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# INDIVIDUAL LETTERS

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**Letter #1**

Mark Belles  
9318 Willard Street  
Rowlett, Texas 75088

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 East 900 North  
Richfield, Utah 84701

11 December 2001

Dear Fishlake NF,

Thank you for the draft EIS for the Quitchupah Creek Road project. I agree with the proposed action.

Thank you for the opportunity to comment,



①

1-1

**Response 1-1**  
Comment noted.

**Letter #2**

2-1

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
155 East 900 North  
Richfield, Utah 84701

Linda:

I read the Quitcupah Creek Road Draft Environmental Impact Statement, and decided to make a comment or two about it.

I think the original plan is the better route to go with, however I think a trail should be made along side the road that livestock could travel on, also since quite a number of people now use this route as an R.V. trail it should be constructed to allow this type of recreation to continue to take place.

I do hope you will consider these things in the plan.

Sincerely,



P.O. Box 36  
Emery, Utah 84522

2

**Response 2-1**

A cattle trail would be constructed on 1.5 miles of the western end of the proposed road in order to facilitate trailing where topography is restrictive. East of this, livestock would trail outside the fenced road corridor.

Although used by recreationists, the existing road/trail is not managed for off-highway vehicle (OHV) use.

The BLM Travel Plan, due out in 2006 after the release of the final RMP, will designate a system of trails for OHVs. The Richfield RMP will designate areas where proposed projects, such as OHV sites, are acceptable on BLM land.

The Fishlake National Forest OHV Route Designation Plan is scheduled to be implemented in the summer of 2006. This Plan will designate roads, trails, and open areas for the use of OHVs. The rules and designations in the Plan will close the Forest to off-route motorized cross-country travel by OHVs, except in the designated areas. This plan will improve management and enforcement of OHV use on Forest land.

**Letter #5**

January, 25, 2002

Thomas C. Bunn  
88 west 500 south  
Wellsville, UT 84339  
435 245 4987  
volvox@cache.net

Dear Ms. Jackson,

On or about May 9, 1999, I received a package from Jones and Demille Engineering of Richfield, UT. This engineering company apparently represents the SUFCO Coal mining business. Their package contained a topo map of the SUFCO Coal interests, locations of their access routes, and details of a proposed new road and modifications of the old dirt road down the Quitchupah Creek. It also contained a Quit-Claim Deed granting 1.682 acres of my ranch to the county (I read this as SUFCO Coal company). Far more disturbing than these items is a letter advising me to accept \$500.00 per acre: "... [Sevier County] recommends that you diligently consider this offer and avoid both the county and yourself the expense associated with condemnation proceedings." The land in question is MY ONLY access to the creek and the road ... \$500 is not even close to covering the impacts.

But the hidden impacts affect all citizens. On their proposed routes are significant archeological sites and petroglyphs. This is where collective voices are needed.

I received a letter from Kent R. Petersen, Chairman of the Emery County Commission, on June 1, 1999. Mr. Petersen stated the Emery Country has no plans to initiate condemnation proceedings for improving Quitchupah Creek Road. I hope this continues to be the sentiment. I have no expectation of a similar letter of assurances from Sevier County.

When I called Jones and Demille and asked about the significant archeological sites that would be in the way of their new road, they replied that, "The petroglyphs would be moved to a museum." This, I believe, is against the Antiquities Act, a Federal law.

In a recent newspaper article, The Emery County Progress, January 15, 2002, it identified "seven significant archeological sites" being in harm's way if this road is to built. David Sucec, Director, BCS Project, stated in the May 16, 2000 The Emery County Progress that the "' Quitchupah Creek Junction Rock Art Site' will be destroyed if the proposed coal haul road is allowed to be built in the canyon."

5

5-1

5-2

**Response 5-1**

The Quit-Claim Deed process by Jones & DeMille Engineering was prior to the EIS, and the proposed action in the EIS does not contain any condemnation process. The EIS only evaluates the right-of-way needed for the road. Rights-of-way are not granted on public lands until all of the right-of-ways are acquired to complete the road.

**Response 5-2**

Cultural resource inventories (Hauck, 1995; Billat and Crosland, 2001; Patterson and Montgomery, 2001) were performed on all of the proposed alternative routes (See Section 3.12). The cultural resource sites, including the rock art sites, are protected by the National Historic Preservation Act and the Archeological Resources Protection Act.

The proposed alignment for Alternative B, Quitchupah Creek Road, and Alternative C, Alternate Junction, was shifted south about 250 feet. This alignment would place the proposed road about 300 feet away and across the creek from the rock art panels. The new alignment would also avoid impacting known cultural sites located within the previous alignment. No additional cultural resource sites would be impacted by this reroute.

The existing road routed between the creek and the panels would be blocked and not used for access. This would tend to limit access for casual visitors

**Letter #5**

5-2 cont.

The second alternative follows Quitcupah Road but meets Highway 10 at a different point; where, I do not know. Quoting the same January 2002 article: "This route involves fencing along the road with five underpasses for cattle and game. ... This route has 29 archeological sites with 11 that will be impacted and six of these are considered significant." The third plan is the Water Hollow route includes, " 19 archeological sites all of which can be avoided." I have serious doubts that these sites will not be impacted. The sites encompass everything in sight and within hearing distance.

5-3

To add to the consternation, I have not received a copy of the proposals due all affected landowners. Were it not my subscription to the Progress, I would have no idea what was going on. My lands could be taken away without comment or notification; so much for due process.

Try as I may to see the coal mines perspective, it comes down to just money; fifty cents a ton to be exact. There is no evidence that the known (and heaven forbid unknown) historical sites figure in any positive way with the coal mine's plans. Our heritage and pre-history are just irritants and impediments to their profits. SUFCO's apparent hiring of an engineering company to employ scare tactics by sending threatening letters does not impress me. This sets the tones of their plan and it reads like a bad western novel: Intimidate the landowners off their property and those who don't sell out and move on will face a "hip pocket" government commission and have their lands condemned. Either way, you lose. And we all lose!

5-4

This coal mine will be played out or made obsolete sometime in the near future. We will be stuck with permanent scars on our land, the loss of prehistorical artifacts and perspectives, and bad memories of the big company inciting division of the peaceful citizens by pushing its way towards profits. It is time for putting your feet down and taking at stand. Just Say "NO" to SUFCO.

Sincerely,  
Thomas C. Bunn



5

**Response 5-3**

The absence of your name from our mailing list was an oversight and has been corrected. We apologize for the inconvenience.

**Response 5-4**

The predicted life of the mine is currently about 25 years. This could be extended if additional coal reserves are leased. Mine reclamation would minimize scars on the land. The road would become the responsibility of the county and would remain a permanent feature. Impacts to cultural resources would be minimized or mitigated prior to construction of the road.

Letter #11

January 27, 2002

Thomas C. Bunn  
88 west 500 south  
Wellsville, UT 84339  
435 245 4987  
[volvox@cache.net](mailto:volvox@cache.net)

Dear Ms. Jackson,

I finally received the Quitcupah Creek Road Draft Environmental Impact Statement. Having read through it I am compelled to write this addendum to my earlier letter of January 25, 2002. To sum up my thoughts, it is easy to say that this EIS is rife with errors such that I have doubts about the credibility of the entire document. And the Alternate Proposals "C" and "D" are so poorly described and are a product of such imagination that I can only assume that are only there to make the original "B" plan appear as the best choice. "No Action" is the only best choice.

Let's look at some of the errors I found by a quick read. I assume there are others:

- Land Status and Ownership Map, fig. 2-2, has 360 acres attributed to "Thomas E. Bunn" (cf. p. 3-84). I am "Thomas C. Bunn," thank you.
- 160 of the acres in section 18 are given to Castle valley ranches that belong to me, "Thomas C. Bunn et al."
- A forty-acre piece also in Section 18 is attributed to "Thomas C. Bunn, Carole Hammel." Her name on the deed, plat maps and taxes is "Carolee."
- Under Cultural and Paleontological Resources (p. 3-103) it is stated, "No known fossil locations have been identified into the project area." You should ask someone who has actually been on my property about the fossils there. I have found hundreds of fossils in that area and friends have found what are believed to be vertebrate fossils.

My receipt of the ESI confirmed my suspicions that Alternate "C" was coming directly across my property. This splits my property into 1.25 miles to the north and 1.5 miles to the south. This plan effectively destroys my family's plans to establish more formalized camping sites. You can find our primitive but supplied camping site at the end of the "Jeep Trail" directly in the path of the proposed coal-haul road. We purchased this property with funds we gained when we sold our property in the Teasdale/Grover area that we have bought for the solitude. It soon became overrun with wealthy developers and the peaceful beauty was ruined.

