



CANYONLANDS WATERSHED COUNCIL

Chris Baird
Executive Director
PO Box 1024
Moab, UT 84532
(435) 260-1431
chris@farcountry.org

May 7, 2014

Revised Version (includes "Assessment fee for proposed use of haul route")

Grand County Council
Attention: Public Lands
125 East Center St
Moab, UT 84532

RE: Bishop Public Lands Initiative

Dear Grand County Council Members,

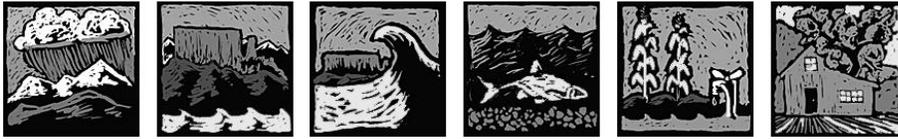
Thank you for the opportunity to provide comments on the County's proposed alternatives for Representative Bishop's Public Lands Initiative. These comments are submitted on behalf of Canyonlands Watershed Council, a local 501(c)3 conservation organization.

We applaud the Council for accepting such a difficult undertaking. A public lands bill such as this can only be viable with comprehensive support from all major stakeholders. We understand the difficulty in achieving this level of support. We also understand that at this stage the County will need to make specific decisions with regard to its final proposal to Rep. Bishop. To that end the Canyonlands Watershed Council would like to present specific comments for your consideration on the below:

- Wilderness
 - o Status quo review, alternatives review, additional proposals
 - o Wilderness as watershed protection
 - o Potential conflicts with industry
- National Recreation Area
 - o Clarifications on protected lands
 - o Potential Industry Conflicts
 - o Potential conservation value
- Recreation



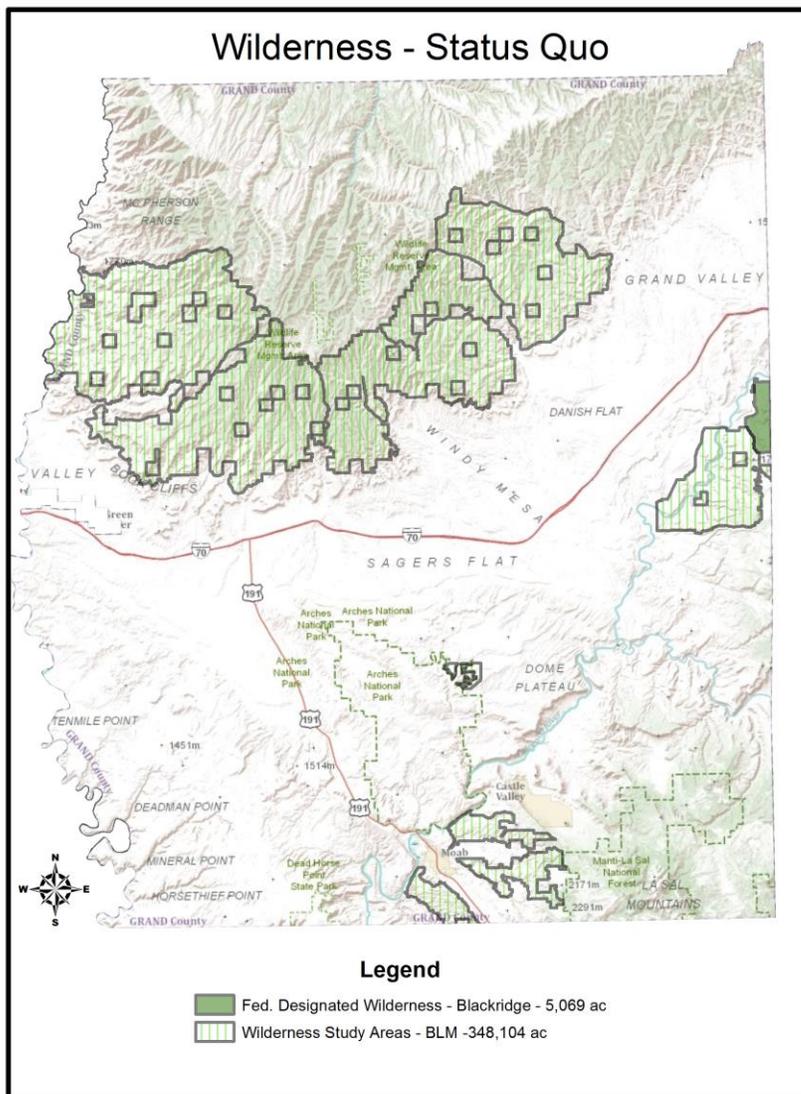
- Roads
- Antiquities Act
- Sego Canyon Transportation Corridor
 - o Overview
 - o Economic Growth Potential
 - Methodology
 - Reasonably foreseeable development scenario
 - Predicted economic benefit to local schools and government
 - Predicted jobs and their effect on local economy
 - Assessment fee for proposed use of haul route
 - o Environmental and Conservation Concerns
 - Hunting
 - Surface Impacts
 - Water Impacts
 - Air quality impacts
 - Cultural resource impacts
 - Private property concerns
 - o Canyonlands Watershed Council's opinion



Wilderness

Status Quo:

Currently Grand Co. has one 5,069 acre parcel of federally designated wilderness, the Blackridge wilderness area. This parcel was part of a Colorado lands bill and is located near Westwater Canyon. Additionally there are several wilderness study areas that are managed as federally designated wilderness would be. The wilderness study areas were established between 1980 & 1983 and encompass 348,104 acres.

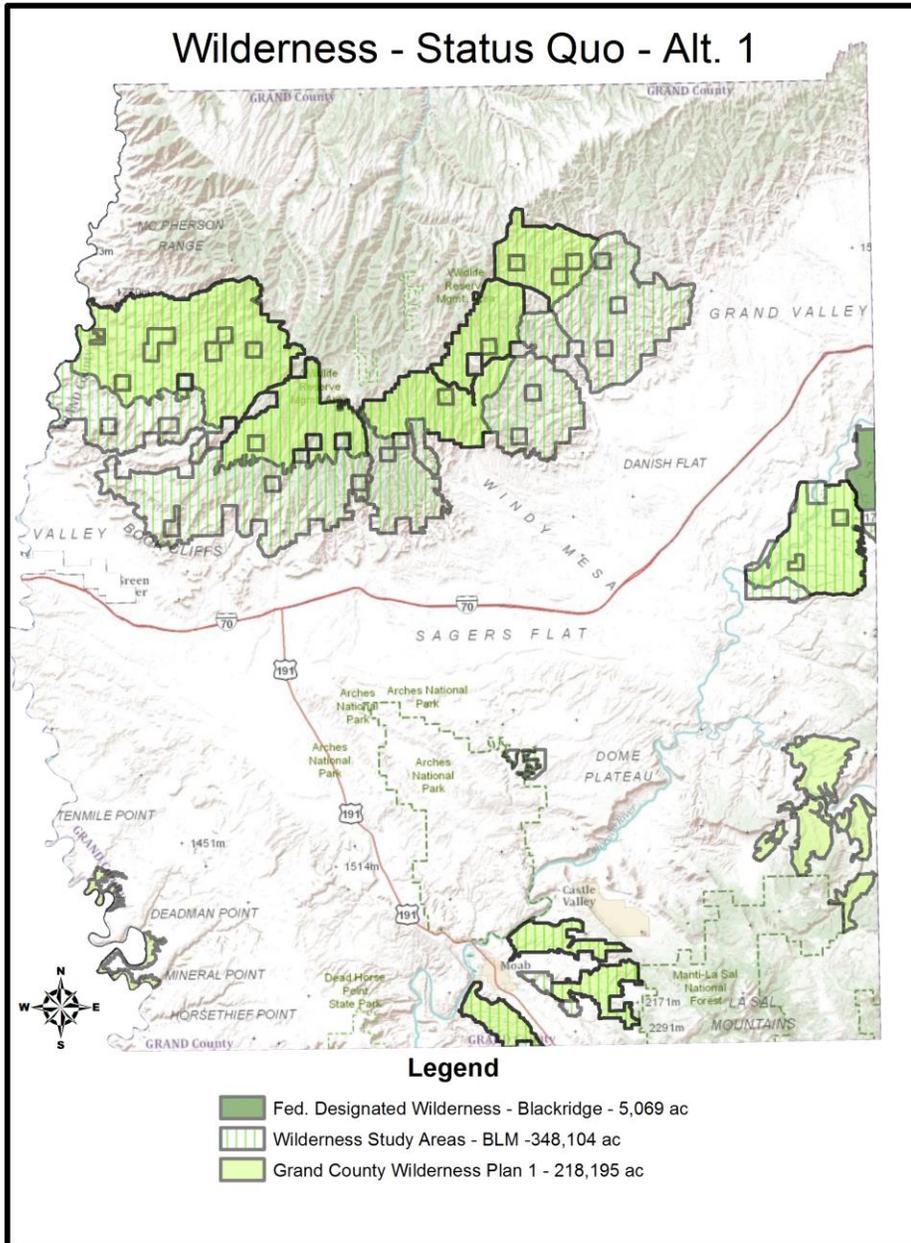




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Wilderness Alternatives Review:

