

FINAL GREEN AND COLORADO RIVERS MINERAL LEASING PLAN RECORD OF DECISION



Prepared for Utah Department of Natural Resources, Division of Forestry, Fire & State Lands

Prepared by SWCA Environmental Consultants

JANUARY 2020

FINAL GREEN AND COLORADO RIVERS MINERAL LEASING PLAN RECORD OF DECISION

Prepared for

**Utah Department of Natural Resources
Utah Division of Forestry, Fire & State Lands**
1594 West North Temple, Suite 3520
Salt Lake City, Utah 84114-5703

Prepared by

SWCA Environmental Consultants
257 East 200 South, Suite 200
Salt Lake City, Utah 84111
(801) 322-4307
www.swca.com

January 2020

GREEN AND COLORADO RIVERS MINERAL LEASING PLAN RECORD OF DECISION

Record Number: 20-01060-03

Date of Execution: January 6, 2020

Introduction

Pursuant to Utah Code 65A-2-2 and 65A-2-4 and the implementing regulations of Utah Administrative Code R652-90, the Utah Division of Forestry, Fire & State Lands (FFSL or the division) is empowered to prepare and adopt management plans for sovereign lands and resources. Given this direction, FFSL initiated the *Green and Colorado Rivers Mineral Leasing Plan* (MLP) revision process with interagency cooperation and collaboration and with open public participation. For the duration of the planning process, FFSL temporarily withdrew permitting for mineral leasing. Existing leases, permits, and easements were allowed to be renewed, extended, or amended in accordance with Utah Administrative Code R652-90-700.

The primary purpose of the MLP is to guide FFSL, along with adjacent landowners and other local, state, and federal partners, in managing, allocating, and appropriately using the mineral resources of the Green and Colorado Rivers. The MLP sets forth guidance and direction for future mineral resource management activities on both rivers.

In compliance with policy, procedures, rules, and statutes for resource management planning, FFSL has completed the mineral resource management plan for the planning area. Therefore, FFSL issues this record of decision for the MLP.

Description of Lands Directly Affected

The Utah State Legislature defines sovereign land as “those lands lying below the ordinary high water mark [OHWM] of navigable bodies of water at the date of statehood and owned by the state by virtue of its sovereignty” (Utah Code 65A-1-1). As noted in this definition, the state’s ownership extends to the OHWM; however, knowing exactly where the OHWM was located at statehood is challenging for the Green and Colorado Rivers. For this reason, and because the OHWM has not been mapped continuously along either river, the planning unit area (or “planning area”) for the MLP extends laterally from top of bank to top of bank. As part of an authorization process, a case-by-case demarcation of the OHWM may be required. The planning area consists of the length of the Green River from the border of Dinosaur National Monument to Sand Wash, and from Swasey’s rapid to the border of Canyonlands National Park. In addition, the planning area consists of the length of the Colorado River from the Utah-Colorado state line to the border of Canyonlands National Park, and the separate, submerged river segment beneath Lake Powell. In cases where sovereign land boundaries associated with the Green or Colorado Rivers have not been settled, the visions, goals, policies, and objectives in the MLP will apply to those lands that are judged to be sovereign lands.

Proposed Action

The proposed action associated with this record of decision is the adoption and implementation of the 2020 MLP.

Relevant Factual Background

FFSL initiated the MLP revision to update, consolidate, and replace the 1998 MLP and all associated amendments. The MLP planning process began in December 2017 and was conducted concurrently with the planning processes for the *Green River Comprehensive Management Plan* (GRCMP)¹ and *Colorado River Comprehensive Management Plan* (CRCMP).² Through a rigorous competitive process, SWCA Environmental Consultants (SWCA) was hired to facilitate the development of the comprehensive management plans and the MLP.

FFSL was interested in improving cooperative management, planning, and research activities within the Utah Department of Natural Resources and incorporated these agencies into the GRCMP, CRCMP, and MLP planning team. Representatives from the Utah Department of Environmental Quality, State of Utah School and Institutional Trust Lands Administration, Utah Department of Agriculture and Food, Utah Department of Transportation, and the Utah State Historic Preservation Office were also included on the planning team.

As part of the planning process, the planning team members provided input and technical support relevant to their area of expertise throughout the process. The purposes of the planning team were to

- provide resource-specific guidance throughout the planning process;
- provide the most recent, relevant research and data pertaining to river resources and associated uses;
- provide timely review and comment on the documents throughout the planning process; and
- offer project updates and opportunities for comment to State of Utah agencies and the general public.

Public Outreach

The development of the MLP involved a 17-month public outreach process from March 2018 to July 2019. FFSL initiated the MLP planning with a press release distributed on March 12, 2018.

Notification of the planning process was made to the Resource Development Coordinating Committee (RDCC) on March 26, 2018. A presentation was also made to the RDCC on February 7, 2019.

¹ SWCA Environmental Consultants, CRSA Architecture, River Science Institute, Inc., J. Schmidt, and A. Walker. 2020. *Green River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.

² SWCA Environmental Consultants, CRSA Architecture, River Science Institute, Inc., J. Schmidt, and A. Walker. 2020. *Colorado River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.

FFSL, SWCA, and CRSA conducted two series of public open house meetings. The first series focused on kicking off the project and gathering information, and the second series focused on reviewing the draft MLP. In addition, meetings were held with stakeholder groups, county commissioners, federal agencies, and tribes as described below.

General Public

Open house format meetings were held in each of the counties through which the rivers flow and in Salt Lake City to kick off the public engagement process. Dates, times, and locations for these meetings are provided in Tables 1 and 2.

Table 1. Green River Planning Area Public Open House Series #1: Project Kickoff

Date	Time	City, County, and State	Location and Address
March 27, 2018	6:00–8:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
April 12, 2018	6:00–8:00 p.m.	Hanksville, Wayne County, Utah	Hanksville EMS Building 575 South Park Town Loop
April 18, 2018	6:00–8:00 p.m.	Moab, Grand County, Utah	Grand County High School 608 South 400 East
April 19, 2018	6:00–8:00 p.m.	Green River, Emery County, Utah	John Wesley Powell River History Museum 1765 East Main Street
May 22, 2018	5:00–7:00 p.m.	Salt Lake City, Salt Lake County, Utah	Department of Natural Resources 1594 West North Temple

Table 2. Colorado River Planning Area Public Open House Series #1: Project Kickoff

Date	Time	City, County, and State	Location and Address
April 10, 2018	6:00–8:00 p.m.	Kanab, Kane County, Utah	Kanab City Library 374 North Main Street
April 11, 2018	6:00–8:00 p.m.	Escalante, Garfield County, Utah	Escalante Senior Center 89 North 100 West
April 17, 2018	6:00–8:00 p.m.	Monticello, San Juan County, Utah	San Juan County Administration Building 117 South Main Street
April 18, 2018	6:00–8:00 p.m.	Moab, Grand County, Utah	Grand County High School 608 South 400 East
May 22, 2018	5:00–7:00 p.m.	Salt Lake City, Salt Lake County, Utah	Department of Natural Resources 1594 West North Temple

Open house format meetings were also used in the same counties to present the draft MLP and to initiate the public comment process. Dates, times, and locations for these meetings are provided in Tables 3 and 4.

Table 3. Green River Planning Area Public Open House Series #2: Draft Plan Review

Date	Time	City, County, and State	Location and Address
June 10, 2019	5:00–7:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
June 10, 2019	5:00–7:00 p.m.	Hanksville, Wayne County, Utah	Hanksville EMS Building 575 South Park Town Loop
June 25, 2019	5:00–7:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West
June 26, 2019	5:00–7:00 p.m.	Green River, Emery County, Utah	John Wesley Powell River History Museum 1765 East Main Street

Table 4. Colorado River Planning Area Public Open House Series #2: Draft Plan Review

Date	Time	City, County, and State	Location and Address
June 18, 2019	5:00–7:00 p.m.	Escalante, Garfield County, Utah	Escalante Senior Center 89 North 100 West
June 19, 2019	5:00–7:00 p.m.	Kanab, Kane County, Utah	Kanab City Library 374 North Main Street
June 24, 2019	5:00–7:00 p.m.	Monticello, San Juan County, Utah	San Juan County Administration Building 117 South Main Street
June 25, 2019	5:00–7:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West

Stakeholders

All stakeholders interested in the rivers were invited to attend the public open houses in each county. In addition, stakeholder workshops were convened for the following groups: recreation, agriculture/irrigation, environmental, and mineral/energy. The first series of stakeholder workshops was held to obtain detailed information on river management concerns and potential goals and objectives. The second series of stakeholder meetings was held after the publication of the draft plan in 2019 to solicit feedback. Dates, times, and locations for these workshops are provided in Tables 5 and 6.

