Research Design and Development of tar sands and oil shale has not yet come up with solutions to environmental, economic, and social issues. As steward of our public lands, the BLM has an obligation to make sure safeguards are in place before leases are issued. For this reason, the Glen Canyon Group of the Sierra Club advocates a decision which reduces lands available for leasing to those already allocated for RD&D. We endorse Alternative 3. If and when companies are ever able to mine the tar sands and oil shale on public lands in a manner that is not harmful to the water, the air, the habitat, the wildlife, and the people, then and only then should the BLM grant these leases.

Preserve Water Quality and Quantity of Flow
We can live without oil, but we cannot live without water. Utah is the second driest state in the United States. We need to take care of and cherish the water we have. It is our most precious commodity. The developers must prove that the energy they produce does not kill us in the process. That may seem like a radical statement, but in reality it is not. We cannot live without water. Yet producing a barrel of oil from oil shale takes 4 - 5 barrels of water and producing a barrel of oil from tar sands takes 4-6 barrels of water. With the recent and ongoing reduction in snowpack in the Rocky Mountains caused by climate change, our Colorado River will have less water flowing into it. With the growth in populations in Utah as well as in all areas downstream that depend on the Colorado River, human demand will be increasing for drinking water. With that population growth will come the need for more irrigation for agriculture. The bottom line is that tar sands and oil shale developers must not only prove they will not need large amounts of water to produce this energy source, they must also prove that they will be able to mine and produce it without the use of toxic chemicals that will contaminate our surface water, ground water, aquifers, watersheds, and the Colorado River.

Protect Endangered Fish
There are several endangered species of fish that live in the Colorado River. They need large amounts of water to survive. The endangered species are the canaries in the coal mine - they are indicators to us that we in fact are in danger. It is time to take care of them.

Preserve Air Quality

Tar sands and oil shale developers must not be allowed to pollute our air or produce greenhouse gases. Health consequences of breathing polluted air completely undermine the quality of life for any species, whether human or wild.

The RD&D sites are poor examples of responsible use of our air. In the process of building the site, strip mining the land, processing materials, extensive traveling on the roads, creating energy to run the operation, the strip miners create many toxic substances as well as ozone depleting chemicals and particulates. Citizens are protected from these forms of pollution by the Clean Air Act. Yet the pollution remains. The visibility, noise level of operating machinery, light pollution at night which disrupts wildlife habits, toxic contamination of the air, and creation of greenhouse gases are all reasons to limit acreage available for RD&D until the developers have proven that they can mine the tar sands and oil shale without polluting the air or contributing to global warming. They need to be proven to be in line with the Clean Air Act before they are issued leases.

Preserve Local Communities and Their Economies
Tar sands and oil shale mining will hurt our communities and our way of life. Many people come to our area for recreation opportunities of hiking, biking, jeeping, river rafting, bird watching, hunting, fishing, camping, rock climbing, horseback riding, and any other activities in which they can experience clean air, clean water, scenic open vistas, quiet. The tourist and recreation industries in this part of Utah provide our livelihoods as well as a way of life. Service industries such as new hospitals, recreation centers, senior centers have grown up in the small towns. Retirees have moved to these areas because of the healthy community spirit and beautiful surroundings. The economies and way of life of the rural communities would be destroyed and would be replaced by inflation, inadequate infrastructures, population explosion, housing shortages, increase in demands on social services like schools, police protection, fire
protection, health care. We in the small towns cannot afford these mining operations. The BLM should require mining companies to pay communities in advance for updating infrastructures as well as increases in all the other expenses the local communities will have to bear.

Preserve Public Lands for Multiple Uses
Public lands have historically been used for many purposes including hunting, camping, grazing, trail riding, recreation, fishing, etc. These multiple uses will have to cease if the mining of tar sands and oil shale causes environmental damage. The BLM should grant more permits for Research and Development for nonpolluting renewable sources of energy esp. wind and solar in Utah. The influx of those industries would benefit our energy development, benefit our environment, and benefit our communities.

Preserve Wildlife Habitat for Endangered Greater Sage Grouse
Wildlife habitat on public lands must be preserved. The Greater Sage Grouse is under protection of the Endangered Species Act and requires a contiguous range that encompasses its needs during various seasons and during various times in the life and breeding cycle. The Resilient Habitats Campaign of the Sierra Club has as its goal the preservation of critical habitats to insure the survival of species in the face of climate change, which causes the suitable available habitat to shrink in area. The developers who want to lease public lands must not be permitted any leases within the sagebrush ecosystem that is so critical to the survival of the Greater Sage Grouse.

Preserve Lands with With Wilderness Characteristics and ACEC’s
The BLM should consider all lands with Wilderness Characteristics or Areas of Critical Environmental Concern off limits to leasing for tar sands or oil shale exploration or Research Design and Development. The RD&D that we have seen so far greatly pollutes the water, the air, and completely destroys the land. These areas cannot undergo the burden of irresponsible development when the companies still have not proven they have the technology to develop the strip mining process.

Choose Alternative 3
In summary, the Glen Canyon Group of the Sierra Club endorses Alternative 3. The RD&D projects already have 32,640 acres available for
them to develop technologies that extract oil in an environmentally sound manner. If they can prove to interested third parties that the technologies are dependably predictable and safe for the water, air, wildlife, and community impact, the BLM can issue permits at that time. Until that time, the land should be kept intact, safe from their experimentation with all its consequences. We must not put the cart before the horse, giving away our land without regard to the long term consequences.

Thank you for your consideration of these issues.
Sincerely,

Deb Walter
Volunteer, Glen Canyon Group of the Sierra Club
Moab, Utah