

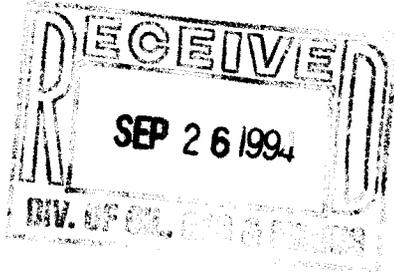
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United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

599 West Price River Dr.
Price, Utah 84501
(801) 637-2817



Reply to: 2820-4

Date: September 22, 1994

Utah Division of Oil, Gas and Mining
ATTN: Pam Grubaugh-Littig, Permit Supervisor
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

ACT 1015/032 # 3

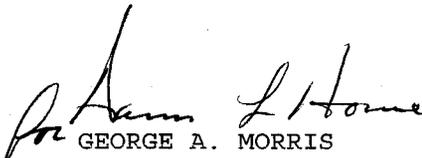
Dear Pam,

The new Genwal Coal Company Mining and Reclamation Plan (MRP), which has been modified to include the recently-acquired lease tract, has been reviewed. We have worked with Genwal directly to correct numerous deficiencies, but a number of minor deficiencies still exist. These remaining deficiencies are not considered serious enough to delay the permitting process, but should be corrected within the next 45 days.

I consent to the MRP conditional on the deficiencies noted on the enclosure being corrected to the satisfaction of the Forest Service by not later than November 1, 1994.

If you have any questions please contact us at (801) 637-2817.

Sincerely,


GEORGE A. MORRIS
Forest Supervisor

Enclosure

REQUIRED CORRECTIONS FOR THE GENWAL COAL COMPANY
CRANDALL CANYON NO. 1 MINING AND RECLAMATION PLAN

Page 3-6, Reptiles and Amphibians.

There is a discussion of amphibians, but no mention of reptiles.

Pages 3-6 through 3-8, Migratory Birds of High Federal Interest

The first paragraph starts with a discussion of the 22 species on the FWS list, then jumps into grassland hunting habitat, presumably for some type of raptor. Something is missing, and the paragraph does not make sense. Also, how current is the list of 22 species?

Number 11 on the list is the "Flammulated Owl", not "Plammulated Owl".

There is a discussion of a few of the birds on the list, but not all. Why were some omitted.

There is no mention of the Forest Service, Region 4, list of especially significant species occurring in the area.

In the paragraph immediately below the list of the 22 species (page 3-7), it states 5 of the species were "previously discussed in this report". We can not find where they were discussed.

The second paragraph below the species list does not make sense. It goes from a discussion of reporting the presence of T&E species into a discussion of golden eagle nest sites.

Page 3-9, section 3.22.230.

Spotted bats, Townsend's big-eared bats, and spotted frogs are known to occur on the Wasatch Plateau, but are not mentioned.

Page 3-14, section 3.33, Impacts to Fish and Wildlife.

There is a discussion of surveying for impacts to raptors, but no mention of identifying impacts to other the other wildlife or fish occupying the area.

Page 3-16, third paragraph.

The baseline data are useless unless there is a periodic check to determine deviations from baseline conditions. The company should commit to an aquatic macroinvertebrate study every 3 years to show that there have been no impacts to the aquatic environment.

Page 3-16, fourth paragraph.

Guzzlers may not provide satisfactory mitigation. Genwal must commit to complying with the lease stipulation which requires replacement of water in quality and quantity.

Page 3-17, Wildlife.

Raptor #4 should be "Swainson's hawk", not "Swenson hawk". Coopers hawk should be added to the list. It is unlikely that the Ferruginous hawk would occur in the area.

If there are possible impacts to raptors, the company should contact the Forest Service in addition to UDWR.

Page 3-18, first paragraph.

The Forest Service will not consent to the sediment pond being left in place after the mine area is reclaimed. It must be removed as agreed to in the original mine plan.

Page 3-33, fourth paragraph.

As on page 3-16, a periodic survey of macroinvertebrates is necessary to compare with baseline data to detect changes in the aquatic environment.

Page 4-3, fifth paragraph.

The last word, "leases", should be replaced with "lease stipulations". The USFS consents, with stipulations, to the issuance of leases by the BLM. The USFS does not issue leases.

Page 4-5, first full paragraph.

There should be mention of the archaeological survey done for the new lease tract.

Page 5-8, item 5 under section 5.22 Coal Recovery.

The last four words, "approved by the Division.", should be replaced with "with the consent of the Forest Service and the approval of the Division."

Page 5-17, Section 5.25

The potential for subsidence under perennial streams must be discussed, and calculations shown for roof support between pillars where there is less than 400 feet of overburden.

Page 5-18, first full paragraph.

There is no mention of potential subsidence along the western edge of the new lease, in the area of the Joes Valley Fault. This area should be discussed thoroughly.

Page 5-27, third paragraph.

Guzzlers may not provide acceptable mitigation. Genwal must commit to replacing water in quality and quantity, as required by the lease stipulation.

Page 5-27, last paragraph.

We do not object to Genwal paying livestock permittees for lost forage, but Genwal must also replace the water in quality and quantity, as required by the lease stipulation.

Page 5-46, section 5.42.5 Timetable and Plans, Removal of Sedimentation Pond, second paragraph.

The Forest Service will not consent to leaving the pond after the mine is reclaimed. This is an unapproved change from the last mine plan.

Page 7-22, last paragraph.

Should mention that all of the water from springs or seeps on the lease ultimately flows into the Huntington or Cottonwood drainages, where they are 100% allocated.

Page 7-23, third paragraph.

If water discharge into Crandall Creek is required, a point source discharge permit would be required. If Genwal does not already have this permits, none are available according to the anti-degradation requirements of the State of Utah. If they have a permit, any discharge must comply with the requirements of the permit.

Page 7-46, last full paragraph.

Copies of the data and analysis must also be sent to the Forest Service.

Appendix 3-1. Vegetation Reference Area and Species List.

This does not appear to have been updated since 1988. Is it valid for the new lease area?

Appendix 3-2. Aquatic Resources of Crandall Canyon.

The macroinvertebrate survey data for 1981 and 1982 are missing.

Appendix 7-30. Manti-La Sal National Forest Vegetation Data.

The map needs a legend or description. It is impossible to determine vegetation type from the map as it is.

Appendix 7-31. Percent Ground and Crown Cover Calculations.

There is no description of the land type or vegetation type. The data in the table are useless as presented and must be revised.