Table 5. Green River Planning Area Stakeholder Workshops

Date	Time	City, County, and State	Location and Address
June 13, 2018	5:00–7:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
June 27, 2018	5:00–7:00 p.m.	Moab, Grand County, Utah	Grand County Public Library 257 East Center Street
June 28, 2018	11:00 a.m.–1:00 p.m.	Green River, Emery County, Utah	John Wesley Powell River History Museum 1765 East Main Street
June 10, 2019	7:00–8:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
June 25, 2019	7:00–8:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West

Table 6. Colorado River Planning Area Stakeholder Workshops

Date	Time	City, County, and State	Location and Address
June 27, 2018	5:00–7:00 p.m.	Moab, Grand County, Utah	Grand County Public Library 257 East Center Street
June 25, 2019	7:00–8:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West

Counties

To reach out to county governments whose management authority often extends to the boundary of sovereign lands, FFSL made direct contact with county-elected officials and planning staff by email and telephone to present the rationale for the MLP and answer any questions about the process. Commissioners were invited to the public open houses previously described. In addition, a meeting was scheduled with the commissioners in each county to discuss county-specific issues and concerns (Tables 7 and 8).

Table 7. Green River Planning Area County Meetings

Date	Time	City, County, and State	Location and Address
March 27, 2018	4:00–5:00 p.m.	Vernal, Uintah County, Utah	Uintah County Offices 152 East 100 North
April 12, 2018	12:00–1:00 p.m.	Loa, Wayne County, Utah	Wayne County Courthouse 18 South Main Street
April 17, 2018	10:00–11:00 a.m.	Castle Dale, Emery County, Utah	Emery County Offices 75 E. Main Street
April 18, 2018	4:00–5:00 p.m.	Moab, Grand County, Utah	Grand County Offices 125 E. Center Street

Table 8. Colorado River Planning Area County Meetings

Date	Time	City, County, and State	Location and Address
April 10, 2018	4:00–5:00 p.m.	Kanab, Kane County, Utah	Kane County Courthouse 76 North Main Street
April 11, 2018	12:00–1:00 p.m.	Panguitch, Garfield County, Utah	Garfield County Courthouse 55 South Main Street
April 17, 2018	4:00–5:00 p.m.	Monticello, San Juan County, Utah	San Juan County Administration Building 117 South Main Street
April 18, 2018	4:00–5:00 p.m.	Moab, Grand County, Utah	Grand County Offices 125 E. Center Street

Federal Agencies

Federal agencies manage property adjacent to the boundary of Green and Colorado River sovereign lands and may have overlapping jurisdiction with FFSL. FFSL made direct contact with federal agencies such as the U.S. Bureau of Land Management, U.S. National Park Service, Natural Resources

Conservation Service, U.S. Fish and Wildlife Service, U.S. Department of Energy, and the Office of Senator Mike Lee through email to present an overview of the MLP process and invite staff to all of the public open houses. In addition, working meetings were scheduled with federal agencies to allow for one-on-one discussions of agency-specific issues and concerns. A second set of meetings was scheduled after the publication of the draft plan in 2019 to collect feedback (Tables 9 and 10).

Table 9. Green River Planning Area Federal Meetings

Date	Time	City, County, and State	Location and Address
June 13, 2018	1:00–3:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
June 27, 2018	1:00–3:00 p.m.	Moab, Grand County, Utah	Grand County Public Library 257 East Center Street
June 10, 2019	3:00–4:00 p.m.	Vernal, Uintah County, Utah	Uintah County Library 204 East 100 North
June 25, 2019	3:00–4:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West

Table 10. Colorado River Planning Area Federal Meetings

Date	Time	City, County, and State	Location and Address
June 27, 2018	1:00–3:00 p.m.	Moab, Grand County, Utah	Grand County Public Library 257 East Center Street
June 25, 2019	3:00–4:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West

Tribes

Because the Ute Indian Tribe of the Uintah and Ouray Indian Reservation, Navajo Nation, and Ute Mountain Ute Tribe are considered adjacent landowners or stakeholders in the MLP process, FFSL reached out to tribal officials through email and by telephone to explain the MLP process and invite tribal members to attend any of the public open houses. In addition, FFSL presented a slideshow that provided an overview of the MLP planning process and expected outcome on August 10, 2018, at the Utah Tribal Leaders meeting in Salt Lake City. After publication of the draft MLP, FFSL presented an overview of the draft plan and information on how to submit comments at a Utah Tribal Leaders meeting in Cedar City, Utah, on June 6, 2019.

Meeting Design

The open houses combined formal presentation and open house formats. At each meeting, the FFSL sovereign lands planner or sovereign lands program manager provided a project overview presentation. Following this overview, FFSL and SWCA staff answered questions and facilitated information-gathering activities in an open house format, as applicable. Attendees were greeted, asked to sign in, provided information about the meeting format, and given the option of taking a brochure and/or business card with project details, the MLP website (<http://bit.ly/GreenColoradoRiversPlans>), and contact information. Attendees were informed about ways to follow the planning process, provide information, and submit comments. They were encouraged to ask questions of the facilitators.

During open house series #1, display boards were arranged around the meeting room to allow attendees to make comments on river resources, including minerals and energy. During open house series #2, a different set of display boards was used to provide information from the draft plan such as river use classes and sovereign lands mineral leasing classification.

Stakeholder workshops were held in an open house format. At times, attendees were broken into smaller groups representing their stakeholder interests. For the first set of stakeholder workshops, directed questions were prepared to use in small groups for guided discussion; however, attendees preferred a more free-flowing conversation. County and federal meetings were also held in an open house format with a free-flowing exchange of ideas and information.

Meeting Advertising

Pursuant to FFSL requirements, public open house meetings were advertised in a variety of formats before their scheduled dates. In each format, the advertisements provided logistics, explained the purpose of the meetings, gave the public comment period schedule if applicable, outlined additional methods to comment, and provided ways to obtain more information. Methods of communicating with the public, stakeholders, counties, federal agencies, and tribes included media outlets, direct emails, direct mail postcards, the project website, the FFSL website, and FFSL press releases.

Advertising for Public Open Houses

Meeting information for the MLP project kickoff open houses was posted on the project website and emails were sent on March 21, 2018, and May 9, 2018 (for the Salt Lake City open house). Media releases for the project kickoff open houses were emailed on March 12, 2018, to FFSL's Public Information Officer's statewide media contact list.

Meeting information for the draft MLP review open houses was posted on the project website and emails were sent on May 31, 2019, and June 13, 2019. Media releases for the draft MLP review open houses were emailed on June 3, 2019, to FFSL's Public Information Officer's statewide media contact list.

Formal newspaper legal notices for the MLP project kickoff open houses were submitted and requested to be posted on the following dates in 2018:

- *Southern Utah News* (Kane County): March 29, 2018, and April 5, 2018
- *Uintah Basin Standard* (Uintah County): March 13, 2018, and April 20, 2018
- *Vernal Express* (Uintah County): March 13, 2018, and April 20, 2018
- *The Insider* (Garfield and Wayne Counties): March 30, 2018; April 6, 2018; and June 12, 2018
- *ETV Emery County* (Emery County): April 4, 2018, and April 11, 2018
- *Moab Times Independent* (Grand County): April 5, 2018, and April 12, 2018
- *Moab Sun News* (Grand County): April 5, 2018, and April 12, 2018

- *San Juan Record* (San Juan County): April 3, 2018, and April 10, 2018
- *Salt Lake Tribune*, *Deseret News*, and *Utahlegals.com* (Salt Lake County): March 13, 2018 and March 20, 2018 (Uintah County); March 27, 2018 (Garfield, Kane, and Wayne Counties); April 3, 2018 (Emery, San Juan, and Grand Counties); May 7, 2018 (Salt Lake County)

Formal newspaper legal notices for the draft MLP review open houses were posted as follows in 2019:

- *Southern Utah News* (Kane County): May 30, 2019, and June 6, 2019
- *Uintah Basin Standard* (Uintah County): May 28, 2019, and June 4, 2019
- *Vernal Express* (Uintah County): May 28, 2019, and June 4, 2019
- *The Insider* (Garfield and Wayne Counties): May 30, 2019, and June 6, 2019
- *ETV Emery County* (Emery County): June 12, 2019, and June 19, 2019
- *Moab Times Independent* (Grand County): June 13, 2019, and June 20, 2019
- *Moab Sun News* (Grand County): June 13, 2019, and June 20, 2019
- *San Juan Record* (San Juan County): June 12, 2019, and June 19, 2019
- *Salt Lake Tribune*, *Deseret News*, and *Utah Legals.com* (Salt Lake County): May 24, 2019, May 31, 2019, and June 7, 2019 (Garfield, Kane, Uintah, and Wayne Counties); June 8, 2019, June 15, 2019, and June 22, 2019 (Emery, San Juan, and Grand Counties)

