

This section documents the results of the scoping process and presents a general characterization and analysis of the comments received. All of the comments and questions received will be considered in the development of the EIS.

There was a total of 53 written comments received.

- 9 comment cards were filled out at the Public Scoping meeting
- 7 emails were received via David Lehmann's email address and the project email established for the purpose of receiving comments, and
- 37 written letters were sent to the BLM office

Individual issues, questions and statements identified during scoping, which were submitted as either written or oral comments, were categorized and summarized. The issue statements were organized by the following general categories:

- General Comments
- Socioeconomic/Allocated Dollars
  - Property Values
  - Labor
- Environmental
  - Wildlife
  - Water Quality
  - Air Quality
- Viewshed/Visual Impacts
- Noise
- Energy use/output
- Rail spur
- Infrastructure
- Traffic / Road Improvements

This list is not intended to be exclusive and other issues may be added or modified as the EIS process continues and the proposed project is further defined. Copies of actual comments received are included in Appendix D.

A summary of the specific comments is presented below.

### **3.1 GENERAL COMMENTS**

- Utilization of low-sulfur/ low mercury coal is important for the U.S. national security and for electric supplies in general. Because of this, the BLM's effort to come into compliance with the Energy Policy Act of 2005, which encourages the inventory and production of domestic supplies of low sulfur coal, is invaluable. Given the recent events in Iraq, Iran and Venezuela domestic energy production is more important than ever.

- Consideration of mitigation measures should encompass not only the immediate proposal, but reasonably foreseeable expansions as well.
- The Red Cliff Mine will boost current McClane Canyon Mine production to nearly 8 million tons of coal, annually. This volume will contribute not only to the health of our economy, but will also keep the lights on in Colorado for decades to come.
- CAM and the BLM should continue a practice of working with the people in the area to ensure public buy-in and support of the project.
- Coal has a long history in Grand Junction and coal will continue to have a great future if this mine expansion is completed.
- Some local residents expressed concern about how this rail spur and coal mine would detract from their serene and peaceful lifestyles they've come to appreciate in this area.
- Some comments expressed concern at the way the mine is being put together and how they believe the community and people are being circumvented.
- An adequate and clear Purpose and Need statement will need to be developed and included in the EIS.
- The EIS should include, but not be limited to, a "no-build" alternative.
- The EIS should provide a detailed and accurate description of the various components of the proposed action. All individual components that make up the project area, or any other project infrastructure, should be identified.

**Some questions that arose and that will be addressed:**

- Does Garfield County have a history of issues with CAM at the McClane Canyon Mine?
- How will the schools be impacted with the increased number of people coming into this area?
- What is the life of the mine and railroad spur?
- What is the likelihood of increased activity over the period of mine use?

### **3.2 SOCIOECONOMIC / ALLOCATED DOLLARS**

- The amount of money that could be brought in during the construction of this project would be monumental and would be a great benefit to trucking companies and other vendors who supply the mine.
- Dollars awarded under energy grants are based on the amount of natural resource development within their respective counties. Citizens strongly urge the BLM, when writing the Red Cliff Mine EIS, to consider how many dollars are returned to Garfield and Mesa counties through useful energy impact grants.
- The EIS needs to include the potential multiplier for how many local companies could be positively affected by the new mine as well as the economic benefits of energy grants being made available through the State of Colorado.

- It is believed that the additional income in the form of taxes, energy impact grants, severances taxes and royalty payments will greatly benefit this community.
- There will be over 250 people employed who buy homes in the area. That means they all pay property taxes and that money goes to schools. This project will help the local school districts.
- The construction of the mine will employ local contractors to do excavation, reclamation, concrete, electrical, framing, and a host of other services. In total, the construction phase will likely extend several years and help aid the already booming Mesa County construction industry.
- Each year millions of dollars are returned to Mesa County through severance taxes. In FY 2005, the Dept. of Local Affairs returned \$2.7 million through severance tax direct distributions. In FY 2006, that number has more than doubled. If the coal mine were placed in Loma, the majority of the workers would live in Mesa County thus adding to the overall severance tax received by the area.
- The economic impact this project could have on Mesa County and the surrounding counties it serves goes far beyond the jobs and wages it provides for its employees. Not only will the mine employees spend money here, but also the actual coal mine, construction employees and construction sub-contractors will as well.
- The BLM has to acknowledge the potential benefits of this construction in the EIS. In order to complete the construction, CAM will have to use the services of water haulers, cement specialists, safety personnel, construction firms, and heavy equipment companies.
- Some of the projects funded last year by the Energy and Mineral Assistance Program included upgrades in hardware and software for our county's EMS system, restoration of the old Riverside School, and the replacement of leaky roofs on the old Department of Energy building in Grand Junction. Projects like these could not have been completed without these grants. These grants are funded based on energy and mineral development within their respective counties. With more development, such as the Red Cliff Mine, Mesa County is positioned to benefit from increased funding.
- The proposed Red Cliff Mine will increase Mesa County's ability to receive more dollars from Colorado's Energy and Mineral Assistance Program.
- The EIS for this project should consider environmental related socioeconomic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, and increased road traffic with associated dust and hazardous materials spill potential.

