



Mrs. Jennifer Maiolo
Bureau of Land Management - Little Snake Field Office
455 Emerson St.
Craig, Colorado 81625

RE: BLM Solicitation of Comments on Environmental Assessment
Peabody Twentymile Coal, LLC – Federal Coal Lease COC-78449

Dear Ms. Maiolo;

Based on the recent BLM notice of availability for the Environmental Assessment (EA) and Opportunity to Comment, Twentymile Coal, LLC (TC), which operates the Foidel Creek Mine in Routt County, Colorado, submitted an application to lease and subsequently mine approximately 640 acres of federal coal, containing approximately 3.7 million tons of recoverable coal. This coal would be mined as part of TC's Wolf Creek Reserve, using underground mining methods to extend the life of the reserve, recover this valuable resource, and extend both the life of the mine and the associated economic and community benefits. I appreciate the opportunity to submit comments to be considered as part of the BLM's environmental and leasing review.

TC and its predecessor operators have operated the mines southwest of Steamboat Springs since the mid-1960's. A major employer and economic contributor to the local and regional economy, TC has been a good neighbor, operating in a safe and responsible manner and returning the mined lands to productive use when mining is complete. In northwest Colorado, our economy has been characterized as a "three-legged stool", with mining, agriculture, and tourism providing both a healthy economic and social balance. I believe it is important to maintain this healthy balance.

It is our understanding that after a detailed environmental review of the proposed leasing action, BLM's Proposed Action supports leasing of the subject coal through an open competitive lease sale. The EA process and Preliminary EA document review and consideration of Reasonably Foreseeable Alternatives, provide a detailed discussion of Alternatives Considered but Not Analyzed in Detail, and provide a detailed description of the Affected Environment and analysis of the Environmental Consequences of the Proposed Action and Alternatives. As part of this analysis, the EA includes extensive appendices detailing; the Air Quality Impact Analysis; Biological Assessment and Biological Opinion; and Socioeconomic Report. Given the scope and nature of the Proposed Action, the EA provides an adequate and reasonable evaluation of the potential impacts of the Proposed Action to protect the environment and public interest.

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Given that the subject coal reserves will be mined underground as an extension of the existing operations, there will be minimal need for additional surface facilities, and as a result, soil, water, vegetation, fish and wildlife, air quality, and other potential associated impacts should be minimized. Development and production of the associated additional coal reserves and continuing operation of the Foidel Creek Mine will result in important and significant local and regional socioeconomic benefits, including continued employment of the skilled mine workforce, support of their families, mine and employee expenditures in the local economy, supporting local businesses and services, and continuing tax and royalty revenues, supporting local, regional, state, and federal services and benefits. As an indirect benefit, production and use of the mined coal to generate electricity will contribute to affordable and reliable electricity.

On behalf of the Craig City Council and as residents of Northwest Colorado, we are well aware that outside interest groups are making every effort to interfere with and delay leasing, permitting, and operation of coal mines, powerplants, and other extractive resource activities essential to our economy and well-being. While well-funded and well-organized, the concerns of these outside interests should not override the very real and practical interests of those directly impacted by agency decisions on important resource actions in our area. The BLM has conducted recent reviews of similar projects, which should support an efficient and timely review process

In summary, the subject lease application is not expected to result in incremental adverse environmental or public consequences and the associated economic and community benefits are important and significant. Approval of the proposed lease will result in continued lease, tax, and royalty payments to local, state, and federal entities. Fair Market Value will be paid as a bonus bid for the leased coal, and additional royalties will be paid when the coal is produced. Local property, sales, and use tax will be assessed on mining operations and applicable purchases. Given these considerations, we support TC's lease application, and ask that the BLM proceed in a diligent and timely manner with a fair and balanced review and approval of the lease application.

Respectfully submitted,

Derek Duran – Mayor Pro-Tem

Print Name

Signature