A list of planning process participants was developed from the following sources:

- Individuals or organizations (land-use applicants) holding an FFSL authorization
- All landowners adjacent to Green and Colorado River sovereign lands within the affected counties
- Green and Colorado River stakeholders including agricultural and irrigation interests, environmental organizations, mineral/energy groups, and members of the recreation community
- Green and Colorado River stakeholders identified by the planning team
- Tribes identified by SWCA cultural resource specialists
- Local, state, and federal agencies identified as having jurisdictional authority in the project

The following invitations were sent to inform interested participants of the open houses, stakeholder workshops, and county and federal meetings:

- Emails sent in March 2018 and May 2018 (Salt Lake City open house) for open houses series #1
- Postcards sent to current lessees and adjacent landowner in March 2018 for open house series #1
- Emails sent to stakeholders in May and June 2018 for the first stakeholder workshop
- Emails sent to county commissioners in March and April 2018 for the county meetings
- Emails sent to federal agencies in May and June 2018 for the federal agencies' working meeting

- Emails sent in May and June 2019 for open house series #2
- Postcards sent to current lessees and adjacent landowners in May and June 2019 for open house series #2
- Emails sent to stakeholders in May 2019 for the second stakeholder workshop
- Emails sent to federal agencies in May and June 2019 for the draft MLP review meeting

The formal comment period began on May 31, 2019. The last day of the public comment period was July 19, 2019, allowing more than 30 days from the first draft review open house on June 10, 2019. The final MLP and record of decision were posted to the FFSL website on January 8, 2020. FFSL sent final postcards and emails of the issued record of decision on January 8, 2020. Petitions for consistency review were to be received by January 28, 2020.

Public Trust

Primary management responsibility for the river's resources lies with FFSL pursuant to Utah Code 65A, which governs management of all state lands within the jurisdiction of FFSL. Utah Code 65A-2-1 states that FFSL "shall administer state lands under comprehensive land management programs using multiple-use, sustained-yield principles." FFSL acknowledges its obligation to multiple-use sustained yield management, as well as its responsibility to the Public Trust (described in Utah Administrative Code R652-2).

FFSL will manage the Green and Colorado Rivers and their resources under multiple-use, sustained yield principles, while accommodating public and private uses to the extent that they do not substantially impair Public Trust resources (navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality) or the river's sustainability.

The overarching management objectives of FFSL are to protect and sustain the Public Trust resources and to provide for reasonable beneficial uses of those resources, consistent with their long-term protection and conservation. The 2020 MLP was designed to facilitate FFSL's management of the Green and Colorado Rivers and their mineral resources under these principles.

Interagency Coordination

Interagency coordination and communication are essential because Green and Colorado River management is complex and because multiple government agencies are involved with various resources and uses. During the MLP planning process, FFSL understood the importance of maintaining communication with the planning team. As outlined in Utah Code 65A-2-2, FFSL may request support for implementation of state land management plans and to this end seeks to maintain support across state agencies as it implements the 2020 GRCMP, CRCMP, and MLP. The management direction of the MLP encourages collaboration with adjacent landowners and agencies that have jurisdiction or authority on the river to improve overall river management and decision making. A complete discussion of agencies with intersecting jurisdictions and regulatory authorities can be found in the GRCMP and CRCMP. In addition, FFSL's strategy for communication between agencies can be found in the Coordination Framework chapters of these documents.

Public Outreach: Notification, Comment, and Review

As outlined earlier in this decision document, the public had numerous opportunities to contribute to the MLP. As required by Utah Administrative Code R652-90-500, FFSL notified RDCC about the planning process and the draft MLP on March 26, 2018, and June 3, 2019, respectively. The project was made available for public comment on the Project Management System website (Exhibit A). However, no comments were received via RDCC during the planning process. Stakeholders and state, federal, and local governments were notified numerous times throughout the planning process, requesting their attendance at public meetings and requesting their comments. Notification for the first public open house series was sent by postcard to approximately 343 addresses and 177 email addresses. For the second series, notification was sent by postcard to approximately 379 addresses and 252 email addresses. Stakeholders were notified by email before the stakeholder workshops. The final announcement of this record of decision was sent by postcard to approximately 379 addresses (Exhibit B) and 252 email addresses. The formal 50-day public comment period for the draft MLP began on May 31, 2019, and ended on July 19, 2019. The public comment period followed the release of the draft MLP and coincided with the second round of public outreach meetings. Comments were accepted by comment response forms at public meetings, on the project website, by email, and by postal mail.

FFSL received three written submissions commenting on the draft MLP. Comments pertained to classification, impacts from proposed lease sales, and management philosophy. From the written submissions, four individual comments were extracted for review of acceptance or non-acceptance. Comments on the draft MLP were acknowledged and addressed, as appropriate, by FFSL (Exhibit C).

Constitutional Provisions, Statutes, and Administrative Rules

Utah Constitution Article XX, Section 1

The Utah Constitution Article XX, Section 1 states the following:

All lands of the State that have been, or may hereafter be granted to the State by Congress, and all lands acquired by gift, grant or devise, from any person or corporation, or that may otherwise be acquired, are hereby accepted, and ... are declared to be the public lands of the State; and shall be held in trust for the people, to be disposed of as may be provided by law, for the respective purposes for which they have been or may be granted, devised or otherwise acquired.

Utah Code 65A-2-1. Administration of State Lands - Multiple-Use Sustained-Yield Management

Utah Code 65A-2-1 states the following:

The division shall administer state lands under comprehensive land management programs using multiple-use sustained-yield principles.

Utah Code 65A-2-2. State Land Management Planning Procedures for Natural and Cultural Resources, Assistance from other State Agencies, Division Action

Utah Code 65A-2-2 states the following:

The division:

- (1) shall develop planning procedures for natural and cultural resources on state lands; and
- (2) may request other state agencies to generate technical data or other management support services for the development and implementation of state land management plans.

Utah Code 65A-2-4. State Land Management Plans, Division to Adopt Rules for Notifying and Consulting with Interested Parties

Utah Code 65A-2-4 states the following:

- (1) The division shall adopt rules for notifying and consulting with interested parties including the general public, resources users, and federal, state, and local agencies on state land management plans.
- (2) Division rules shall provide:
 - (a) for reasonable notice and comment periods; and
 - (b) that the division respond to all commenting parties and give the rationale for the acceptance or non-acceptance of the comments.

Utah Code 65A-10-1. Authority of Division to Manage Sovereign Lands

Utah Code 65A-10-1 states the following:

- (1) The division is the management authority for sovereign lands, and may exchange, sell, or lease sovereign lands but only in the quantities and for the purposes as serve the public interest and do not interfere with the public trust.

Utah Administrative Code R652-2-200. Sovereign Land Management Objectives

Utah Administrative Code R652-2-200 states the following:

The state of Utah recognizes and declares that the beds of navigable waters within the state are owned by the state and are among the basic resources of the state, and that there exists, and has existed since statehood, a public trust over and upon the beds of these waters. It is also recognized that the public health, interest, safety, and welfare

require that all uses on, beneath or above the beds of navigable lakes and streams of the state be regulated, so that the protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality will be given due consideration and balanced against the navigational or economic necessity or justification for, or benefit to be derived from, any proposed use.

Utah Administrative Code R652-70-200. Classifications of Sovereign Lands

Utah Administrative Code R652-70-200 states the following:

Sovereign lands may be classified based upon their current and planned uses. A synopsis of some possible classes and an example of each class follows. For more detailed information, consult the management plan for the area in question.

1. Class 1: Manage to protect existing resource development uses. The Utah State Park Marinas on Bear Lake and on Great Salt Lake are areas where the current use emphasizes development.
2. Class 2: Manage to protect potential resource development options. For example, areas adjacent to Class 1 areas which have the potential to be developed.
3. Class 3: Manage as open for consideration of any use. This might include areas which do not currently show development potential but which are not now, or in the foreseeable future, needed to protect or preserve the resources.
4. Class 4: Manage for resource inventory and analysis. This is a temporary classification which allows the division to gather the necessary resource information to make a responsible classification decision.
5. Class 5: Manage to protect potential resource preservation options. Sensitive areas of wildlife habitat may fall into this class.
6. Class 6: Manage to protect existing resource preservation uses. Cisco Beach on Bear Lake is an example of an area where the resource is currently being protected.

