Who We Are: The Sierra Club was founded in 1892 and incorporated under the laws of the State of California. As of the end of December, 2011, there were over 600,000 Sierra Club members residing in the United States. Additional members live in Canadian and territorial jurisdictions. The Utah Chapter of the Sierra Club is one of many state and provincial chapters which are, in turn, comprised of a number of groups, each having Bylaws and Executive Committees. Currently the Utah Chapter has over 3,500 members. The Glen Canyon Group of the Utah Chapter has 150 members living in five counties of southeastern Utah—Carbon, Emery, Grand, San Juan and Wayne. The Glen Canyon Group Executive Committee has approved submission of these Comments by Jean Binyon, Conservation Chair.

Our Request: We ask that you consider these Comments in preparation of the Final EIS later this year. Although your decision will result only in: 1) the approval, with conditions (Alternative C) or 2) without conditions (Alternative B Proposed Action), or 3) denial (Alternative A—No Action) of a 25-year extension of leasing coal reserves in the Alton Coal Tract, we feel it essential that all impacts of mining, transport, and use of the coal be strongly considered as well.

Our Position: In developing our position, we have paid closest attention to Chapter 4—Environmental Consequences. Considering the direct and indirect as well as implied costs and benefits of offering this lease, the Glen Canyon Group of the Utah Chapter Sierra Club advocates Alternative A—No Action. BLM should continue to manage the Alton Tract under the RMP and Healthy Lands Initiative. The environmental impacts of leasing, mining and reclamation would certainly last more than 2 decades, likely up to 35 years or longer—more than a generation of Utahns. Specific objections follow.

Re: Recreation and Tourism: BLM asserts that impacts consist largely of reduced opportunity for hunting and OHV use. Of more concern are the impacts on tourists’ appreciation of the incomparable Bryce Canyon National Park. Over 25 years, it is easy to believe that the reputation of Bryce would be negatively affected, thereby reducing the number of visitors, both Americans and international tourists, and the length of stay in the State and the region. How would a neighboring industrial operation 24-hours a day and 6 days a week conceivably enhance their experience? Reducing the economic value of the
area’s National Parks and Monuments just might cost more than the million dollar annual revenues to the State.

Re: Transportation and Use: Apparently the coal will be taken by truck over a rerouted KFO 116 via historic route SR 89 through Hatch & Panquich, and SR 56 to Cedar City where it will be loaded onto trains. (The hazards of PM 10 and nitrogen dioxide in the mining and transport of the product should not be underestimated.) Presumably the trains will then transport the coal to Delta, where a very dirty coal-fired IPP power plant will convert it to electricity. The electricity will go west to Nevada and/or California; the pollution will be driven by prevailing winds across the Wasatch Front and into the atmosphere to fall as acid rain on the Adirondack Mountains of New York and the potato fields of Prince Edward Island.

Re: Greater Sage Grouse: It is clear that BLM is particularly sensitive to this Special Status since an entire alternative—C, focuses on reducing impacts to the Greater Sage Grouse whose southernmost mating habitat is in the Alton Tract area, where there has been a stable population of 30-40 Greater Sage Grouse over 10 years. How much better Alternative A would be for the Greater Sage Grouse, as well as the Paunsaugunt mule deer, and all the other wildlife than either of the action alternatives.

In Conclusion: I am not an economist who can apply a cost-benefit analysis to your proposal, nor a mathematician who can critique the models used in your projections. I certainly cannot fathom the pressures that are brought to bear on the BLM in its goal of balancing protection of the public lands with facilitating development of clean energy and resource conservation. I thank you for the opportunity to comment.

With the No Action alternative, mining would continue as it is currently and could even expand on surfaces that are privately owned, but the publicly owned coal would stay where it is, perhaps awaiting less intrusive methods of retrieval in the future. Whether for the more than 100 prehistoric and historic sites; the public use of the public lands—National Parks and Forests; preservation of visibility and Class I and II air quality; wildlife and key plants, the best alternative is no action.

In the past I have observed that proposals in draft EIS’s usually become preferred alternatives in the final EIS. I don’t know if BLM has ever adopted the No Action alternative, but – this time, I hope you get it right.

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