

state of utah

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DIVISION OF WILDLIFE RESOURCES

DOUGLAS F. DAY
Director

EQUAL OPPORTUNITY EMPLOYER

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

March 2, 1981

Reply To SOUTHEASTERN REGIONAL OFFICE
455 West Railroad Avenue, Box 840, Price, Utah 84501
(801) 637-3310

Mr. Cleon B. Feight, Director
Utah Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

#2

Attention: James W. Smith

RE: PRO/015/032

Dear Cleon:

The Division has reviewed the Mine and Reclamation Plan (MRP) for Genwell Coal Company Inc.'s Crandal Canyon Mine. To our knowledge the Division of Oil, Gas and Mining has not yet provided guidelines for fish, wildlife and habitat information (UMC 783.20) for this mine. Thus, our comments are provided without benefit of those guidelines. Generally speaking, the MRP is poor from a position of data relative to the wildlife resource and a mitigation plan. This situation has probably resulted due to a lack of coordination by the applicant with the Division. Most of the resource information they need we can provide as a service. The Division can also provide recommendations to assist the applicant in development of a mitigation plan.

Attached are the Division's comments.

Thank you for an opportunity to provide comment on this permit application.

Sincerely,

John Livesay
John Livesay, Supervisor
Southeastern Region

JL:LBD:gp

Attachment

cc: Darrell Nish
U.S. Fish and Wildlife Service
U.S. Forest Service

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DIVISION OF
OIL, GAS & MINING

DIVISION OF WILDLIFE RESOURCE'S COMMENTS ON THE
MINE AND RECLAMATION PLAN (MRP) FOR GENWELL COAL COMPANY'S
CRANDAL CANYON MINE

- Page 15: The discussions of unsuitability are incomplete and do not address all of the criteria.
- Page 30: The discussion of projected impacts on fish and wildlife are vague, nondescriptive and unacceptable.
- Page 30 and 227 and Page 10 of the Aquatic Resource Report: Mitigation plans are absent from this proposal. The applicant has identified "goals" but not a specific detailed plan.
- Page 33: The list of species to be utilized in revegetation of south facing slopes does not include any browse species. Since the area is range for big game animals plus a myriad of other wildlife, a great deal of consideration should be given to plant species that will benefit those animals.
- Page 40: The MRP fails to identify that the major land use of the project area is that of providing habitat for wildlife.
- Page 153--Vegetation and Wildlife Report: The raptor report fails to identify specifically who conducted the survey. The Division is concerned as to whether or not a qualified Biologist trained to conduct such survey was utilized.
- Pages 40-42: The raptor survey failed to sample the entire breeding season--March, April, May and June--for those birds. It was the Division's recommendation that the purpose of such a survey would be to detect the presence of breeding raptors and their critical valued nest sites proximal to planned surface disturbed areas.
- Pages 43-47: The Division has compiled a narrative for use by the various mines in the coal industry discussing the presence of species having high federal interest and their high-priority habitats. The applicants have not requested such information. It is important to note that the applicants narration fails to discuss from a qualitative perspective the habitats as they relate to those high interest species. The applicants narration concerning use of the area by individual species is also lacking due to a failing to discuss or request needed information from the Division.
- Page 48: The Division is unaware of specific drumming logs for ruffed grouse in the Crandal Canyon area. Such critical sites, if known, must be mapped and identified by the applicant.
- Discussions concerning ruffed grouse are vague and nondescriptive relative to a qualitative analysis of habitat use areas. Discussions concerning blue grouse are almost completely absent from the MRP.

Page 49 and 50: All amphibians and reptiles are protected.

Again the applicant has utilized substandard data for description of vertebrate wildlife and their habitat associated with the project area. This information is available from the Division to the applicant upon request.

Page 50: The comments on this page relative to a mitigation plan use the descriptors ". . .would also be hoped for . . .". A plan must be definitive in nature and not vague as the aforementioned phrase suggests.

Page 51: The term "reside" is misleading when dealing with birds due to their ability to fly and utilize vast areas. The Division's ranking system for habitat use areas accommodates that problem and affords a reviewer an understanding of the birds use of an area. The American peregrine falcon and bald eagle probably do make some use of the Crandal Canyon-Huntington Canyon area.

Page 52: Again the applicant makes use of substandard information concerning use by big game habitats on the mine plan area. This has resulted from a lack of contact on their part with the Division.

Page 222: The MRP does not provide discussion relative to a qualitative approach concerning terrestrial habitats.

The expected impacts section is vague and lacks adequate description.

The MRP does not contain a Wildlife Mitigation Plan.

Stream buffer zones are not discussed or identified.

The need or lack of need for monitoring is not discussed.