Utah Administrative Code R652-90-300. Initiation of Planning Process

Utah Administrative Code R652-90-300 states the following:

2. Resource Management planning is initiated by the division's identification and determination that there is a need for such a plan.

Utah Administrative Code R652-90-500. Notification and Public Comment

Utah Administrative Code R652-90-500 states the following:

3. Notice that a site-specific or resource planning effort is under way shall be given to:
 - (a) Affected parties as required by rule for exchange, or lease;
 - (b) The Governor's Office of Planning and Budget for inclusion in the RDCC Project Management System for public and agency notification and comment.

Utah Administrative Code R652-90-600. Public Review

Utah Administrative Code R652-90-600 states the following:

2. Resource plans shall be published and made available upon request.
 - (a) Persons wishing to comment on these plans may do so at any time.
 - (b) The division shall acknowledge all written comments.

Findings of Fact

1. As described herein, FFSL notified the public and local, federal, and state agencies, including the RDCC, of the MLP planning effort.
2. As described herein, FFSL conducted public meetings in conjunction with the MLP planning effort.
3. As described herein, FFSL published a draft of the MLP and accepted comments from the public and other government entities and responded to all comments properly submitted.
4. FFSL considered and implemented legislative directives concerning the content of the MLP.

Conclusions of Law

1. FFSL properly initiated the planning process for a resource management plan by designating the planning unit and planning priorities established by FFSL.
2. FFSL fulfilled its notification requirements to lessees, to local governments, and to the RDCC when the project was initiated. FFSL went beyond its required notification by also notifying adjacent landowners and stakeholders.
3. The notification requirements for the public meetings have been met or exceeded.
4. The public review requirements have been met or exceeded.
5. FFSL properly responded to comments received in compliance with the applicable law.
6. The MLP fulfills the requirements of applicable statutes, rules, policies, and legal doctrines.
7. The planning process and subsequent MLP comply with the legal requirements for a resource management plan.

Decision and Order

Based on the foregoing, FFSL hereby adopts the MLP, which satisfies the requirements of applicable statutes, rules, and policies. The MLP becomes the resource management plan that guides mineral leasing on the sovereign lands within the planning area. The MLP supersedes any and all previous management plans—adopted, draft, or otherwise—and represents the official position of FFSL.

Dated this 6th day of January 2020.

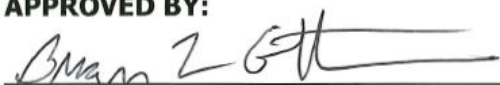
Administrative Appeals

Parties having an interest in this action may file a petition for administrative review by the division pursuant to Utah Administrative Code R652-9. Said petition must be in writing and shall contain

1. the statute, rule, or policy with which the division action is alleged to be inconsistent;
2. the nature of the inconsistency of the division action with the statute, rule, or policy;
3. the action the petitioner feels would be consistent under the circumstances with statute, rule, or policy; and
4. the injury realized by the party that is specific to the party arising from division action. If the injury identified by the petition is not peculiar to the petitioner as a result of the division action, the director will decline to undertake consistency review.

Said petition must be received by the division by 5:00 p.m. on January 28, 2020.

APPROVED BY:



BRIAN COTTAM
STATE FORESTER/DIRECTOR

DATE: 12-27-19

PREPARED BY:



LAURA VERNON
SOVEREIGN LANDS PLANNER

DATE: 12/26/19

REVIEWED BY:



JAMES BARNES
SOVEREIGN LANDS PROGRAM MANAGER

DATE: 1-6-2020

REVIEWED BY:



FREDRIC J. DONALDSON
ASSISTANT ATTORNEY GENERAL

DATE: 1/6/2020

This page intentionally left blank.

EXHIBIT A. RESOURCE DEVELOPMENT COORDINATING COMMITTEE DOCUMENTATION

This page intentionally left blank.

Project Information

Close

Project #69363 Saved. Submitted projects are subject to review by PLPCO staff prior to official project creation.

Project Id: 69363

* Stream Alt:

* Sponsor: DNR/Division of Forestry, Fire & State Lands

* Comments Due to Sponsor: 07/19/2019 (MM/DD/YYYY)

Anticipated Project Start Date: 01/15/2018 (MM/DD/YYYY)

* Title of Proposed Action: Green and Colorado River Draft Comprehensive Management Plan and Up

* Project Abstract: The Utah Department of Natural Resources Division of Forestry, Fire and State Lands (FFSL) is seeking public comment on the draft Comprehensive Management Plans (CMPs) and draft Mineral Leasing Plan (MLP) for the Green and Colorado Rivers. Multiple open houses will be held to host the public and receive comments about the draft plans.

Project URL: <http://bit.ly/goromp>
i.e. <http://www.epa.gov/fedrgstr/EPA-PROJ1/2009/August/Day-12/e19998.htm>

* Counties: ☐ select all ☐ unselect all

- | | | | |
|---|--|--|---|
| <input type="checkbox"/> Beaver | <input checked="" type="checkbox"/> Garfield | <input type="checkbox"/> Rich | <input type="checkbox"/> Utah |
| <input type="checkbox"/> Box Elder | <input checked="" type="checkbox"/> Grand | <input type="checkbox"/> Salt Lake | <input type="checkbox"/> Wasatch |
| <input type="checkbox"/> Cache | <input type="checkbox"/> Iron | <input checked="" type="checkbox"/> San Juan | <input type="checkbox"/> Washington |
| <input type="checkbox"/> Carbon | <input type="checkbox"/> Juab | <input type="checkbox"/> Sanpete | <input checked="" type="checkbox"/> Wayne |
| <input type="checkbox"/> Daggett | <input checked="" type="checkbox"/> Kane | <input type="checkbox"/> Sevier | <input type="checkbox"/> Weber |
| <input type="checkbox"/> Davis | <input type="checkbox"/> Millard | <input type="checkbox"/> Summit | |
| <input type="checkbox"/> Duchesne | <input type="checkbox"/> Morgan | <input type="checkbox"/> Tooele | |
| <input checked="" type="checkbox"/> Emery | <input type="checkbox"/> Piute | <input checked="" type="checkbox"/> Uintah | |

* Location: Lat/Lon (Decimal) 38.28557,-110.0119
Lat/Lon Decimal ex. 40.7653,-111.8933

Location or Supplemental Attachment

Attach a location or supplemental file to the project. Office type documents will be converted to the PDF format.

Allowed file formats: .doc, .docx, .xls, .xlsx, .bit, .rtf, .csv, .pdf, .tif, .gif, .jpg, .bmp, .png, .oda

Location Attachment: GRCMP Press Release_R2 05-21-2019.pdf

* Has local government been contacted? ☒ Yes ☐ No

* Date local government was contacted: 05/31/2019 (MM/DD/YYYY)

What was the local government's response? Invitations sent to county officials to review and meeting to discuss the draft plans.

* How is the local government(s) likely to be impacted? Consistent river management guidance from FFSL on Green and Colorado Rivers.

* Possible significant impacts likely to occur: None anticipated

Admin Notes:

(255 characters remaining)

Project Contact Information

* Name: Laura Vernon

* Phone Number: (801) 673-0227

* Email: lauravernon@utah.gov

Submitter: Laura Vernon (lauravernon@utah.gov)

**EXHIBIT B. NOTICE TO INTERESTED PARTIES (MLP
CURRENT LESSEES AND ADJACENT LANDOWNER
MAILING LIST)**

This page intentionally left blank.

