



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

ACT/015/032

#2

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February 14, 1997

Mr. James W. Carter, Director
Utah Division of Oil, Gas and Mining
1594 West North Temple #1210
Salt Lake City, Utah 84116-3154

Attention: Paul Baker

Subject: Response to Technical Analysis of Culvert Expansion Project Permit Amendment
Crandall Canyon Mine, Genwal Resources, Inc., Permit ACT/015/032-96, Emery
County, Utah

Dear Mr. Baker:

The Utah Division of Wildlife Resources (DWR) has reviewed the above mentioned mine permit amendment. We submit to you the following comments for your consideration.

- Page 3-5, paragraph 5, refers to Crandall Creek as primarily a spawning and nursery stream. Crandall Creek supports a year round stable population of resident fish, covering all age classes.
- "A few mature resident fish" is a relative term and misleading as to the number of fish actually found in the stream. The number of mature fish in this section of Crandall Creek is consistent with a healthy fish population for a stream this size.
- Page 3-8, paragraph 1, is no longer accurate. A species from the U.S. Forest Service Sensitive Species list has been verified in Crandall Canyon. Samples of the cutthroat trout found in Crandall Creek were sent to Utah State University for DNA testing. Preliminary results indicate that the cutthroats found in Crandall Creek are native, pure strain, Colorado River cutthroat (*Oncorhynchus clarki pleuriticus*). Further, verification of the DNA results are being pursued.
- Appendix 3-6, Seed Mix, includes Rocky Mountain juniper in the shrub mix for reseeding. An exception not to revegetate should be made for this tree. Juniper is a notorious invader that crowds out preferable vegetation. Thousands of dollars are spent annually by state and federal natural resource agencies to reduce the amount of juniper in the region. Requiring revegetation of juniper is counter productive, especially given that, sufficient juniper is already found throughout Crandall Canyon.



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We appreciate the opportunity to review this permit renewal and provide our comments. If you have any questions, please call Ben Morris or Bill Bates at (801) 637-3310 in our Price office.

Sincerely,



John Kimball
Acting Director

JK/WAB/sm

cc: Randy Radant
Bill Bates