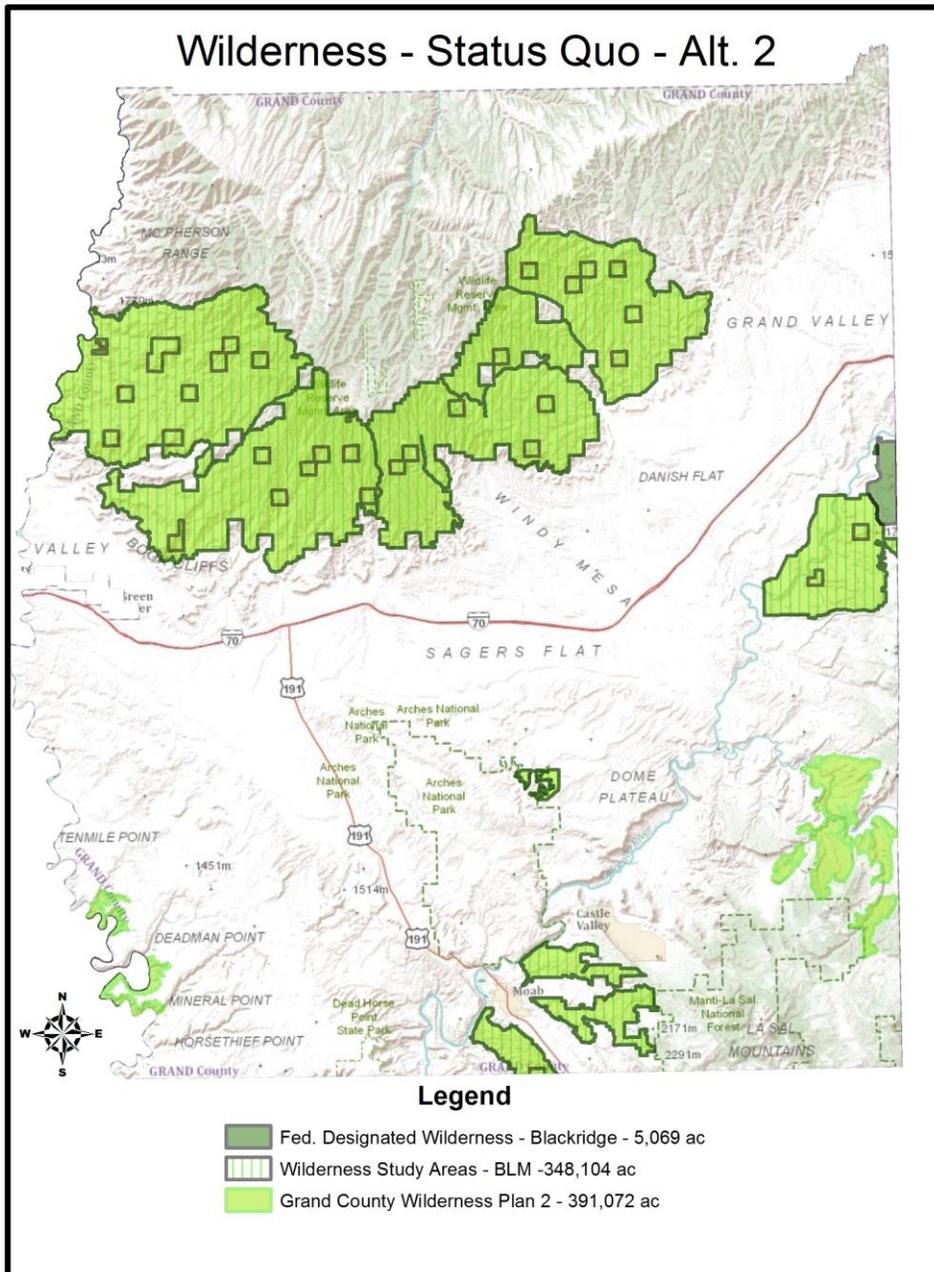
Wilderness alternative 1 proposes 218,195 acres of wilderness. This would reduce the status quo of lands managed as wilderness by 165,909 acres.





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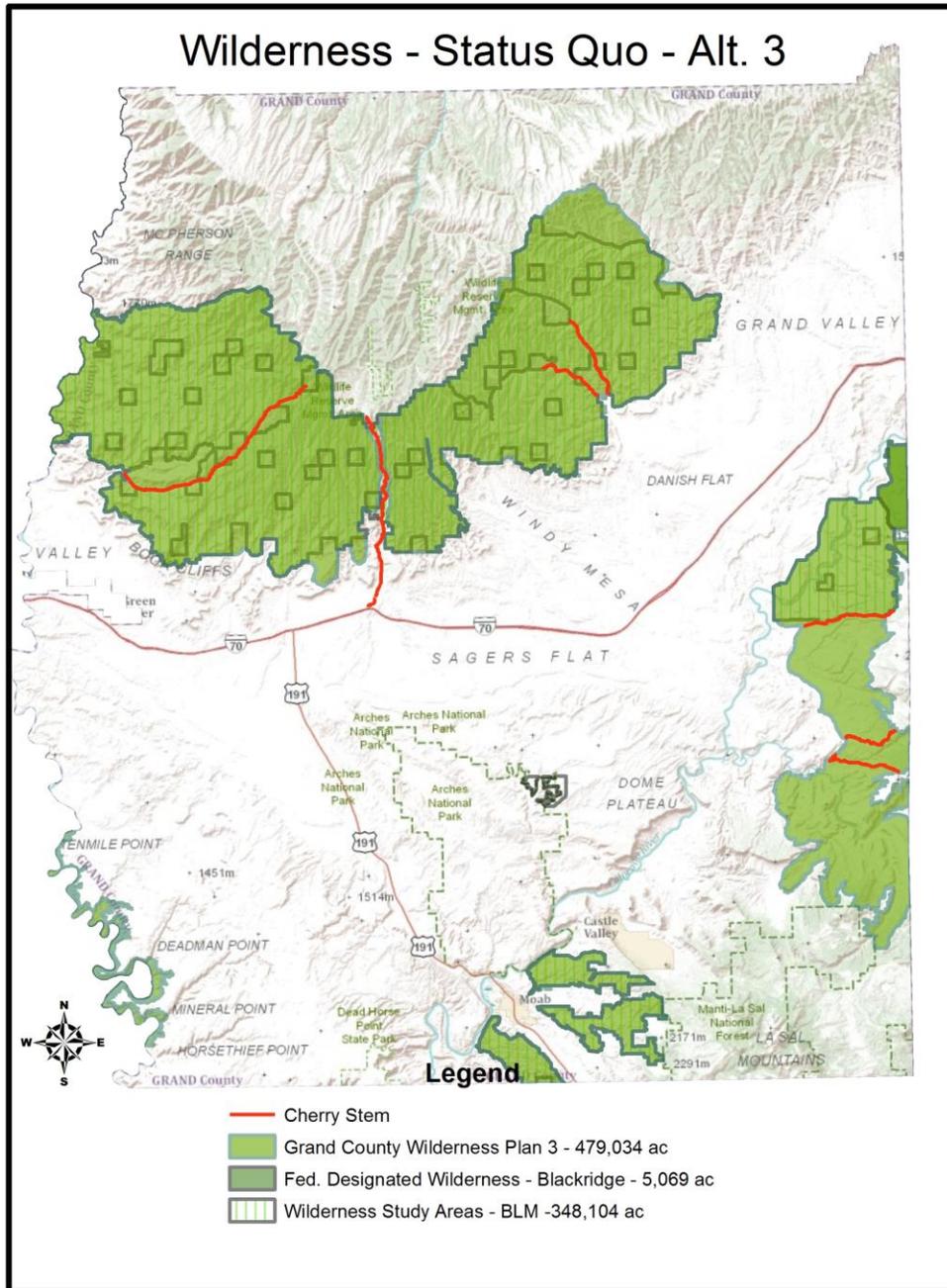
Wilderness alternative 2 proposes 391,072 acres of wilderness. This would increase the status quo of lands managed as wilderness by 42,968 acres. Primarily in the Fisher Valley/Mary Jane, Dolores Triangle, and Labyrinth Canyon areas.





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Wilderness alternative 3 proposes 479,034 acres of wilderness. This proposal is not as fully formed as alternative 2. More explanation on next page.





The County's alternative 3 for wilderness contains a few anomalies that we suspect are the result of time constraints.

1. The 5,069 acre Blackridge federally designated wilderness area is being proposed for wilderness again. It is already wilderness.
2. The Lost Spring Canyon WSA (NE of Arches N.P.) is proposed for wilderness in alt. 2, but is not in alt. 3.
3. Alt. 2 makes many specific allowances for roads beyond the identified "cherry stems". Alt. 3 however, has not received the same level of attention.

We hope that these anomalies will be addressed. Alt. 3 can only be seriously considered if it receives the same level of attention as Alt. 2. We hope that the County will seriously consider all of its proposed alternatives.

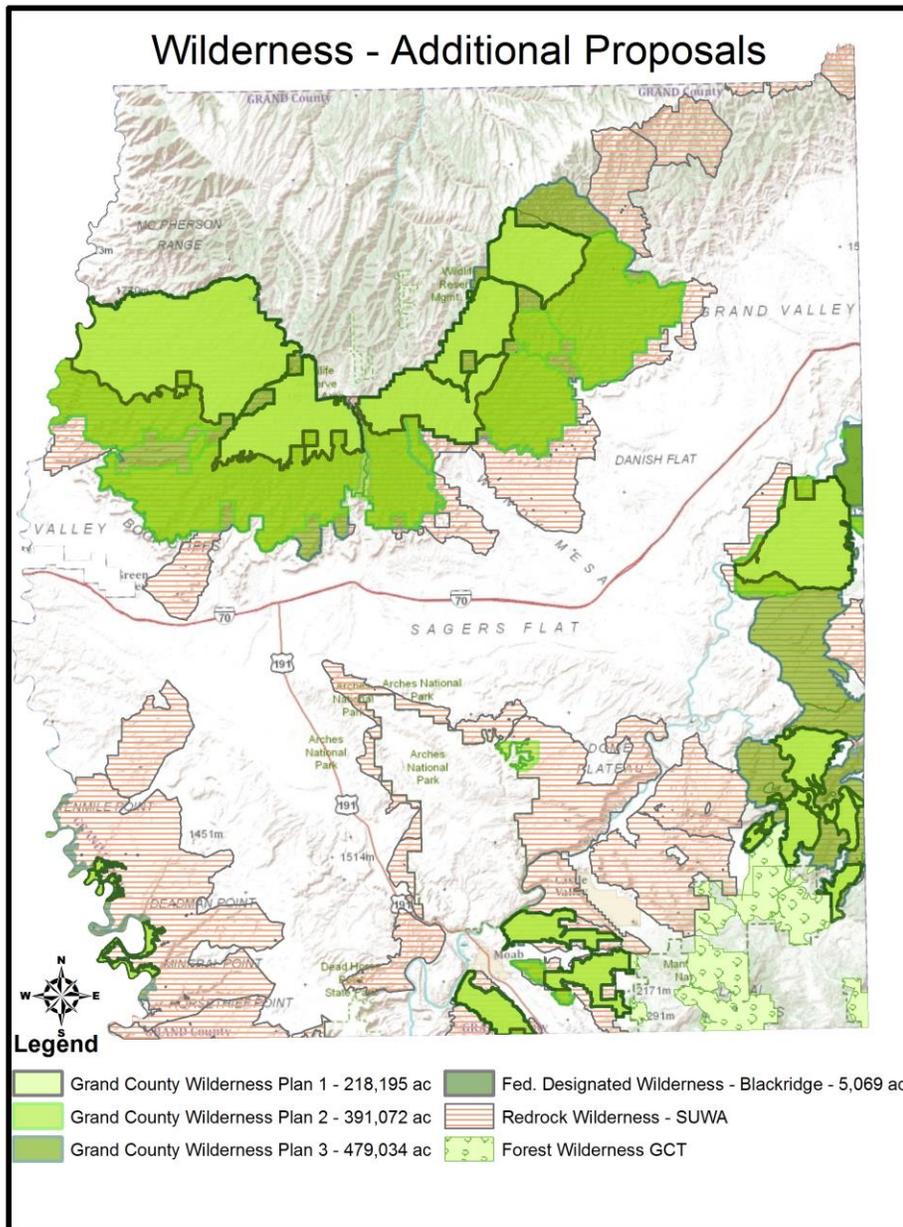
As Alt. 3 stands, less the Blackridge wilderness area, it proposes 473,965 acres of wilderness. This would increase the status quo by 131,861 acres.

