



PO Box 1412 Moab, Utah 84532 435-259-2870 www.utah-adventures.com

4-22-2008

**Brad Higdon
Bureau of Land Management
Price Field Office
125 South 600 West
Price, UT 84501**

Dear Mr. Higdon,

The Utah Guides and Outfitters (UGO) represents 47 commercial outfitters who use Public Lands and contribute to the economy of Utah. Commercial outfitters bring thousands of river runners, hunters and others into the area of the proposed Price River BLM Field Office's proposed oil and gas leases in the vicinity of Peters Point and Jack Creek.

The Utah Guides and Outfitters is opposed to all of the Alternatives proposed in the West Tavaputs Plateau Natural Gas Full Field Development Plan, in which Bill Barrett Corporation and other operators plan to conduct full field development of natural gas resources in the northeast portion of Carbon County. All alternatives improperly infringe on the Green River through Desolation Canyon and the Jack Canyon Wilderness Study Areas. Simply put, all of the alternatives are flawed and require extensive additional study and actions by BLM.

The BLM long-term development plan includes drilling up to 807 new natural gas wells on 538 locations over a period of approximately eight years, with the potential to produce natural gas for up to 33 years. Project infrastructure would include a network of roads and pipelines, gas compression stations and other facilities. At a minimum it would also include three 5-acre storage sites. Under the Agency proposal there are no restrictions on the number of drill rigs, or seasonal drilling restrictions. The proposal includes 3-15 acre surface water disposal sites and the EIS is mute on liquid and solid waste disposal pits.

The proposals are significant actions upon lands dedicated to Wilderness and Wild and Scenic River status. In addition the "NO ACTION" alternative does indeed include actions. The BLM must rewrite the EIS to include a true "No

Action” alternative and discuss its implications. Given the scope of the proposals, amending current RMP is wholly inappropriate. The proposed action is so significant, that as a minimum it requires review and revision of the Price River Management Framework Plan (MFP) and Resource Management Plan (RMP).

~CUSTOM & CULTURE

In all of the BLM proposed alternatives the majority of Customs and Cultures of the West are overlooked in favor of oil and mining. From a historical perspective, the Customs and Culture of the West does not include semi-trucks and all-weather roads. The Customs and Cultures of the West does not include scenes where oil and gas operation dominate the landscape from horizon to horizon. It does not include a night sky that replicates a city.

The BLM document is mute on the affect of the actions to hunting outfitters who use the proposed sites and adjacent areas. Although Hunt Oil holds the grazing permit for the area, the economic affect of the proposed actions on ranchers and local economies are dependant upon availability of public grazing. In order to accommodate the Customs and Cultures of the West the EIS and proposed actions need to study and quantify the long and short term economic impact on activities like grazing, hunting, horseback riding and other historic uses of the land. The EIS proposals do not address the restrictive, economic and social affects on river rafting, hunting, grazing, hiking and horseback riding, off road vehicle use, and other historic activities or uses on or adjacent to the proposed lease sites. Utah hunters and anglers, for example have a significant impact on economy. They spend \$696 million a year, {Hunting and Fishing: Bright Stars of the American Economy}.

Certainly river running can be considered as a historic use of the area, and therefore part of the Customs and Culture of the region. River running began in the late 1800's and Commercial River running on the Green River in Desolation and Gray Canyons began in the mid-1900. By 1975, 38 commercial outfitters held permits for Desolation and Gray Canyons. In 1974 12,947 user days were recorded, of which 8,820 were on commercial trips { Boating the Upper Colorado; Crampton & Madsen, U.S. Army Corps of Engineers, 1975}. Today 22 outfitters and businesses bring approximately 2,500 people to this wild, scenic and serene stretch of river. Private river runners account for an additional 3,500 (approximate) people - the total exceeding 25,000 user days. Despite the large number of people who take river trips down Desolation and Gray Canyons the proposed EIS fails to adequately address the effects of the BLM Alternatives on those who use the Green River corridor or earn a living from it.