### 3.2.1 Property Values

- Property value could potentially decrease by 40% due to the rail spur being approved.
- The railroad line and its use would be an eyesore and a noise source. Both effects would reduce property values in an area of prospective subdivision for residential development, both along 10 Road and along US 6 (M.8 Rd.) Mitigation should include relocation or at least vegetative screening.

- In the last 2 years land values have increased significantly due to strong growth in Mesa County created, in part, by the energy industry finding and developing additional natural gas and now coal. CAM has helped increase land values in the Mack/Loma area by purchasing land for their proposed railroad line at prices significantly above what then current values were. Future values of land in the area should be affected by these purchases in a positive manor.
- CAM has been a very positive force in the Mack/Loma area since purchasing property for the proposed railroad because of the desire to clean up purchased properties and be a good neighbor.
- Realtors believe that there will be no reason to believe the proposed project would decrease residential, agricultural, or commercial property values in the area.
- CAM has already purchased an abandoned bar and trailer park in Loma and is renovating it. Such activities like this will increase property values and will enhance the communities on the western part of Mesa County.

### 3.2.2 Labor

- Mesa County will benefit not only from the economic benefits of employing some 200 miners and numerous local companies as vendors, but will bring additional dollars to our county in the form of energy impact grants.
- If the mine is under construction, not only will money come into the community from the construction, but also from the construction workers. The majority of the individuals working to build the mine will need to live in the surrounding areas. This means they will be paying taxes that will come back to this community. The increase in population means more people will be buying merchandise in our local stores.
- The Red Cliff Mine means that 250 will be employed with benefits and an average salary of nearly \$60K. Vendors and contractors will supply the mine, which will also help maintain our construction industry.

#### **Some questions that arose and that will be addressed:**

- When labor starts, is CAM planning to use local labor as much as possible?
- How many non-miner employees will be employed in relation to the mine? What will their income levels be?
- Where will this increased labor camp live? Will they work in shifts?

### 3.3 ENVIRONMENTAL

- Subsidence and safety of property and roads adjacent to the underground mining activities should be a significant focus of the EIS.
- The Upper Colorado River Endangered Fish Recovery Program has regulations concerning how much water can be taken from the river flow. The water levels must be such that they do not hurt our environment, wildlife, or livelihood.

- The 2006 survey map also indicates there are jurisdictional wetlands adjacent to one portion of the proposed rail line. Wetlands should be protected and avoided.
- Location of facilities and soil borrow pits should be carefully considered to avoid the two locally important habitat types: sagebrush and pinyon-juniper.
- Topsoil is limited in the area and may need to be imported in order to achieve successful reclamation of the gob pile slopes.
- In instances where on-site mitigation is not feasible, impacts could be offset by implementing improvements on property recently purchased by the mine along the rail spur. These improvements could include pasture enhancements, water developments, creation of wetlands or other wildlife habitat improvements.
- Colorado Department of Wildlife (CDOW) recommends a yearly monitoring program to include field surveys and an annual report to assess changes to habitat and species.
- Field surveys would be necessary to evaluate the distribution and abundance of important wildlife species and their habitats.
- The EIS should provide cumulative impact analyses for impacted resources of concern. The EIS should analyze impacts according to airsheds and watersheds rather than political boundaries. The cumulative impact analysis should include additional coal and energy development activities.
- The EPA recommends that a Noxious Weed Management Plan be prepared in coordination with State and local agencies and be included in the EIS. The Plan should address control of weeds in all areas where ground disturbances will occur including the mine, roads, pipelines, transmission lines, underground cables, railroad lines, etc. It should also address such techniques as washing/cleaning equipment before entering sensitive areas, which will help prevent importation of seeds, etc.
- The EIS should include an evaluation of project greenhouse emissions and their potential control technologies to provide public disclosure of this environmental impact. The coal mines in general are the most polluting form of energy for the future.
- The final EIS should identify how CAM will avoid/reduce pollution at the source as the preferred course of action at the facility to lessen the need to recycle, treat, and otherwise implement Pollution Prevention objectives.
- The BLM should institute an active monitoring system regiment to ensure that coal exploration and associated activities continue to follow mitigation measures, stipulations, procedures, and regulations after the initial development phase of the project is complete.
- Soil compaction may result from vehicles associated with the proposed project. Soil compaction can cause numerous ill effects on plant species. The BLM should consider the effects that vehicles will have on the soil, and identify mitigation measures to reduce these effects.
- The BLM must survey for sensitive soils to determine the extent to which they exist in the project area. The BLM must also undertake field sampling and surveying to determine if biological soil crusts do occur in the project area; the BLM must take into