ADAMS,BILL L CO-TRUSTEE PO BOX 293 Green River UT 84525	Adesta Communications Inc 70 West 500 South Provo UT 84601	Adventure Bound Inc 2392 H Road Grand Junction CO 81505
Adventure Bound, Inc. River Expeditions 2392 H Road Grand Junction CO 81505	AGAINST THE WIND PROPERTIES LLC 4898 S 4625 E VERNAL UT 84078	ALLEIN,JOHN MICHEAL 2556 E VALLEY VIEW AVE HOLLIDAY UT 84117
American Adventure Productions, Inc. 314 South Second St Aspen CO 81611	AMERICAN GILSONITE COMPANY P O BOX 7611 SAN FRANCISCO CA 94120-7611	American River Touring Association, Inc. 24000 Casa Loma Rd Groveland CA 95321
Andover Partners 1001 Fannin Suite 2000 Houston TX 77002	ANTLES RANDY AND JILL 3000 S 5000 E VERNAL UT 84078	Armstrong Resources, LLC 1421 Blake Street Denver CO 80202
ARNOLD COLLETT P O BOX 311 JENSEN UT 84035	Aurora Gathering, LLC. 1401 -- 17Th St, Suite 700 Denver CO 80202	'BANASKY JAMES RANCHES LLC' 'PO BOX 728' 'PRICE' 'UT' 84501
Banasky, James 2080 Spring Oaks Drive Springdale UT 84663	Banson, Bonnie 12601 Darlene Lane Hot Springs SD 57747	BARDON BENJAMIN 337 E HORSESHOE BEND RD VERNAL UT 84078
Base Camp P.O. Box 37 Moab UT 84532	BBJC INVESTMENT COMPANY LTD 2690 TELEMAR DR PARK CITY UT 84060	BEASLEY JAMES R 4941 S 2525 E VERNAL UT 84078
BEEZ INC 1120 E 1500 S VERNAL UT 84078	Belco Development Corp PO Box 1188 Houston TX 77251	BIG DOG PROPERTIES LLC ETAL 2550 E 1500 S VERNAL UT 84078
'BINGHAM MARC C' 'PO BOX 185' 'OREM' 'UT' 84059	BLM (MOAB FIELD OFFICE) 82 E DOGWOOD MOAB 'UT' 84532	BLM (Monticello Field Office) 365 North Main Monticello UT 84535
BLM (PRICE FIELD OFFICE) 125 S 600 W PRICE UT 84501	BLM (VERNAL FIELD OFFICE) 170 S 500 E VERNAL UT 84079	Blue Heron Outfitters, Inc. PO Box 1520 Moab UT 84532

BOWDEN ROBERT PO BOX 165 JENSEN UT 84035	Bowden, Randal PO Box 692 Moab UT 84532	BRAD HASLEM INVESTMENTS LLC 826 S 1500 E VERNAL UT 84078
BREWER,KESHA B PO BOX 304 Green River UT 84525	Bureau of Land Management, Grand Resource Area PO Box 970 Moab UT 84532	BURROLA JOSEANGEL AND MARIBEL 3029 S 670 E VERNAL UT 84078
Cabot Oil & Gas Production Cor PO Box 4544 Houston TX 77210-4544	CADY,MAE 24438 CREAMERY LN WEED CA 96094	Calais Resources Inc 202 Spring St PO Box 310 Morrison CO 84065
Calais Resources Inc PO Box 310 Morrison CO 80465	Canyon River Company 1914 South Cross Hollow Dr Cedar City UT 84720	Canyon Voyages PO Box 416 Moab UT 84532
Canyonlands by Night P.O Box 328 Moab UT 84532	Canyonlands Field Institute Ft Duchesne Moab UT 84532	CARROLL DON J & JEAN R 12457 S DRAPER GROVE CT DRAPER UT 84020
'CARROLL DRILLING LLC' '11850 S HWY 191 STE A-10' 'MOAB' 'UT' 84532	'CARTER JUSTIN E' 'P O BOX 101' 'GREEN RIVER' 'UT' 84525	Carter, Dorothy 3480 E 3000 S Roosevelt UT 84066
CARTER,DOROTHY A PO BOX 436 ALTAMONT UT 84001	Centennial Canoe Outfitters 1623 Juniper Ct. Grand Junction CO 81505	CHAFFIN,STEPHEN FAUN 1919 9 RD MACK CO 81525
'CHANDLER JAMES M' PO BOX 372 'GREEN RIVER' 'UT' 84525	CHAPMAN NILE AND ROGER PO BOX 818 ROOSEVELT UT 84066	Chapoose Canyon Adventures PO Box 766 Ft Duchesne UT 84026
Chevron USA Inc PO Box 1635 Houston TX 77251	Chevron USA Inc PO Box 36366 Houston TX 77236	CHEW RANCH LLC ETAL PO BOX 126 JENSEN UT 84035-0126263
Chris Sammartano Productions 68 Jeffreys Neck Rd Ipswich MA 1938	CJC Properties 1111 Horizon Dr. Unit 807 Grand Junction CO 81506	COLLINS RANDY V AND JESSICA 616 S 2150 W VERNAL UT 84078

Colorado Outward Bound 16 Ranch Road Moab UT 84532	COLORADO RIVER & TRAIL EXPED 5058 COMMERCE DR SALT LAKE CITY UT 84107	Colorado River & Trail Expeditions 5058 South 300 West Salt Lake City UT 84107-4708
Colorado River And Trail Exped 5058 South 300 West Salt Lake City UT 84107-4708	Compass Minerals Ogden Inc 765 North 10500 West Ogden UT 84404	'CONRAD PATRICK N' 'PO BOX 10263' 'FORT SMITH' 'AR' 72917
Construction Company, Inc 166 East 14000 South Suite 200 Draper UT 84020	Corporate Helicopters PO Box 296 Moab UT 84532	'CRUEGER ROBERT KYLE' '2918 61ST AVE NORTHEAST' 'TACOMA' 'WA' 98422
CUMMINGS LORENZO JOHN AND LAJEAN R TRUSTEES CUMMINGS ASSET PROTECTION TRUST 1050 E BRIGHAM RD #72	CV AGRICULTURE LLC PO BOX 70 Green River UT 84525	CV AGRICULTURE LLC PO BOX 623 Green River UT 84525
DALBO INC 2180 S 1300 E STE # 310 SALT LAKE CITY UT 84106	DAVIS VICTOR AND AMANDA 490 E HORSESHOE BEND RD VERNAL UT 84078	Deer Hill Expeditions PO Box 180 Mancos CO 81328
DESERET GENERATION & TRANSMISSION COOPERATIVE 10714 SOUTH JORDAN GATEWAY SOUTH JORDAN UT 84095	Desert Highlights PO Box 1342 Moab UT 84532	Div of Parks And Recreation 1594 West North Temple Ste 116 Salt Lake City UT 84114-6001
Dominion Exploration & Product 1450 Poydras Street New Orleans LA 70112-6000	Don Hatch River Expeditions, Inc. PO Box 67 Angels Camp UT 95222	DUCHESNE COUNTY WATER CONSERVANCY DISTRICT 275 W 800 S ROOSEVELT UT 84066
'DUNHAM CHRIS C' 'PO BOX 193' 'GREEN RIVER' 'UT' 84525	'DUNHAM KELLY' 'PO BOX 451' 'GREEN RIVER' UT 84525	Dunham Land & Livestock PO Box F Green River UT 84525
'DUNHAM NANCY JEAN TRUSTEE' 'PO BOX 540' 'GREEN RIVER' 'UT' 84525	DUNHAM,CHRIS C PO BOX 193 Green River UT 84525	DUNHAM,KELLY PO BOX 451 Green River UT 84525
DUNHAM,NANCY JEAN TRUSTEE PO BOX 451 Green River UT 84525	El Paso Production Oil& Gas Co 1099 - 18Th St Suite 1900 Denver CO 80202	Encana Oil & Gas (USA) Inc 950 17th Street Suite 2600 Denver CO 80202

ENEFIT AMERICAN OIL CO 307 W 200 S SUITE 4005 SLC UT 84101	Enron Oil & Gas Company 1625 Broadway Suite 1300 Denver CO 80202	Enterprise Products PO Box 4324 Houston TX 77210-4324
EOG Resources Inc PO Box 4362 Houston TX 72210-4362	EP Operating Company Ltd PO Box 2649 Dallas TX 75221-2649	Epstien, William 4391 S. Parkview Drive Salt Lake City UT 84124
ERWIN,JACK R & CHARLOTTE PO BOX 142 Green River UT 84525	ERWIN,KIRK RANDALL PO BOX 638 Green River UT 84525	ERWIN,KIRK RANDALL PO BOX 640 Green River UT 84525
FARRER,E S MRS 1731 HARTS MILL RD NE ATLANTA GA 30341	FINLEY PRODUCTION CO LP ETAL 1308 LAKE STREET FT WORTH TX 76102	Finley Resources PO Box 2200 Fort Worth TX 76113
FREEMAN LINDSAY MORGAN ETAL PO BOX 340 RIVERTON UT 84065	Fryer, Colin 11147 East SR128 Moab UT 84532	G & H STORAGE LLC 331 N VERNAL AVE VERNAL UT 84078
Gasco Production Comkpany 8 Inverness Dr East Ste 100 Englewood CO 80112-5625	GEE KIMBERLY 15505 N 4400 W GARLAND UT 84312	'GERBER JEFFREY MARK TRUSTEE' 'PO BOX 776009' 'STEAMBOAT SPRINGS' 'CO' 80477
GILROY GREG L AND JOLYNN 704 W 2500 S VERNAL UT 84078	GKM PROPERTIES LLC 85 S 200 E VERNAL UT 84078	Grand County 125 East Center Street Moab UT 84532
Gravity Play Sports Marketing 11536 Cr250 Durango CO 81301	Gray, Gordon PO Box 232 Snyder TX 76550	Great Iguana Filmworks 17623 Bullock St Encino CA 91316
GREEN PASTURE INTERNATIONAL INC P O BOX 160 JENSEN UT 84035	GREEN RIVER CANAL COMPANY PO BOX 84 Green River UT 84525	Green River Companies 124 South 400 East Salt Lake City UT 84111
GREEN RIVER COMPANIES LLC 9911 S 78TH AVE HICKORY HILLS IL 60457	GREEN RIVER COMPANIES, LLC' '9911 S 78TH AVE' 'HICKORY HILLS' 'IL' 60457	Green River Development Associates, Inc. PO Box 570 Green River UT 84525

