

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 1, 2010

TO: Internal File

THRU: Priscilla Burton, Lead *PWB km sds*

FROM: Joe Helfrich, Biologist *JH*

RE: Phase I Cultural Resource Treatment Plan, Alton Coal Development Company, Coal Hollow Mine, C/025/0005, Task ID #3647

SUMMARY:

On October 5, 2010 the Division received a phase I cultural resources treatment plan for data recovery at 42KA6093 and 42 KA6505 and avoidance for 42KA1313, 42KA2041, 42KA2043, 42KA6109, 42KA6110, and 42KA6126 for the Coal Hollow mine. This memo will include a review of the information provided in the treatment plan. This treatment plan was developed from the survey dated July 10, 2008 by Montgomery Archeological Consultants indicating that these two sites could not be avoided by the proposed mining activities.

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TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

HISTORIC AND ARCHEOLOGICAL RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.12; R645-301-411.

Analysis:

Data recovery has already been completed for most of the sites to be disturbed by the Coal Hollow mine in Kane County Utah. Several additional sites were identified late in the permitting phase of this mine. The Division subsequently conditioned the Coal Hollow mine permit to protect these sites either by avoidance or by approved mitigation.

A phase I cultural resources treatment plan for data recovery at 42KA6093 and 42KA6505 and avoidance for 42KA1313, 42KA2041, 42KA2043, 42KA6109, 42KA6110, and 42KA6126 were developed for the Coal Hollow mine. This treatment plan was developed from the survey dated July 10, 2008 by Montgomery Archeological Consultants indicating that these two sites could not be avoided by the proposed mining activities. These sites are located southeast of the town of Alton, Utah.

Level one mitigation will evaluate whether intact stratified deposits exist at 42KA6093 and 42KA6505, and establish whether the data potential of these sites has been exhausted. The treatment plan will also include avoidance of the other sites. If significant intact cultural deposits are encountered at either site, additional data recovery efforts at level II or III may be necessary.

The Division has determined that following this treatment plan will satisfy the conditions of the permit and provide mitigation for the last two eligible sites within the area to be disturbed by the mine.

Findings:

The information is adequate to meet the requirements of this section of the regulations.

RECOMMENDATIONS:

The amendment is recommended for approval.

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