consideration the impact that the proposed project may have on these soil crusts and develop measures to minimize or eliminate this impact.

- The proposed project and its associated activities will likely have negative indirect effects on rare plants by way of leaving the area vulnerable to establishment of nonnative species. Vehicular traffic and surface disturbing activities are the two general elements that will increase the likelihood of noxious weeds introduction into the project area.
- It is likely that construction activities associated with this project will transport noxious weed species into the area.
- Surface disturbances should simply be avoided in rare plant habitats and kept to a minimum throughout the project area. It is imperative that reclamation procedures allow the re-establishment of native vegetation cover as rapidly as possible to minimize the opportunity for the invasion of noxious weeds. Do not substitute *post facto* reclamation for proactive conservation measures.
- The BLM must use native plant species for revegetation as well as locally collected seeds to preserve local genotypes and species composition.
- The BLM must consider the environmental impacts of revegetation efforts in the project area, and ensure that such efforts do not have negative effects on rare plant species and the overall native ecosystem.
- The BLM has the ability to take action on climate change by limiting the threats it can control. When making decisions on various land use activities such as mineral extraction or when developing conservation strategies and plans for Sensitive species, the BLM must carefully consider climate change.
- Another subsequent impact that the BLM must consider is the degree to which the coal extracted from this mine will lead to global warming. The BLM must address the adverse impacts in the EIS and develop strategies for eliminating and reducing them.

**Some questions that arose and that will be addressed:**

- How significant will subsidence from the mining activities be?
- What are the environmental issues associated with the "coal preparation plant"?
- What are the impacts to the wildlife due to drainage crossings, migration routes, and other riparian areas?
- What are the reclamation plans for when they discontinue use?
- What effect will the coal dust have on the fish and wildlife in this area and down the Colorado River?
- How does the BLM take into account the impacts that coal burning has on global warming and how will it be addressed in the EIS?

### 3.3.1 Wildlife

- The proposed line will now make an impact on the newly grown antelope herds that are just beginning to come back, after the building of the Gas Plant on 6.5 road, and the new power lines in that same area.
- The construction and railroad spur have the potential to negatively impact both aquatic and terrestrial wildlife. As relates to aquatic species, CDOW anticipates that Designated Critical Habitat for the kit fox may be affected. State endangered (SE) bonytail chub and razorback sucker, along with the State Threatened (ST) humpback chub and Colorado pike minnow may be negatively impacted by water depletion related to the mining process. Other native aquatic species, including the Species of Special Concern (SC) Colorado roundtail chub may also be impacted.
- The proposed rail line will run through white-tailed prairie dog habitat, a species of growing concern for CDOW. Burrowing owls (ST) are often associated with prairie dog colonies, and were observed during the 2006 preliminary ecological survey.
- The bald eagle (ST) may occur near the riparian area of East Salt Creek as well as in the agricultural lands and desert habitats near Loma and Mack. Other raptors including the ferruginous hawk (SC), the American peregrine falcon (SC), prairie falcon, Swainson's hawk, American kestrel and northern harrier are known to occur within the area proposed for the mine. Golden eagles and red-tailed hawks were observed in proximity to the mine portals. These raptors and their habitat protection will have to be addressed in the EIS.
- The greater sandhill crane (SC) is a common visitor to the agricultural areas near Mack during migrations, and some have successfully nested in the area. Buffer zones for various raptor/birds of prey from 75 meters to 1/3 mile, are recommended depending on species.
- The midget faded rattlesnake (SC) is a probable resident of the habitat to be affected. The longnose leopard lizard (SC) also occurs in the area, and was noted in the 2006 ecological inventory.
- The pond located near the proposed train loadout is believed to provide important habitat for the Great Basin spade foot toad.
- Impacts to wildlife may include direct mortality, habitat destruction, decreases in the ability of wildlife to utilize important habitats (habitat effectiveness) due to increased disturbance, and habitat fragmentation resulting from the inability of certain species to negotiate obstacles such as the proposed conveyor system.
- Another issue of significant concern is the potential for the railroad line to fragment habitat.
- Fencing of the railway would have severe negative consequences for pronghorn antelope. As an alternative, CDOW recommends slow train speeds in order to reduce the potential for collisions with wildlife or livestock.
- CDOW anticipates that impacts to wintering populations of deer and elk from new disturbance could be significant. The route between the unit train load out and the mine entries bisects an important winter range for both deer and elk.

