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*Act 1041/002
Incoming
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- Aaron*

FOREST SUPERVISOR'S OFFICE
and PRICE RANGER DISTRICT
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PRICE UT 84501

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TO: Pam Grubaugh-Littig and Dave Darby FAX #: _____

FROM: Carter Reed

SUBJECT: Pines Tract Addition

TOTAL PAGES INCLUDING COVER PAGE: 7

COMMENTS: *A copy went out to you in the mail today,
but we forgot the enclosure. Here is a complete
copy with the enclosure.*

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United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

Supervisor's Office
599 West Price River Drive
Price, UT 84501
Phone # (435) 637-2817
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File Code: 2820-4

Date: March 27, 2000

Mary Ann Wright
Utah Department of Natural Resources
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

RE: Additional Information on Pines Lease (UTU-76195) Addition to SUFCO Mine (Third Submittal), Canyon Fuel Company, LLC, SUFCO Mine, ACT/04/002-SR99D

Dear Mary Ann:

We have reviewed the subject materials. Several items in our December 16, 1999 comments have been adequately addressed as shown on the attachment. The items that have not been addressed are reiterated below with some additional comments:

1. Plate 5-10B shows subsidence protection areas but there is no information presented in the text to describe how the mine plan was developed to specifically provide protection from subsidence (Comment I.1 of attachment). A description of how the subsidence protection zones in Box Canyon were determined must be added in the reserved space on pg. 5-21. This description must include the buffer distances from the stream and angle-of-draw used to determine full-extraction mining limits and an analysis of full-support mining proposed to occur beneath the protection zones regarding pillar support capabilities to prevent subsidence from ever occurring in the subsidence protection zones. Pillar support capabilities (safety factor) and pillar foundation properties must be addressed.
2. The company needs to develop a monitoring plan for the stock watering ponds.
3. The discussions on wildlife habitat must be revised to recognize the importance of perennial water and riparian vegetation (Comment II.2 of attachment). Information on elk migration routes also needs to be incorporated (Comment II.4 of attachment).
4. Vegetation monitoring in the subsidence areas must be added (Comment III.4 of attachment).
5. The hanging garden vegetation zones in Box Canyon must be identified in the vegetation section and representative sites must be mapped, photographed, and identified for monitoring (Comment III.5 of attachment).
6. The segments of riparian vegetation in Link Canyon downstream of Link Canyon Springs



SUFCA Pines Lease Addition to SUFCA Mine

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and below the old Link Canyon Mine portals need to be described, mapped, and shown on Plate 3-1. Monitoring of the riparian vegetation segments at these locations, and in the left fork of the East Fork of Box Canyon, must be monitored in conjunction with monitoring of identified water monitoring points. Canyon Fuel must make a commitment to mitigate any loss of flow or riparian vegetation attributable to mining. Canyon Fuel must recognize and document that any mitigation plans are subject to approval by the regulatory authorities and surface management agency (Forest Service).

7. SUFCA must commit to mapping of surface flow reaches in Box Canyon on a yearly basis to be completed around the first of October and compare results with precipitation data to determine if there are any mining-caused effects to perennial flow (Comment V.2 of attachment).
8. The spring in the stream channel of the small east fork of the main fork of Box Canyon below monitoring point must be monitored for flow. The stream appears to become perennial at this point (Comment V.4 of attachment).
9. The springs or locations in the East Fork of Box Canyon where the tributaries become perennial must be added to the monitoring plan (Comment V.6 of attachment). This can be accomplished by implementing item 6 above.
10. A subsidence monument is needed in the vicinity of the left fork of the East Fork of Box Canyon.
11. A conceptual cross-section of the Muddy Canyon breakout was added. The submittal does not contain adequate information to be able to evaluate the Muddy Canyon breakout. A detailed plan will be required prior the Forest Service issuing consent/concurrence. The breakout can only be approved on a conceptual basis in the MRP approval at this time. A site-specific environmental analysis will be required prior to final consent to the Muddy Canyon breakout because it was only conceptually evaluated in the Pines Tract EIS. In order to minimize delays, the detailed plans should be submitted as soon as possible.
12. The Cultural and Historic Information Section on page 4-9 needs revision. The last paragraph identifies some of the sites that are in and out of the subsidence zones, but is not complete. In addition, the second sentence states that rock shelter site 42SV2434 is unevaluated. This is not correct. Site 42SV2433 is unevaluated as stated, but 42SV2434 has been determined to be a significant site. We suggest that this be resolved by changing the last paragraph to state that information regarding the potential for specific sites is contained in the Memorandum of Agreement.
13. A statement needs to be added on page 4-10 explaining that if any of the sites sustain adverse effects from mining, treatment plans will be developed in consultation with SHPO, the Forest Service, Advisory Council, UDOGM, and consulting parties.
14. Delete the word "adversely" in the last sentence of the second paragraph on page 4-10.
15. Change the reference in the fourth paragraph on page 4-10 from "Utah State Historical

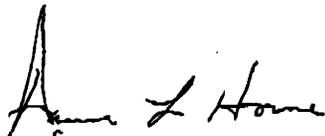
SUFCO Pines Lease Addition to SUFCO Mine

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Society" to "Utah State Historical Preservation Office (SHPO)".

If you have any questions, contact Carter Reed or Jeff DeFrest at the Forest Supervisor's Office in Price, Utah.

