

Thank you for your comment, Tom Kenyon.

The comment tracking number that has been assigned to your comment is OST2012D50154.

Comment Date: April 26, 2012 10:52:05AM

OSTS 2012 Draft PEIS

Comment ID: OST2012D50154

First Name: Tom

Middle Initial:

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Privacy Preference: Don't withhold name or address from public record

Attachment: SignedLTR-PEis.doc

Comment Submitted:

Please refer to the attached letter for comments. Thank you.



April 26, 2012

Argonne National Laboratory  
9700 S. Cass Avenue  
EVS/240  
Argonne, IL 60439

Re: *Draft 2012 Oil Shale and Tar Sand (OSTS) Programmatic Environmental Impact Statement (PEIS)*

Via <http://ostseis.anl.gov/involve/comments/index.cfm>

Dear Comment Compiler,

The City of Grand Junction ("City") by and through the Mayor and City Council offers the following comments on the Department of Interior, Bureau of Land Management ("BLM") *2012 OSTS PEIS*. Please incorporate these comments into the official record of decision on that matter.

Grand Junction and the Grand Valley of the Colorado River are filled with abundant natural beauty and natural resources. The City serves as the hub of commerce, social activity and health care for the Western slope of Colorado and Eastern Utah. We proudly serve, near and far, our sister communities and because of our regional importance we are both positively and negatively affected by the development in and around those communities and the greater region.

Recently the City has been both benefitted and burdened by the exploration for and development of natural gas in the Colorado and Gunnison River basins near us. The exploration for and development of gas, some oil and other mineral resources has been an important economic engine for our community but it has also caused impacts to roads, schools, social services and virtually all publicly funded endeavors. Additionally, the gas exploration and development industry has created a shortage in housing and has strained already needy public programs and resources.

The City experienced an oil shale boom once before and the aftermath of those events was to say the least not good. Because of that historical experience and because of the more recent experiences we have had with the gas and oil industry, we implore those that are deciding among the *OSTS PEIS* alternatives to step back and remember as is stated in the preamble to the National Environmental Policy Act ("NEPA") that the purpose of an environmental review is:

*"To declare national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation..."*

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By our comments on the *OSTTS PEIS* alternatives we hope to encourage productive and enjoyable harmony between man and his environment and to stimulate our collective health and welfare. To that end we state the following regarding the *2012 OSTTS PEIS*:

- 1) We are supportive of oil shale and tar sand research, development and demonstration (“RD&D”) projects. We conclude that additional RD&D is necessary and appropriate and that as a matter of Federal, State and local policy, public lands should be made available in sufficient quantity and with a reasonable regulatory structure that recognizes the importance of and presents an opportunity for responsible growth of the industry.
- 2) We recognize that reasonable alternatives are presented in the 2012 OSTTS PEIS and that we do not possess the expertise to recommend one alternative over the other. What we are supportive of and would expect is that industry and the federal land administrators will come to a consensus position on an alternative that will allow the industry to grow but will not, absent a demonstration of the viability of the industry, to develop without regard to impacts and/or mitigation of those impacts.
- 3) Which alternative is chosen is not as important to the City as the development of a policy (whether applied via lease stipulations or as a matter of amendments to the BLM *Resource Management Plan(s)*) that requires a cumulative, regional impact study of any and all commercial activity as a pre-condition to and as a result of OSTTS exploration and/or production and/or development.
- 4) A study(ies) must be performed before the impacts occur and must address the changes to the quality of life that will be/are visited on communities such as ours by the introduction of the commercialization of a new and valuable resource. From the silver and gold rush days to the first oil shale boom to the recent experience with gas exploration and development, the needs, the shortages and the aftermath of insufficient planning and more importantly the failure to invest before the full brunt of the impacts occur, is highly predictable. Because many of those impacts are predictable they are also preventable. We would ask that you help to prevent or at a minimum reduce the impacts from exploration and development of oil shale and tar sand resources.
- 5) The analysis and ultimate selection of an alternative must acknowledge that funding is crucial to the planning and mitigation of impacts. A pre-development, industry funded

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trust or other similar financing vehicle for the use and benefit of the communities ought to be advanced as a condition of all leasing.

- 6) The City Council strongly urges that the BLM, Secretary Salazar and our legislative delegation build a national energy policy that recognizes the importance of developing our oil shale, coal and natural gas resources and in turn reducing dependence on foreign oil. Likewise we encourage solar, wind, geothermal and hydro electric power development. As important as development of a comprehensive policy is, it must be written and enforced in light of and with the understanding of the impacts on communities and the environment that are associated with large scale development of any resource.

Please work to meaningfully develop and implement protections for our community. Should you have any questions or if we may otherwise be of assistance to you as the matter proceeds to a record of decision, please let us know.

CITY OF GRAND JUNCTION  
OFFICE OF THE CITY COUNCIL

by:   
Tom Kenyon  
Mayor

Pc: City Council  
Rich Englehart, Acting City Manager  
John P. Shaver, City Attorney