- The proposed coal mine waste disposal area (gob pile) is sited on a sagebrush bench that has moderate to heavy use by wintering elk and moderate use by wintering mule deer.
- Desert sagebrush habitats are critically important to wildlife and once disturbed cannot be replaced in the near term. CDOW recommends minimizing disturbance in the sagebrush and pinyon-juniper habitats to preserve their value as big game winter ranges.
- The railway's activity would likely cause displacement and could have a wildlife avoidance fringe effect. This could move wildlife away from water sources they currently use. CDOW suggests these impacts be considered and consult with CDOW with regard to creation of additional watering locations for wildlife mitigation.
- The crucial habitat contained within the proposed project area is of significant concern. The Colorado Natural Heritage Program (CNHP) has identified several species of concern. Those are: white-tailed prairie dog, midget faded rattlesnake, grand buckwheat, bald eagle, kit fox, Uinta basin hookless cactus, longnosed leopard lizard, and the razorback sucker.
- The BLM must develop mitigation measures for white-tailed prairie dogs and their habitat in order to avoid the destruction of individual white-tailed prairie dogs, occupied white-tailed prairie dog habitat, and the ecosystem upon which other listed and sensitive species rely.
- Mineral exploration within its range will bring the midget faded rattlesnake into more frequent contact with people and motor vehicles, which, in turn, will increase snake mortality. Being a ground dwelling species, the snake is especially susceptible to large-scale surface disturbing activities within its habitat.
- Only 34 occurrences of the grand buckwheat are known globally. One of the most significant threats to the species is the proximity of roads. The grand buckwheat is a species that is especially vulnerable to significant surface disturbing activities, such as a major coal mining operations within its habitat.
- The coal mine project and its associated disturbances will have a significant impact on the local natural environment, including impacts on potential bald eagle habitat and food supply.
- The kit fox is one of Colorado's most vulnerable species with less than 100 individuals in the state. The fox lives in the semi-desert shrub lands extending from Montrose to Grand Junction. A major threat to the kit fox is habitat loss due to conversion of the foxes' native grounds to agriculture and development usage.
- The greatest threat to the Uinta basin hookless cactus is habitat destruction or modification by development of energy extraction, water storage projects, transportation, and residential facilities. Nearly all populations of the cactus are threatened by these actions.
- Within the state, the longnose leopard lizard is known to exist only in the desert areas of western Colorado. The lizard is especially susceptible to impacts resulting from habitat alteration, degradation, and destruction caused by commercial uses and invasion of exotic

herbaceous plants, introduction of predators, the influx of environmental pollutants, flash floods, and drought.

- The razorback sucker reproducing populations remain only in the middle Green River in Utah and in an off-channel pond in the Colorado River near Grand Junction.
- The BLM must also analyze population trends, migration patterns, and determine whether management objectives are being met.
- The BLM must fully analyze the consequences of fragmentation, dissection, perforation, shrinkage, and attrition as it applies to the project area. They must also develop measures to prevent or minimize loss and isolation of habitat due to the key spatial processes listed above and its effects on Special Status Species.
- The BLM must consider the impact that the coal mine waste disposal area may have on wildlife and special status animal species should these species encounter the disposal area.
- Power lines serve as perches for raptors, and can therefore concentrate predation pressure around power line corridors. Thus, it is critically important that power lines not be sited within one mile of prairie dog colonies or within reasonable distances of other special status species that may serve as prey for raptors species.