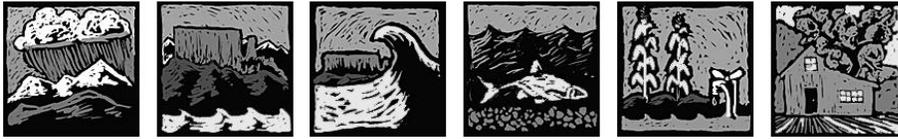


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Additional Proposals:

The below map includes the Southern Utah Wilderness Alliance's "America's Red Rock Wilderness Act" as well as the Grand Canyon Trust's forest service wilderness proposal.





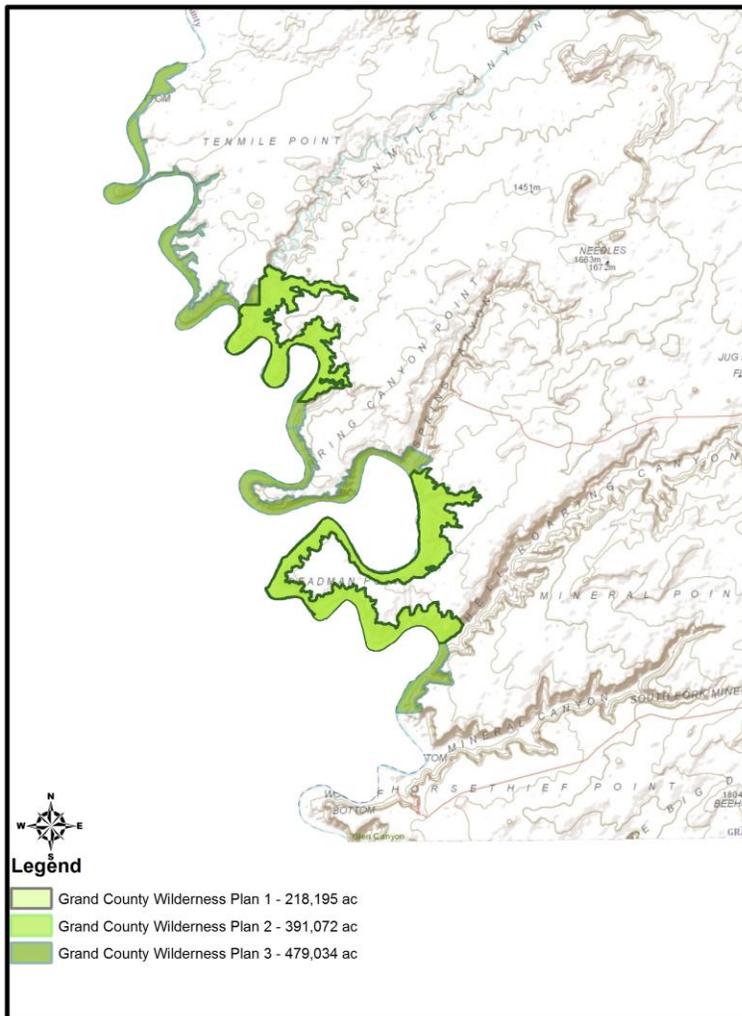
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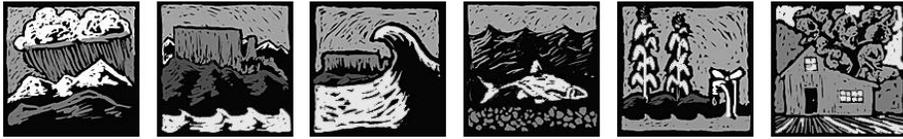
Wilderness as watershed protection:

The Canyonlands Watershed Council, despite its name, is concerned with all facets of conservation and land use. However, we prioritize water related issues and so we will restrict our wilderness requests as such.

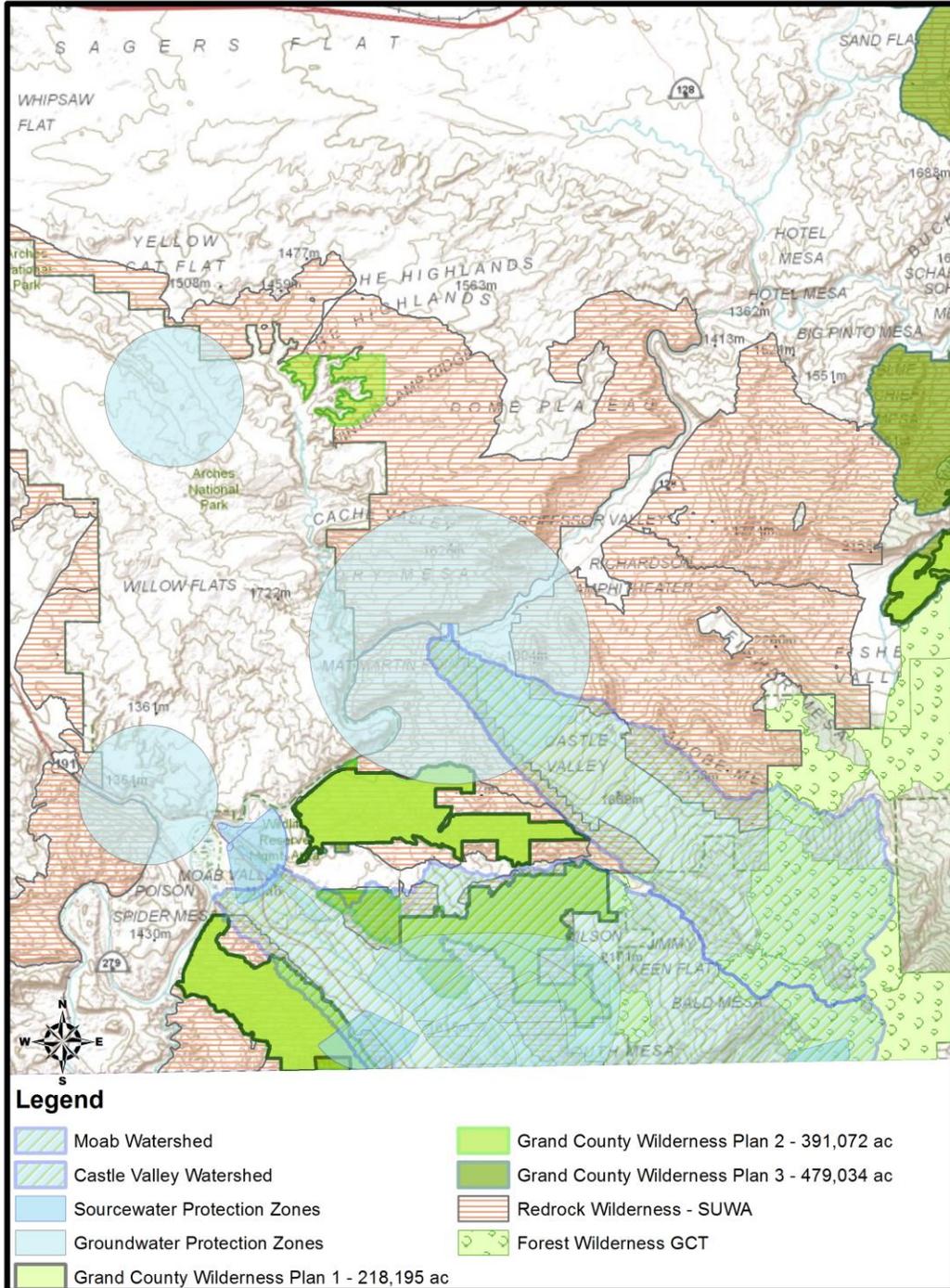
We respectfully request that wilderness proposals specifically within the Moab and Castle valley watershed be considered for inclusion in the County's recommendations to Rep. Bishop. We also request that the Alt. 3 wilderness proposal be accepted for the Labyrinth Canyon area and expanded to include a visual and sonic setback along the canyon rim. Currently only the river bottoms are being considered. We also request the inclusion of Lost Springs Canyon WSA as proposed wilderness.

