



GRAND COUNTY COUNCIL MEMBERS  
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RE: **Proposed Master Leasing Plan Amendments to 2008 Moab Resource Management Plan (RMP)**

Gentlemen and Ms. Smith:

[Master Leasing Plans in the Moab Planning Area](#)

It has come to our attention that as a result of closed door discussions between BLM and the plaintiffs in *SUWA v. Lewis*, the BLM has already devised pre-determined so-called Master Leasing Plans on BLM lands in the Moab RMP Planning area, that roughly correlate with the so-called proposed redrock wilderness act areas in the Moab planning area.

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We have also learned that these Master Leasing Plans will likely lead to regulations and restrictions of oil and gas leasing and development that conflict with the corresponding provisions of the approved 2008 BLM Moab Field Office Resource Management Plan (RMP), requiring amendment of that RMP. This is the RMP that the State of Utah, Grand County and San Juan County spent years, countless hours and untold sums of money to help develop as cooperating agencies with the BLM. as was our right under FLPMA Section 202. The idea that closed door meetings with the wilderness lobby could drive a pre-determined dismantling of that which took several years to put together in an open and public process, and without any involvement from the cooperating agencies whatsoever, is of great concern to Grand County.

We write to memorialize our grave concern with the Master Leasing Plan proposal. BLM Moab Field Office and/or the BLM Utah State Office worked up this Master Leasing Plan for the Moab planning area without involving or even giving advance notice to Grand and San Juan Counties, both of whom are cooperating agencies with the BLM on such matters and should have been notified up front and given the opportunity for meaningful participation and coordination from the very beginning. The State, its agencies, and Grand and San Juan Counties were all cooperating agencies who worked closely with BLM for several years in producing the 2008 Moab FO RMP. The above-mentioned Master Leasing Plan proposal threatens to overturn the oil and gas provisions of the 2008 Moab FO RMP. Again, the BLM should have notified the State and Grand and San Juan Counties from the very beginning before it even began to consider and work on the Master Leasing Plans for the Moab planning area. Should any amendment to the 2008 RMP result in greater restrictions to oil and gas development and/or result in the creation of more wilderness, Grand County will vigorously oppose such amendment as being inconsistent with county local plans as well as State statute regarding public lands management.

We respectfully request that the BLM

- Pull back on the proposed Master Leasing Plan for the Moab planning area;
- Give proper notice to the State and local cooperating agencies (including Grand and San Juan Counties) of intent to work on Master Leasing plans for the Moab FO planning area, inviting these cooperating agencies to cooperate fully with the BLM in this process;
- Start over from the beginning on these Master Leasing Plans, this time providing State and local governmental cooperating agencies opportunity for proper input, involvement, cooperation and coordination, taking care to adhere to the coordination and consistency requirements of FLPMA Section 202(c); and
- Provide us with any other written materials documenting the work done thus far on these two Master Leasing Plans, including letters, e-mails and other correspondence evidencing this work.

Sincerely yours,

Gene L. Ciarus, Chair  
Grand County Council

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