### 3.3.2 Water Quality

- To ascertain the extent of waters on the project site, the applicant should prepare wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetland Delineations" and submit it to the U.S. Corps of Engineers for verification.
- Every effort should be made to avoid project features that require the discharge of dredged or fill material into waters of the U.S.
- In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the U.S., mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation.
- After review of the information submitted, it appears there may be less environmental damaging alternatives for this project and that it can be designed to avoid impacted waters of the U.S., including wetlands.
- Additional mitigation should be established to compensate for the long-term loss of wetland values.
- The BLM should require complete avoidance of disturbance to any fen wetland.
- The EIS should note that water consumption would not be adversely affected by the proposed Red Cliff Mine project.
- CAM is looking to remove 500 acre-feet from Salt Wash. That amount of water is believed to be insignificant.
- During data collection, there should be a comparative analysis of how much water CAM is proposing to take out of the water body and how much is removed by municipalities.

- It should be conveyed to the public that CAM's use of recycled water is sensitive to the arid nature of this environment.
- Concerns raised about water use should not be marginalized and at the same time, current operational procedures should not be overlooked.
- A complete life-cycle analysis, including any impacts on other potential users of the proposed water sources, had it not been diverted for use by the mine, needs to be completed.
- It is imperative that your EIS fully evaluate all the potential downstream and upstream impacts in addition to those anticipated at just the mine operation itself.
- For water quality protection and reducing the effects of increasing soil salinity during runoff events, CDOW suggest the project proponent consider lining the gob pile.
- The EPA recommends the EIS include an accurate description of surface and ground water resources, as both are essential to understand the potential effects on the project.
- A discussion of project area geology, topography, soils, and stream stability in terms of erosion and mass failure potential may be necessary to adequately portray the potential risk to surface and subsurface water quality and quantity, aquatic habitat, and other resources.
- The EIS should show the extent to which aquatic habitats could be impaired by project activities. This includes effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, large organic material supplies (woody debris), stream bank vegetation, and riparian habitats.
- The EIS will need to analyze potential impacts to potential drinking water.
- The EIS needs to evaluate stormwater management. To protect water quality from storm water runoff, including contaminated runoff from construction and operation activities, specific practices should be detailed in the EIS and their implementation defined.
- Particular focus should be given in the EIS to the transition points adjacent to any anticipated stream subsidence to ascertain if the proper stream function and channel geometries will be maintained in a post-subsidence condition.
- The Grand Valley Water Users Association operates irrigation drains that might be affected by the railroad.
- There are some springs on private lands that might be affected by the railroad construction.
- The BLM must consider the impact that the proposed coal mine and its associated structures and activities may have on the watershed, nearby water bodies, aquatic species and habitat, and local drinking water quality.
- The BLM must consider the environmental impacts that the coal mine waste disposal area could have on the watershed, nearby water bodies, and aquatic species should chemicals and substances from the waste disposal area enter the watershed.

- The current proposal for construction of the new transportation and mine facilities would alter existing drainage patterns, causing changes in the amount and distribution of water that wildlife is depending upon.

**Some questions that arose and that will be addressed:**

- What about the coal dust in the area of the Mack Wash and its tributaries? How will this be addressed in the EIS?

### 3.3.3 Air Quality

- Air emissions from rail spur and trains will be degrading to life quality.
- There is concern that the trains and any roads and/or activity along side of the tracks will create excessive amounts of dust.
- The EIS should identify all relevant, reasonable mitigation for air quality impacts, even if they are outside the jurisdiction of BLM. The probability of the mitigation measures being implemented should be also discussed.
- The EIS should indicate a path to assure compliance with National Ambient Air Quality Standards. It should outline both regulatory and non-regulatory processes that are in place to address air quality concerns in the project area, as well as include all mitigation.

**Some questions that arose and that will be addressed:**

- What is the anticipated pollution output of motive power/unit?
- What will be the ambient air quality impacts of this increased generation, including that of increased mercury emissions?