Wilderness - Labyrinth Canyon Area





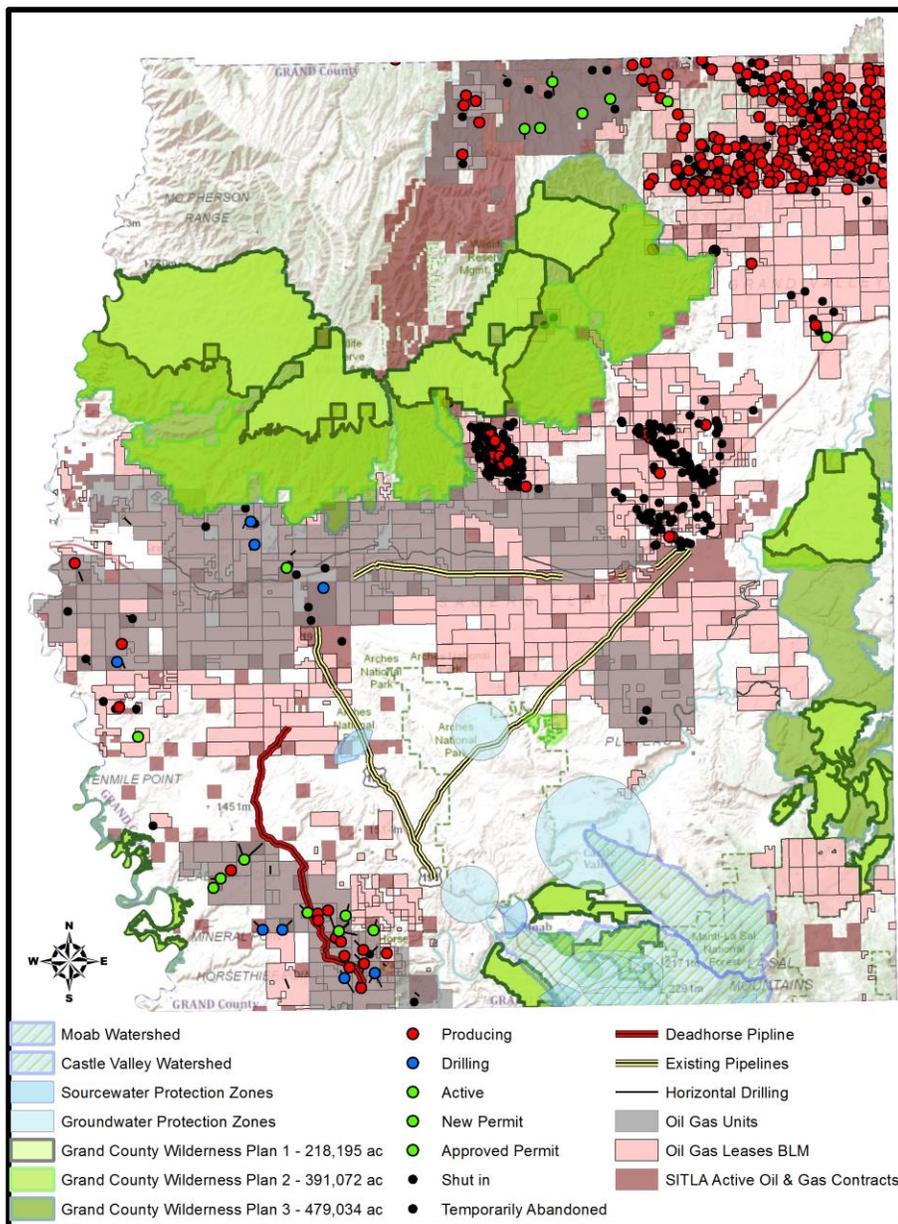
Wilderness - Watershed + Lost Springs Canyon



Potential Conflicts with Industry:

The below map shows the current oil & gas scenario against the County's proposals. It is worth noting that no federal designation, even of wilderness, can void an existing valid lease.

Wilderness - Oil & Gas

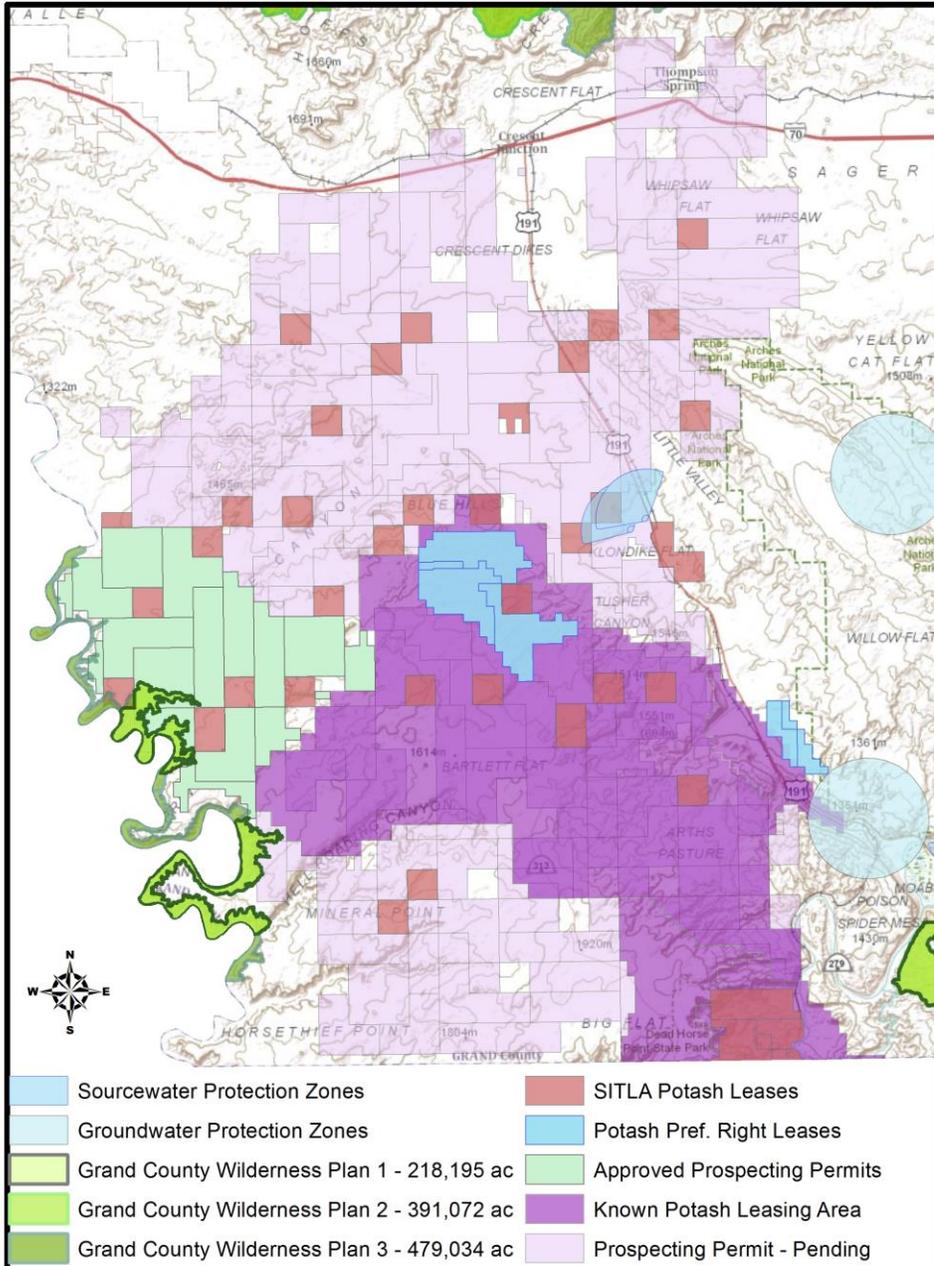


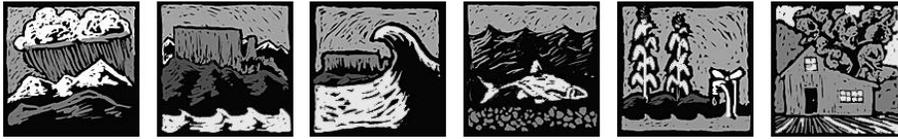


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The below map shows the current potash scenario. The only legally vested potash interests are the approved prospecting permits, preference rights leases, and SITLA contracts.

Wilderness - Potash



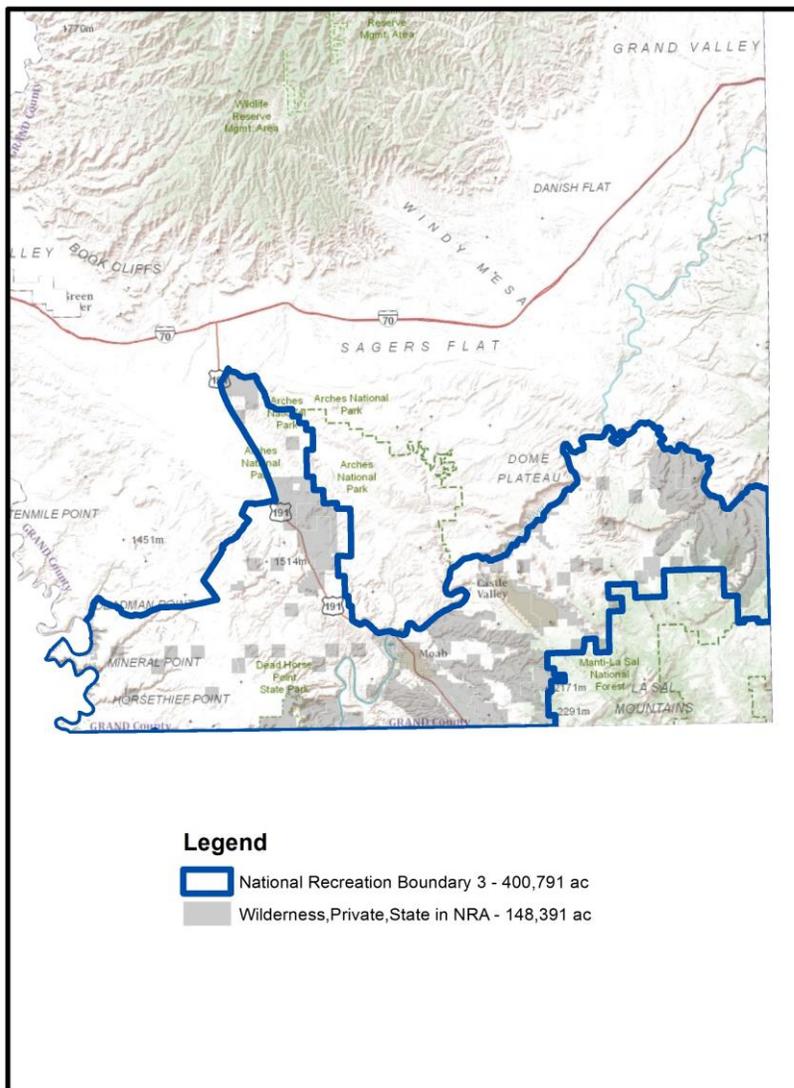


National Recreation Area

Clarifications on Protected Lands:

The proposed National Recreation Areas (NRAs) include private, state, and proposed wilderness. Private and state lands will not be a part of an NRA. The wilderness proposed within the proposed NRAs should be counted for protection only once. For Alt. 3 this would leave a total area of protected lands (less private, state, and wilderness) of 252,400 acres.

