

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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July 18, 2011

TO: Internal File

THRU: Daron Haddock, Permit Supervisor, Coal Regulatory Program Manager *DH*

FROM: Ingrid Campbell, Environmental Scientist, Lead *IC*

RE: Remove Vegetation Survey Commitment, PacifiCorp., Deer Creek Mine, Permit #C/015/0018, Task ID # 3869

## SUMMARY:

On July 12, 2011, the Division received an amendment from Energy West Mining Co (EWMC) to remove the commitment to conduct periodic vegetation surveys using color infrared aerial photographs. This amendment is EWMC's response to task ID 3793, 2010 annual report Review for Deer Creek Mine. EWMC has had aerial photographs taken of the Deer Creek Mine active mine areas every year (in Black and White) and color infrared every 5 years. However, none of these images are on file with the Division.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**VEGETATION**

Regulatory Reference: R645-301-330, -301-331, -301-332.

**Analysis:**

EWMC has had aerial photographs taken of the Deer Creek Mine active mine areas every year (in Black and White) and color infrared every 5 years. However, none of these images are on file with the Division. EWMC states that they have attempted to detect changes in vegetation that might be caused by mining by interpreting the photographs. They were unsuccessful in detecting any changes due to mining. EWMC attributes any change to other factors such as, spreading insect infestations in forest stands, variations in precipitation from year to year, variations in the time of year when the photographs are taken, and the quality of the photographs themselves. Because of this, EWMC proposes to remove the commitment to monitor vegetation by color infrared aerial photographs from the Mining and Reclamation Plan.

Page 2-174 was amended by EWMC to state that there has been no detected stress or any other impacts to vegetation using aerial photography. Because stress to vegetation is also subject to natural processes, the aerial photographs do not provide enough information to adequately address the effects of mining. Therefore, the commitment to produce color infrared photographs is unnecessary and should be removed from the M&RP.

**Findings:**

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

**RECOMMENDATIONS:**

This amendment is recommended for approval.