### 3.4 VIEWSHED / VISUAL IMPACTS

- Concerns were expressed about the power lines proposed on Scenic Byway, State Highway 139. This is an excellent road for viewing the natural beauty surrounding the area of Grand Junction. It would seem possible to bury the lines with minimal impacts to the land and no impacts to visual qualities of the landscape.
- The valley east of 10 Road and North of Mack Mesa is, at this point, beautiful, quiet, and relatively undeveloped. The proposed spur will result in a cut and rails, which will be visible for the entire distance from where the spur will cross the Highline Canal to where it will cross 10 Road.
- The BLM and CAM should do all they can to minimize visual impacts to those who live near the area where the rail spur will be located.
- Some people may have concerns over the possible visual impacts that the Red Cliff Mine could have on the area.
- The BLM, as the permitting authority, should assess possible ways to take into account standard cost effective visual mitigations while also reminding the people who are opposed to the project that the visual impacts are going to be minimal.

- Mack and western part of Mesa County already contain an interstate, the main rail line, power lines and county roads. Running power lines along a rail spur will not drastically affect the look and feel of the area.
- Landscaping is often used to screen off sights or sounds - such could be employed here to both the benefit of the residents and as a demonstration of goodwill on the part of the mining company in investing in both the community and their transportation infrastructure.
- There is great concern over where Grand Valley Power will place their power lines.
- Visual impacts associated with project facilities and activities may affect the visual character and scenic resources of an area, including aesthetic and/or functional quality of recreational experiences.
- The EIS should evaluate visual impacts based on aspects such as: can the surrounding landscape integrate visual changes without attracting attention, how far from or visible to sensitive viewing areas and/or roadways are the activities, how much disturbance will occur, etc. A detailed mitigation plan should be provided in the EIS that will minimize impacts.
- The EIS should address the issue of light pollution.

**Some questions that arose and that will be addressed:**

- What will be done at 10 Road crossing to improve visibility?
- What are the other options proposed for transporting the electricity to the mine, which does not disturb the scenic quality and experience in this location?

### 3.5 NOISE

- Noise pollution will be degrading to life quality.
- For the distance between Highline Canal and 10 Road, (approx. 1 mile) Mack Mesa functions as a megaphone by reflecting noise back to the north. Noise expected from the train's engines, the rumble and squeal of the cars, the horns and the attendant 10 Road crossing signals will be excessive and disruptive to an otherwise quiet area.
- Regulations require a train horn, but the decibel levels also change depending on the time of day or whether the train is arriving in the evening when people are sleeping.
- Motorized vehicles, including trucks, cars, trains, and helicopters, mining and seismic exploration activities, construction activities, explosions, and any other activity that may create excessive noise associated with the proposed project may have ill effects on animal species.
- The BLM must analyze the impacts that noise may have on Endangered, Threatened, Sensitive and other Special Status Species. To mitigate the effect that mining disturbances may have on wildlife and Special Status Species in the area, the BLM must take steps to reduce habitat fragmentation, ensure that excessive noise pollution occurs only at certain times of the year, require helicopters to fly at appropriate heights,

consolidate and minimize transportation corridors, and require the mining company to use noise reducing devices and quiet machinery.

**Some questions that arose and that will be addressed:**

- What is the decibel level noise/unit at each of the eight power settings (of the engines)?
- What are the noise contours?

### **3.6 ENERGY USE / OUTPUT**

- A company affiliated with CAM Colorado is currently mining about 280,000 tons of coal per year from the McLane Canyon Mine. The proposed expansion of production in the area would increase production from the Cameo coal seam to roughly 8 million tons per year. Such an increase in volume has national implications, as power plants around the nation need Colorado's relatively high BTU, low-sulfur coal to meet EPA standards.
- The Red Cliff Mine will provide potential new supplies for the Cameo power plant, which provides the Grand Valley with its energy.
- The Red Cliff Mine will deliver 8 million tons of coal to our nation. This will help reduce our reliance on foreign energy. Given the recent events in Iraq, Iran, and Venezuela, domestic energy production is more important than ever.
- My concern is about electrical power requirements for the mine and how that will be met. If existing Excel generating capacity is used for this, what is the potential impact on Excel customers? This is particularly important in view of Excel Energy's current request for a \$210 million rate increase, its stated need for a new 750 MW coal plant, and its request to have taxpayers finance the new plant before it is "used and useful".

**Some questions that arose and that will be addressed:**

- What is the environmental impact of this new load requirement of 20 MW, both at its place of generation as well as the processing of the additional fuel needed to generate the increased load?
- If existing Excel generating capacity is used to meet this need, what is the potential impact on other Excel customers regarding the need for additional generating capacity?