11

11-1

11-2

11-3

**Response 11-1**

Editorial changes have been made.

**Response 11-2**

A paleontological inventory was completed in July of 2002. The inventory resulted in the recordation of 10 fossil localities. Nine of these are considered *insignificant* while one is rated as *important*. The fossil locality rated *important* is no longer in -situ and represents fossils from outside the project corridor. This data has been added to Section 3.12 of the FEIS.

**Response 11-3**

The Alternative C route was subsequently realigned to avoid this parcel of private land.

**Letter #11**

11-4

If any of the engineers had actually visited the Alternate "C" area, not that I am condoning in any way trespassing on my property, they would see an area with a wash some 100 feet deep and over a quarter mile in width. Their simple solution of a couple of underpasses is suspicious. Vast amounts of fill materials or a substantial bridge would be needed to keep their trucks at 40 mph up to the intersection with SR10. The environment will not tolerate changes on this large a scale.

Much the same is true about Alternate Plan "D." This is severe topography and it is constantly changing. Two years ago a thunderstorm caused a terrific flash flood. The existing Quitchupah Road was washed out near the historic ruins, east of the petroglyphs. On my land, flood heights were near 20 feet. As complex as the Plan "D" lands are, one decent flood could cut off the road.

To reiterate; this EIS has significant data errors. The EIS also does not exhibit sufficient details in the engineering to convince me that it has been very well thought out or practical solutions designed. The two alternatives, "C" and "D," appear to be embedded distracters from the major thrust of the Plan "B," their original plan. Plan "C" destroys my family's plans for a heritage of a common place where our children, their children, and generations to come can assemble to renew relationships and revel in the beauty of this place, its geological and archeological history.

Plan "B" was the focus of my first letter and this letter is to be considered a part of it.

Just Say "NO" to SUFCO.

Sincerely,  
Thomas C. Bunn



11

**Response 11-4**

The road designers are well aware of the flashy and often extreme nature of flood flows in Quitchupah Creek and its tributaries, and have accounted for that nature in their design of channel crossings. However, should a very extreme event occur, and Acut off the road@, the proposed high-use of the road would necessitate immediate repair, which would put the road back into service as quickly as possible, and would also minimize any resource damage due to the failure. This is in contrast to the existing road, where flood damages go unnoticed and unrepaired for extended periods of time.

Letter #96

96-1

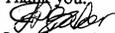
96-2

30 January 2002

Dear Fishlake National Forest,

I am writing to voice my opinion that the proposed roads for SUFCO proposal are anathema to my people. I am a resident of Joseph in Sevier County and of Native American descent so the possibility that more of our ancestors will be disturbed through roadwork is likewise troubling to me. There are likely to be found archeological sites if you build more roads, and some are already protected. In particular, the Quitcupah Creek Junction Art Site", is threatened, as well as others.

When the idea of a coal processing plant was first introduced, I was disturbed for the pollution that will result. But when I heard the proposed routes, my disturbance grew. For my people, the Earth is sacred. I hope that you consider this viewpoint kindly and deny permission to desecrate any more of our beloved ground.

Thank you  
  
Jeanmine Baker

40 North State St  
Joseph UT 84739

527-3738

96

Response 96-1

Cultural resource sites are protected under the National Historic Preservation Act and the Archeological Resources Protection Act. Consultation with tribal representatives (Paiute, Hopi, and Ute) is ongoing (see Section 3.13). Impacts to cultural resource sites would be mitigated as approved by the SHPO, land administering agency, and the consulting parties.

Response 96-2

The processing of coal was not included in this study. The annual air pollution resulting from coal truck combustion of diesel fuel would decrease. This is based on vehicle miles traveled. The local air quality along the proposed transport route would meet air quality standards. Mitigative measures for dust control are required by Utah State regulation, during construction activities.

cattle trailing

JAN. 31, 2002

DEAR Fish Lake Forest,

ON JAN. 29, 2002 I ATTENDED A MEETING IN YOUR BUILDING CONCERNING THE ROAD CONSTRUCTION OF THE ROAD FROM SUFEO MINE TO HWY 10, AND THE IMPACT OF IT CONCERNING CATTLE TRAILS THROUGH THE CANYON.

IN ATTENDANCE WERE LINDA JACKSON Fishlake Forest, Wes Sorsen Sufco Mine Ralph Okerland Sevier County, Morgan Robertson, Wayne Gremil, Cy & Marie Eardley Quitchupah Cattle Assn.

THIS CANYON HAS BEEN PRIMARILY USED AS A CATTLE TRAIL TO & FROM THE MOUNTAIN THROUGH OUT HISTORY. IT IS IMPERATIVE THAT THIS USAGE NOT BE DISTURBED, IT WOULD BE

(97)

**Response 97-1**

A cattle trail would be constructed on 1.5 miles of the western end of the proposed road where movement is restricted by topography. Livestock would trail outside the fenced corridor on the remainder of the proposed road, or in the case of Alternative D, along the existing road in Quitchupah Creek canyon.

Disastrous to stop these cattle  
Somewhere along the way and kill  
850 head of Cows & Calves without  
Separating babies to their Mothers,  
Having cattle searching the canyon,  
& Hwy for their lost babies.

After reviewing Appendix B  
Impact Statement the conclusion  
that only 1/4 mile of the road  
would have to be adjusted to  
accommodate a possible trail,  
Fenced off with underpasses.

It was the consent of all  
that a cattle trail would not  
interfere with the road, and con-  
cession's could be made so cattle

Letter #97

would have the right-of-way From  
Broad Hollow to the Bottom of  
Quitthumpsh Canyon.

97-2

It would cause extreme hard-  
ships to the Cattle & operator's  
to take our right to trail cattle  
through the Canyon.

I HAVE NO objection's to the  
road, ~~as~~ long ~~as~~ it doesn't interfere  
with the rights of other's.

Thank You

Sincerely,

Robert Robertson

ROBERT ROBERTSON

(97)

Response 97-2

The right to trail cattle in the canyon would not be affected; see Section 3.8.

**Letter #99**

January 31, 2002

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 East 900 North  
Richfield, Utah 84701

Dear Kay Erickson:

This letter is in response to the Environmental Impact Statement on the Quitchupah road.

I am 83 years old and I was born and raised right on the Quitchupah ranch. This ranch is located right at the base of the canyon. It is presently owned by the Johnson's. All of my growing up years we herded sheep and cattle in Quitchupah, Convulsion Canyon and across the Water Hollow benches.

After returning from World War II, I was able to obtain the grazing rights on the Saleratus allotment plus the GL Olsen allotment and several State School sections within the Quitchupah drainage which I depend on for a big portion of my living.

I have spent a lifetime in this canyon and feel as though my knowledge of this canyon is as vast as the people who created this EIP. There is not a rock in this canyon that I haven't crawled over. My family has over a 100 years of living in and working in this canyon.

If by chance this proposed road does go through and it takes the alternative route, it will virtually cut off the only trail off into the Water Hollow Creek from the Water Hollow Benches. Our livestock depend on this creek for water every day, not just on weekends as the EIP suggests. This would make the Water Hollow Benches on the G.L. Olsen allotment useless to us as far as being able to graze this area. This would virtually eliminate all of our spring grazing which would be very costly to our business. We depend on this for our livelihood. The only way any proposed route could be feasible would be for the road to be fenced and under passes provided and a trail to and from the summer range. It would be impossible to schedule the fall gathering on weekends and holidays to fit Sufo Mines schedule as is suggested in the EIP. The cattle coming off the summer range will drift off this natural migration route any day of the week they choose. Cattle don't use calendars. This canyon has been used for a driveway to and from the summer range for a lot longer than the Sufo Mine has been in existence. I may be mistaken but I believe that if a driveway has been used for this long uncontested, it becomes a right of way. If we are forced to truck our cattle to and from the summer range, the additional costs would be very detrimental to our livestock operations and the actual value of our ranches will depreciate.

The EIP states several times that in building this road it would create extra expenses for the cattlemen. If they are aware that this is the case, then I believe that the

99

**Response 99-1**

Mitigation for the G.L. Olson Allotment will be found in Section 2.4 of the FEIS. The road would be fenced and a water system developed to supply troughs out on the bench for the cattle. See Section 3.8 Range Resources.