Green River Diversion Dam Cooperation 460 East Main Green River UT 84525	GREEN RIVER PROPERTIES LLC' '1648 FEDERAL HEIGHTS DR' 'SALT LAKE CITY' 'UT' 84103	Green River Properties, LLC 755 E. Turtle Point Drive Ivins UT 84738
GREEN RIVER REAL ESTATE INVEST 5911 FASHION BLVD STE 200 SALT LAKE CITY UT 84107	Green River Valley Investments, LLC PO Box 1501 Clifton CO 81520	Griffith, Sheri 2740 Old City Park Road Moab UT 84532
Group Publishing, Inc. 1515 Cascasde Avenue Loveland CO 80538	GW&E LC 580 West 1261 North Orem UT 84058	Hansen, Bart PO Box 653 Mona UT 84645
HANSEN,RICHEY E PO BOX 113 Green River UT 84525	HARLOW LYLE W AND LINDA TRUSTEES OF THE LYLE AND LINDA HARLOW FAMILY TRUST 751 S 2050 W	HARMSTON GREGG AND MELODY L PO BOX 1548 ROOSEVELT UT 84066
Harris, Dale 1258 S 860 W Cedar City UT 84720	HARRIS,BALLARD 1259 S 860 W CEDAR CITY UT 84720	HASLEM RICHARD M TRUSTEE OF THE RICHARD M HASLEM TRUST DATED 11/3/2000 ETAL PO BOX 1265
'HASTINGS H L ET AL' '400 36TH AVENUE' 'SANTA CRUZ' 'CA' 95062	HATCH KENT DEE ETAL 141 W 500 S HEBER CITY UT 84032	HATT,BETSY R TRUSTEE PO BOX 420 Green River UT 84525
HEATH,HAROLD TRUSTEE 40 N 425 E SMITHFIELD UT 84335	Hiko Bell Mining & Oil Co PO Box 1845 Vernal UT 84078	HISKEY MICHAEL K AND MARY ANN P. O. BOX 315 EUREKA UT 84628
Holiday River Expeditions 544 East 3900 South Salt Lake City UT 84107	HOLMES BAR NE RANCH LLC 4751 S 500 E VERNAL UT 84078	HOLYOAK LAND AND LIVESTOCK LLC PO BOX 82 Green River UT 84525
HORROCKS DIXIE L TRUSTEE OF THE DIXIE L HORROCKS FAMILY TRUST 1785 S 1500 E VERNAL UT 84078	HORROCKS JOSHUA G AND ERIN L 2209 S 2000 E VERNAL UT 84078	HOWLAND,ANNALEE PO BOX 272 Green River UT 84525
HOWLAND,GARY L & KOIE L TRUST 1829 N LABYRINTH DR ST GEORGE UT 84770	Hunt Petroleum (Aec), Inc PO Box 1350 Houston TX 77251-1350	Hunt Petroleum (Aec), Inc PO Box 1350 Houston TX 77251-1350

HUNT,CHET D PO BOX 501 Green River UT 84525	HUNT,COBY PO BOX 502 Green River UT 84525	HUNTING LARRIS A 2906 E 2500 S VERNAL UT 84078
HUNTING ROBERT T 2575 S 2400 E VERNAL UT 84078	HUNTING STEVEN C 2442 E 2500 S VERNAL UT 84078	Impossible Pictures 12 Great Portland Street London England
INABNIT HENRY LES AND ZENaida D TRUSTEES OF THE HENRY LES INABNIT TRUST ETAL PO BOX 993	INDIAN RESERVATION (UINTAH & OURAY TRIBAL LANDS) FORT DUCHESNE UT 84026	INDIAN TRAIL RANCH LLC 621 VISTA VIEW CT NORTH SALT LAKE UT 84054
INTERMOUNTAIN CONCRETE CO 625 E MAIN ST VERNAL UT 84078-2703254	International Adventure Tours 420 Kane Cr Blvd Moab UT 84532	'INTERNATIONAL PETROLEUM LLC' '8083 BARNWOOD WAY' 'SANDY' 'UT' 84092
International Petroleum, LLC. 4834 So Highland Dr #200 Salt Lake City UT 84117	Intrepid Oil & Gas, LLC. 700 17Th Street Suite 1700 Denver CO 80202	Intrepid Potash - Moab, LLC PO Box 1208 Moab UT 84532
J N TRUCKING INC 4091 W 3000 S ROOSEVELT UT 84066	JENSEN,JEAN WILCOX PO BOX 1736 PRICE UT 84501	Jet Enterprises 2429 E 73rd Place Tulsa OK 74136
JHCRPN, LLC 5910 Emigration Canyon Salt Lake City UT 84108	JOHNS WILLIAM J PO BOX 496 NETTIE WV 26681-0496	Johnston, Terill 3595 Spanish Valley Dr Moab UT 84532
JONES TIMOTHY C ETAL PO BOX 222 JENSEN UT 84035	Jones, George 10770 Fred Lane Missoula MT 59808	'JOUFLAS CHRIS P' '1111 HORIZON DR UNIT 801' 'GRAND JUNCTION' 'CO' 81506
K BAR RANCH LLC PO BOX 757 MOAB UT 84532	Kerr-Mcgee Oil & Gas Onshore L PO Box 4995 The Woodlands TX 77387-4995	'KING DEAN LEE' PO BOX 326 'GREEN RIVER' 'UT' 84525
King Land & Livestock PO Box 326 Green River UT 84525	KING,DEAN LEE TRUSTEE PO BOX 326 Green River UT 84525	Lakeside School 14050 First Avenue Ne Seattle WA 98125

Lakeside School Outdoor Program 14050 First Avenue Ne Seattle WA 98125	LAMB KARL AND DONNA PO BOX 216 MYTON UT 84052	Lance H&D Properties PO Box 526 Midway UT 84049
Land Rover G'4s Challenge 1 Farnham Road Guildford Surrey GU2-4RG	LAZY 3X SWEETWATER RANCH LLC 561 S ROAD MACK CO 81525	'LECHLEITER CRAIG' PO BOX 474 'GREEN RIVER' 'UT' 84525-0474
LEGRAND JOHNSON CONSTRUCT PO BOX 248 LOGAN UT 84323	Letlow, Rusell 1626 W. 3rd Street Pecos TX 79722	LINDGREN,BONNIE B CO-TRUSTEE 826 TEN LETTER CT KUNA ID 83634
Livestock, Taylor 280 W. Center Street Moab UT 84532	Lomax Exploration Co 475 Seventeenth St Suite 1500 Denver CO 80202	LUTHER CHARLES AND YOLANDA D P.O. BOX 492 DUCHESNE UT 84021
MACKAY,DAVID J TRUSTEE 5058 COMMERCE DR SALT LAKE CITY UT 84107	MARTIN JAMES W 12730 HORSESHOE BEND RD VERNAL UT 84078	MASSEY SHON AND TAMRA 7770 E 7260 S JENSEN UT 84035
MATTINGLY,JAMES 1945 SPANISH VALLEY DR MOAB UT 84532	MAYHEW LON W AND AMY L PO BOX 9 JENSEN UT 84035	MCCARREL SCOTT & RAYMA 4556 E HIGHWAY 40 VERNAL UT 84078-9271563
MCCARTNEY,SALLY DIANE 1155 HAYES AVE SALT LAKE CITY UT 84104	MCFARLANE,KIM T PO BOX 356 Green River UT 84525	MECHAM,GERALD D PO BOX 383 CLEVELAND UT 84518
'MEENS LAURENCE K' '3162 SADDLEGATE CT' 'GRAND JUNCTION' 'CO' 81504-4050	MERKLEY EDWARD H AND GERALDINE F TRUSTEES OF MERKLEY FAMILY TRUST 12/15/16 990 N 1270 W	MERKLEY LORIN T AND BEVERLY - CO- TRUSTEES ETAL 1357 N 3500 W VERNAL UT 84078
MERRELL DALE J AND JOANN R. TEES OF THE DALE J. MERRELL REVOC TRUST ET AL 400 S BELLA VISTA DR	MIGLIACCIO,MARIOLIVER PO BOX 229 Green River UT 84525	'MITCHELL DENNIS' '125 WOLFE ST' 'ALEXANDRIA' 'VA' 22314-3831
Moab BLM 2370 South 2300 West Salt Lake City UT 84119	Moab City 217 E. Center Street Moab UT 84532	Moab Gas Pipeline LLC 1801 Broadway, Suite 800 Denver CO 80202

