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From: Carmen Bailey
To: Pam Grubaugh-Littig
Date: 10/30/2007 1:52 PM
Subject: UDWR Alton comment letter
Attachments: Alton signed.pdf

Here is our comment letter on Alton.
Thanks, Carmen

*Jacqui K
e/oss/0005*



State of Utah

Department of Natural Resources

MICHAEL R. STYLER
Executive Director

Division of Wildlife Resources

JAMES F. KARPOWITZ
Division Director

ION M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

February 23, 2007

Carolyn Wright
Public Lands Policy Coordination
Office of the Governor
5110 State Office Building
Salt Lake City, Utah 84114-1107

Subject: RDCC #7336 Federal Coal Lease Application Filed by Alton Coal
Development LLC

Dear Ms. Wright:

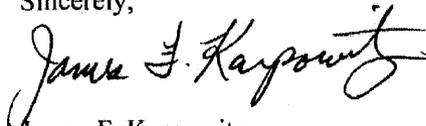
The Utah Division of Wildlife Resources (UDWR) has reviewed the draft of the RMP/EIS for the Kanab Field Office BLM. We provide the following comments:

UDWR has concerns about a greater sage-grouse lek near Alton, the southernmost existing lek rangewide. Based on all existing data, the proposed coal mine would be expected to result in the destruction of this greater sage-grouse lek. To date, there are no documented instances of successful transfers of a lek by way of experimental introductions. From a wildlife standpoint, the lek would appear incompatible with coal mining activity of the type contemplated near Alton, which would involve removal of the overburden where the coal is approximately 30 feet below the surface. Generally, we would suggest mitigation measures to compensate for the loss of wildlife (Example: Mitigation in the form of habitat restoration for loss of elk or mule deer winter range), however, there are no alternatives or reparations known to suitably replace a greater sage-grouse lek.

Another issue of importance concerns the coal dust impact on water quality. Haul trucks, if not properly covered, could produce large quantities of coal dust potentially impacting aquatic life inhabiting Asay, Kanab, and Mammoth creeks, as well as the upper Sevier River. We encountered similar problems along Salina Creek when the SUFCO mine began heavy hauling which resulted in layers of coal dust entering the creek.

Thank you for the opportunity to comment on this draft document. We look forward to working with the Kanab BLM on both RMP and project-specific activities. If you have further questions, please contact Bruce Bonebrake, Habitat Manager, in our Cedar City Office at (435) 865-6112.

Sincerely,



James F. Karpowitz

JFK/cb