About us: The Glen Canyon Group is one of the Utah Chapter’s groups and represents over 150 members living in Carbon, Emery, Grand, San Juan and Wayne Counties. As of the end of January, 2012, the Utah Chapter had over 3,600 members. Although each group and chapter has its own Executive Committee, all are part of a single organization—The Sierra Club, which was founded in 1892 and incorporated under the laws of the State of California. The Sierra Club has close to 620,000 members.

The Glen Canyon Group submitted comments on both the Moab and the Monticello District RMPs and welcomes this opportunity to contribute to scoping considerations for the MLP. The Glen Canyon Group Executive Committee has approved submission of these Comments by Jean Binyon, Conservation Chair.

We request that these comments be considered in preparation of the Draft MLP/EIS and expect to make additional comments on that document. Further information about the Group can be found on its website: http://utah.sierraclub.org/glencanyon/

General comments regarding leasing of oil, gas and potash

The DEIS/MLP should identify clearly any change in oil, gas and potash deposits over those identified in the RMPs. For example, the “potash and salt deposit – development potential” shown in Map 3-5 of the Moab District RMP identified very few sites, including known potash leasing areas (such as the Seven Mile KPLA and Lisbon Valley KPLA). Comparing this map to the MLP potash “poster” shows a significant increase in the amount of acreage as “prospecting permit applications (pending).” I hope I would be correct in assuming that all such applications would be held in abeyance until the MLP process is completed. Indeed, the poster appears to demonstrate that the worst case scenario has already occurred; the poster shows a severe rash over BLM, SITLA, and private lands, a terminal case of rosacea.

It is apparent that the increased economic value of potash has already led to rampant speculation. Assuming that the MLP governs prospecting, and even
though the MLP will determine only the leasing phase, it would be wise to look at the longer term implications at each site. Again, looking at the poster, the Draft should answer:

- How many potential leases are represented?
- How many applicants are represented?
- If adjacent leases are granted to different corporations, would each of them be constructing and operating separate processing plants?
- Would alternatives include stipulations for prospecting and exploratory drilling?
- If so, how are such stipulations enforced?
- Whether or not such permits are followed by leases, will reclamation bonds and plan be required of the applicants?
- Is the financial strength of applicants considered in leasing? If a corporation goes bankrupt and is unable to fulfill its cleanup/reclamation responsibilities, how is the burden borne?
- Most important, what are the water and energy usage required for each alternative?

It is hoped that we can learn from history, both the mining, milling, and resultant cleanup of uranium and the recent Bush Administration’s end run to lease oil and gas lands close to national parks as well as on split estate lands in Spanish Valley. There is ample evidence that natural gas production and storage in the United States so exceeds demand that prices are depressed. A great number of leases have already been granted for oil and gas development, a large proportion of which have not been drilled. It is questionable that additional leasing for oil and gas should be done at this time.

Finally, while we note that the MLP excludes Canyonlands National Park, the Sierra Club strongly advocates holding the currently roadless Greater Canyonlands area east of the Park off limits for all mineral leasing and development.

Scoping Considerations:

Air quality and global climate change: By far our leading concern is deterioration in the air quality in our region caused by dust and air-borne pollutants. It is important that baseline data for wind direction and speed be included, particularly for existing and new leases for potash drilling, mining and processing as well as for natural gas production and pipelines. Plans for monitoring and reducing threats to air quality must be required for exploration, drilling, and recovery of oil, gas and potash resources. As for climate change, we noted that the RMPs did not consider its causes and impacts, and we are glad to see that the RMP Amendments will do so.

Cultural Resources: BLM’s “Preliminary Planning Issues” list “historic trails and traditional cultural properties of importance to Native American tribes.” Please
note that such cultural resources are of importance to everyone, not just to descendants of the ancestral pueblan civilizations. Such ancient rock art, ruins, relics, sacred sites and burial grounds are easily disturbed and devastated by exploitation of mineral resources. The Old Spanish Trail should be mapped and efforts made to reduce impacts to this historically important way. Plans must include identification and preservation of cultural resources wherever possible.

Paleontological resources: The Colorado Plateau/Paradox Basin are known for salt anticlines, the presence of Pennsylvanian period deposits, and for dinosaur fossils and tracks. The Moab area is often called part of a “dinosaur diamond.” These remnants should be mapped and protected.

Wildlife and fisheries habitat: In addition to Critical and Endangered Fish and Prairie Dog Habitat and breeding grounds for such birds as the Mexican Spotted Owl, Bald and Golden Eagle, Burrowing Owl and Ferruginous Hawk, consideration should be given to leks of the rare Gunnison Sage Grouse and habitat of Desert Bighorn Sheep in the southeastern park of the MLP area. Their distribution and characteristics should be protected by stipulations for all oil, gas, and potash leasing.

Visual Resources and Recreation Use: The economic base of both Grand and San Juan Counties is tourism. Anything which negatively affects visual resources is detrimental to our economies and quality of life. Where possible, such industrial evidence as drill rigs, plant sites, and tailings ponds should be hidden from the viewshed of roads and trails. Transportation of equipment and minerals by truck or train should be undertaken at night so as not to interfere with safety and enjoyment of the out-of-doors by residents and visitors.

Fragile soils and steep slopes: Grand County’s Land Use Code prohibits building on slopes of 30% or more. While leasing will impact only public and split estate lands, the local codes of both Grand County and San Juan County should be respected.

Water resources, including aquifers: Second in priority to air quality is consideration of the availability, use and quality of our water supplies. It seems evident that potash mining and processing will use—and lose, large quantities of water. Given the current and future impacts of global warming and severe drought conditions, serious questions must be raised about the wisdom of new leasing of potash resources at this time. Despite its economic benefits to mine owners and to the State, some thought should be given to delaying such leases until less water-intensive (and energy-intensive) processes are developed.

Socioeconomics: Of concern are both the impacts of leasing to the health and safety of surrounding populations and that of workers, equipment operators, and transport systems. Alternatives should specify the respective population changes and characteristics—numbers of single persons, families, income levels, local vs
imported labor, etc. Housing is scarce in towns of Grand and San Juan Counties. The negative effects of boom towns are well known, whether in crime and social disruption or the economic turmoil of the inevitable bust phase. Perhaps the most important thing BLM could do is to phase in the leasing and later operations programs.

**Special Designations (ACEC, Wild and Scenic Rivers) and Wilderness characteristics:** All areas noted as having special designations, as well as WSAs and non-WSA lands with wilderness characteristics should be outside leasing tracts and protected from leasing impacts. Same with National Parks and State lands.