~OUTFITTER ECONOMICS

There have been no significant economic studies of the impacts, both long and short term, of river running in Desolation and Gray Canyons. It is roughly estimated that the annual commercial river running potential is in excess of \$500,000. Using a conservative multiplier of four (4) that indicates almost two million dollars in annual economic impact to the State of Utah, and an even more significant affect upon local communities. Of course, government coffers also benefit – it is estimated spending by people in pursuit of outdoor activities generates \$70 million in state and local taxes.

While the energy extraction industry may contribute more to local economies in the short term, river running outfitters and private river runners provide communities with a stable source of funds over the long term. In addition those who go on river trips come into our communities bring their funds and leave. They do not require additional infrastructure (schools, roads, police, victims' advocates, etc.). The record of the river running contribution to local economies is present during the lean years (bust) as well as the times of boom. Prior to making decisions that favor one economy over another the BLM EIS must conduct an in depth study of the socio-economic impact of both industries on communities and scientifically determine how the proposal(s) will affect nearby communities AND commercial operations who require wilderness and solitude as a part of their livelihood and enjoyment of the area.

Selling Desolation Canyon trips is a difficult venture for outfitters, and they exert considerable funds and energy in order to bring customers to the area. The major selling points of a trip through the Desolation and Gray Canyons are its remoteness, its unimpaired beauty and its wilderness characteristics. It is significant that most outfitters have advertised this trip as the "Green River Wilderness." Selling the wilderness experience is critical in order to attract customers on trips through Desolation and Gray Canyons. Sight and sound of intrusions on the river are of critical importance or the trip cannot be marketed as "wilderness".

Developments like those proposed by BLM have the affect of seriously damaging outfitters ability to attract customers, and the same is true for hunting outfitters who use the area. It is likely the proposed action may put some outfitters out of business.

~WILDERNESS STUDY AREA (WSA) AND WILD & SCENIC RIVER (WSR)

The climb to Peters Point and/or up Jack Creek is an integral part of many commercially outfitted and private river trips. The dramatic sweeping view from Peters Point is critical for BLM to maintain. According to the Proposed Alternative (A) over eight well pads would be located within the Jack Creek WSA. In all alternatives a large number of developments would infringe on or be in the view shed of WSA's and Wild and Scenic River Study Area's.

Infringing upon any Wilderness Study Area, including the Desolation Canyon Wild and Scenic River study and Jack Canyon Wilderness Study Areas disrupts and negates an orderly designation of lands for which the Wilderness Act and other Federal management actions and judicial decisions have decreed. There is little doubt that pipelines, roads, wells and other facilities are incompatible with wilderness - even proposed wilderness.

While a statutory mineral lease holder may have rights to an area, those rights do not denigrate surface designations such as a WSA. That leases for mineral and other rights were issued prior to the FLPMA is a bogus attempt to circumvent the WSA designation. It betrays the public trust of BLM and the Federal Government. A Wilderness Study Area MUST be managed as a mandated Wilderness Area until such time as a final decision is made regarding its status:

"During the review of such areas (WSAs) and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this Act (FLPMA) and other applicable law in a manner so as not to impair the suitability of such areas for preservation as wilderness, subject, however, to the continuation of existing mining and grazing uses and mineral leasing in a manner and degree in the which the same was being conducted on the date of approval of this Act (October 21, 1976).{43 USC 1782©}." The BLM HAS made a recommendation to the President through his designee, the Secretary of Interior as to the suitability of the Jack Creek, Peters Point and Green River WSA's for wilderness. Therefore the WSA's are protected by subsection © as noted above.

In addition the Department of Interior is under no obligation to accommodate proposed lease holders in access to those leases. Nor is the Department of Interior under obligation to provide access to SITLA lands owned and managed by State of Utah.

The Green River through Desolation and Gray Canyons has been found eligible to be a Wild and Scenic River. This means, like a WSA, it must be managed in the interim in order to protect its values, as if it is a Wild and Scenic River, until a decision has been made on the suitability of the river. The proposed developments will affect the nature of the river visually, in sound and in the nature of the experience, and is inconsistent with Wild & Scenic River legislation.

Developing Oil and Gas resources is within the mission of the BLM, it does not, however, override the BLM's obligation to provide for support of and management for other resources such as grazing, recreation, and designated (WSA) areas. Minerals management is only ONE of the principal uses of public lands. The BLM draft EIS (Purpose and Need) totally overlooks those other factors and is therefore deficient. (43 U.S.C.).