National Recreation Area - Private, State, Wilderness



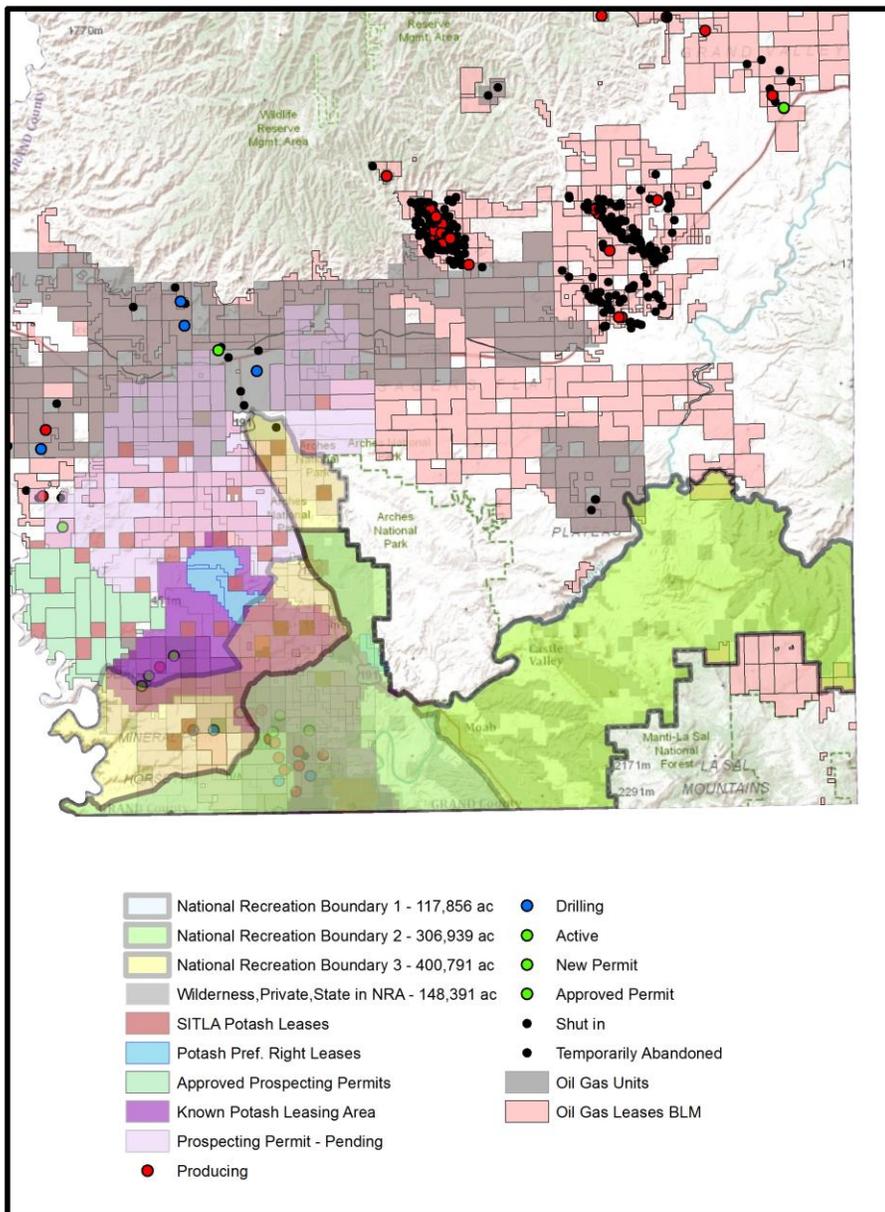


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Potential Industry Conflicts:

It is likely that most oil/gas interests are already leased within the NRA boundaries, however there are pending potash prospecting permits within the NRA boundary. Again, an NRA designation will not void existing leases.

National Recreation Area - Oil, Gas, Potash





Potential Conservation Value:

As the proposed NRAs will not void existing leases nor close any roads, the only conservation value inherent in an NRA is found in Alt. 3's "no new leasing". The recreation industry stands to gain additional advertising as an NRA would appear on all road atlases and gazetteers. The Canyonlands Watershed Council, however, believes that, between the Grand Co. Travel Council and private advertising, the recreation industry is well covered. We only support NRA designations that include "no new leasing" language as that is the only designation that carries any conservation value. An NRA is not de-facto wilderness, and, depending on its stipulations, may run counter to conservation interests.

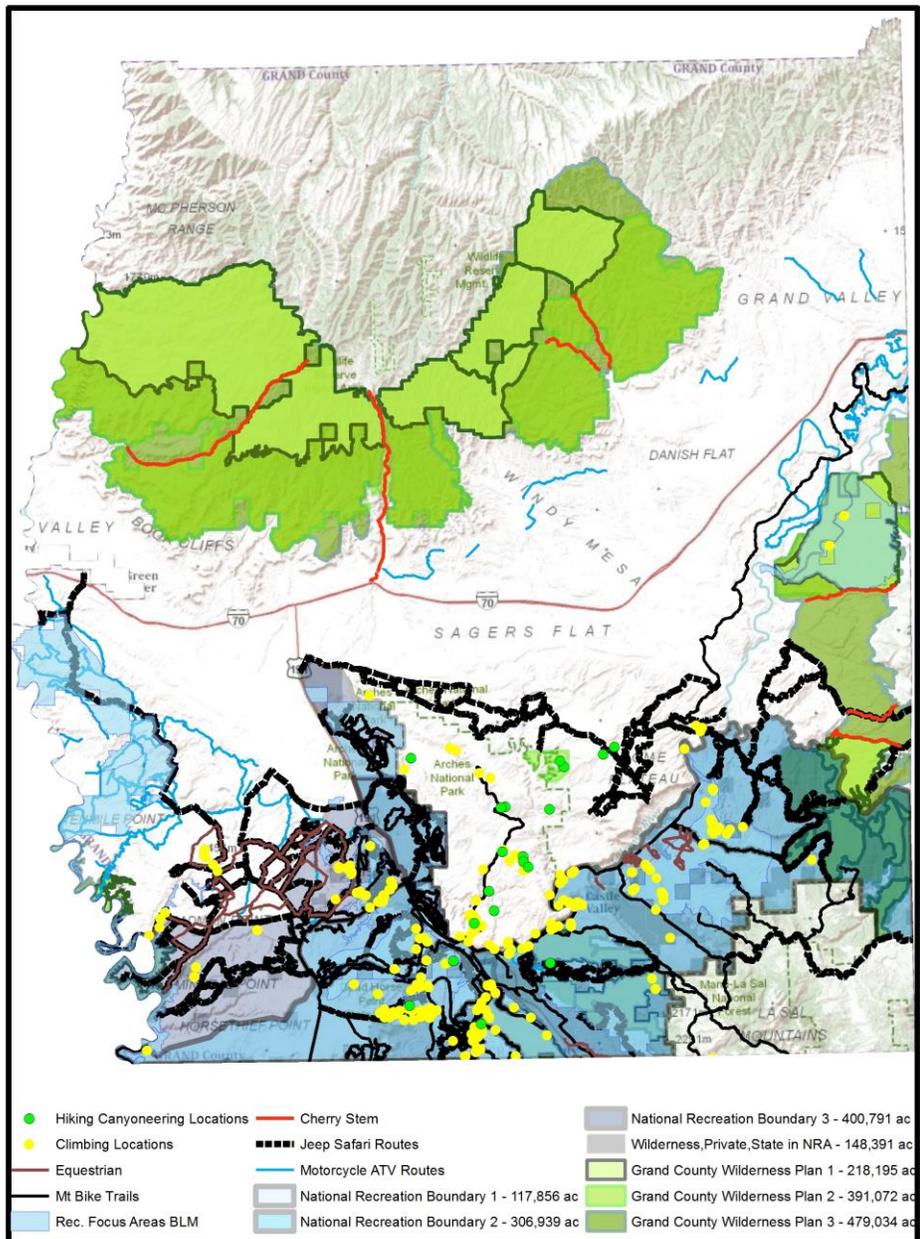


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Recreation:

The recreation sector accounts for 70%+ of the Grand Co. economy. Any proposal should give significant attention to potential effects to the recreation economy.

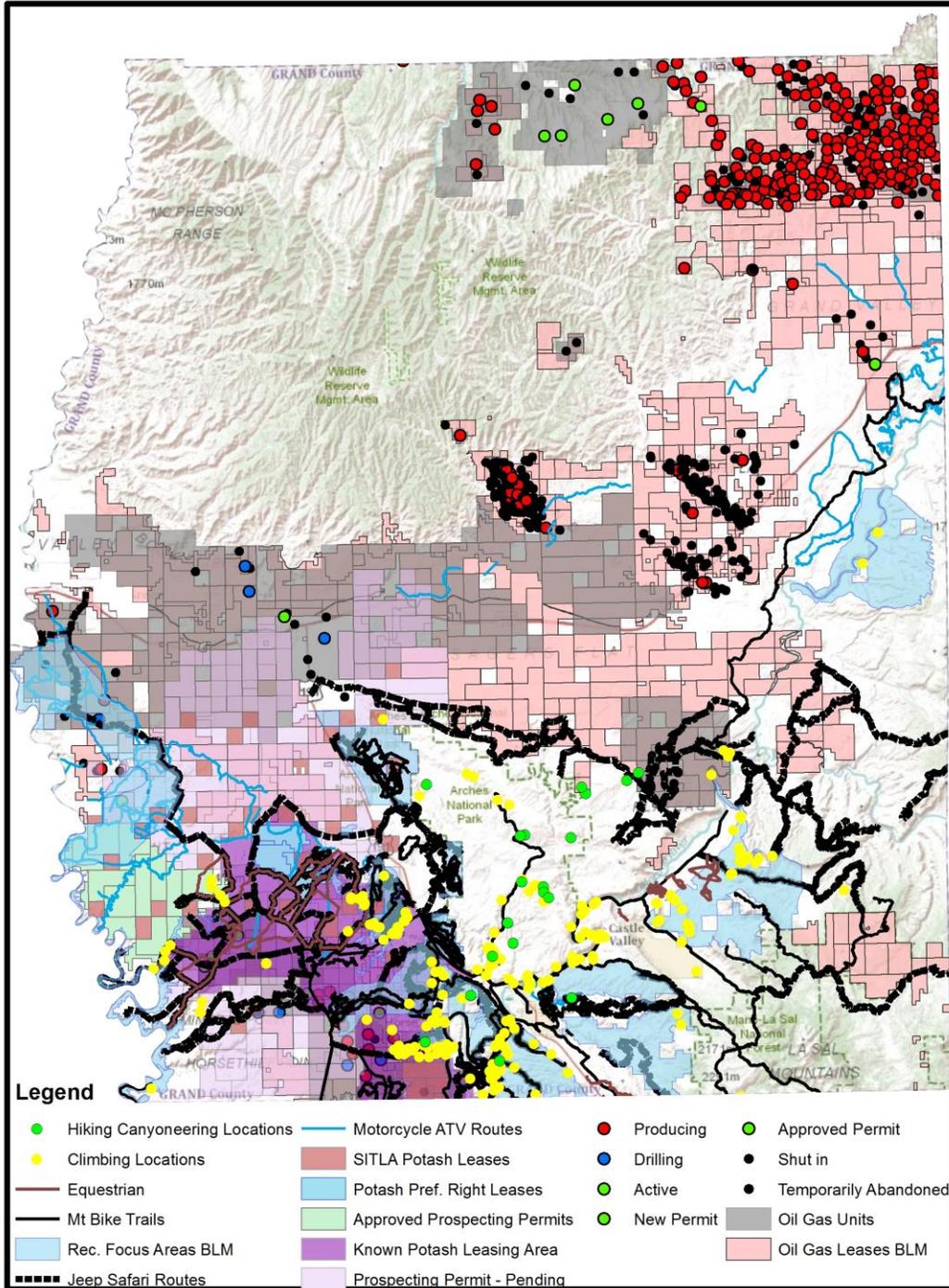
Recreation





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Recreation & Oil, Gas, Potash



