

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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December 14, 2004

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TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Jerriann Ernstsens, Ph.D., Environmental Scientist II, Biology *JE*

RE: Vegetation Reference Areas, CO-OP Mining Company, Bear Canyon Mine, C/015/0025, Task ID #1504 (AM02D)

## SUMMARY:

This memo re-reviews the April 5, 2002 amendment to:

- Remove the MRA\* in Trail Canyon from the vegetation plan.
- Use the SHPRA\* for the shop, coal storage, sediment pond, and scale house areas.
- Use the TSARRA\* for the access road to #1 Mine.

The current amendment did not include changes to the Operational, Reclamation Plan, or Reclamation Performance Standards of the MRP.

\*Key to abbreviations: Reference areas: main reference area (MRA), shower house pad reference area (SHPRA), and tank seam access road reference area (TSARRA).

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**TECHNICAL ANALYSIS:**

**ENVIRONMENTAL RESOURCE INFORMATION**

**VEGETATION RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.19; R645-301-320.

**Analysis:**

The Division considers that the request of using SHPRA as the success standard for the shop, coal storage, sediment pond, and scale house areas; and using TSARRA for the lower portion of the Primary Portal Access Road meets R645-301-321.100. The Permittee provided adequate evaluations for undisturbed areas. Furthermore, the Permittee provided vegetation maps suitable for assigning vegetation communities to the disturbed areas, which were likely present prior to disturbance. These likely community types nearly match the community types of SHPRA and TSARRA. The Permittee will adhere to the standards set by R645-301-356 and follow the Division's Vegetation Information Guidelines.

C. W. Mining Company requests to:

- Remove the MRA in Trail Canyon from the vegetation plan.
- Use the SHPRA for the shop, coal storage, sediment pond, and scale house areas.
- Use the TSARRA for the access road to #1 Mine.

The Division approved using the MRA as the success standard for the main facilities area in 1983 and the SHPRA as the success standard for the shower house pad in 1994. The Permittee considers that local residences have degraded the MRA in Trail Canyon over the years. The Permittee requests replacing the MRA with the SHPRA (near the baseball field) as the success standard for the shop, coal storage, sediment pond near main office, and scale house (both sides of road) areas. The areas around these facilities are within a couple of miles north of the SHPRA. The areas all have similar aspect and elevation as the area around the shower house pad (main office and "bath house") and the SHPRA. The vegetation map shows that all these facilities and the SHPRA are within a sage community with a pinyon juniper community flanking the sites.

The surface facilities maps (Plate 2-4 series [electronic version 5-2 series]) refer to the primary unpaved road associated with the #1 Mine as the Primary Portal Access Road. The Permittee requests using TSARRA as the success standard for an extended, lower portion of the Primary Portal Access Road that starts where the Primary Portal Access Road junctions with the

primary road to Wild Horse Ridge and ends at the #1 Mine. This lower portion of the road has a similar aspect, but very different elevation from the upper portion of the "tank seam road" and TSARRA. The vegetation map shows that the length of road from the tank seam pad to the junction is within a pinyon juniper community. Below the switch back of this road is a sage (and riparian, Appendix 3-A) community.

Patrick Collins (Mt. Nebo Scientific, 1994) evaluated vegetation for the shower house pad, SHPRA (Appendix 9D, [electronic version 3C]), and TSARRA (Appendix 9A; pages 15-35 [electronic version 3A]). Mr. Collins, however, did not evaluate the vegetation association with the shop, coal storage, sediment pond, scale house, or lower portion of the Primary Portal Access Road. The Permittee had already disturbed these areas by 1994.

**Findings:**

Information provided in the plan meets the minimum Environmental - Vegetation Resource Information requirements of the regulations.

**RECOMMENDATIONS:**

Approve the amendment.

During 2005, the Permittee plans to conduct a vegetation survey of a proposed riparian reference area. This area is up a narrow canyon off the Tank Seam Road. The riparian area near the scale house (not the SHPRA) and possibly other riparian areas, planned for disturbance in the future, will most likely use this reference area as the standard for success. The Permittee agrees to submit the report in 2005 and add the location on the vegetation map – Plate 9-1 (electronic version 3-1).