While UGO recognizes the national importance of oil and gas, it opposes such development at the expense of several other valuable resources. The BLM Wilderness Characteristics Study is suspect under the current political/economic conditions. A complete review of that document by an interagency and diverse interest group committee is required. The BLM Plan does not adequately address the role of Wilderness, Natural Areas, and the economies they produce to communities over the long term. If the BLM is going to stress the importance of the President's National Energy Plan (economic related) then it also needs to complete an in-depth study to determine the economic affect to the outdoor recreation community including private and commercial river running, hunting, hiking, wildlife watching, etc.

~INCOMPATIBLE WITH RIVER USE

All of the proposed actions have incompatible affects upon river users as well as areas adjacent to the leased areas. The Book Cliffs and Desolation/Gray Canyons are the least affected by ambient light than any area in the Continental United States. Oil and gas development, in general have had a negative effect on ambient light at night, and BLM needs to recognize the value of a night sky that is not interfered with by direct or ambient light. The proposed development sorely lacks in mitigation of polluting the unimpaired night sky. The BLM document states the three sites on Peters Point will be illuminated for two weeks during the river outfitter peak operating season. The BLM statement regarding visible and ambient light is not realistic and it is not the result of scientific study, production of a light model and ground truthing of the results. The EIS is silent on the affect of vehicle lights at night, another factor that must be addressed. Prior to leasing any sites BLM must conduct ambient and visual light studies and conduct a ground-truthed model. The BLM must then establish standards and substantial fines for violations. This will require publication of new regulations in U.S.C. and various C.F.R

Silence is another unquantified benefit of both Wilderness and a trip down the Green River. Silence is under constant attack in the West. The result of "hospital grade" mufflers proposed by BLM is suspect and no data is provided to support their effectiveness. There is no data to determine the effect of wind, geology, aspect and other factors on the sound generated from the proposed and alternative actions and how those sounds travel from each of the drill sites, access roads or other infrastructure. There are no controls on the sound generated by motors of rigs, pipeline construction, vehicles and other sources the proposed action will bring. Will cattle guards be installed? How far will sound from vehicles crossing cattle guards travel? UGO feels that ALL sound produced or caused by the project MUST be mitigated, and studies performed that will assure the maintenance of silence prior to any action or activities.

In the 1980's Dinosaur National Monument conducted an ambient sound study. The stations provided data that was so low it was thought they were defective and they were replaced with more sophisticated monitors. The sound levels were less than 8 decibels on a sustained level. Does the BLM have such baseline studies for the proposed actions and alternatives? If not the BLM must conduct similar studies to establish baseline data and establish standards and fines. Again this will require the appropriate publication in U.S.C. and C.F.R.

The Visual Resources Technical Support Document (prepared by Buys and Associates, Inc) is primarily an academic document and has almost no relevance to the micro and macro view sheds that are appropriate to the BLM/Barrett proposals. It appears that visually, roads and developments will be seen in direct lines of sight from the river corridor. The BLM has not shown a model of visual lines of sight, and indeed the EIS states there will be little control of developments like rights of way (ROW) in the alternatives. UGO feels that all line of site from Peters Point and the Green River and WSA's MUST be eliminated.

Studies must be conducted that determine the affect of the proposed actions on consumptive activities like hunting, grazing and non-consumptive uses like wildlife watching. The EIS must indicate where additional fences will be required. Will such activities as firewood cutting be allowed, and will rock picking be permitted?

Though Utah State Lands (SITLA) are within the lease area, that in no way obligates the Federal Government to abrogate the rights of Federal supremacy in regards to access or any other management activity. Federal supremacy also applies to the affected counties and such master plans or contrivances they might develop.

All of the Alternatives are in opposition to the Desolation and Gray Canyons of the Green River Management Plan (BLM-1979). After difficult actions to mitigate past incompatible uses in Desolation Canyon regarding grazing and recreation, the EIS totally ignores conflict with river runners in regards to oil and gas development. To be a credible document the issues of use compatibility must be addressed.