### **3.7 RAIL SPUR**

- There is already a railroad unloading station in Loma and they should use this rather than creating a new one in Mack where it's not wanted.
- On alternative would be that the location of the railroad spur be moved to access East Salt Creek Wash and proceed in the Wash or that it be moved west to the old alignment of the Uintah Railway.
- Requiring screening the track on the north side, using foliage and/or berms or lowering the track into the ground may reduce the view and noise problems. Constructing grade separated crossings at 10 Road, R Road, and M.8 Road will eliminate the noise

associated with the crossing signals and the approach horns of the trains and will eliminate emergency vehicle response problems by keeping the roads open.

- Drainage issues and lack of grade separations are significant concerns.
- Railroad spurs are still the best way to transport coal from the mine to the various markets around the country.
- Railroad track and train traffic will complicate access to BLM lands in north Fruita desert for recreationalists and grazing permittees and will create an artificial barrier and safety hazard to livestock and wildlife.
- An alternative for EIS consideration would be a railroad spur route ending up in Loma.

**Some questions that arose and that will be addressed:**

- Is planning in place for limiting the potential for invasive species, habitat fragmentation, and industrial effluent or run-off at any stage of this proposal around the rail spur?
- Will the railroad spur interfere with extraction of any minerals and/or transportation of gas/oil (pipelines, wells, etc.)?

### 3.8 INFRASTRUCTURE

- Citizens hope some of the cumulative impacts of this proposed mine along with the active McClane Canyon Mine to the north could be mitigated through the sharing of infrastructure.
- Because Loma is already host to an interstate highway, the main line railway, power lines, and an abundance of county roads, the minimal infrastructure needed to supply the mine would not significantly alter the character of the land.
- All pipelines required for and associated with this project, including water-gathering and distribution pipelines, should be paired in the same right-of-way in order to reduce the overall surface impacts of pipeline networks in the project. All pipelines should be buried in road and rail line ROWs and power line corridors, instead of being placed in separate ROWs.

**Some questions that arose and that will be addressed:**

- Will CAM be building, in the future, a Power Plant there, because of the access to the water, or have these plans already been considered?

### 3.9 TRAFFIC / ROAD IMPROVEMENTS

- The proposed crossings at 10 Road and at R Road will restrict vehicular access by emergency vehicles and school busses. Due to the proposed length of the trains, it is likely that 10 Road and R Road will be blocked the same time. If 10 Road is blocked and if R Road is blocked, the only way to access the upper 10 Road area is a long roundabout way, utilizing M.8 Road. In time-critical situations, this will be an unacceptable increase in the response time of emergency vehicles to upper 10 Road. If, under extraordinary

circumstances, M.8 Road is also blocked, by either an additional CAM train or some other problem, there will be no access to upper 10 Road.

- Local residents are unhappy about the noise and dust that will be a part of this project, but most are concerned about the train blocking the roads and thereby blocking access to residences and, most importantly, emergency services.
- The easiest solution would be to build off-grade crossings. This would allow traffic to flow and the trains can sit as long as they need to without causing problems with the surrounding traffic.
- Members of the local fire department and rescue squads are concerned for the timeframe in emergency calls north of the proposed tracks.
- The EIS should evaluate effects of any proposed road improvements, new road construction, railroad, and ROW construction activities on the area.
- Include in the EIS specific plans for addressing dust control for the project.
- There are concerns about the additional traffic on State Highway 139. At full operation, there could be roughly 200 more cars on the road, potentially equating to 400 trips daily.
- In addition to increased traffic, there are also space/disturbance issues around the requirement for parking for all the cars.
- T Road is another county road that the railroad crosses, out in the desert to the north. This crossing will need to be addressed in the EIS.
- Vehicles speeding down the CAM access road mixed with livestock could be dangerous (mortally).
- The BLM must consider the economic costs that are associated with road construction.
- The BLM also needs to analyze the costs of road maintenance and restoration and compare these costs with the budgets available to complete the work.

**Some questions that arose and that will be addressed:**

- How much delay in traffic will this cause on 10 Road?
- What is the exact elevation change of the rail spur from up track to mine?
- Does CAM have a plan for when the main line is slow or backed up for where the rail spur will sit and wait?
- Will the road access from the Highway to the mine be discontinued once the railroad spur is in?
- What are the impacts on safety and access of emergency vehicles when roads are blocked by trains?
- What transportation alternative and routes were considered or will be considered?