**Response 99-2**

A cattle trail would be constructed along 1.5 miles of the western portion of the proposed road where movement is restricted by topography. Livestock would trail outside the fenced road corridor for the remainder of the road, or in the case of Alternative D, along the existing road in Quitchupah Creek canyon.

**Response 99-3**

The road design was modified to include a fenced cattle trail where needed. Ranchers would not be forced to truck livestock. Trailing would continue normally.

99-1

99-2

99-3

99-4

Letter #99

99-4 cont.

99-5

99-6

-2-

cattlemen should be compensated for the feed and AUMS that would be lost plus the expense of the shipping and the losses that will occur with coal truck and livestock collisions.

The EIP also states that the noise level in the town of Emery would be moderate. I live a block off main street and the noise that these coal trucks roaring through town has already made it almost impossible to sleep. The coal company is projecting the numbers to multiply several times in the next few years. I really don't think this noise that is being generated from these loaded coal trucks could be defined as moderate. The noise is loud as hell in my house, I can only imagine how the people who live on main street sleep.

The Quitchupah has been home to me my whole life and this Quitchupah Canyon will be around for a long time yet. I hate to see it permanently scarred by a road that is being built to accommodate a coal company that will only be in existence until their coal supply runs out. Then who will maintain this road? Or will it be abandoned and an ugly scar left to remind everyone of just how much money Sufco Coal made from this and how many cattlement was put out of business.

Sincerely,

*Robert E. Anderson*

Robert E. Anderson

99

Response 99-4

Costs of mitigation and the livestock facilities would be the responsibility of the proponent. The Sevier County Special Service District would provide loading/unloading/holding facilities for the ranchers trailing livestock along Quitchupah Creek and in Convulsion Canyon. The compensation for livestock involved in collisions with coal trucks or other vehicles would be guided by the open range law of Utah.

Response 99-5

There would be no increase in noise in the town of Emery as a result of the proposed road. The amount of trucks heading north through Emery will continue at current levels.

Response 99-6

The proposed road would be a county road to be paid for by the toll user (SUFCA Mine). It will not be abandoned after the mine is closed. The road will remain open to the public for recreation and travel through the area. Ranchers will have continued access to the allotments in the area. After the closure of the mine, the road would then be maintained by public (county) road funds.

Letter  
#103

103-1

January 31, 2002

Mary C. Erickson  
Forest Supervisor  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

RE: Quitchupah Creek Road EIS

Dear Ms. Erickson,

I am a member of several wildlife groups in Utah and one of our main goals is to help the mule deer herds in Utah recover from their present low numbers.

In the past when deer numbers were at a higher level, the deer that were killed on I-70 between Salina and the Emery turnoff was estimated to be between 450 and 500 deer a year.

Road kill is just one of the factors that adversely affect deer, but is one we need to address. It looks like the Quitchupah Creek Road would eliminate approximately 50 miles of round trip travel for a coal truck going to Emery county. The fewer miles that we can keep these trucks from traveling in deer country the lower chance they will have to kill a deer on the highway.

I am totally in support of building the Quitchupah Creek Road.

Sincerely,



Paul Niemeyer  
Box 954  
Richfield, UT 84701

103

**Response 103-1**

Potential impacts to wildlife species from vehicle collisions are included in the FEIS (See Section 3.5).

Letter  
#104

January , 2002

Mary C. Erickson  
Forest Supervisor  
USDA Forest Service  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

RE: Quitchupah Creek Road EIS

Dear Ms. Erickson:

As part of my business, I frequently travel to the SUFCO mine. I support the construction of the Quitchupah Creek Road for the following reasons:

1. It will provide a shorter route from Emery County to the SUFCO Mine and the Acord Lakes area thus saving time and fuel;
2. Create a lower probability of accidents with passenger vehicles by reducing traffic on I-70 and the Acord Lakes Road;
3. Saves wear and tear on existing highways;
4. Provides alternative route from Emery County to the Salina area, and
5. Employment opportunities at the SUFCO Mine would be more appealing to Carbon and Emery County residents.

We would appreciate your consideration and approval of the proposed Quitchupah Creek Road specifically Water Hollow, Alternative D.

Sincerely,

Address:

*A. K. Wilford*  
*615 E. 500 N.*  
*Richfield, Utah 84701*  
*of Dinosaur time Inc.*

104

104-1

Response 104-1  
Comments noted.

**Letter  
#106**

February 6, 2002

Ms. Mary C. Erickson  
Forest Supervisor  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

RE: Quitcupah Creek Road EIS

Dear Ms Erickson:

I am an employee of Canyon Fuel Company, LLC at the Sufco Mine. I regularly travel to Price, Utah as part of my job responsibilities. The road would benefit me personally in less travel time. It would also benefit others that travel to the mine or the Accord Lakes Area from Emery and Carbon counties in a similar manner. The most significant benefit would be to the mine and the trucking companies because of the decreased haul distance. The trucking route to the east would also be safer during the winter months because two icy summits that must be crossed using the present eastern route would be avoided.

I have been intimately involved with the Quitcupah Road since its need was determined almost ten years ago. I personally can see the benefit of the road to the mine, trucking companies, counties and citizens of the area. Although the Water Hollow Alternative costs additional money, I believe it is the best route and support its selection as the preferred alternative for the EIS. This route mitigates the concerns of the private landowners and the Native Americans and still meets most of the needs of the mine and trucking operations. Because of its location away from Quitcupah Creek, sediment load into the creek would be reduced over those alternatives down the canyon along side the creek. It would also avoid known cultural resources sites and allow traditional uses of Quitcupah Canyon. A cattle trail should be included in the design of the road on the Forest Service Lands. This trail could be located north of the road with the north side of the road being fenced from Broad Hollow to Water Hollow thus separating the trailing cattle and road traffic.

In summary I strongly support selection of Alternative D, Water Hollow Route as the preferred alternative for the EIS.

Sincerely,



Wesley K. Sorensen

FISHLAKE NATIONAL FOREST	
FEB 7 2002	
FS	NO
ENC	D & P
PREC	GR
PAC	HR
RANGE	IS
REC	LC
TIMBER	PURCH
WASH	SEC
ENTER	TRUCK
P.O. BOX 193 • SALINA, UTAH • 84654	
PHONE: (435) 529-7601	

106

106-1

**Response 106-1**  
Comment noted.

106-2

**Response 106-2**  
A fenced cattle trail would be constructed along 1.5 miles of the western end of the proposed road, where topography restricts trailing options. East of that, livestock would trail outside the fenced road corridor. Livestock trailing would not be impeded by the proposed road.

Letter  
#146

KATHY BASTIAN  
P. O. Box 394  
AURORA, UT 84620

FEBRUARY 6, 2002

Ms. MARY ERICKSON  
FOREST SUPERVISOR  
FISHLAKE NATIONAL FOREST  
115 EAST 900 NORTH  
RICHFIELD, UT 84701

RE: QUITCHUPAH ROAD

DEAR Ms. ERICKSON:

I AM A SECRETARY AT THE SUFCO MINE. I WOULD LIKE TO EXPRESS MY SUPPORT FOR THE ROAD FROM SUFCO TO EMERY COUNTY. THE WATER HOLLOW ALTERNATIVE WOULD BE THE MOST FAVORABLE ROAD SINCE IT WOULD AVOID DISTURBING THE NATIVE AMERICAN SITES.

THIS ROAD WOULD LESSEN THE DENSE AMOUNT OF TRAFFIC ON THE CURRENT MINE ACCESS ROAD. IT WOULD ALSO BENEFIT THE EMPLOYEES WHO TRAVEL TO THE MINE FROM EMERY COUNTY BY SAIVING THEM SIGNIFICANT TRAVEL TIME. THE ROAD WOULD ALSO BENEFIT THE VENDORS WHO SERVICE THE MINE FROM EMERY AND CARBON COUNTIES. HAULING SUFCO COAL TO THE HUNTER POWER PLANT WOULD ALSO BE SAFER AND SAVE VALUABLE TIME FOR THE TRUCKERS.

I OBVIOUSLY HAVE A VESTED INTEREST IN THE SUCCESS OF SUFCO. SEVIER COUNTY HAS LOST SEVERAL BUSINESSES THIS PAST YEAR THAT CONTRIBUTED TO THE AREA IN EMPLOYMENT, SALES AND PROPERTY TAXES, AND OTHER RELATED BUSINESS CONNECTIONS. SUPPORTING THE BUSINESSES WE HAVE IN SEVIER COUNTY BENEFITS EVERY CITIZEN AS WELL.