~ENVIRONMENT HEALTH & SAFETY

The health and safety of people and the environment are serious concerns to UGO. Even though the proposed oil and gas sites are not in the Green River WSR corridor (1/4 mile) they are on a tributary. Therefore anything introduced into that tributary has potential to negatively impact the Green River.

Previous incidents, like high saline run off in the Powder River Basin indicate that there are concerns with oil and gas development that have not been properly addressed. On August 23, 2005 a drilling rig perched on the rim of Jack Creek lost circulation and drilling fluids blew out through the canyon wall. Despite being DIRECTLY on the WSA boundary the fluids ran down slope and killed trees with minimal response from the rig operator or the BLM in a timely manner.

In the spring of 2007 a waste pit on SITLA (Utah) lands near Horseshoe Bend on the Green River breached and harmful chemicals nearly entered the river. Again agency and company response was sluggish at best AND the Vernal BLM Field Office attempted to deny the incident. In the spring of 2007 a large mile-long raft of foam that smelled of petroleum and stung a persons hand was observed near Ouray. The incident was reported on by KSL in Salt Lake City and news media in Grand Junction. Again, the Vernal BLM Office tried to deny, and then blame the foam on other events. The foam was observed as far downstream as Jack Creek with no BLM response. Private water samples taken with the foam indicated the "incident" was caused by a drilling mud. The Vernal BLM will not release the results of a sample their employees had analyzed. Indeed they will not share the results of the tests with their own hydrologist.

Cattle and wildlife drink from the river, they and fish in the river enter the human food chain. Thousands of people swim, bath and use the river as a source of culinary water on river trips. While water filters remove giardia bacteria, they do not remove petroleum related products or other harmful chemicals. There is no adequate warning system in place to advise people on the river that an "incident" has occurred.

How can BLM assure that drilling activities will not cause pollution of aquifers? Does the BLM assure that spills will not occur and dangerous chemicals will not enter the river? What assurances (law enforcement, monitoring, education, etc.) are going to be in place to prevent such actions - accidental or intentional? The section of the EIS describing drilling in close proximity to canyon rims is inadequate, and requires a thorough re-write that includes the related characteristics of the specific formations (fractures, aquifers, etc.) that might be locally exposed to drilling failure. The prevention of drilling fluids into adjacent canyons (like the one described above) is a serious threat to water quality, wildlife and plants. Thus in order to make educated decisions, the sites that require closed loop drilling must be identified prior to the approval of the action proposed in the EIS.

The BLM EIS has no mitigation of air pollution by the proposed developments. There should be requirements that prohibit violation of the Clean Air Act Standards of both Utah and Colorado (downwind). While the Buys and Associates report includes the Utah Air Quality Standards, it makes no mention

of those standards in Colorado, where air pollutants are likely to plume. The Cumulative and Alternative a PSD Class I & II charts as well as most of the air quality data used in the EIS uses have no local data to make fair comparisons. In 2007 a major natural gas company was charged, and settled to mitigate spewing 5,500 pounds of harmful emissions in Colorado and Utah. BLM must conduct visual and air quality BASELINES and historic baselines for each site before any development takes place. The lessees should be required to provide and maintain monitoring systems.

Presently there are great concerns over Global Warming and carbon imprint. Some government agencies are, or are planning to require concessionaires to address their affect upon global warming and carbon imprint. Given the serious nature of Global Warming the EIS should address that issue. In addition those who plan on developing the leases should be required to submit a plan to reduce their impact on Global Warming and their carbon imprint by a minimum of 50%. For example it is not uncommon to see a dozen pick up trucks headed to a rig - one person in each truck. That practice needs to end. It is not uncommon for semi-trucks to idle for hours on site, another example of how the oil and gas industry can reduce their impact. BLM should require all lessee's to attend training and evaluate a companies performance on their Global impact and reduction of carbon imprint.

The water quality and outstanding values of the Green River WSA must be protected in order to maintain or enhance its values. In a recent case (Friends of Yosemite Valley v. Kempthorne), the Ninth Circuit ruling reaffirmed that agencies have an affirmative duty to enhance conditions by ameliorating past or ongoing degradation of the river.

