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Date: 9/19/2005 8:47:31 AM
Subject: Completeness Review, Bear Canyon Mine, Task #2292

Here are Forest Service comments on the Bear Canyon Completeness Review. Let me know if you have any question.

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Manti-la Sal National Forest

(See attached file: completeness_review_comments.doc)

CC: Dale Harber <dharber@fs.fed.us>

Subject: Request for Consultation for Lease Addition U-46484, U-61048, & U61049, Co-Op Mining Company, Bear Canyon Mine, C/015/0025, Task ID #2292, Outgoing File

Date: September 16, 2005

The following are comments from the Manti-La Sal National Forest on an application from Co-Op Mining to add approximately 7,500 acres of existing leases to their Bear Canyon Mine permit area. These comments are submitted as a part of the Administrative Completeness Review by the Utah Division of Oil, Gas and Mining. We understand that we will also be able to comment during a letter technical analysis review of the application at a later date.

Page 2-28, second paragraph.

The terms “native topsoil” and “additional topsoil” are used. Please explain what these two terms mean.

Page 3-14, Wild Horse Ridge Tank Seam Vegetation, second paragraph.

This description of Co-Op’s concept of successful reclamation may or may not meet Forest Service standards. Our general standard of successful reclamation of a site is 90% of the vegetation of the surrounding undisturbed area, not more than 10% weeds, and no noxious weeds. If container stock of browse species is used, we would also apply a standard for these plant species.

Page 3-29, Listed or Proposed Endangered or Protected Species of Plants and Animals

This section is not complete. It should discuss raptors such as the golden eagle and peregrine falcon. The Utah Division of Wildlife Resources has mapped potential Mexican spotted owl and wolverine habitat in the Huntington Canyon area. A sensitive plant, *Hedysarum occidentale* var. *canone*, the canyon sweetvetch, is present around their mine facilities. Another sensitive plant, *Aquilegia flavescens* var. *rubicunda*, the Link Canyon columbine, has been found in lower Huntington Canyon and may be present around springs in the Co-Op Mine area.

Page 4-21, Success Monitoring and Extended Responsibility Period

This section should describe the reclamation standards that will be used. They can not measure success of reclamation unless they have a standard.

Page 5-18, Protection of Natural Surface Structures & Streams

This section needs a more detailed description of how they will avoid subsidence of escarpments and streams, as required by lease stipulations. They should describe what they have learned about subsidence from past monitoring so that it can be applied to proposed mining.

General comments on the maps.

1. All maps should have section lines, so data can be compared between maps.

Some of the maps have only UTM coordinates.

2. There are features shown on some of the maps that are not listed in the legend. For example, on Map 7-4, there are red circles with a number. We assume these are the locations of springs that have not been chosen for monitoring.