HAVING BEEN BORN AND RAISED IN THIS BEAUTIFUL AREA, I MARVEL AT THE WONDERFUL SCENERY WE ENJOY. JUST TAKING A RIDE ON THE WEEKEND AFFORDS US BREATHTAKING VIEWS. WHERE ELSE CAN YOU ENJOY MOUNTAINS, DESERTS, FISHING AND HUNTING ONLY MINUTES FROM YOUR HOME?

OUR AREA RESIDENTS REALIZE THAT WE MUST BE RESPONSIBLE STEWARDS OF THIS GREAT STATE WHILE BEING SUPPORTIVE OF ECONOMIC OPPORTUNITIES FOR BUSINESS DEVELOPMENT AND GROWTH.

THANK YOU FOR YOUR SUPPORT OF OUR AREA AS WELL.

SINCERELY,

  
KATHY BASTIAN

146

FISHLAKE NATIONAL FOREST RECEIVED	
FEB 7 2002	
FS _____	AO _____
ENR _____	D & F _____
PRE _____	GRS _____
PAO _____	HR _____
RANGE _____	IS _____
REG _____	IC _____
TRM _____	PURCH _____
WFO _____	TRA _____
ENR _____	TRK _____
CON'S GRNT TO _____	

146-1

Response 146-1  
Comments noted.

**Letter  
#269**

Mary C. Erickson  
Forest Supervisor  
Fishlake National Forest

Jan. 18, 2002

This letter is in regards to the Quitcupah Creek Road.

269-1

I'm in favor of Alternative B or Alternative C, with two modifications. These modifications are, #1 A cattle trail should be built along side the road so that the cattlemen can trail their cattle to and from the Forest Allotments. #2 An ATV trail needs to be incorporated with this cattle trail so that the ATV enthusiasts still have access to the forest. These two trails could and should be together with notices placed on it that the cattle have the right-of-way.

269-2

It was said that there is not enough room in the canyon for such a trail and the new road. I say ~~if they can~~ ~~build a dam and a bridge across Glen Canyon~~ they can surely build a road and trail up Convulsion Canyon.

As for Alternative D, why waste money on such an expensive rout. Spend some money on the Native American concerns and help enhance the prehistoric sites.

Ken Christiansen



Emery Stock Growers  
P.O. Box 552  
Emery, Utah 84522

269

**Response 269-1**

A fenced cattle trail would be built along 1.5 miles of the western end of the proposed road, where topography restricts trailing options. East of that, livestock would trail outside the fenced road corridor. Livestock trailing would not be impeded by the proposed road.

**Response 269-2**

The money saved by using a shorter haul route would still be substantial for Alternative D. See Section 3.15, Socioeconomics.

**Letter  
#271**

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 East 900 North  
Richfield, Utah 84701

January 17, 2002

Linda:

After reading the Quitcupah Creek Road Draft Environmental Impact Statement, rereading parts of it, talking with others and reading the article in the Emery County Progress following your presentation to the county commissioners, I have decided that I am leaning toward the Water Hollow option.

271-1

This option will cost more money, but then that's not the main issue. It will not impact any archaeological sites, and I feel that is important. These sites are hundreds of years old and need to be preserved. We enjoy going to the sites that we know about, looking at them, teaching our children and grandchildren about them. This is part of our heritage and needs to be preserved.

271-2

I would like to see a 4-wheeler/cattle trail go along side the road as it goes on up through the canyon. We enjoy riding this area, using it to go up onto the Old Woman through Jolley Mill, or going on up to the Acord Lake area, my parents have a cabin at Acord Lake and we love going there. We like to travel on over to the Duncan Mountains and then dropping off Link Canyon. We have made these loops on our 4-wheelers many times and for many years.

We also own horses and enjoy riding them and would like to see a corridor open for us to ride up through this canyon.

Access to this area for these forms of recreation needs to be preserved. I don't feel that it would add anything to the cost of building this roadway.



271

**Response 271-1**

See Cultural Resources Section 3.12. Cultural resource sites are protected under the National Historic Preservation Act and the Archeological Resources Protection Act. Section 106 Regulations 36CFR 800.5 and 800.6 detail the process by which agencies determine whether an undertaking will adversely affect historic properties (NRHP eligible cultural resources) and how agencies consult to avoid, minimize, or mitigate adverse effects.

**Response 271-2**

There will be no ATV trail beside the proposed road.

A fenced cattle trail would be built along 1.5 miles of the western end of the proposed road, where topography restricts trailing options. East of that, livestock would trail outside the fenced road corridor. The proposed road would not impede livestock trailing.

Letter  
#272

January 25, 2002

Mary C. Erickson  
Forest Supervisor  
USDA Forest Service  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

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RE: Quitchupah Creek Road EIS

Dear Ms. Erickson:

As part of my business, I frequently travel to the SUFCO mine. I support the construction of the Quitchupah Creek Road for the following reasons:

1. It will provide a shorter route from Emery County to the SUFCO Mine and the Acord Lakes area thus saving time and fuel;
2. Create a lower probability of accidents with passenger vehicles by reducing traffic on I-70 and the Acord Lakes Road;
3. Saves wear and tear on existing highways;
4. Provides alternative route from Emery County to the Salina area, and
5. Employment opportunities at the SUFCO Mine would be more appealing to Carbon and Emery County residents.

I would appreciate your consideration and approval of the proposed Quitchupah Creek Road Alternative D (Water Hollow Bench Route).

Sincerely,



Scott Jensen, Manager  
Gary's Shoes  
126 North Main Street  
Richfield, UT 84701

272

272-1

Response 272-1  
Comments noted.

Letter  
#275



t&c  
<volvox@cache.net>  
02/05/02 06:21 PM

To: Linda L Jackson/R4/USDAFS <lljackson@fs.fed.us>  
cc:  
Subject: quitcupah: the story never ends

Hello Linda,

I well used Sunday to better document the historic artifacts along and near the Quitcupah Creek. It is so beautiful and peaceful there. I also took the opportunity to post, on my property, signs reflecting my opinion of this issue (see attached). These too I photographed and distributed via e-mail to various interested and should-be interested parties.

Another look at the DEIS reveals problems with the Grazing Allotments (fig. 3-7). These rights belong to me, not E. Olsen, and are reserved for my use as I see fit. In fact, I have had discussions with local ranchers in an effort to keep unwanted and not permitted livestock off my property. I have arrangements with a nearby rancher for him in my stead to maintain the fences, postings, and utilize the property for our privately held stock.

I hope this information is applicable and useful to the EIS.

Sincerely,  
Tom

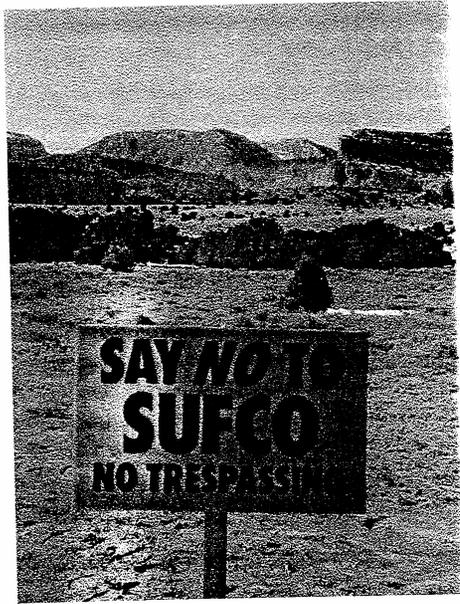
275-1

**Response 275-1**

Editorial changes have been made.