~ENVIRONMENT ENDANGERED SPECIES & WILDLIFE

The Green River through Desolation and Gray Canyons is home to four fish on the federal Endangered Species list. One of these species, The Colorado River Pike Minnow (Squawfish), has its only known breeding area near Three Fords in Desolation Canyon. Other endangered fish have critical habitat along the river immediately below Flat Canyon and at other localities below Jack Canyon. Any leakage or spills from the Jack Creek sites would flow into the Green River from Jack Creek in a very short time. The BLM EIS has no plan or response to mitigate this problem or how they and the lessee is to react to such an event.

In addition to the endangered fish there are potential falcon and other birds of prey nesting sites on cliffs immediately adjacent to all of the sites. Disturbance from above will cause these birds to abandon their nest, and their young. During summer in the 1970's over a dozen canyon wren calls could be heard/hour from Sumner's Amphitheater to Gray Canyon. In a similar anecdotal study done in the

late 1990's the number of calls were less than two (2).

The EIS indicates that 20,000 acres of wildlife habitat would be modified or affected by the proposals. Modeling is precursory at best and the EIS focuses on mule deer, elk, sage grouse and wild horses. In addition the study focuses mainly on winter critical habitat; it makes no mention of other significant areas like nesting/birthing habitats. The BLM needs to identify a full range of indicator species and determine a trend analysis for those baseline species. Is there a determination on big game that there should be, for example, one branch antlered bull elk per one hundred cows and what habitat requirements are needed to achieve that result? What will be the effect of the proposals on upland birds, song birds and wading birds? What mitigation will be done for big game and predator game species? Is the area proposed a possible ecosystem for reintroduction of endangered species?

At best the mitigation indicates that road "realignment" will be done to "protect" current sage grouse winter use and concentration areas. The plan should consider reintroduction of other native species that are now absent from the area. The plan should also include habitat rehabilitation to improve and expand not only winter habitat but sage grouse dancing/breeding grounds. Frankly it was difficult to determine whether the Bill Barrett Corporation Wildlife Mitigation plan was a farcical comedy or a document that one should take seriously. Therefore, because the Plan indicates that wildlife "will benefit from the screening" of relocating ROW's from sage brush parks to Pinion Juniper forests, it needs to expand upon the effects of that ROW relocation on other species, including macrobiotic soil communities and other wildlife that use the P-J forest. Regarding the mitigation of sage grouse concentration areas, how is determination made to remove individual trees that might be used by other endangered species?

Revegetation of sites after pad construction is totally inadequate. Selection of native species, their seeding and maintenance must be a requirement from the beginning of any disturbance. Horse packing outfitters have to assure their use of noxious weed free forage brought into federally managed areas. In some cases they are required to remove manure to prevent the spread of noxious weeds. How will the individual vehicles entering the area be checked to see they are not introducing new exotic species? The BLM has already spent hundreds of thousands of dollars on noxious weed and exotic plant management. The EIS proposals will simply expand the problem related to those plants. If not planned in advance of construction, bare ground will provide an excellent base for pioneering noxious weeds. and the weed fronts will invade Desolation Canyon and other designated areas. Prior to any new road construction a Weed Control Plan must be in place.

Unless water developments can be made and widely dispersed over a significantly wide area, the proposal to develop water “sources” through water guzzlers, ponds and similar water supplies have the effect of unnaturally concentrating wildlife and creating a conflict with cattle.

The Bill Barratt Corporation Wildlife Mitigation Plan suggests they will mitigate wildlife interactions on a “geographical basis!” There is no description as to what the definition “geographical basis” is. In addition the Barrett Corporation plans year-round operations. There are no specific responses to issues like nesting and birthing seasons, winter yarding or resting sites, or migration mitigation. The Barrett Wildlife Mitigation of predator habitat and predator use of the area is wholly inadequate. “Garnering information” is vague and meaningless. Will river outfitters and hunting outfitters be involved in making “closure” decisions, or will those decisions be solely determined by the Barrett Corporation?

