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Timothy H. Provan
Division Director

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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*orig mine file
route thru
R. Buxton*

ACT/015/019 #2

RECEIVED
SEP 28 1990

DIVISION OF
OIL, GAS & MINING

September 26, 1990

Dr. Dianne Nielson, Director
Utah Division of Oil, Gas and Mining
755 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84116

Dear Dianne:

The Division has reviewed Utah Power and Light Company's response to permit stipulations for the Cottonwood/Wilberg waste rock facility and we have concerns that original recommendations have not been considered.

Original mitigation recommendations specified a 3:1 ratio for disturbed areas which specifically amounted to a 75 acre chaining (or bulldozing) activity. The present UP&L response has allowed for only 45 acres of mitigation.

Initial effects of chaining operations dramatically increase forage quantity and quality of an area. This serves to minimize immediate land use impacts to wildlife species. After a five year period, the benefits from such operations have lessened and after 50 years, a chained area produces forage equivalent only to that of the surrounding area. The loss of the 25 acres at the waste rock site will force the dispersion of big game to other areas, subsequently increasing pressure on the range.

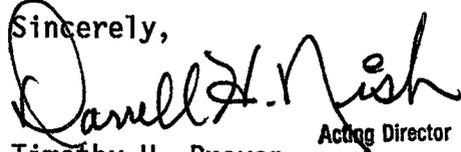
Due to the long term impacts of a life of mine waste rock facility, it is our opinion that implementation of a 3:1 mitigation ratio is essential for the provision of adequate wildlife forage. We recommend selecting chaining sites that will total 75 acres.

UP&L's response has indicated the installation of one guzzler to be located in the chained area as mitigation for the loss of 32 acres of steep-sloped pinyon/juniper habitat to cliff spalling. As previously stated, we recommend the installation of two guzzlers. The second should be located in the previously chained area downslope from the Des-Bee-Dove Mine. The water developments will serve to increase the habitat quality of the area as present water sources are limited to ephemeral and intermittent streams.

Dianne Nielson
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Dianne, it is our hope that we can work with DOGM, BLM, USFS, and UP&L to manage the resource of the area to the benefit of wildlife. Thank you for an opportunity to provide comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy H. Provan". The signature is written in a cursive style with a large initial "T".

Timothy H. Provan
Director

Acting Director