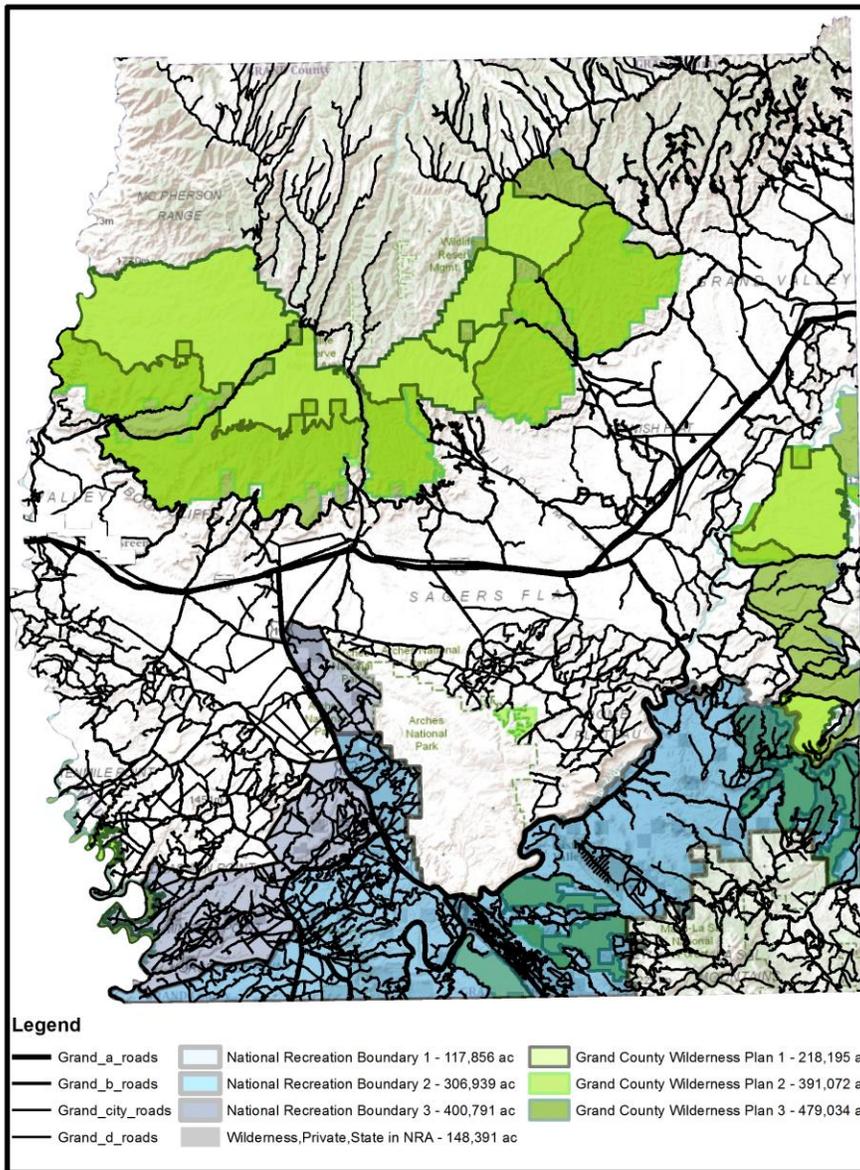


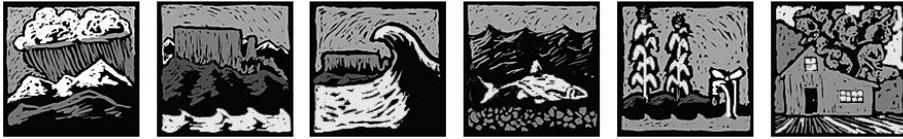
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Roads

The County's 1 & 2 proposals give a fair amount of attention to the current travel plan. However, Alt. 3 is devoid of such attention. We request that Alt. 3 be give such attention for fair evaluation. We do not support routes into Labyrinth Canyon nor do we support unnecessary and duplicative routes within proposed wilderness.

Travel Plan

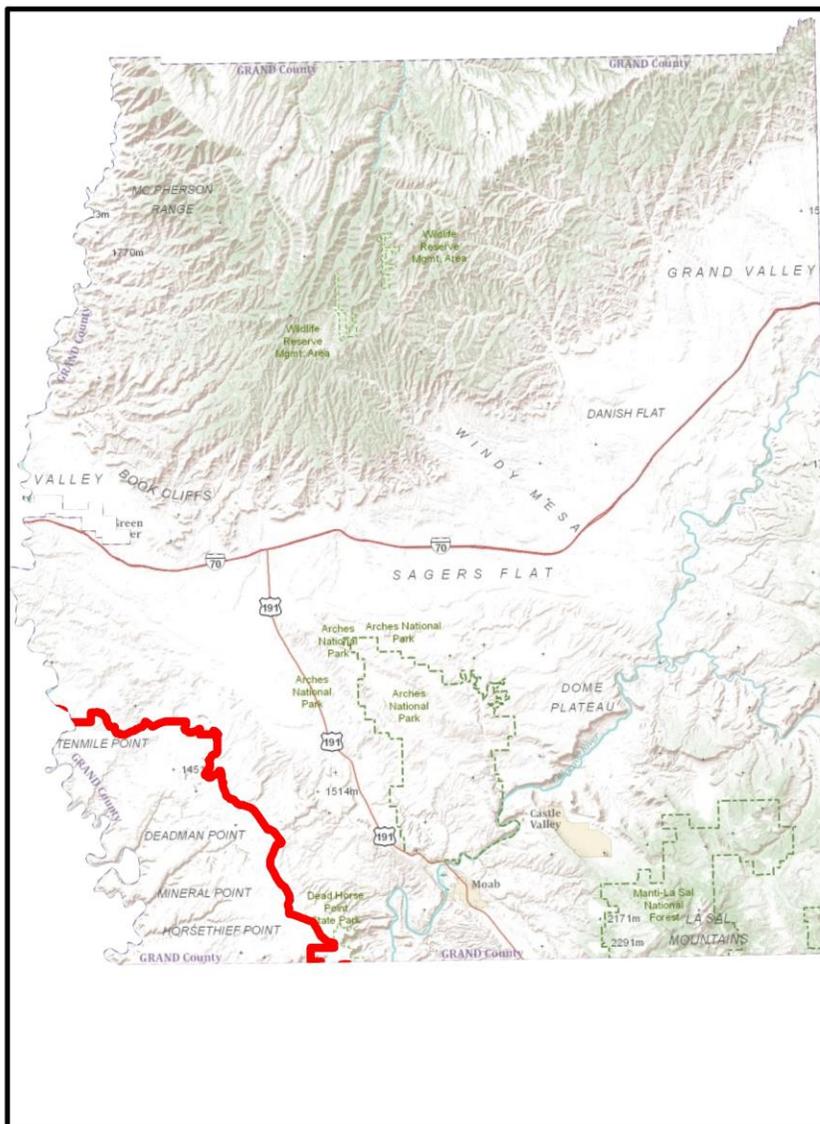




Antiquities Act

We can not support any proposal that includes “no further antiquities act” language. The Grand Co. economy is largely based on its National Parks. While we see value in conferring with local populations with regard to such acts we also feel that a “no further antiquities act” provision sets a negative precedent and eschews our most important economic driver and conservation interest. We would not want to see a precedent that would negatively affect future national monuments or parks.