The Barrett Mitigation Document indicates that wildlife select habitat “on a seasonal basis.” It describes various explanations of “energy expenditures” and “build ups.” It totally overlooks such obvious wildlife habitat needs as breeding, nesting and birthing areas. It does not explore the conflicts between domestic livestock and wildlife populations such as conflict between domestic and bighorn populations. The BLM proposals and the Barrett document do not describe the effect of the actions on populations of omnivores like black bear or carnivore predators like mountain lion. The BLM proposals for development take away the use of one of the most important habitat management tools in pinion/juniper and sagebrush ecosystems - fire. Prescribed natural fire in these environments should be a part of the BLM management plan, any changes or modifications to the use of prescribed, or prescribed natural fire should be reflected in the EIS proposals.

The Agency and Bill Barrett Corporation Wildlife Mitigation Plans are sorely lacking in depth and require a complete rewrite. Prior to any additional surface activity ALL surveys and studies MUST be completed.

~HISTORIC SITES & NATIVE CULTURES

Jack Creek Canyon and Desolation Canyon has some of the best examples of and densest concentration of Ancient Native American Indian ruins and rock art in the area. The introduction of additional roads and rights of way create threats to historic places and ancient rock art or habitation sites. Although paleo and historical surveys will be done, the EIS makes no mention of how sites will be protected. The Jack Creek area has Ancient Native American Indian artifacts which are completely unprotected and vulnerable to casual vandalism.

Monitoring of remote sites is difficult, and even though monitoring might occur it

does not mitigate damage done by the additional people who visit sites or the dust and chemicals raised from roads. It is alleged that chemicals used to keep dust down on roadways has a deteriorating affect on native rock art, and litigation has been filed to discontinue the use of that material. Has BLM conducted any studies to determine the effect of chemicals applied on roads has to rock art? The Appendix-G, Dust Study is incomplete. Baseline atmospheric studies that determine pollutants and particulate matter need to be completed over a long term, multi year period. When the baseline data has been compiled scientific estimates must be made of the short term and cumulative affect of dust on archeological and other features AND its affect upon the recreation experience.

While the BLM has or will conduct surface inventories, the proposals DO NOT indicate how the site workers will be monitored to prevent them from harming sites, artifacts or other historical materials.

~LACK OF MONITORING BY BLM

BLM and the State of Utah lack the personnel to adequately monitor the increased use of the area by drill crews that do not fully understand the implications of their actions. An anecdotal study of the Bonanza Highway in Uintah County shows 40 miles of heavily increased litter along the road. The litter, along with tank insulation and other jetsam blow along until they lodge against an obstruction - or until they wash into the watercourses. What mitigation is proposed to limit the effect of litter, industrial debris and jetsam? Additionally what affect will the increased development have on such infrastructure as local landfills?

In addition to those working the rigs, the areas will see an increase in people coming into the area via the newly developed access. What impacts will additional ATV's have upon the area and what will prevent them from intruding upon the Wilderness and River experience?

The Nine Mile Canyon Road (Carbon County Road 53) is identified as a primary access to the sites. This creates an obvious conflict with tourists and sightseers who use this Scenic Byway. It also increases the danger to everyone and because of the increased traffic on the Nine Mile Canyon road there have been numerous accidents. The additional oilfield traffic creates clouds of dust and makes it difficult for tourists to view the rock art. Recently there have been reports of the highway being closed for up to an hour while large tanks are being transported. What ancillary affect will this proposed development have on adjacent areas? In order to adequately address the effects of the EIS actions, the BLM needs to study and include access routes other than the Nine Mile route.

It is well known (anecdotally) that the employees of oil and gas companies are hired for their ability to work hard for long hours. It is also known (anecdotally)

that those employees generally lack the education that helps them understand the nature of fragile environments, endangered species, the affects of ambient light and sound, exotic species and other topics that would make them more compatible with the resources in places like Desolation Canyon. Therefore Workforce Requirements should require that all (each) crews be supervised by a college graduate. In addition all employees of any company working at the sites must be required to attend a 20 hour course to sensitize them to land ethics issues.

