Biological Evaluation/Assessment for Sensitive Plant and Animal Species for the PacifiCorp Deer Creek Mine Surface Facilities and Mining in Rilda Canyon, August 9, 1994. This document is on file at the Price District Office.

Val Payne, Biologist for Applicant, reviewed Forest Service publication Threatened, Endangered, and Sensitive Species of the Intermountain Region (1991) and determined that twenty (20) TES plant species are listed as "known/suspected" to occur on the Manti-La Sal National Forest. According to Utah Endangered, Threatened and Sensitive Plant Field Guide (1991) ten (10) TES plants "occur or might occur" in the Manti-La Sal Forest. Only four (4) of the ten plants "occur/might occur" on the Price District. A review of the habitat requirements for the four species indicated that only two (2) species, Hedysarum occidentale var. canone and Hymenoxys helenioides are potentially found in the area of the Rilda Canyon Surface Facilities. Surveys for these plants have been conducted annually, during the summer months (June, July and August) since 1992, in the project area. Neither species has been observed.

A SCS range condition and production survey will be conducted on 8/29/94. This information will be submitted to the Division for inclusion in the application.

The primary land uses in Rilda Canyon are wildlife habitat, recreation and grazing. These will continue during operation of the facilities and following final reclamation.

Public access to Rilda Canyon is via Emery County Road 00306 (see pages 2-218.4 and 2-218.5) and USFS Forest Development Road 246. Emery County has approached the Forest Service to annex the "upper portion" of the Rilda Canyon road (FDR 246) into the County Road system (see pages 2-218.6 and 2-218.7). A Forest Development Trail provides access to the Left Fork.

The Rilda Canyon Facility Access Road will begin at the terminus of the public road and follow the Forest Development Trail along the north side of the Left Fork to the facility pad. Public access will remain available throughout operation and following reclamation of the Rilda Canyon Facilities. Only approximately 1.5 acres, associated with the facilities pad and the topsoil pile, will be restricted from public access during operation of the facility.

The Rilda Canyon Facilities are located on Manti La Sal National Forest lands. All public uses, consistent with the Forest Land Resource Management Plan will remain available during operation and following reclamation of the facilities.

No Prime Farmlands exist in the area of the Rilda Canyon Surface Facilities (see pages 2-218.1 and 2-218.2).



Emery County Road Department

P.O. Box 889
Castle Dale, Utah 84513

Phone (801) 381-5450 or 381-2550
Fax (801) 381-5239

March 18, 1994

Energy West Mining Company
15 West Main
Huntington, Utah 84528

Dear Mr. Payne:

Regarding your inquiry concerning Emery County Road #306 I submit the following:

1. The road in question was commonly known as Ridley Canyon probably earlier than our November 2, 1901 map.
 - a. It was commonly used by local citizens for cattle grazing and timber harvesting.
 - b. Mining claims appear to have developed at some subsequent period of time as fuel needs were recognized in the developing Huntington settlement.
2. The road seems to have been well established to within ½ mile of the forks (North Emery collection system) in 1901 then continues on as a trail.
3. For decades the county has participated in the road maintenance in one way or other (for various reasons) including coal mining.
4. Sometime in the early 30's a dispute developed between property owners and citizens utilizing Rilda Canyon Road. Apparently J.B. Johnson wanted to setup a toll across his portion of property. It went to court wherein it was "Hereby adjudged and decreed a public highway" on the 17th day of June 1935 by Judge Dilworth Wooley of the Seventh Judicial District.
5. One might reasonably assume that the county was more regularly involved in maintenance from that time on through the present.
6. In approximately 1987 I was involved in a bridge structure inventory and could not identify the source who constructed the present mud sill type bridge structure which was on top of a then still visible pole type bridge (obviously very old). I conferred with Brent Barney of the Forest Service regarding the bridge. He agreed that the bridge deck appeared to be a forest type but the steel "I" beams suggested otherwise. The forest indicated that the bridge was not constructed by them. I then contacted Co-Op Mine who emphatically denied any association with the county's bridge or roadway. The bridge, I feel, is vintage late 1950's or early 1960's and has been commonly used by citizens including North Emery Water Users, ranchers and coal interests. Because of the diverse public use we did not pursue abandonment of the road or bridge. The county authority then stems from several decades of public use combined with the adjudication of 1935 (on part of the road) and county maintenance.

Mr. Val Payne
March 18, 1994
Page 2

7. Active county maintenance is from the Highway 31 connection to the springs used by North Emery Water Users. The grader turnaround is very visible and it is apparent where our active maintenance ends.
8. The state recognizes this as a valid county roadway including the bridge.
9. The earliest county road log available to me is 1968 wherein the road is called Rilda Canyon #H-23, 2.0 miles long.
10. The 1973 county road log names this road Rilda Canyon and Trail Canyon #306, 2.3 miles long. the Trail Canyon .3 miles across highway 31 was added to the original 2.0 miles (of Rilda Road) and labeled road #306.