Sincerely,



for
JEFF WALTER
Acting Forest Supervisor

Enclosure

cc:
D-2/3
Dick Manus, BLM Price Field Office

SUFCO Mine Plan – Addition of Pines Tract Forest Service Comments, 12/16/99

I. General Comments

1. Plates 5-2C and 5-10 show subsidence protection areas but there is no information presented in the text to describe how the mine plan was developed to specifically provide protection from subsidence. A description on how specific perennial drainage reaches and rock shelters would be protected from subsidence needs to be added. The angle-of-draw used must be discussed with information to support that the angle-of-draw is supported by subsidence monitoring in adjacent areas. In addition, a buffer zone needs to be established and discussed as the basis for providing adequate protection from subsidence.
- OK / 2. Plate 5-10 needs to be refined to show actual GPS locations of protected rock shelter sites relative to proposed underground workings, subsidence limits, and a established protection or buffer zone.
- OK / 3. Tables in the text need to be added to the "Table of Contents" for quick reference.
- OK / 4. Specific comments for each section are provided below. In addition, copies of mine plan pages with suggested changes or edits are attached.

II. Chapter 3, Biology

- OK / 1. Page 3-5, First Paragraph – The statement that game fish quality is correct for the majority of the Pines lease area. However, Muddy Creek and the lower reaches of Box Canyon provide fish habitat. This needs to be changed in this paragraph and at various other locations in the document.
2. Page 3-6 – The discussion of habitats does not recognize the importance of perennial waters and associated riparian habitat for the species discussed. The EIS for the Pines Tract discusses this importance. The text should be changed to better reflect the EIS and recognize the importance of riparian vegetation for habitat and maintaining populations.
- OK / 3. Page 3-7, Paragraph 6 – It is implied that only known raptor nests will be monitored. This needs to be changed to state that the permit area will be surveyed each year for known and new raptor nests.
4. Page 3-8, Information from the EIS regarding the extent and importance of deer and elk winter-range and elk migration routes needs to be added to this discussion.
- OK / 5. Page 3-11 – Need to add a discussion of macroinvertebrate species and bats.
- OK / 6. Page 3-16, Paragraph 6 – The Link Canyon Columbine is a sensitive species, not threatened or endangered. This paragraph and later references need to be corrected.
- OK / 7. Page 3-18, Paragraph 5 – See comment above. Also change "thought" to "known" in the first sentence.

III. Chapter 4, Land Use (vegetation) and Air Quality

- ok ~~1.~~ The description of vegetation communities needs to be changed to correspond with the EIS for the Pines Lease Tract.
- ok ~~2.~~ The vegetation condition ratings used in the document is outdated and should be removed.
- 3. The hanging garden type vegetation communities found on the canyon walls in Box Canyon associated with perennially wet areas need to be recognized in the discussion of riparian vegetation.
- 4. Vegetation monitoring in subsidence areas must be added.
- 5. A monitoring plan to determine any effects to the hanging-garden vegetation areas must be included.
- 6. Need to show the riparian vegetation zone on Muddy Creek on Plate 3-1.

IV. Pines Tract Area, Cultural and Historic Information

- ok ~~1.~~ A mitigation plan needs to be developed for monitoring of sites within the tract and mitigation of potential impacts as discussed in our meeting of December 15, 1999.
- ok ~~2.~~ The subsidence protection zones and cultural resource sites need to be more accurately located to assure compliance with lease decisions.

V. Chapter 7, Hydrology

- ok ~~1.~~ Page 7-18, 1st paragraph – The text needs to be changed to add a description of the perennial reaches of Box and Muddy Creeks. The perennial reaches need to be shown on Plate 7-3.
- ok ~~2.~~ Yearly mapping of perennial flows in both forks of Box Canyon around the beginning of October must be added to the monitoring plan.
- ok ~~3.~~ The flume in the main fork of Box Canyon below the already mined area and above monitoring point GW-20 must be added as a monitoring point. The stream becomes perennial in this vicinity.
- ok ~~4.~~ The spring in the stream channel of the small east fork of the main fork of Box Canyon below monitoring point SUFCO 089 must be located and added as a monitoring point. The stream becomes perennial at this location in most years.
- ok ~~5.~~ The frequency of monitoring at points 407 and 408 is not adequate to detect mining impacts. The frequency should be changed to monthly instead of quarterly and/or a continuous monitoring device installed to take continuous readings during ice-free periods.
- ~~6.~~ The springs or locations in the East Fork of Box Canyon where the tributaries become perennial must be added to the monitoring plan.

covered by
item 2
above.

Subsidence Monitoring

- ok / 1. Subsidence monitoring air photography control monuments must be shown on Plate 5-10.
- ok / 2. Subsidence monitoring must include annual monitoring of rock shelters, cultural resource sites, cracks, and escarpment failure areas.

Muddy Canyon Breakout

- need more detail*
- 1. Additional information and more detailed drawings are required for evaluation of this proposal. A cross-section is needed showing the breakout and location and elevation relative to Muddy Creek.
 - 2. If the breakout or any part of the disturbed area would be located within the 100-year floodplain of Muddy Creek, information on how the facility would be protected from stream erosion will be required.
- ok / 3. This could be the low point of the mining area. If so, drainage from this area could occur after reclamation and abandonment of the mine. Information on drainage control would be required. This would need to be addressed in the PHC and CHIA.