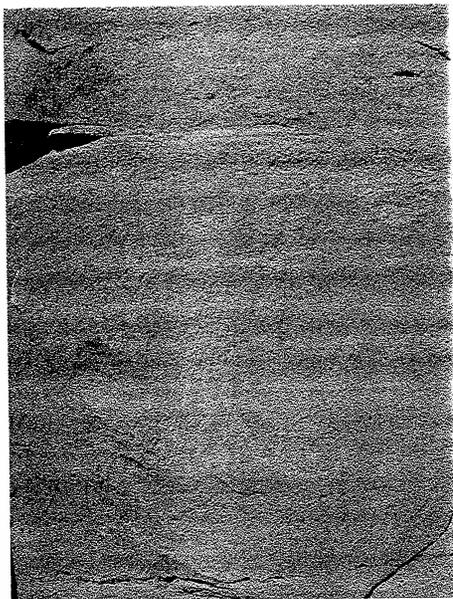
275

Letter  
#275



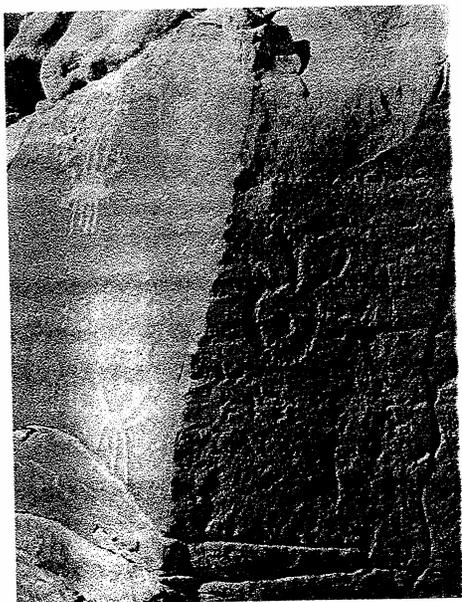
275

Letter  
#275



275

Letter  
#275



275

Letter  
#299

2/6/02

To: Linda Jackson  
Public Affairs Officer  
Fishlake National Forest

Re: Quitchupah Creek Road

299-1

At the Jan. 8, 02 Public Lands Council the BLM representative stated that Quitchupah Creek was not used much by A.T.V.s/ Where is the monitoring data to back up this claim?

299-2

You claim there isn't enough room in the upper 2 miles to allow an A.T.V. trail, but a four lane interstate was built through Spotted Wolf.

Geographically, A.T.V. access to the mountain in this area is very limited. We need A.T.V. access in Quitchupah Creek because loop trails are important for A.T.V. trails management.

A.T.V.s are an important part of this areas lifestyle and economy. If anybody knows the economic value of A.T.V.s it is Sevier County. We are not at that stage yet, but we do have the nucleus of a trails system and are hoping to expand it using existing roads and trails.

299-3

You didn't address an Alternative that would by-pass the towns in *How* Emery County. U-10 is overloaded with local traffic. U-10 was not designed and built for this increased truck traffic.

299-4

None of your Alternatives address the problem of trucks speeding *scope* through Emery County towns.

Barney and Robinson, along with Utah Highway Patrol and the Emery County Sheriff Dept. are not enforcing posted speed limits. Fully one half of the empty south bound coal trucks are exceeding the 45 mph speed limit in Ferron by 20mph.

299-5

When was the last time you saw an officer pull over a coal truck?  
Barney or Robinson trucking are not controlling their employees.  
You can't destroy historic or prehistoric sites. you can't build a road without fences. A coal haul road in Quitchupah Creek will destroy

(299)

**Response 299-1**

There are no designated ATV trails in or adjacent to the project area so no data has been collected on ATV use. See Section 3.10 Visual Resources, Recreation, and Wilderness for explanation of current ATV use in Quitchupah Creek.

**Response 299-2**

A fenced cattle trail would be built along 1.5 miles of the western portion of the proposed road, where topography restricts trailing options. East of that, livestock would trail outside the fenced road corridor. Livestock trailing would not be impeded by the proposed road.

This trail would not be available for ATV use.

**Response 299-3**

An alternative that included a portal loadout facility in Muddy Creek was considered but is not feasible for the SUFCO Mine because the interior mine coal transport system is aligned west and south away from Link Canyon and Muddy Creek. See Section 2.6.

**Response 299-4**

Analyzing the potential for speeding trucks is outside the scope of this project.

**Response 299-5**

Section 106 Regulations 36CFR 800.5 and 800.6 detail the process by which agencies determine whether an undertaking will adversely affect historic properties (NRHP eligible cultural resources) and how agencies consult to avoid, minimize, or mitigate adverse effects. See Section 3.12.

Fences will be constructed. See alternative discussions in Sections 2.2, 2.3, and 2.4.

Letter  
#299

299-6

2

an area that is used for family recreation. Leavitt should build roads not Monuments.

Your Draft E.S. is totally based on monetary consideration for SUFCO Mine. It is not right for Sevier County to reap all the positive benefits and Emery County all the negative.

Until the above is addressed, keep your coal in Sevier County.

Don W. and Bonnie P. Keele  
PO Box 217  
Ferron, Ut. 84523

299

Response 299-6

The primary purpose of the proposed Quitcupah Creek Road is to ensure the competitive productivity of the SUFCO Mine, as a source of economic stability for Sevier County and a potential source of additional income and revenue for Emery County, as well as provide a source of high quality coal for power plants (See Section 1.1, Purpose and Need).

The Mine is an important component of local economies. The presence and stability of the SUFCO Mine, and the families who support it, guarantee a continued demand in both Sevier and Emery counties for bank loans, mortgages, utilities, and other goods and services. This adds to the economic stability of both counties. See Section 3.15, Socioeconomics.

Letter  
#301

301-1

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

February 6, 2002

Dear Ms. Jackson:

I have reviewed the DEIS for Quitcupah Creek Road and have reached the following conclusions on specific topics addressed by the DEIS:

Geology; minimal differences between Alternatives B, C, and D;  
Air Quality; minimal differences between Alternatives B, C, and D;  
Noise; minimal differences between Alternatives B, C, and D;  
Water Quality: given the vertical relief of all the terrain in this area, it is unlikely that the change in water quality could be quantified after the construction on any alternative;  
Wildlife; minimal differences between Alternatives B, C, and D;  
Land Use; Alternate D preferred;  
Visual; Alternate D preferred;  
Cultural; Alternate D preferred;  
Native American; Alternate D preferred;  
Private Land Owners; Alternate D preferred;  
UDOT Impact; minimal, comparing removing 6 miles of SR-10 from the coal haul to 10 miles;  
Cost to SUFCO; Alternates B or C preferred.

Given that alternates B, C and D will meet the Purpose and Need, it appears that the Water Canyon route, Alternate D, provides the least impact to archaeological sites and private interests. I suggest that when public goodwill is given the same weight as large industry, Alternate D is the preferred alternative.

Sincerely,

*Fred S. Jenkins, P.E.*  
Fred S. Jenkins, P.E.  
880 North 200 East  
Price, UT 84501

301

Response 301-1

The final EIS includes discussions using several ways to contrast alternatives in regard to water resources. These include: number of stream crossings, risk of culvert failure, and proximity of road to perennial stream reaches. Many of the BMPs, applicant-committed measures, agency-committed measures, and general construction/design components of proposed project are similar for all alternatives. Thus, in regard to water resources, impact comparison among alternatives is primarily a function of the alignment-specific details listed above.

Letter  
#340

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Ms. Linda Jackson  
Public Lands Officer  
Fishlake national forest  
115 east 900 north  
Richfield Utah 84701

**Comments on Quitchpah canyon,**

Ms, Jackson,

I appreciate the opportunity to express my opinion on the proposed quitchpah road construction. I want to express that in my opinion option A is the only option. Please allow me to state my case.

340-1

**#1. Sufco mine has flatly stated ( In the proposal book) That they are going to produce up to eight and a half million tons of coal a year irregardless, if they get a shorter route they will make more money, But they will still make alot of money without it (the road). EMPLOYMENT IS NOT AFFECTED!!!**

340-2

**#2. Near the bottom of convulsion canyon is a set of ancient petroglyphs and pictographs, This camp was thought to be a major migration camp for anywhere from 2500 to 6000 years. The Anazazi, the desert culture, the fremont and the shoshone utæ are all thought to have used this particular camp regularly. Options B and option C would definitely place an unacceptable impact on this site. To desecrate this site I believe would be not only an act of ignorance but criminal!**

340-3

**#3. On option D ( Which is the best of the worst) Meaning most acceptable if the money and the power behind this project are overwhelming and option A is really not an option. A large wintering herd of both deer and elk use this bench (Water hollow) Heavy coal truck traffic would undoubtably raise havoc and the mortality of wintering animals would be unbelievable. (But animals can someday rebuild a herd, The Indian sites once they are gone will be gone forever). I don't believe there has been any archaeological sites of any real significance, But there has been some and given the known heavy use of this area by the ancients and the little explored area I believe a real professional review and study of the area would be in order.**

340-4

**#4. Option E. Yes you read this right. One option that should be looked at very seriously is the use of a conveyor belt. Conveyor belts can be very enviromentally friendly, leaving no permanent scarring on the land and as animals learn quite**

340-5

340

**Response 340-1**

The SUFCO Mine was Utah's largest coal producer in 2004. SUFCO and dependant trucking companies provided 20 percent of the non-farm employment and 28 percent of the personal income in Sevier County in 2002. The mine is an important component of local economies. The presence and stability of the SUFCO Mine, and the families that support it, guarantee a continued demand in both Sevier and Emery counties for bank loans, mortgages, utilities, and other goods and services. This adds to the economic stability of both counties. See Section 3.15 Socioeconomic Resources.