Moab Salt Inc PO Box 1208 Moab UT 84532	Morelli, Ralph 5127 E. Woodland Ave Salt Lake City UT 84106	MORGAN JASEN M 240 E HORSESHOE BEND RD VERNAL UT 84078
MORRISON MICHAEL 1030 E 500 S VERNAL UT 84078	MOST JOEL AND DANIELLE 508 E HORSESHOE BEND RD VERNAL UT 84078	Mountain Island Ranch PO Box 57 Glade Park CO 81523
'MOUNTAIN ISLAND RANCH LLC' '5350 LITTLE DOLORES RD' 'GLADE PARK' 'CO' 81523	Myke Hughes, Inc 378 N Main Moab UT 84532	NASH ANN HUNTING P O BOX 7953 NIKISKI AK 99635
National Ability Center 1000 Ability Way Park City UT 84060	National Outdoor Leadership Schools PO Box 1304 Vernal UT 84078	National Park Service (Glen Canyon National Recreation Area) PO Box 1507 Page AZ 86040
'NATURE CONSERVANCY THE' '559 EAST SOUTH TEMPLE' 'SALT LAKE CITY' UT 84102	Navtec Expeditions PO Box 1267 Moab UT 84532-1267	'NELSON BRUCE EARL TRUSTEE' 'BOX 537' 'GREEN RIVER' 'UT' 84525
'NELSON CHARLES W TRUSTEE' 'PO BOX 940' 'MOAB' UT 84532	Nelson, Robert PO Box 393 Green River UT 84525	Newfield Production 1001 17Th Street Suite 2000 Denver CO 80202
Newland, William PO Box 313 Green River UT 84525	Nichol's Expeditions 497 North Main St Moab UT 84532	NICKEY, WILLIAM M JR TRUSTEE 1700 WIGGINS AVE SPRINGFIELD IL 62704
NIELSEN NATHAN THOMAS HC 69 BOX 192 RANDLETT UT 84063	North American River Expeditions PO Box 68 Angels Camp CA 95222	Northwest Pipeline Corp PO Box 58900 Salt Lake City UT 84158-0900
NTCH- Colorado, Inc 1600 Ute Avenue Ste 10 Grand Junction CO 81501	Oars Canyonlands Inc PO Box 67 Angels Camp CA 95222	Onshore Offshore Explorations PO Box 178 Durango CO 81302-0178
Ouray National Wildlife Refuge 1680 W Hwy 40 #112C Vernal UT 84078	OZAETA ADOLFO AND LORRIE ANN 1318 W 2500 S VERNAL UT 84078	PacifiCorp 825 Ne Multnomah Suite 1000 Portland OR 97232

'PALLADIUM FOUNDATION'	PALMER TERRY	Pan Oklahoma Corporation
'867 E SIMPSON AVE'	4880 S 4380 W	PO Box 371
'SALT LAKE CITY' UT 84106	KEARNS UT 84118	Riverton UT 84065
'PAPPAS STEVEN L'	Parallel Petroleum Corp	PELTIER HENRY T AND TAMERA
'424 K STREET'	PO Drawer 10587	TRUSTEES OF HENRY T JR AND TAMERA
'SALT LAKE CITY' 'UT' 84103	Midland TX 79700	C PELTIER TRUST
		PO BOX 80
PETERSON COLE A ETAL	PETERSON KEITH B	PICKUP KENNETH D AND JOAN
PO BOX 37	PO BOX 13	HC 69 BOX 101
JENSEN UT 84035	JENSEN UT 84035	RANDLETT UT 84063
'PINNEO CHADWICK JIM'	'PINNEO FRANK JIM'	'PLEVELL JILL'
PO BOX 432	PO BOX 233	'7440 N BOGERT PL'
'GREEN RIVER' 'UT' 84525	'GREEN RIVER' 'UT' 84525-0233	'TUCSON' 'AZ' 85741
POELZL LILO	POWELL KELLY DUANE AND JAN	POWELL ROBERT R & NORMA
5583 N DRYFORK CANYON ROAD	PO BOX 195	1960 E 1500 N
VERNAL UT 84078	JENSEN UT 84035	VERNAL UT 84078
Provo Canyon School	PURDY, FORREST TRUSTEE	QEP Energy Company
4501 North University Ave	PO BOX 11	1050 17Th Street, Suite 500
Provo UT 84604	WIKIEUP AZ 85360	Denver CO 80265
QEP Field Services Company	QEP Uintah Basin, Inc	Questar Explor & Prod Co
160 East 100 South / Pob 45433	1050 17Th Street Suite 500	1050 17Th Street, Suite 500
Salt Lake City UT 84145-0433	Denver CO 80265	Denver CO 80265
Rahme, Richard	RAIM KENT WESLEY	RASMUSSEN SMOKEY TRUSTEE OF THE
PO Box 9286	17247 WARD CREEK RD	SMOKEY RASMUSSEN 2014 TRUST
Jackson WY 83002	CEDAREDGE CO 81413	PO BOX 141
		JENSEN UT 84035-0141419
Red Cliffs Adventure Lodge	Red Moon Ranch	RED MOUNTAIN CORPORATION
550 South Main	7722 Keswick Rd	PO BOX 818
Moab UT 84532	Sandy UT 84093	ROOSEVELT UT 84066
REDIPIANO ENTERPRISES LIMITED	'REDIPIANO ENTERPRISES LLC'	Rees, Steve
3688 FAIRWAY DRIVE	'1527 E WOODLAND AVE'	520 Main, Box 546
CAMERON PARK CA 95682	'SALT LAKE CITY' 'UT' 84106	Ashton ID 83420

Renegade 83 121 W Lexington Dr Bldg 413 Glendale CA 91203-2203	RGBM, Inc. 3926 S. Lake Lane Moab UT 84532	RGMB, LLC 3926 S Lake Ln Moab UT 84532
Richard Tangren 6775 Quinella Dr Las Vegas NV 89103	RICHES,DUANE PO BOX 278 Green River UT 84525	Rim to Rim Restoration PO Box 297 Moab UT 84532
RJM INVESTMENT CO 160 N 100 E MOAB UT 84532	ROACH RICHARD 10741 E BRAINERD RD APISON TN 37302	Robert L. Bayless, Producer, LLC. 621 17Th Street, Suite 2300 Denver CO 80293-2023
Rocky Mountain Power 710 North Main Street Richfield UT 84701	Rosen, Timothy PO Box 1825 Avon CO 81620	Rozman, Curtis PO Box 757 Moab UT 84532
RSA-USA, Inc. 634 North Lapeer Dr West Hollywood CA 90069	'RTA MOAB VALLEY LLC' '433 E. LAS COLINAS BLVD STE 300' 'IRVING' 'TX' 75039	RYAN,RANDY PO BOX 324 Green River UT 84525
S & H RANCHES INC PO BOX 150432 EAST ELY NV 89315	S. Douglas McLaughlin P.O. Box 758 Moab UT 84532	'SALINAS J DANIEL' 'PO BOX 129' 'GREEN RIVER' 'UT' 84525
SALINAS,J DANIEL PO BOX 129 Green River UT 84525	'SALT LAKE ACCOMDATION NO 338 LLC' '168 E CENTER ST' 'MOAB' UT 84532	Salt Lake Pipeline Co 2875 So Decker Lake Dr, # 150 Salt Lake City UT 84119
SCHMIDT DEBRA K ETAL 6236 W 5100 S HOOPER UT 84315-9717	SCHWARZANO ENTERPRISES LLC 13586 MCNALLY RD VALLEY CENTER CA 92082	SEAGER,JAMES D PO BOX 205 Green River UT 84525
SEARSON,MICHAEL L 553 SUN VALLEY ST GRAND JUNCTION CO 81504	SEARSON,MICHAEL L & MARY A 552 SUN VALLEY ST GRAND JUNCTION CO 81504	'SEQUOIADENDRON LLC' '9911 S 78TH AVENUE' 'HICKORY HILLS' 'IL' 60457
SHAY MICHAEL TODD AND RHONDA LAVON P O BOX 458 JENSEN UT 84035	SHEFFER BRENT D AND KALYNN TRUSTEES OF BRENT AND KALYNN SHEFFER FAMILY TRUST 7656 S REDWASH RD	Sheri Griffith Expeditions 2231 South Hwy 191 Moab UT 84532

