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January 14, 2016

RE: Supplemental Environmental Impact Statement to reinstate the North Fork Coal Mining Area exception of the Colorado Roadless Rule

Dear Mr. Broyles, Mr. Jiron, and Mr. Tu,

This letter of comment on the Supplemental Environmental Impact Statement to reinstate the North Fork Coal Mining Area exception of the Colorado Roadless Rule is submitted by the Board of Directors of the Black Canyon Audubon Society (BCAS) on behalf of our membership. The BCAS, formed in 1990, is an autonomous chapter of the National Audubon Society with a membership of more than 300. Many of our members have visited and are very familiar with the area and are concerned about potential the impacts of roads and development there.

We appreciate that the SEIS addresses the contributions to climate change as directed by the court case.

Among our main concerns are the following:

1. We believe that Alt 2 has the potential for too great a road density over too large an area. Alt 3, which protects at least part of the wilderness capable land is more acceptable.
2. We believe there should be some requirement to capture methane form the vents.
3. We are more concerned about Arch's bonding due to the recent bankruptcy. We need to be more assured that the reclamation is certain to happen.

We appreciate being given the opportunity to comment on the SEIS.

Thanks,

Bill Day
Conservation Chair, BCAS
Hotchkiss, CO 81419