**Response 340-2**

The alignment for Alternative B, Quitchpah Creek Road, and Alternative C, Alternate Junction, was shifted south about 250 feet. This alignment would place the proposed road about 300 feet away and across the creek from the rock art panels. The new alignment would also avoid impacting known cultural sites in that area located within the previous alignment. No additional cultural resource sites would be impacted by this reroute.

The existing road routed between the creek and the panels would be blocked and not used for access. This would tend to limit access for casual visitors.

This modification to Alternatives B&C will preclude the direct impacts of a busy public road next to the rock art sites.

**Response 340-3**

The design of Alternative D in the FEIS includes fences along the road to mitigate the impact of the proposed road across the benches. See Section 2.4 and Section 3.5.

**Response 340-4**

A cultural resource inventory (Billat and Crosland, 2001) was conducted on the Water Hollow route (Alternative D). The proposed right-of-way corridor was routed to avoid cultural resource sites. See Section 3.12.

Letter  
#340

340-5 cont.

rapidly to adjust to the low noise.) It looks to me that the only reason Sufco would not want a conveyor belt is they would actually have to pay for its installation and maintenance. The options on the road, Sufco has someone else flipping the bill. They are wanting to do this on the cheap. Which is understandable from their perspective, But as a tax payer is unacceptable. Conveyor belts are feasible and if they say different, they are only attempting to spin the story to their own benefit.

340-6

In summing up my statement I would like to say please let's be very careful in what we do right now. Posterity will hold us accountable for any mistakes we make. The Quitpah road is not needed! Sevier County does not want to build it up to UDOT standards.

*Larry O. Brown*

Larry Brown  
p.o. box 221 Orangeville Utah  
84537

*Feb. 8 2002*

340

Response 340-5

The terrain below the mine is too steep for a conveyor system, see Section 2.6. A portal loadout facility in Muddy Creek is not feasible for the SUFCO Mine because the interior mine coal transport system is aligned west and south away from Link Canyon and Muddy Creek.

Response 340-6

See Section 2.2 Alternative B. The proposed road would be built to AASHTO and UDOT standards.



Letter  
#372

February 11 2002

Linda Jackson  
public affairs officer  
Fishlake National Forest  
115 east 900 north  
Richfield Utah 84701

Zanpher Farrer  
pobox 46 350 south main  
Orangerille Utah  
84537

In Regards to the survey on the proposed coal haul route in quitchpah canyon I want to voice my firm opposal to this project. I am a native american a proud member of the shoshone tribe. But my mother is Ute. And many members of my family are Ute. So you see this project is personal to me, Being that many of the Archaeological sites in this particular canyon are of the shoshone ute cultures. Most of the sites in the nearby San Rafael are of the fremont or the desert cultures. Shoshone ute are much rarer in this area. Although we know this area was a very important and vital area to my people.

I find it very hard to believe that in this day and age that the federal government would even consider placing this kind of heavy impact, and damaging who knows how much priceless history. It should be so obvious to anyone that the main writings from the ancient ones in the canyon are truly significant. This camp was used for thousands of years by all the different tribes that were in this area. And they left their markings on the wall. I believe this indeed is a sacred place.

So option A to me is the only option. Option d is much better than b or c but without an extensive environmental impact study. And an extensive search for all unknown significant archaeological sites in the area option d should not be considered either. Please realize how special this canyon is. How one can touch the past, the solitude of the canyon today with the silence only broken by the occasional scream of a red hawk, or call of a blue jay as one ponders to oneself of how it must have been to the ancient ones that left their marks on the walls.

Sincerely,

Zanpher Farrer  
Shoshone tribal member

Zanpher Farrer

372

372-1

372-2

**Response 372-1**

Cultural resource sites are protected under the National Historic Preservation Act and the Archeological Resources Protection Act. Section 106 Regulations 36CFR 800.5 and 800.6 detail the process by which agencies determine whether an undertaking will adversely affect historic properties (NRHP eligible cultural resources) and how agencies consult to avoid, minimize, or mitigate adverse effects. Consultation with tribal representatives (Paiute, Hopi, and Ute) is on-going. The Paiute and Ute tribes have accepted consulting party status and would assist in determining mitigation measures for impacts to cultural resource sites and Native American concerns.

**Response 372-2**

All of the proposed alternatives are analyzed in the EIS. A cultural resource inventory (Billat and Crosland, 2001) was conducted on the Water Hollow route (Alternative D); see Section 3.12. The proposed right-of-way corridor for Alternative D was routed to avoid cultural resource sites.

Letter  
#378

378-1

03/19/02 TUE 11:15 FAX 801 896 9347

FISH LAKE NTL. FOREST

004

Don Jamison  
155 E. 100 S.  
Venice, UT. 84701 9392

Fishlake National Forest  
Supervisor's Office  
115E. 900 N.  
Richfield, Ut. 84701

Attn: Linda Jackson  
Subject: Quitchumpah Creek Rd. (SUFCO MINE)

Dear Linda:

I fully support proper planning and care for our precious resources. I also fully support using the resources we have in a thoughtful and conservative way. I do not believe it is in the best interest for anyone or anything for us not to proceed with this road which would contribute so much in savings and safety.

I therefore support having this road developed.

Thank You  
Don Jamison

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378

Response 378-1  
Comments noted.



Letter  
#393

Linda Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 E. 900 N.  
Richfield, UT 84701

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Dear Linda,

This letter is in regards to the EIS documents that were compiled to discuss several proposals made to pave a short cut road from the SUFCO mine to Highway 10. Although two of these proposals involve property owned by myself and Thomas Bunn, I would like this letter to be more than just a "not in my own back yard" view point.

I am a native Utahn born in Sevier County. Although most of my life has been spent north of Sevier County, the deserts of Utah have become the place where I truly belong. I understand why the citizens of Sevier County want to accommodate the SUFCO mine as it employs many from the county. But does this new road bring in any new revenue or jobs? As an ordinary citizen I cannot understand why Sevier County is in favor of this road. It is true that the coal will be delivered sooner to the power plant, but won't that only mean the mine itself will be played out sooner? If the amount of coal is a finite number, eventually Sevier County will be left with the upkeep on a road that will not be bringing in revenue, only taking it away. It would seem to me that the money spent for the proposed road would be better spent addressing new forms of clean energy and jobs for our progeny. The road is very short-sighted and not for the common good of the Citizens of Sevier County.

Of course much could be written about how this new road would affect the flora and fauna and destroy the ancient artifacts, but I will leave those writings for the experts. As a Utahn who loves the undisturbed desert, I am opposed to Proposal B, C and D. The only proposal that will serve the common good of all Utah citizens is A, "no action" and this is the only proposal in this EIS document that I am in favor of.

Sincerely,

*Carolee Hammel 2-23-02*  
Carolee Hammel  
88 West 500 South  
Wellsville, UT 84339

393

393-1

393-2

392-3

**Response 393-1**

See Section 3.15 in the FEIS for socioeconomic impacts of the proposed road.

**Response 393-2**

The coal from SUFCO Mine is high quality and low sulphur and should be used in existing coal-fired power generation to lower emissions.

**Response 393-3**

Comment noted.

Letter  
#395

03/19/02 TUE 11:16 FAX 801 896 9347

FISH LAKE NTL. FOREST

006

January 27, 2002

Mary C. Erickson  
Forest Supervisor  
USDA Forest Service  
Fishlake National Forest  
115 East 900 North  
Richfield, UT 84701

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RE: Quitchupah Creek Road EIS

Dear Ms. Erickson:

Although, the construction of the Quitchupah Creek Road would not effect my current route to work, it does have the potential to relieve some of the congestion on the Acord Lakes Road. In addition, the road would provide an alternative route for emergency vehicles and an alternative route from the SUFCO mine if there were an emergency or accident on the Acord Lakes Road. As an employee at the SUFCO mine, I appreciate the advantages the construction of this road would provide and am in favor of the development of the Quitchupah Creek Road (Alternative D).

Thank you for your time and consideration of this letter.

Sincerely,

*J. Rick McEwan*

Address:

*J. Rick McEwan  
475 West 900 St.  
Richfield, UT  
84701*

395

395-1

Response 395-1  
Comments noted.

