Feb 3, 2017

To: Dave Corry, BLM St George Field Office

Subject: BLM Lease of Public Lands in Washington County for Oil and Gas Development

Dear Mr. Corry,

Thank you for the preparation of the Environmental Assessment (EA) of this proposed lease. Please consider the following points in your continuing assessment.

It is assumed that any lessee would intend to explore the area to determine production feasibility and then commence production operation if economically feasible. Such a production operation in Washington County is highly undesirable and incompatible with our direction. Our county is a fast-growing area with an economy based on our scenic vistas, clean air and outdoor recreation. It hopes to become a high-tech business center whose employees would be attracted to a clean environment supporting recreation and protecting scenery and our natural resources. The very idea of this operation is in direct conflict with the direction our county is heading. Air quality, traffic congestion, and wilderness access will be stressed enough by our growth alone, even without oil and gas development. Such development would be fundamentally incompatible. Such an industry in close proximity would have significant long-term negative economic and environmental impacts.

Many of these impacts were not adequately addressed or given enough weight in the EA. If after considering public input on this matter, the BLM still wishes to support the lease application, a full Environmental Impact Statement (EIS) should be required. Contrary to the initial unsigned finding, these potential impacts are severe.

**A summary of topics inadequately addressed or inappropriately weighted in the EA:**

**1. Section 4.2.1.1 Air Quality, Climate Change, and Greenhouse Gases**

A production operation would have a significant adverse effect on air quality from drilling operations and product transport, producing pollutants hazardous to human health and to our economy. The county is already on the edge of acceptable ozone levels. Impact on visibility, especially near Zion National Park and its Class I air quality, would not be acceptable.

The overwhelming scientific consensus is that the release of greenhouse gases (GHG) must be significantly reduced within the next 20 years in order to avoid catastrophic impacts to society. Climate modeling shows Southwest Utah is especially susceptible to these impacts. Well operations would feed increased GHG on-site, in the transport of oil and gas, and in the eventual burning of the product fossil fuels. Continuing infrastructure development and extract of these fuels is counter-productive to the necessity of reducing GHG emissions. It should not be allowed on any public lands, and most certainly not on lands that have such high value to the local economy.

**2. Section 4.2.1.3 Lands with Wilderness Characteristics**

The lands being considered have significant wilderness characteristics and should not be spoiled with new roads, dust, industrial equipment, and the potential of spills. The character of these lands is fundamentally incompatible with oil and gas production.

**3. Section 4.2.1.5 Recreation**

These lands have high current and future value for recreation such as hiking, bicycling and horseback riding. These recreational uses are fundamentally incompatible with oil and gas production.

**4. Section 4.2.1.6 Socio-Economics**

The temporary local economic benefit potentially offered by oil and gas production is far out-weighed by the associated long-term loss of tourism and outdoor recreation. By nature, oil and gas production are boom-bust in nature. Both phases of this cycle have negative benefits overall. The costs of the production would include road improvements and all the relatively temporary boom-bust infrastructure development, maintenance and eventual removal, including the environmental clean-up that would inevitably be required. Communities are impacted in many negative ways by fossil fuel development: roads, over-flights, security, site operations, waste by-products, public safety, etc. Compensation modeled after the Alaska development should be considered. The EA seemed to address only potential temporary short-term positive effects and did not consider the overwhelming highly probable negative effects. The long-term impacts of boom-bust industries are extremely detrimental to local economies in both the boom and the bust phases, especially when compared to the long-term steady growth of tourism and outdoor recreation. The EA did not recognize the county’s high growth rate and its planned high-tech industry employment goals which are incompatible with gas and oil exploration. The socio-economic study is woefully inaccurate.

**5. Section 4.2.1.8 Visual Resources**

This sort of development in the heart of these lands used so much for recreation and quiet observance is inconceivable. Operation sites cannot be adequately hidden in our landscapes. The air quality impacts would lead to visibility degradation.

**6. Section 4.2.1.9 Wildlife**

New roads and added noise would be very disruptive to wildlife.

**Topics omitted from the EA that should be added:**

**1. Water**

Washington County has sufficient water to meet our growth needs if we carefully manage it. Risking water contamination from drilling, spills and leaks is unacceptable. These lease parcels are in the middle of our watersheds and near proposed future reservoirs. Contaminated waste water could leak into our water supply. Hydraulic fracturing would be wholly incompatible. This operation poses an unwise and unacceptable risk to our water supply.

Without a clear idea of how underwater rivers and aquifers map (depth and boundaries), drilling in this area would be blind and would risk of polluting all downstream water sources for not just Virgin but all downstream communities. There cannot be any price put on this risk as it could threaten the whole regions health and economy.  Meager revenue from such lease operations would be worthless to mitigate any such dangerous impacts. The EA lacks this water source contamination risk analysis, economic and health impacts of such an eventuality.

**2. Traffic and Roads**

The impact to the narrow Zion corridor from increased traffic due to well operations and product transport would not be acceptable. Highway infrastructure from Hurricane to Springdale is inadequate to support commercial access along its entire route.

**3. Night sky**

This area is known for its night sky viewing quality. Night operations and natural gas flaring would have significant impact.

**4. Seismic stability**

This area has several active seismic fault zones which could be impacted by operations, either in the drilling operation itself or in waste-water injection.

**5. Impact Analysis**

The impact analysis should not be reliant on subjective expert opinion; it should be data- and fact-based, declaring the “significant impact” criteria compared to the anticipated values, referencing comparable cases with predicted vs observed outcomes.

**6. Inspections**

It is also unclear if the definition of "surface inspection" include testing of underground and downstream water quality measurements.

Based on these reasons, we request that you reject these and any other parcels of BLM-managed land in our county from this and any future lease considerations. If these reasons are not considered adequate, please perform a full EIS to determine more precisely the impacts of the factors mentioned above.

Sincerely,

Tom Butine, board president of Conserve Southwest Utah (<http://conserveswu.org/> )