



United States Department of the Interior  
FISH AND WILDLIFE SERVICE

UTAH FIELD OFFICE  
LINCOLN PLAZA  
145 EAST 1300 SOUTH, SUITE 404  
SALT LAKE CITY, UTAH 84115

In Reply Refer To

(CO/KS/NE/UT)

March 25, 1998

Ms. Pamela Grubaugh-Littig  
Utah Coal Program  
Division Oil, Gas, and Mining  
1594 West North Temple, Suite 1210  
Box 145801  
Salt Lake City, UT 84114-5801

*Copy Aaron, Paul,  
#2  
RAM*

RE: Permit Renewal, Crandall Canyon Mine, ACT/015/032-98PR

Dear Ms. Grubaugh-Littig:

We have received your letter of February 19, 1998 and offer the following comments for your consideration:

1. Page 3-6; Raptor surveys in 1996 identified inactive nests which were classified as "old and dilapidated." It is unclear in this section if that classification referred to all of the located nests in the 1996 survey effort. Golden eagles nested in at least one of the nests in 1995, inferring that at least this nest is potentially useable. Please clarify this section.
2. Page 3-7; In the listing of threatened and endangered species identified for Emery county, please add the Winkler cactus (*Pediocactus winkleri*) which is proposed for listing as an endangered species. Also, the bald eagle was downlisted to threatened status in 1995.
3. Page 3-7; The section regarding Migratory Birds of High Federal Interest indicates that 22 species occur in the Uintah-Southwestern Utah Coal Production Region. Only 8 species have been listed here. Are the other 14 not present within the permit area? Further comments specify that seven species are considered migratory within the permit area -- which seven? Potential for nesting should also be discussed relative to this list; for instance, Page 3-15 identifies 5 tree nesting raptors within the permit area.
4. Page 3-8; Genwal has committed to conduct aerial surveys for cliff-nesting raptors every three years, or on request by our office or the Utah Division Wildlife Resources. Similarly, Page 3-13 states that Genwal has agreed to survey tree nesting raptors and their active nests if subsidence is detected. The intent to monitor for both tree and cliff nesting raptors should be clarified in the permit application. Inactive nests are also considered important and are provided protection

under the provisions of the Migratory Bird Treaty Act, Endangered Species Act, and Eagle Protection Act.

5. Page 3-8; Habitats of Unusual High Value for Fish and Wildlife should include discussions regarding the value of seeps, springs, and riparian habitats for a wide array of wildlife species. Potential impacts to these important wildlife resources from the haul road and surface facilities should be discussed. Methods to avoid and minimize impacts to these resources should be discussed in the Habitat Protection and Enhancement section, Page 3-9.

6. Page 3-9; Genwall ensures that all electric power lines and other transmission facilities are constructed to minimize electrocution hazards. We recommend conformance with specifications presented in:

*Avian Power Line Interaction Committee (APLIC). 1996. Suggested practices for raptor protection on power lines: the state of the art in 1996. Edison Electric Institute/Raptor Research Foundation. Washington, D.C. 125pp.*

*Avian Power Line Interaction Committee (APLIC). 1994. Mitigating bird collisions with power lines: the state of the art in 1994. Edison Electric Institute. Washington, D.C. 78pp.*

Construction of transmission towers and power poles should enhance raptor nesting opportunities where appropriate.

Thank you for the opportunity to provide comments. If we can be of further assistance, please contact Laura A. Romin of this office at (801)524-5001, ext. 142.

Sincerely,



Reed E. Harris  
Field Supervisor