

COLORADO PLATEAU RIVER GUIDES * HOLIDAY EXPEDITIONS *
OARS * COLORADO OUTWARD BOUND SCHOOL

BY ELECTRONIC MAIL ([blm ut vernal comments@blm.gov](mailto:blm_ut_vernal_comments@blm.gov))

July 9, 2018

Bureau of Land Management, Vernal Field Office
Stephanie Howard – NEPA Coordinator
170 South 500 East
Vernal, UT 84078

Re: Comments - Enefit American Oil Utility Corridor Project FEIS

Dear Ms. Howard:

We are writing to you regarding our concerns about the severe and harmful impacts that will occur to Utah's wild and natural stretches of the White River and other important rivers from BLM's approval of Enefit American's Oil Utility Corridor Project. As you may know, a number of local and regional businesses and associations, individuals, and conservation organizations provided your office with detailed comments on the draft Vernal field office resource management plan and urged the BLM to put in place protective management for the potential White River Area of Critical Environmental Concern (ACEC), the proposed Wild and Scenic segments of the White River¹ and Evacuation Creek (under the Wild and Scenic Rivers Act), and the proposed White River special recreation management area. We have also submitted written comments to the Vernal field office from time to time on specific proposed projects that have threatened the integrity of the White River and requested that BLM exercise its

¹ BLM's Vernal final environmental impact statement acknowledged the importance of the White River from the Colorado State line to the Indian Trust Land Boundary: "The White River is a favorite canoeing destination for people from all of the state and beyond." Vernal FEIS at Appendix C-11. That document noted that the White River has several outstandingly remarkable values which made it eligible for designation as a Wild and Scenic River, including: recreational, scenic (geologic), fish, wildlife/habitat and historic values. *Id.*

discretion to protect this important resource. For many of us, our businesses and livelihoods rely on the remote nature of this stretch of river (as well as other nearby rivers similarly at risk, including the Upper Desolation and Desolation Canyon stretches of the Green River that are downstream of the confluence of the White and Green Rivers and would be adversely affected by pollution, spills, and degradation of the White River), its abundance of wildlife, natural quiet, dark skies and wild qualities. We are gravely concerned that our customer base will choose other places to spend their time and money if the White River continues to be severely impacted by fossil fuel development. In addition, many of our members recreate and enjoy the peace and quiet found on the White River and are seriously concerned that the special qualities of this place are in jeopardy of being lost to the sight and sound of fossil fuel development.

We have previously stated our overwhelming desire that new fossil fuel development not significantly affect the White River and its remarkable values. Unfortunately, Enefit's proposed utility corridor project and the resulting impacts from mining, retorting and refining, may result in the destruction of the area's wild qualities, natural soundscape, and remarkable visual character. It would destroy the outstanding recreational qualities of the White River and impair if not destroy the River's other remarkable features. The EIS for this proposed project is a severely inadequate environmental document that fails to sufficiently analyze the direct, indirect and cumulative impacts that both the utility corridors and the development they will facilitate has on the natural environment. In addition, it cannot begin to account for the cumulative impacts from present and future fossil fuel development in the White River area.

We adamantly disagree with the EIS's assertion that this development would have only "minimal" impacts to the the opportunity for wild and primitive river-related recreation. In addition, BLM has simply ignored the grave threat that this project poses to the region's air quality as well as the potentially severe greenhouse gas emissions from mining, retorting, refining and burning this particularly dirty fossil fuel. These impacts are all reasonably foreseeable and would not occur but for BLM's approval of the rights-of-way; they must be analyzed now and before BLM issues its record of decision.

The EIS, as drafted, confirms that the BLM considers recreational opportunities and river-related values to be of lower priority than fossil fuel development. Such a determination is contrary to the specific mandate given to the BLM in the Federal Land Policy and Management Act. In order to give these resources the same weight and value as natural resource extraction the BLM should require the company to more fully detail its ability to proceed with the proposed action irrespective of BLM's actions. We believe, as the Environmental Protection Agency stated in its 2013 letter, that there is not sufficient information to confirm that Enefit can and would proceed unless BLM approved the company's action. The public has a right to know that it will be BLM's authorization that allows this dangerous project to move forward. We hope that will not come to pass and strongly encourage BLM to perform the additional analyses discussed above and then select the no-action alternative, the only option that will safeguard the White River and other important nearby rivers.

Thank you for your time and consideration of these comments.

Sincerely,

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