

*9/10/25/005 Incoming
cc: Priscilla Dana
Baron*



United States
Department of
Agriculture

Forest
Service

Dixie National Forest
Powell Ranger District

225 East Center Street
P.O. Box 80
Panguitch, UT 84759-0080
435-676-9300

File Code: 1950-5

Date: May 9, 2008

Ms. Mary Ann Wright
Associate Director, Mining
Coal Regulatory Program
Division of Oil, Gas & Mining
P.O. Box 145801
Salt Lake City, UT 84114-5801

RECEIVED

MAY 13 2008

DIV OF OIL GAS & MINING

Dear Ms. Wright:

Thank you for the letter informing the Powell Ranger District, Dixie National Forest, that the Utah Division of Oil, Gas and Mining has determined the Alton Coal Development, LLC permit application for the Coal Hollow Mine is administratively complete.

The District understands that "Alton Coal Development intends to conduct surface coal mining on the 635.64-acre tract of land to mine privately held coal leases" and is "located in Kane County, T.39 S, R.5 W, Sections 19, 20, 29, and 30, approximately 3 miles south of Alton on County Rd. #136". This tract of private land is immediately adjacent to a Bureau of Land Management (BLM) tract, which is also under consideration for surface coal mining, and within one mile of National Forest System lands on the Powell Ranger District, Dixie National Forest.

On February 26, 2007, the District/Forest submitted a letter to the Kanab Field Office, BLM, expressing concerns to be addressed in the Alton Coal Tract Lease by Application, Environmental Impact Statement. The concerns expressed to the BLM in the afore mentioned letter also apply to the 635.64 acre tract of privately held coal leases in the Coal Hollow Mine under review by the State of Utah, Division of Oil, Gas and Mining.

The Forest Service asks that this cover letter and an enclosed copy of the February 26, 2007, letter to the BLM be included as comments in the application/permitting process for the Coal Hollow Mine.

Again, thank you for the opportunity to provide comments.

Sincerely,

DONNA L. OWENS
District Ranger
Enclosure
cc S.O.





File Code: 1950-4

Date: February 26, 2007

Mr. Keith Rigtrup
Kanab Field Office
Bureau of Land Management, USDI
318 North 100 East
Kanab, UT 84741

Dear Mr. Rigtrup:

This letter is in response to the request for scoping comments for the proposed *Alton Coal Tract Lease by Application, Environmental Impact Statement* on Bureau of Land Management (BLM) lands managed by the Kanab Field Office.

Thank you for the opportunity to suggest issues and other topics that should be included in the scope of the EIS that is being prepared. The proposed lease application and coal mine presents concern to the Dixie National Forest particularly the Powell Ranger District which is located one mile east of portions of the proposed coal mine. It is imperative the potential impacts to Federal lands and the local region be examined and mitigated to ensure that energy development is conducted in a manner that protects these lands for the public.

Our concerns include air pollution, water pollution, and the loss of scenic vistas, natural quiet, and wildlife habitat. The Forest Service also has concerns as they relate to tourism, highway safety, and the effects this proposal has on Bryce Canyon National Park (BCNP) and BLM lands managed by both the Kanab Field Office and the Grand Staircase-Escalante National Monument (GSENM) which connect through boundaries and through interagency efforts to coordinate services to the public. The Forest Service would like to work closely with staff from the Kanab Field Office as this analysis is developed.

Millions of visitors seek out the campgrounds, scenery, trails and other recreation activities found on the Dixie National Forest and adjacent BCNP, BLM, and GSENM lands. Most of these visitors travel on U.S. Highway 89 to access these areas. The outstanding visual, recreational, and resource values that are found on the Dixie National Forest should be addressed in the EIS and the potential effects to this area if adjacent lands are opened to coal mining.

Tourism represents 60% of the economic base in Garfield County, where visitor expenditures contribute substantially to employment and economic activity of Garfield County. Impacts to the economy of Garfield County should also be addressed in the EIS since coal extraction could adversely impact tourism in the area.

The proposal to extract coal near Alton, Utah, raises many concerns about what impacts these activities would have on the Dixie National Forest and the local region. Specifically there are significant concerns related to the following:

Air Quality: BCNP and nearby Zion and Capitol Reef National Parks are Class I Airsheds under the Clean Air Act, so no significant degradation of air quality should be permitted under the proposed actions in the EIS. The proximity of Alton, Hatch, and other private residential



subdivisions should also be considered when analyzing the impacts to air quality. In addition to impacts to criteria pollutants, the Forest Service asks that you examine the visibility of dust plumes from haul routes, surface mining, coal preparation, and loadout activities in the impact analysis. The analysis should also address cumulative impacts from the distribution of coal off-site and its use in regionally located, coal fired power plants which could increase air pollution to these Class I Airsheds. The ongoing nature of the mining activity could also impact the public agencies ability to conduct prescribed burns and treat wildland urban interface areas if air quality is degraded to the point of risking compromise to a Class I Airshed.