Proposed Boundary - Greater Canyonlands National Monument

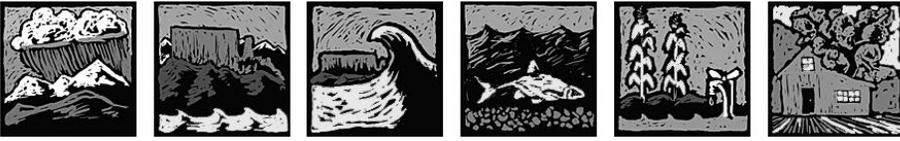




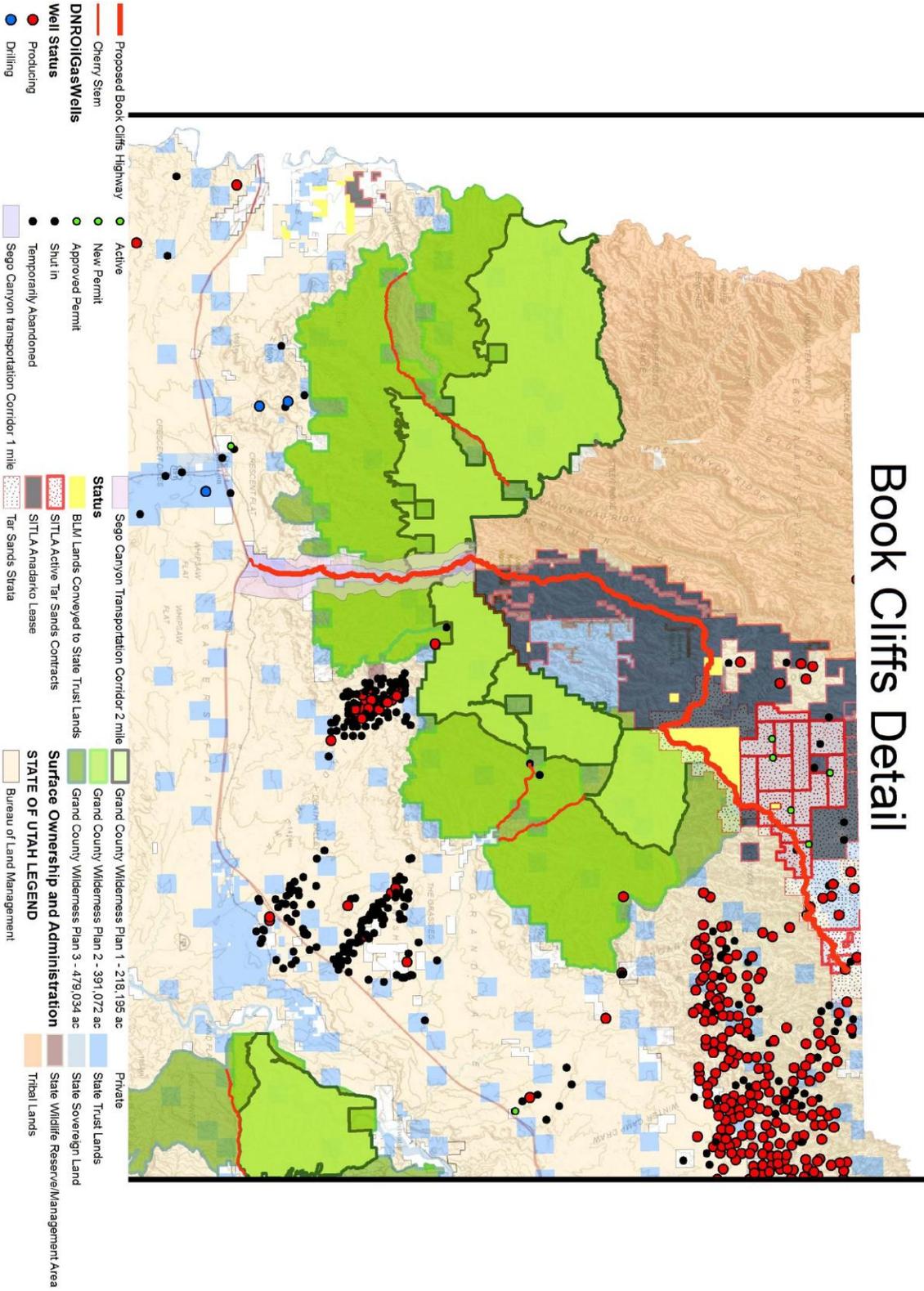
Sego Canyon Transportation Corridor

Overview:

This proposal should be given very careful consideration, weighing the potential economic gains against the potential environmental, cultural, and conservation impacts. Below we will explore these potential gains and impacts.



Book Cliffs Detail





Economic Growth Potential

Methodology:

In order to consider the economic potential we have to evaluate development potential in the area that the proposed transportation corridor would serve. There are three different ways to do this; using analogous development in the area (oil/gas wells), using geological information, and using “future statements” from companies that propose development (Oil Sands).

- Analogous Development
 - o This is perhaps the most reliable source of data. We used regional well density and well production data from the Utah Department of Oil, Gas, & Mining (UDOGM) to determine probable well density, production, and product.
 - o Well Density: The well density of the adjacent San Arroyo and Westwater gas field was calculated and applied to the Anadarko lease area. This resulted in a potential for 225 wells. Additionally, we evaluated the acreage of the soon-to-be recreational land exchange parcels and applied the same well density, which resulted in 13 potential wells.
 - o Production: Analogous local production statistics were used from UDOGM to calculate average annual production rates. It was found that gas wells produce, on average, 49,266 MCF (thousand cubic feet) of gas annually. There are no analogous oil wells in the area.
- Geology
 - o Product: Both analogous data and geologic data give little chance of conventional Uintah crude production from the Green River and Wasatch oil bearing formations in the Anadarko lease area (they are considered immature for this area). However, deeper hydrocarbon bearing strata are proven to contain natural gas potential. We conclude that the Anadarko lease will mostly likely be a natural gas play.
- “Future Statements”
 - o In the case of oil sands development there is no analogous data available and so we have to rely on statements from the company in order to supply useful data. “Future Statements” are what the company expects to do, with the caveat that they make no guarantees. For oil sands this is 2,000 barrels a day bitumen crude production over 6,000+ acres for their phase I commercial proposal.
- All citations, references, calculations, and data obtained will be provided to the County via an excel spreadsheet file. It is only useful as an electronic file.



Reasonably Foreseeable Development Scenario

The above methodology was used to produce the below for the Book Cliffs area in Grand Co.

- Gas Wells – 238 (13 on future land exchange parcels)
- Oils Sands – 1 - 6,000+ acre site

Predicted Economic Benefit to Local Schools and Government

Grand County Schools: (HMK, GCMS, GCHS, MCS)

Annually the Schools and Institutional Trust Lands Administration (SITLA) provides, respective to the total State-wide K-12 budget, 1.03%

In Grand Co., included within the total K-12 budget, they provide 0.78%

If the above development scenario were to happen instantly, the Grand Co. public schools would receive an additional annual revenue of **\$1,004**. This would increase their annual revenue by **0.006%**.

Grand County Government: General Fund

The recreational land exchange provides an opportunity for the Grand Co. government to make economic gains from development on SITLA parcels associated with land exchanges.

If the above development scenario were to happen instantly, the Grand Co. government would receive an additional annual revenue of **\$186,925 (0.70% of total revenue / 2.05% general fund revenue)**. And, a one-time contribution (from bonus lease revenue) of **\$299,723(1.13% of total revenue / 3.29% general fund revenue)**.

Predicted Jobs and Their Effect on Local Economy

Given the above development scenario there are predicted:

13, 30 year FTEs for the Drill/Completion well phase @ \$100,000/yr

48 FTE jobs for productions phase (variable duration) @ \$50,000/yr

88 FTE jobs for Oil Sands (from future statements) @ \$45,000/yr

This would raise the: **(!!!Assuming all jobs are Grand Co. Jobs!!!)**

Number of Grand Co. Jobs by **2.69%**

Average Salary in Grand Co. by **2.08%**



Assessment Fee for Proposed Use of Haul Route:

In my experience (Chris Baird, 2 years Planning Commission & 4 years Council) I've been under the impression that fees may be assessed respective to services provided. However, if the fee exceeds the cost of the provided service then the legal frame work for the fee becomes very fragile. It seems likely that a fee could be setup to account for the cost of the road and its maintenance, however, expecting more than that may be unrealistic. I am no lawyer however, and this issue can only be resolved with the aid of specific legal counsel.

Pertinent Utah Code: [emphasis added]

11-36a-102. Definitions.

As used in this chapter:

(1) (a) "Affected entity" means each county, municipality, local district under Title 17B, Limited Purpose Local Government Entities - Local Districts, special service district under Title 17D, Chapter 1, Special Service District Act, school district, interlocal cooperation entity established under Chapter 13, Interlocal Cooperation Act, and specified public utility:

(i) whose services or facilities are likely to require expansion or significant modification because of the facilities proposed in the proposed impact fee facilities plan; or

(ii) that has filed with the local political subdivision or private entity a copy of the general or long-range plan of the county, municipality, local district, special service district, school district, interlocal cooperation entity, or specified public utility.

(b) "Affected entity" does not include the local political subdivision or private entity that is required under Section [11-36a-501](#) to provide notice.

(2) "Charter school" includes:

(a) an operating charter school;

(b) an applicant for a charter school whose application has been approved by a chartering entity as provided in Title 53A, Chapter 1a, Part 5, The Utah Charter Schools Act; and

(c) an entity that is working on behalf of a charter school or approved charter applicant to develop or construct a charter school building.

(3) "Development activity" means any construction or expansion of a building, structure, or use, any change in use of a building or structure, or any changes in the use of land that creates additional demand and need for public facilities.



(4) "Development approval" means:

(a) except as provided in Subsection (4)(b), any written authorization from a local political subdivision that authorizes the commencement of development activity;

(b) development activity, for a public entity that may develop without written authorization from a local political subdivision;

(c) a written authorization from a public water supplier, as defined in Section [73-1-4](#), or a private water company:

(i) to reserve or provide:

(A) a water right;

(B) a system capacity; or

(C) a distribution facility; or

(ii) to deliver for a development activity:

(A) culinary water; or

(B) irrigation water; or

[103:](#) (d) a written authorization from a sanitary sewer authority, as defined in Section [10-9a-](#)

(i) to reserve or provide:

(A) sewer collection capacity; or

(B) treatment capacity; or

(ii) to provide sewer service for a development activity.

(5) "Enactment" means:

(a) a municipal ordinance, for a municipality;

(b) a county ordinance, for a county; and



(c) a governing board resolution, for a local district, special service district, or private entity.

(6) "Encumber" means:

(a) a pledge to retire a debt; or

(b) an allocation to a current purchase order or contract.

(7) "Hookup fee" means a fee for the installation and inspection of any pipe, line, meter, or appurtenance to connect to a gas, water, sewer, storm water, power, or other utility system of a municipality, county, local district, special service district, or private entity.

(8) (a) "Impact fee" means a payment of money imposed upon new development activity as a condition of development approval to mitigate the impact of the new development on public infrastructure.

(b) "Impact fee" does not mean a tax, a special assessment, a building permit fee, a hookup fee, a fee for project improvements, or other reasonable permit or application fee.

(9) "Impact fee analysis" means the written analysis of each impact fee required by Section [11-36a-303](#).

(10) "Impact fee facilities plan" means the plan required by Section [11-36a-301](#).

(11) "Level of service" means the defined performance standard or unit of demand for each capital component of a public facility within a service area.

(12) (a) "Local political subdivision" means a county, a municipality, a local district under Title 17B, Limited Purpose Local Government Entities - Local Districts, or a special service district under Title 17D, Chapter 1, Special Service District Act.

(b) "Local political subdivision" does not mean a school district, whose impact fee activity is governed by Section [53A-20-100.5](#).

(13) "Private entity" means an entity in private ownership with at least 100 individual shareholders, customers, or connections, that is located in a first, second, third, or fourth class county and provides water to an applicant for development approval who is required to obtain water from the private entity either as a:

(a) specific condition of development approval by a local political subdivision acting pursuant to a prior agreement, whether written or unwritten, with the private entity; or



(b) functional condition of development approval because the private entity:

(i) has no reasonably equivalent competition in the immediate market; and

(ii) is the only realistic source of water for the applicant's development.