It is not the counties intention to relinquish any authority regarding the roadway or the bridge; in fact it is our intent to improve the existing road with culverts, gravel and rip rap (as needed) including a new bridge structure. This of course is long over due and is a much needed improvement. I am particularly pleased to see the bridge replaced and I'm sure North Emery Water Users and the "citizens" in general will be pleased with the new gravel and culverts. We intend to stay on the present alignment except at the bridge crossing where we shift the new structure a little to the west for better road alignment and attachment to Highway 31.

If I can be of further assistance please call.

Sincerely,

Rex Funk,
Road Supervisor

RF/lb

a/16.94



Emery County Road Department

P.O. Box 889
Castle Dale, Utah 84513

Phone (801) 381-5450 or 381-2550
Fax (801) 381-5239

May 9, 1994

Mr. Charles Jankiewicz/Price Ranger
U. S. Forest Service
599 Price River Drive
Price, Utah 84501

Dear Mr. Jankiewicz:

Enclosed please find three (3) sets of blue prints for Rilda Canyon Road #306 situated in Huntington Canyon. We currently recognize this roadway in two portions; upper and lower. The lower portion begins at Highway 31 and ends at North Emery Water Users collection system and the upper portion begins at the collection system and ends at the Forks.

The scope of maintenance on the lower portion will be of a routine nature where the road bisects Forest Service jurisdiction consisting of:

1. Blading and sloping of the existing roadway to a consistent 20' width (currently averages 16'-20') crowning of the existing road in preparation for 6" of Permazyme treated road base. The alignment will not be changed; we will stay on top of the old road template.
2. Several culvert crossings will be installed and engineered to eliminate the north shoulder scour and erosion while presenting minimal impact to the servient estate. Of course our engineers (J&T Engineers) will work closely with your engineers to achieve optimum results for your processes. The repaired shoulder will be armored with small rock where the worse problems have been.
3. The small stream encroachment against the existing roadway will of necessity need rip rap. This will be on the south edge of the road and identified on the enclosed drawings. Mark Page has been contracted and permits are being processed.
4. The termination zone will be at the North Emery Water Users Collection system and a proper road access will be constructed at that point.

Letter to Charles Jankiewicz
May 10, 1994
Page Two

As mentioned we view the above items as essential maintenance and look forward to your co-operation and assistance. In an earlier conversation with Brent Barney and Aaron Howe, Emery County desires permanent easement for the already mentioned lower portion of Rilda Canyon Road.

At the April 20th Commission meeting, Commissioners approved annexation for the upper portion of Rilda Canyon to the Forks, in the vicinity of the Energy West proposed fan portal. They feel that the diverse public uses already recognized on the upper portion of road sufficiently justifies a request to the Forest Service for annexation. Of course this arrangement is subject to Forest Service approval and a subsequent easement agreement. We are therefore requesting road construction and permanent easements for the upper Rilda road. We have directed J&T Engineers to survey and design a roadway which is shown on the attached blueprints.

We recognize that there are several "hoops" to jump through (NEPA & etc.) to acquire permanent easements and would appreciate your assistance to that end. I have also instructed J&T Engineering to provide you with surveys and legal descriptions for both the lower and upper portions of Rilda Canyon Road in hope that both can ultimately be combined into one agreement with the Forest Service. We have enjoyed years of good relationship with the Forest Service and look forward to many more. The descriptions will be sent to you very soon. Thank you for your help.

Sincerely,



Rex Funk,
Road Supervisor

enclosure
cjw

29.94

from the construction sites and placed in a storage area, within the permit area, adjacent to the access road (See Map Packet 2-17A). Prior to topsoil removal, vegetation was removed as directed by the surface management agency. Only major vegetation types were removed. The remaining vegetation materials were incorporated into the topsoil material, to the extent possible. Topsoil was stripped to the depths indicated on Map 2-17A using conventional earth moving equipment. Removal depths were based on the soil survey information. Removal depths were confirmed in the field by visual observations of the soil materials and standard surveying practices. The topsoil pile was revegetated and silt fence was placed at the toe of the pile to provide erosion control.

The topsoil will be redistributed during final reclamation.

Power Line - A 25KV power line provides electrical power to the substation at the facility pad. The power line follows the access road from near the public turn-around area to the pad. The poles and cross-member structures are consistent with the current raptor protection design criteria.

The power line will be removed and hauled from the area during final reclamation.

Facility Pad - The Rilda Canyon Facility Pad is an earthen fill structure utilized to support the fan, substation, water tank and pumphouse. The pad occupies approximately 1.2 acres. Approximately 17,000 cubic yards of material for the pad fill was purchased from a local contractor and hauled to the site. The fill material is held in-place by a "Hilfiker"-type retaining wall system. This type of system provides structural support with greatly reduced visual impacts.

The pad is gravel surfaced. All precipitation intercepted by the pad will be retained on the pad and routed into the mine. See Volume 3, Appendix VII, for the Surface Runoff Control Plan.

During final reclamation, approximately 10,000 cubic yards of the pad fill will be used for recontouring the pad area and the access road (See Map Packet 4-4A). The remaining materials