Night Skies: The Dixie National Forest works closely with BCNP in the interpretation of night sky quality. The Red Canyon Visitor Center conducts popular evening interpretive programs to educate visitors about night sky quality. Night sky quality is principally degraded by light pollution – emissions from outdoor lights that cause direct glare and reduce the contrast of the night sky – but atmospheric clarity also plays a role. The EIS should address the impacts to night sky quality and provide mitigation measures if the night sky quality would be compromised due to round-the-clock mining operations.

Tourism: The impacts of coal development on the tourism industry of the area should be included in the EIS and should include users of National Forest, National Park, and BLM lands and visitors just traveling through the area on highways and scenic byways. During the public meetings it was stated that there would be 153 double trailer coal trucks traveling one way or 306 round trips per day along the proposed route. Please address additional heavy equipment and increased traffic loads on surrounding highways especially U.S. Highways 89, Utah Highway 20, and Interstate 15. U.S. Highway 89 has recently been designated as “The Mormon Pioneer Heritage Highway” and is also the main artery for tourist travel between Bryce Canyon, Zion, and Grand Canyon National Parks. This traffic not only includes cars but larger recreational vehicles. Increased traffic would have a negative impact on both residents, which include employees, and visitors to the area who would not be able to fully appreciate the new designation of this corridor as a result of the increased truck traffic. In addition, the analysis should include how the increased truck traffic would impact the city of Panguitch, which has recently been added to the National Historic Register. Panguitch is also the western gateway to Scenic Byway 12, an All American Road, the highest scenic designation a highway can have. The EIS should address impacts to the nationally designated historic city and adjacent designated areas.

Safety along these highways is always an issue, especially during the high tourist season. The increased truck traffic obviously will increase the safety hazard potential. The EIS should address the safety issues and possible mitigations.

The EIS should also analyze proposed and any potential haul routes, especially if there is a chance that the route may change over the 20 years of operation of the coal mine. If this does not occur during this EIS process, there may be no opportunity to address these issues in the future.

Soundscapes: During the public meetings it was mentioned that there would be no blasting associated with the proposed coal mine. The EIS needs to analyze and demonstrate how mining operations will be conducted so that no blasting would occur especially when needing to remove up to 200 feet of overburden. If there is any potential that blasting could occur during the proposed life of the mining operation (20 years) the EIS should address this potential impact.

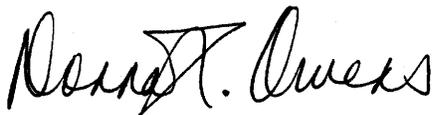
Scenic Values: The Paunsaugunt Plateau rises to the east of the proposed coal mine. It is likely that the proposed coal mine would be directly visible from trails, roads, and viewpoints along the Paunsaugunt Plateau. It is also likely that disturbances such as removal of overburden and dust along haul routes could cause dust plumes that may be visible. These dust plumes could also affect the air quality since the prevailing winds come from the south and west. The EIS should address impacts to the scenic values of the U.S. Highway 89 corridor, which is a primary travel route for visitors to the area as discussed under the tourism section.

Water Quality: Several watersheds could potentially be impacted by the proposed coal mine. The potential for water quality degradation from ground disturbing activities within the Robinson Creek and Kanab Creek watersheds should be addressed in the EIS. The potential for water contamination from spills and natural overland flow (rain runoff) should also be addressed. This analysis should include the Sevier watershed along the proposed haul route.

Other Resource Concerns: The EIS should address a number of concerns related to possible impacts to other regional resources and visitor appreciation of the National Forest and surrounding areas. These include wildlife; habitat; sensitive species (surveys for such species should follow established scientific protocol); restoration of the impacted site; and cumulative impacts from other activities (existing truck traffic along the proposed haul routes, logging, proposed oil and gas leasing, residential expansion throughout the region). Many factors (light pollution, dust, noise, traffic) singularly may not degrade the National Forest and regional resources, but cumulatively could be a great impact to these areas and to those visiting the area. Please address what may happen if there is a future need for alternate haul routes, blasting, or expansion of the proposed mine site. In addition, impacts associated with portions of the proposed coal mine occurring on state or private lands should be considered as part of the overall cumulative impacts of the mine.

The Forest Service is very interested in being involved in the EIS process and appreciates the opportunity to provide input into this proposed project and looks forward to working with the Bureau of Land Management cooperatively on this analysis.

Sincerely,



DONNA L. OWENS
District Ranger

cc S.O.
Eddie Lopez, Superintendent, BCNP
Brad Exton, Monument Manager, GSENM
Rusty Lee, GSENM