(14) (a) "Project improvements" means site improvements and facilities that are:

(i) planned and designed to provide service for development resulting from a development activity;

(ii) necessary for the use and convenience of the occupants or users of development resulting from a development activity; and

(iii) not identified or reimbursed as a system improvement.

(b) "Project improvements" does not mean system improvements.

(15) "Proportionate share" means the cost of public facility improvements that are roughly proportionate and reasonably related to the service demands and needs of any development activity.

(16) "Public facilities" means only the following impact fee facilities that have a life expectancy of 10 or more years and are owned or operated by or on behalf of a local political subdivision or private entity:

(a) water rights and water supply, treatment, storage, and distribution facilities;

(b) wastewater collection and treatment facilities;

(c) storm water, drainage, and flood control facilities;

(d) municipal power facilities;

(e) roadway facilities;

(f) parks, recreation facilities, open space, and trails;

(g) public safety facilities; or

(h) environmental mitigation as provided in Section [11-36a-205](#).

(17) (a) "Public safety facility" means:



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(i) a building constructed or leased to house police, fire, or other public safety entities; or

(ii) a fire suppression vehicle costing in excess of \$500,000.

(b) "Public safety facility" does not mean a jail, prison, or other place of involuntary incarceration.

(18) (a) "Roadway facilities" means a street or road that has been designated on an officially adopted subdivision plat, roadway plan, or general plan of a political subdivision, together with all necessary appurtenances.

(b) "Roadway facilities" includes associated improvements to a federal or state roadway only when the associated improvements:

(i) are necessitated by the new development; and

(ii) are not funded by the state or federal government.

(c) "Roadway facilities" does not mean federal or state roadways.

(19) (a) "Service area" means a geographic area designated by an entity that imposes an impact fee on the basis of sound planning or engineering principles in which a public facility, or a defined set of public facilities, provides service within the area.

(b) "Service area" may include the entire local political subdivision or an entire area served by a private entity.

(20) "Specified public agency" means:

(a) the state;

(b) a school district; or

(c) a charter school.

(21) (a) "System improvements" means:

(i) existing public facilities that are:

(A) identified in the impact fee analysis under Section [11-36a-304](#); and

(B) designed to provide services to service areas within the community at large; and



(ii) future public facilities identified in the impact fee analysis under Section [11-36a-304](#) that are intended to provide services to service areas within the community at large.

(b) "System improvements" does not mean project improvements.

11-36a-201. Impact fees.

(1) A local political subdivision or private entity shall ensure that any imposed impact fees comply with the requirements of this chapter.

(2) A local political subdivision and private entity may establish impact fees only for those public facilities defined in Section [11-36a-102](#).

(3) Nothing in this chapter may be construed to repeal or otherwise eliminate an impact fee in effect on the effective date of this chapter that is pledged as a source of revenues to pay bonded indebtedness that was incurred before the effective date of this chapter.

11-36a-202. Prohibitions on impact fees.

(1) A local political subdivision or private entity may not:

(a) impose an impact fee to:

(i) cure deficiencies in a public facility serving existing development;

(ii) raise the established level of service of a public facility serving existing development;

(iii) recoup more than the local political subdivision's or private entity's costs actually incurred for excess capacity in an existing system improvement; or

(iv) include an expense for overhead, unless the expense is calculated pursuant to a methodology that is consistent with:

(A) generally accepted cost accounting practices; and

(B) the methodological standards set forth by the federal Office of Management and Budget for federal grant reimbursement;

(b) delay the construction of a school or charter school because of a dispute with the school or charter school over impact fees; or



(c) impose or charge any other fees as a condition of development approval unless those fees are a reasonable charge for the service provided.

(2) (a) Notwithstanding any other provision of this chapter, a political subdivision or private entity may not impose an impact fee:

(i) on residential components of development to pay for a public safety facility that is a fire suppression vehicle;

(ii) on a school district or charter school for a park, recreation facility, open space, or trail;

(iii) on a school district or charter school unless:

(A) the development resulting from the school district's or charter school's development activity directly results in a need for additional system improvements for which the impact fee is imposed; and

(B) the impact fee is calculated to cover only the school district's or charter school's proportionate share of the cost of those additional system improvements; or

(iv) to the extent that the impact fee includes a component for a law enforcement facility, on development activity for:

(A) the Utah National Guard;

(B) the Utah Highway Patrol; or

(C) a state institution of higher education that has its own police force.

(b) (i) Notwithstanding any other provision of this chapter, a political subdivision or private entity may not impose an impact fee on development activity that consists of the construction of a school, whether by a school district or a charter school, if:

(A) the school is intended to replace another school, whether on the same or a different parcel;

(B) the new school creates no greater demand or need for public facilities than the school or school facilities, including any portable or modular classrooms that are on the site of the replaced school at the time that the new school is proposed; and

(C) the new school and the school being replaced are both within the boundary of the local political subdivision or the jurisdiction of the private entity.



(ii) If the imposition of an impact fee on a new school is not prohibited under Subsection (2)(b)(i) because the new school creates a greater demand or need for public facilities than the school being replaced, the impact fee shall be based only on the demand or need that the new school creates for public facilities that exceeds the demand or need that the school being replaced creates for those public facilities.

(c) Notwithstanding any other provision of this chapter, a political subdivision or private entity may impose an impact fee for a road facility on the state only if and to the extent that:

(i) the state's development causes an impact on the road facility; and

(ii) the portion of the road facility related to an impact fee is not funded by the state or by the federal government.

(3) Notwithstanding any other provision of this chapter, a local political subdivision may impose and collect impact fees on behalf of a school district if authorized by Section [53A-20-100.5](#).

11-36a-204. Other names for impact fees.

(1) A fee that meets the definition of impact fee under Section [11-36a-102](#) is an impact fee subject to this chapter, regardless of what term the local political subdivision or private entity uses to refer to the fee.

(2) A local political subdivision or private entity may not avoid application of this chapter to a fee that meets the definition of an impact fee under Section [11-36a-102](#) by referring to the fee by another name.

17-36-34. Special assessment.

Money received by the county treasurer from any special assessment shall be applied towards payment of the improvement for which the assessment was approved. Such money shall be used exclusively for the payment of the principal and interest on the bonds or other indebtedness incurred to finance such improvements, except as provided in Section [17-36-29](#).

17-36-29. Special fund ceases -- Transfer.

If the necessity to maintain any special fund ceases and there is a balance in such fund, the governing body shall authorize the transfer of the balance to the fund balance account in the General Fund. Any balance which remains in a special assessment fund and any unrequired balance in a special improvement guaranty fund shall be treated as provided in Subsection [11-42-701\(5\)](#). Any balance which remains in a capital projects fund shall be transferred to the



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appropriate debt service fund or such other fund as the bond ordinance requires or to the general fund balance account.

Environmental and Conservation Concerns

Hunting:

The announcement of the Anadarko lease created an uproar among the sportsmen associations. The lower portion of the lease includes roadless and un-grazed lands of high value for sportsmen and anglers.

Several sportsmen associations protested the lease and even obtained support from Gov. Gary Herbert (not to mention, at the time, council member Lynn Jackson).

The Governor and sportsmen associations were unsuccessful in reversing SITLA's lease decision. However, a wildlife advisory committee was created. The outcome of which entails deferring development of the lower roadless area for 1 & 2 years (respective north to south).

Sportsmen associations have expressed an interest in using this time to work with SITLA, Anadarko, and Rep. Bishop to trade out the 2 lower roadless areas for wildlife conservation.

The newly proposed "Book Cliffs Highway" would pave a haul road through those two roadless areas.

Surface Impacts:

Oil/Gas pads have a physical impact of 2 – 10 acres each. The oil sands operation includes strip mining and could impact as much as 6,000 acres for phase I and an additional 28,000+ acres in later phases. The best way to illustrate surface impact is with photographs.



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DeLambert Cattle Ranch, Few Miles Below Oils Sands Project





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Roadless Areas





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Oil Sands – PR Springs





Gas Field – Natural Buttes – Uintah Co.



Water Impacts:

One of the main limiting factors for development in this area is availability of water. This development would severely stress the area's water resources and potentially impact existing water rights, resulting in costly litigation and loss of adjacent land use revenue (primarily ranching).

There is also the possibility of significant run-off pollution

Air Quality Impacts:

The Uintah Basin has a serious ozone pollution problem, which restricts their ability to approve new development. Part of the reason for the proposed haul route is to export pollution to the proposed refineries in Green River and beyond via rail.

Grand Co. has an ozone pollution problem as well. There is a good chance that the National Ambient Air Quality Standard for ozone will be reduced to 70 parts per billion (ppb), or less, next year. The Island in the Sky monitoring station has us at 69 ppb.

Nonattainment for ozone would be a major problem for Grand Co.'s economy as 70% is based on outdoor recreation and the personal mitigation for ozone pollution is to stay indoors and avoid outdoor exertion.

The two proposed refineries in Green River could push us past 70 ppb.



Oil Sands production has a Co2 foot print up to 40% greater than conventional crude.

This is **not** a move in the direction of a cleaner energy future as the IPCC etc. has urged in order to avoid catastrophic consequences due to climate change.

Cultural Resource Impacts:

Sego Canyon has a vast array of cultural resources ranging from historical inscriptions/structures to ancient rock art that spans thousands of years.

Private Property Concerns:

The mouth of Sego Canyon is partly in private ownership. We've talked with two of those owners and they oppose this proposed haul route. This may result in an emanate domain confrontation.

Roughly 1 mile of the proposed route would have to cross Ute Tribal land that is currently closed.

Canyonland Watershed Council's Opinion:

Due to almost no economic return to Grand Co. schools, minimal return to Grand Co. government, marginal returns to the job market, and a very questionable fee for use of the road we feel that the potential impacts, especially with regard to oil sands mining, far out-weigh the economic benefits. We, therefore can not support any proposal that includes the Sego Canyon Transportation Corridor. The proposed haul route is not facilitating "moderate and balanced" resource extraction. It facilitates a very extreme energy development portfolio. If one were to draw a line after oil sands it could be concluded that one has no line at all, as oil sands development is nearly as environmentally impactful as can be in the U.S.

We urge the Council to carefully consider this information and present a moderate and balanced proposal to Rep. Bishop.

Sincerely,

Chris Baird

Executive Director
Canyonlands Watershed Council
435-260-1431
chris@farcountry.org