



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE RESOURCES

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December 14, 1993

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DIVISION OF  
OIL, GAS & MINING

Mel Coonrod  
Environmental Industrial Services  
4855 North Spring Glen Road  
Spring Glen, Utah 84526

Dear Mel:

The Division of Wildlife Resources has been involved for some time with Genwal's proposed coal loadout in the Mohrland area. We have not had a chance to review the most recent proposal, but we have discussed potential impacts to wildlife with the Bureau of Land Management, U.S. Fish and Wildlife Service and, to some extent, your office. These impacts center primarily on Genwal's first proposal, but are impacts that should be considered regardless of the location of the loadout. The following is a summary of wildlife issues we feel should be addressed within the draft Environmental Assessment (EA).

The proposed loadout area provides habitat for a variety of wildlife species. However, construction of this loadout will primarily affect big game and raptor species. It is towards these species that efforts to avoid, mitigate and replace lost habitat values should be directed.

The project area is classified as high-priority mule deer and elk winter range. Winter is a stressful time for big game due to forage inaccessibility and severe weather conditions. Additional stress resulting from the construction and operation of this loadout could result in significant impacts to wintering big game. In order to reduce impacts to these populations, we recommend that construction of the loadout facilities occur outside of the critical winter period, December 1 through April 15. In addition, the loadout facilities, access roads and impacts to the surrounding vegetation due to blowing coal dust will result in the long-term loss of a significant amount of habitat. It is important that this long-term loss of important winter range be replaced through appropriate mitigation measures. This can be accomplished through the enhancement of winter range in other areas to benefit these big game herds.

When considering the enhancement of habitat for mitigation purposes, we recommend that enhancement occur at a rate of 3:1 to adequately replace the long-term loss of habitat. We recommend a



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3:1 mitigation rate because habitat that may be enhanced already provides some value to wildlife. Simply enhancing the value of that habitat does not provide an equal value to that habitat that is lost due to the construction of the loadout facilities, etc. In order to replace the value of habitat that is lost, a greater area must be enhanced. Some potential mitigation projects include pinyon/juniper treatment, erosion/gully control, sagebrush enhancement, oak/mountain brush treatment, riparian enhancement, rangeland seedings and prescribed burning.

The other issue we would like to see addressed is the potential impact to raptors. The enclosed map indicates the location of several raptor nests that could be impacted by this project. The location of the loadout in Genwal's original proposal would fall within the recommended 0.5 mile buffer zone for the two eagle nests and the great horned owl scrape. While the prairie falcon eyrie sites also fall within 0.5 miles of the loadout, they would be out of the direct line of sight of the anticipated disturbances. Genwal's latest proposal apparently moves the loadout location outside of the buffer zone for the eagle nests. If this is the case then, as long as the loadout remains out of the direct line of sight for the prairie falcon eyries, the potential for impacts to raptors should be minimized. The location of these nests and the potential for impacts to raptors should be kept in mind if other alterations to the proposal occur.

You requested that we inform you of any WSA's or ACEC's that may be affected by this proposal. These are areas defined and managed by the Bureau of Land Management which fall outside of our jurisdiction.

We appreciate the opportunity to remain involved with this project. We would like to receive a copy of the draft EA for review and for our files. If you have any questions regarding our comments, please contact Ken Phippen or Scott Richardson.

Sincerely,



Miles Moretti  
Regional Supervisor

Copy: Ralph Miles, DWR  
Mark Bailey, BLM  
Paul Baker, DOGM

Enclosure

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