Letter  
#399

COMMENTS AND RECOMMENDATIONS  
David Sucec  
QUITCHUPAH CREEK ROAD PROJECT DRAFT  
ENVIRONMENTAL IMPACT STATEMENT

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After reviewing the Draft EIS and some early correspondence from SUFCO to the private land owners in Quitchupah, attending a couple of hearings, and talking with SUFCO's representative, it is apparent to me that the road SUFCO is requesting is not critical and certainly not worth its costs to the public lands, the wildlife and the cultural resources.

Therefore, I ask that you choose Alternative A, No Action.

As I understand the proposal, SUFCO is asking for a permit(s) to sacrifice a canyon, some of its wild and domestic life and degrade and destroy some irreplaceable and significant prehistoric panels of rock art just so that they can increase their profit.

If SUFCO does not get a new road, their only consequence is that their profit margin will not be quite as generous...they will still turn a profit under the no action alternative.

While the DEIS seems to present SUFCO interests in detail, I feel that it does not address some critical issues adequately—issues that should be fully considered in making your choice of Alternatives.

SOCIOECONOMIC

Under all alternatives, the DEIS lists a key socioeconomic issue to be an increase in mine production, employment and revenues (presumably for SUFCO) with increased economic stimulus for Emery County.

However, the economic reality is that SUFCO's good fortune comes at the expense of Emery County—the coal mines, miners, and truckers as well as its tax base from the loss of the Hunter contract. There is a chance in the future that Carbon County mines may also lose market share to SUFCO. Even SUFCO's considerable projected savings in fuel costs (an admirable goal) would result in a loss of income to fuel distributors and truckers as well as taxes.

Because it is only a matter of a few decades until the coal seams are exhausted, short-term economic schemes, such as SUFCO's, must be closely questioned when they result in the destruction of the long-term cultural and economic benefits. Benefits that may well be sustained over hundreds of years if the natural resources and rock art are protected (Fremont Indian State Park had more than 94,000 visitors in year 2000).

399

399-1

**Response 399-1**

The SUFCO Mine was Utah's largest coal producer in 2004. The mine is an important component of local economies. The presence and stability of the SUFCO Mine, and the families that support it, guarantee a continued demand in both Sevier and Emery counties for bank loans, mortgages, utilities, and other goods and services. This adds to the economic stability of both counties. There is assertion that it would be an economic stimulus for Emery County since there is an anticipated need for truck service in Emery due to the proximity to the SUFCO Mine. See Section 3.15 of the FEIS.

**Letter  
#399**

399-2

**TRANSPORTATION**

Regardless of which Alternative is selected, the drivers using SR-10 in Emery County will have to further suffer the inconvenience of the heavy two-trailer truck two-way traffic. And, as indicated in the DEIS, the wear and tear from the increased and frequent heavy trucks (43 tons filled) will necessitate a significant upgrade of SR-10.

Rather than spend the money to build a destructive new road to facilitate SUFCO's coal trucks and profit increase, the better solution would be to upgrade and add truck lanes to SR-10 from Fremont Junction at I-70 to the turnoff for the load out near Wellington. This would allow citizens a less stressful drive on SR-10 and, since the road is already established, would result in far less damage to the environmental and cultural resources.

SUFCO should not ask the citizens of Utah to pay for the upgrade and lane addition because the road-work would be for SUFCO's economic benefit and are required because of the heavy impact of their coal haul trucks. SUFCO should provide the funding (tolls) for the upgrade, addition and maintenance of SR-10 (as they do for the Acords Lake road and will do for the proposed roads).

399-3

**WILDLIFE RESOURCES**

The DEIS indicates that each road alternative will impact wildlife and domestic livestock beginning with the construction and continuing for the life of the road with truck-wildlife encounters.

A major wildlife concern, not addressed in the DEIS, is the fragmentation of the large mammal habitat by the Quitchupah or the Water Hollow roads. The Wasatch Plateau has already been carved into smaller sections by the Huntington Canyon coal haul road (SR-31), the Joe's Valley Road (SR-29), and the Ferron Canyon Road (FR-701/022).

A heavy traffic road in Quitchupah (Alternatives B and C) would create an imposing physical and noise barrier, 24 hours a day, 250 days a year—seriously fragmenting the habitat of large mammals (elk, deer, moose, bear and mountain lion) from I-70 to Ferron Canyon Road by about 40 %. The Water Hollow Road (Alternative D) would result in less fragmentation (about 20%) but will result, as indicated by the DEIS, in even greater numbers of truck/wildlife and livestock encounters.

The narrow range of benefits, for a very few, does not justify the loss of vital habitat, critical and high value winter and summer range for elk and deer, the disruption of raptor nesting, certain deaths of all species from truck encounters, and the threats to unknown and known threatened and sensitive species such as the leatherside chub and the flannelmouth sucker.

**Response 399-2**

Under all the alternatives SR-10 will need an upgrade to facilitate continued public use and truck traffic, but the build alternatives remove the impact of coal truck traffic on the south portion of SR-10. SR-10 is under the authority of UDOT and they would decide how to upgrade SR-10 and whether to add truck lanes. The SR-10 project would be a separate project from the proposed road.

**Response 399-3**

We have reviewed the EPA document on highway development and refer to it in the revised sections of the FEIS to better reflect the barrier and fragmentation potential of the proposed road. The revision will be in the context that due to the poor quality soils in the project area and the sparseness of the vegetation most of the habitats would be classified as low quality. The revision discusses the effects of noise in confined sites, the frequency of truck traffic, the human activity, and the physical barrier the road may be in the ecosystem.

Ambient or background noise levels along the proposed haul road and SR10 are typical for outdoor and rural locations. As stated in the DEIS, additional noise from construction and haul truck activity associated with the proposed action will impact area near the haul truck route. Noise levels of outdoor and rural areas of 35 and 56 dBA were measured, respectfully. Future noise level estimates of 60 and 74dBA were noted in the DEIS.

Noise pollution's effects on wildlife is not well studied, but recent research from the U.S. Air Force and U.S. Department of the Interior, relates given noise levels to the effects on certain types of animals. The most relevant published noise effects on animals are listed below:

Noise Source	Noise Level	Subjective Description
Pronghorn	77 dBA	Escape and Running
Various species	132 dBA	Anxiety-like behavior
Rats, rodents	105 dBA (continuous)	Hearing loss;
Mouse activation	95 dBA	Suppressed thyroid activity
	110 dBA (intermittent)	decreased in circulating eosinophils; adrenal
	105 dB(continuous)	longer time intervals between litters; miscarriages, lower weight gain

While none of these limited studies relate directed to the study area, pronghorn behavior with 77 dBA are directly effected by noise levels of that magnitude. Similar results can be assumed to occur for large game animals indigenous to the canyon area.

The noise section addresses canyon walls inasmuch as saying, noise levels will likely double 200 meters away, where haul truck noise is allowed to dissipate in all directions. Further, An increase in these predicted levels would be experienced is noise is prohibited ... such as, having a canyon wall immediately to one side of the haul road. @

Letter  
#399

399-4

#### CULTURAL RESOURCES

While the DEIS represents the Native American relationship with the cultural and natural resources (all strongly against any degradation), it is less adequate in its description and discussion of the prehistoric rock art, particularly the North Fork site.

The North Fork rock art site centers on the large outcropping at the junction of North Fork and Quitcupah Creek. The site area also includes the West Point site (across North Fork runoff, up canyon) and extends, along the rock wall north of the creek, about 300 yards down canyon, to the Ghost Figure site.

The North Fork site is a major rock art outdoor museum in the area and one of the most important multi-cultural sites in Utah. A unique rock art site, images are found on three sides of the outcropping. Also unusual for Utah rock art, the major panel of prehistoric images is on north side and were mostly created in variations of Archaic period forms, particularly the Barrier Canyon and Glen Canyon Linear styles. Both ancient styles, the Barrier Canyon style may be Utah's longest-lived image-making style (ca. 5,600 BCE – CE 300).

The most typical Fremont images appear on the south facing walls. There are a smaller number of pecked and painted or drawn images in the Ute and, perhaps, Paiute styles—although there are some images, whose style is atypical, that could very well be from their hands.

Another unusual feature of this site is a few pecked and painted figures that are defined with elements from different styles (Barrier Canyon – Fremont). These mixed-style, or transitional, figures may well prove to be critical in tracing the transformation of a people from hunting and gathering to a more settled lifeway.