~GRAZING

While much discussion of grazing is included in the Bill Barrett Wildlife Mitigation plan, that discussion does not include the methods of gathering data and the qualifications of the individuals gathering the data. That the BLM lauds the Bill Barratt inclination to take non-use, it begs the question - if so important why hasn't non-use been applied to the allotments and pastures sooner? We have stated several concerns in the ENVIRONMENT ENDANGERED SPECIES AND WILDLIFE section above. But the discussion does not include habitat modification values and impacts of domestic cattle grazing. Such behaviors as trailing, habitat destruction by domestic cattle near water sources are important factors that deserve study. The Bill Barrett suggestion that the company's purchase of federal grazing permits to change use from sheep to cattle might have a big impact upon ranchers and community economies. Because the discussion does not include methods of determining AUM's, Total Digestible Nutrients produced by habitats (TDN) or desired cover elements - the reviewer is left to guess the methods. Are wildlife cover benefits, for example, determined by Robelle Pole readings by certified range conservationists or are they determined by some other method?

~PERFORMANCE REQUIREMENTS

The performance bonds required assuring compliance and recovery of disturbed lands is wholly inadequate. In addition subsequent sub-leases by lease holders renders the performance bonds impotent. Given the nature of such development and disturbance, and the value of the product extracted the performance bond should be increased, at a minimum, 500%. It is the American taxpayer, and the businesses that use this land over the long term who carry the burden of those who make a short term profit and leave unhealthy ecosystems along with their wastes and disturbances. The EIS must address the recovery of land in more depth and include scientific studies that provide baseline data prior to any lease or activity.

~COMMUNITY INFRASTRUCTURE

Any action like the proposals in the BLM EIS have effects far beyond the site pad

and rights of way. Simply put, more people require communities to provide more services and they require additional developments. The residents and current taxpayers of those communities have to bear the burden of population increases caused by projects such as those proposed in the BLM EIS. For example, in Vernal, Utah, 75% of the domestic violence cases are directly related to employees who are employed in the oil fields. Thus, not only is there a dramatic increase in domestic violence cases the percentage of cases related to oil field employment has also risen. In Vernal, for example, there were no motel/hotel rooms available for river trip customers. That made it extremely difficult to sell river trips as tourists had to drive unreasonable distances to stay overnight.

Therefore in order to properly assess the overall affects of the proposals a complete socio-economic study of the project proposals must be completed before any work begins. How many additional workers will be needed, how large are their families, what changes to local community infrastructure will be required, and who will fund those changes are only the tip of the socio-economic iceberg that must be considered. The EIS contains, primarily, only the “good” economic results of an energy boom. In order to be an effective tool in the decision making process the socio-economic analysis must be more thoroughly performed. The EIS is incomplete and if Bill Barratt, with the approval of BLM is going to cause changes in communities then they should be required to pay for those changes.

In conclusion Utah Guides and Outfitters believes the BLM proposed alternatives for oil and gas leases in the vicinity of Peters Point and Jack Creek are critical actions of significance. Overturning the status of a Wilderness Study Area is in and of itself cause to have well developed, extremely complete and thoroughly thought out alternatives (Proposed Actions). After study and review by those who use the river corridor and have familiarity with the ecosystems that will be affected, The Utah Guides and Outfitters does not support any of the Alternatives put forth by Price BLM. A large number of thorough and detailed studies MUST be conducted before any actions, including the selection of a Preferred Alternative, are undertaken. The proposed action is so significant, that as a minimum it requires review and revision of the Price River Management Framework Plan (MFP) and Resource Management Plan (RMP) prior to any action on the surface.

We request a response to the issues and questions presented within this document.

Sincerely

Thomas J. Kleinschnitz
President / Utah Guides and Outfitters
president@Utah-Adventures.com
800.423.4668

Vice- President	Michael Smith	435-259-7733	vp@utah-adventures.com
Sec-Treasurer	Nicki Hazlett	435- 259-7515	treasurer@utah-adventures.com
AO- Rep	Arlo Tejada	435-259-8229	atejada@griffithexp.com
At- Large	Bob Jones	435-259-8946	tagalong@tagalong.com
Past President	Steve Christensen	435-637-5092	steve.christensen@ceu.edu
Land Based	Kirstin Peterson	435-259-5223	info@rimtours.com

Copy:

Honorable Nick Rahall (Chairman- House Committee on Natural Resources)
Honorable Jeff Bingham – (Senate Committee on Energy and Natural resources)
Honorable Jim Matheson - Utah
Utah Governor Jon M. Huntsman Jr.

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