Judging from the style and levels of image repatination (a more recent pecking is dated 1903), the Quitcupah Creek North Fork site may have been a repository for sacred images for, conservatively, four or five thousand years. And, indeed, Southern Paiute and Ute bands maintain that Quitcupah Creek is still a sacred place for them, with specific reference to the rock art.

The DEIS indicates that North Fork is marked as a pullout site during the construction of the proposed road. Considering the expanse of the North Fork site, a pullout, with parking of equipment and deposits of supplies, would severely degrade the environment of the site. The construction vibrations and blasting would threaten the rock art site (particularly the West End of the outcropping that is unstable).

The proposed road would, most likely, destroy the Ghost Figure ridge and its two or three panels. In addition, it has been reported that two additional red ghost figures have been covered over by the present road that cuts across the ridge. It is likely these two figures can be recovered if the present road is rerouted or deconstructed.

Although the DEIS does acknowledge the certain possibility of increased vandalism because of the easier access the proposed road would provide; it does not address the serious

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#### Response 399-4

The North Fork rock art site, as well as other cultural resource sites in the area, have been further detailed and analyzed in the FEIS. The North Fork site represents several cultural periods. The text in Section 3.12 regarding the cultural resources within the project area has been expanded to better describe the uniqueness and significance of the sites, as well as possible impacts, including secondary impacts, to cultural resource sites. The realignment of the proposed road in the area of the rock art sites now precludes the North Fork site area as a pullout during construction.

The proposed alignment for Alternative B, Quitcupah Creek Road, and Alternative C, Alternate Junction, was shifted south about 250 feet. This alignment would place the proposed road about 300 feet away and across the creek from the panels. The new alignment would also avoid impacting known cultural sites located within the previous alignment.

The existing road routed between the creek and the panels would be blocked and not used for access. This would tend to limit access for casual visitors. This modification to Alternatives B&C would preclude the direct impacts of a busy public road next to the rock art site.

Vibrations due to construction activities, blasting, and coal truck traffic would not adversely affect the cultural resource sites, specifically the rock art sites. The proposed road route was realigned about 300 feet away from the rock art complex. Rock art and structural cultural resources are the site types potentially most susceptible to impacts from minimal movement/damage that could possibly lead to structural failure and loss of the resource. As presented in the BLM Handbook H-3150, illustration 10, the BLM has determined that peak velocities at the base of standing cultural structures and rock art should not exceed 0.75 inches per second. The BLM's distance of set-back, for example, is 205 feet for a 10 lb charge buried 10 feet. The set-back for a 10 lb charge at the surface increases to 1,013 feet. There are no proposed blasting areas within 1,200 feet of the rock art complex. BLM guidelines for blasting set-backs would be utilized.

Normal environmental conditions to which these resources are subjected on a daily basis and which cause similar effects include wind, temperature changes, humidity changes, and vibrations from aircraft and vehicles. Failures of prehistoric structures and rock art occur as natural events a function of ever-present forces of erosion and decay. Precipitation combined with freeze-thaw cycles and other natural processes can impact the stability of these sites.

Dust from road construction would be suppressed through use of water or an approved dust suppressant. There is no conclusive evidence that emissions would impact the rock art.

**Letter  
#399**

399-4 cont.

consequences of the heavy truck traffic will have for the rock art images.

A very significant threat to the rock art, although not addressed in the DEIS, is the oily diesel exhaust and coal dust blow-off, which would settle on the surface of the rock art panels.

Given the heavy truck traffic (1000 plus trips every 24 hours, 250 days a year) and the close proximity of the road to the rock art (survey stakes within 35 feet of the outcropping); it is absurd to imagine that the rock art images would not suffer from fallout.

Art conservators have known, for half a century, that many granite and marble monuments are seriously degraded from the effects of smog, airborne particles, and in a surprisingly short period of a few decades (since sandstone is much softer than granite, the degradation here could well be quicker). The dissolution of the rock surface cannot be reversed or corrected. Neither would cleaning be possible because of the fragility of the paintings and sandstone surface.

Finally, the environment/atmosphere that is necessary to experience the aesthetics and sacredness of this site must be natural and peaceful—whether the visitor is an admirer of rock art or a Native American pilgrim. The presence of a paved road and the attendant noise and impact of the large trucks would be grossly inappropriate.

Considering how narrow the benefits would be for a very few, how great the loss to a relatively pristine canyon and wildlife population, and the level of degradation and destruction of significant and irreplaceable prehistoric rock art sites (and the diminishing of their long-term cultural and economic value); the appropriate choice is Alternative A, No Action.

Thank you or your consideration.

David Sucec  
832 Sejo Avenue  
Salt Lake City, Utah 84102  
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**Response 399-4 cont.**

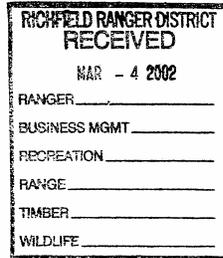
Coal truck trailers would be covered and subjected to an air bath after loading to minimize fugitive coal dust. Quantifying air pollution damage is difficult. The damage function is the quantitative relationship relating the influence of a pollutant, such as diesel emissions, on a receptor-like stone. The mathematical form of the damage function depends on whether the ambient air concentration or deposition rate is the measure of pollution and also on the measure of damage, such as surface loss or chemical denudation (Livingston 2002). Air pollution standards are created for human health protection utilizing ambient air quality standards. A measure of deposition rate would be more appropriate in determining the affects on rock art.

Motor vehicles generate three major pollutants: hydrocarbons, nitrogen oxides, and carbon monoxide. Nitrogen oxides are produced from burning fuels, including gasoline and coal. Ground-level ozone is a product of reactions between chemicals that are produced by burning coal, gasoline, other fuels, and chemicals. Vehicles and industries are the major sources of ground-level ozone. Particulate Matter is any type of solid in the air in the form of smoke, dust, and vapors, which can remain suspended for extended periods. Particulates are produced by many sources, including burning of diesel fuels by trucks, fossil fuels, road construction, and industrial processes such as mining. Volatile Organic Compounds (VOCs) are organic chemicals, many of which are hazardous air pollutants. Vehicle emissions are an important source of VOCs. As stated above, these are human health standards which do not apply readily to the damage function. Therefore stating that these emissions/pollutants are within or out of acceptable range does not imply the same in regards to affects to rock art in the area. Sufficient data does not exist and therefore does not appear in the analysis.

Letter  
#405

March 1, 2002

Linda L. Jackson  
Public Affairs Officer  
Fishlake National Forest  
115 East 900 North  
Richfield, Utah 84701



Subject: Quitchupah Creek Road Draft Environmental Impact Statement

Dear Linda:

I have reviewed the subject document and I appreciate the opportunity to comment on the document.

I did not find any defects in the document and would recommend it be issued as the final EIS.

I recommend Alternative D - Water Hollow Alignment be adopted. Even though it is the more expensive alignment it eliminates the most important problems while still providing significant economic benefits. I will list the major problems I see with the other alternatives.

Alternative B - Quitchupah Creek Road:

The road will have significant impact on the major rock art panel which is very important to the people of Emery County. The amount of truck traffic using the road and passing so close to the panel will make it very difficult to enjoy the panel.

The junction with SR 10 will be at the bottom of a very steep hill and will probably cause significant traffic delays.

Alternative C - Alternate Junction with SR 10

The road will have the same impact on the rock art as Alternative B but the junction with SR 10 will be much improved.

Thank you for the opportunity to make these comments.

Kent Petersen  
PO Box 935  
Ferron, UT 84523

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405-1

405-2

**Response 405-1**

The proposed Alternate B and C road corridor has been realigned in the area of the rock art panels. This new alignment would place the proposed road about 300 feet away and across the creek from the panels. The alignment would also avoid impacting known cultural sites located within the previous alignment. This modification to Alternatives B&C would preclude the direct impacts of a busy public road next to the rock art sites.

**Response 405-2**

See Section 3.14, Transportation. Currently traffic congestion due to coal trucks is experienced on the Acord Lakes Road and SR-10 at the steep grade on Quitchupah Hill. The proposed road would alleviate traffic congestion on Acord Lakes Road and SR-10 from Fremont Junction to Quitchupah Creek Bridge. The Alternative B junction with SR-10 would include modifications such as turn lanes, expansion of the bridge across Quitchupah Creek, and an acceleration lane up Quitchupah Hill in order to alleviate traffic congestion. Alternative C would alleviate traffic congestion on Quitchupah Hill as it junctions with SR-10 to the north.