Shoshone Environmental Nomination 770 E South Temple Salt Lake City UT 84102	Sierra South 11300 Kernville Rd PO Box 1909 Kernville CA 93238	SILLIMAN,KAREN LOUISE PO BOX 880 CORTEZ CO 81321
SILLIMAN,KAREN LOUISE PO BOX 881 CORTEZ CO 81321	SILLIMAN,KENNETH BLAINE TRUSTE PO BOX 480 Green River UT 84525	SIMONSON,E ROGER TRUSTEE 2825 FLORIBUNDA DR SALT LAKE CITY UT 84117
SLAUGH BURNELL & CARMALITA, LEE & ROXANNE 4815 S 2500 E VERNAL UT 84078	SLAUGH BURNELL K AND CARMALETA TRUSTEES BURNELL K SLAUGH TRUST ET AL 10973 CIRCLE S RANCH RD	SLAUGH JOSEPH R AND TARI C 9425 W HORSESHOE BEND VERNAL UT 84078
SLAUGH MURRAY DOUGLAS TRUST-SLAUGH MURRAY DOUGLAS & PHYLLIS IRENE-TRUSTEES ETAL 3329 S 4000 E	'SMITH KAREN L' 'PO BOX 153' 'GREEN RIVER' 'UT' 84525	Smoot, Richard 847 E 400 S Salt Lake City UT 84102
SMUIN FARRELL AND GLENDA PO BOX 209 JENSEN UT 84035	SNOW DALE A PO BOX 15 JENSEN UT 84035	SNYDER JON R AND JULIE A PO BOX 650 JENSEN UT 84035
SOCO 1979 Acreage Program 1801 California St #3500 Denver CO 80202	SOCO 1979 Acreage Program 1801 California St #3500 Denver CO 80202	Solacium New Haven LLC 2096 East 7200 South Spanish Fork UT 84660
Spears, Jennifer 867 E. Simpson Avenue Salt Lake City UT 85106	'SPENCER MICHAEL D TRUSTEE' '11575 RD 42' 'MANCOS' 'CO' 81328	SPOON JIMMY SAM P O BOX 1473 VERNAL UT 84078
SPOONER MARGRET S PO BOX 496 NETTIE WV 26681-0496	SRR Properties, LLC HC 64 Box 4002 Castle Valley UT 84532	STANDARD ENERGY CORPORATION PO BOX 27156 SALT LAKE CITY UT 84127
STATE & INSTITUTIONAL TRUST LANDS 675 E 500 S STE. 500 SALT LAKE CITY UT 84102	State Road Commission State Capitol Building Salt Lake City UT	STUNTZ VALLEY RANCH LC PO BOX 246 JENSEN UT 84035
SULLIVAN RUSSELL J-TRUSTEE OF THE RUSSELL J SULLIVAN TRUST 201 ROSSMORE DRIVE OXNARD CA 93035	SUMMIT PROPERTY VENTURES LLC 1985 E CHENANGO COURT ENGLEWOOD CO 80113	Tex's Riverways PO Box 67 Moab UT 84532

THACKER R TODD AND SUSAN F
PO BOX 281
JENSEN UT 84035

'THOMPSON HARRY E'
PO BOX 640'
'GREEN RIVER' 'UT' 84525

Trachyte Oil Company
PO Box 11206
Salt Lake City UT 84147

TWO BAR X RANCH LLC
P O BOX 2
VERNAL UT 84078

Uintah Water Conservancy District
78 West 3325 North
Vernal UT 84078

US Department of Energy
200 Grand Ave
Grand Junction CO 81501

Utah Colorado River Ranch, LLC
PO Box 2738
Grand Junction CO 81502

Utah National Guard
PO Box 1776
Draper UT 84020

VACHER,DAN E TRUSTEE
PO BOX 94
Green River UT 84525

'VETERE TIMOTHY'
'PO BOX 404'
'GREEN RIVER' 'UT' 84525

THAYN,LEE R
PO BOX 447
Green River UT 84525

THOMSON,CECILIA
1525 KENSINGTON AVE
SALT LAKE CITY UT 84105

Trust, Wade
8976 Sutton Way
Sandy UT 84903

U.S. Department of the Interior Bureau
of Land Management, Moab Field
Office
82 East Dogwood Ave

'UMETCO MINERALS CORPORATION'
'332 SH 332 EAST'
'LAKE JACKSON' 'TX' 77566

US FISH & WILDLIFE (OURAY NATIONAL
WILDLIFE REFUGE)
HC69 BOX 232
RANDLETT UT 84063

Utah Department of Transportation
4501 South 2700 West
Salt Lake City UT 84119

Utah Power & Light
825 Ne Multnomah Suite 1000
Portland OR 97232

Vastar Resources Inc
15375 Memorial Drive
Houston TX 77079

VETERE,JAY
PO BOX 175
Green River UT 84525

The Standard Oil Company
200 Public Square
Cleveland OH 44144

Tour West
PO Box 333
Orem UT 84059-0333

'TULLOCH DAVID H'
'PO BOX 711'
'TYRONE' 'NM' 88065

UFFORD DONALD B AND M DARLINE
TRUSTEES ETAL
45 E 2500 S
VERNAL UT 84078

UPL Three River Holdings
304 Inverness Way South Suite 295
Englewood CO 80112

US Fish & Wildlife Service
2155 West Forest St
Brigham City UT 84302

Utah Geological Survey
1594 W North Temple
Salt Lake City UT 84114-6100

Utah State University
505 Wakana Way Suite 210
Salt Lake City UT 84108

Vetere John C
PO Box 515
Green River UT 84525

VETERE,JOHN CORY
PO BOX 515
Green River UT 84525

VETERE,TIMOTHY J
PO BOX 404
Green River UT 84525

WEILER,GEORGE P TRUSTEE
731 THREE FOUNTAINS DR # 84
SALT LAKE CITY UT 84107

'WESTWATER RANCH TRUST 6/8/96'
'1626 W 3RD STREET'
'PECOS' 'TX' 79772

WILCOX,IRENE
PO BOX 122
Green River UT 84525

'WILLIAMS MARK W'
'705 E ELM ST'
'COTTONWOOD' 'AZ' 86326

Wyoming Interstate Company Ltd.
PO Box 1087
Colorado Springs CO 80944

YOUNG SLADE MAX AND SUSANNE
GOOCH
2370 E 2500 S
VERNAL UT 84078

WALL SCOTT D AND KRISTY ANN ETAL
PO BOX 188
JENSEN UT 84035

Western River Expeditions
7258 Racquet Club Drive Ste A
Salt Lake City UT 84121-4599

Wilcox Trust
PO Box 28
Farson WY 82932

WILCOX,PEARL M
1186 OLSEN AVE
GRAND JUNCTION CO 80503

WOODBURY DOUGLAS C AND LARUE H
TRUSTEES OF DUGLAS C AND LARUE H
WOODBURY FAMILY
3003 CRAIG DRIVE

XTO Energy Inc
810 Houston Street
Fort Worth TX 76102-6298

WEILER,GEORGE P TRUSTEE
730 THREE FOUNTAINS DR # 84
SALT LAKE CITY UT 84107

'WESTWATER RANCH LLC'
'149 N LIMESTONE'
'LEXINGTON' 'KY' 40507

WILCOX,DWENDLE A
PO BOX 640
Green River UT 84525

Wilderness Inquiry
808 14Th Avenue Se
Minneapolis MN 55414

World Wide River Expeditions
625 Riversands Rd
Moab UT 84532

YOUNG SLADE MAX
114313 S HORSESHOE BEND RD
VERNAL UT 84078

EXHIBIT C. GREEN AND COLORADO RIVERS MINERAL LEASING PLAN PUBLIC COMMENTS

This page intentionally left blank.

Table C-1. Green and Colorado Rivers Mineral Leasing Plan Public Comments

Submission Number	Comment Location	Commenter	Topic	Comment Number	Comment	Disposition/Response to Comment
1	Email, paragraph 15	American Whitewater	Mineral leasing impacts	1.1	As recreation advocates, American Whitewater is concerned that FFSL may disregard potential impacts from proposed lease sales to river recreation and other important values. Because the direct, indirect, and cumulative effects that would result from implementation of potential mineral leases on sovereign lands would be detrimental to recreation experiences and local communities that have invested in recreation assets, FFSL should include the evaluation of these effects of potential leases on the region's recreation economy and how it would affect future growth opportunities in the local business community and socioeconomics regionally. Effects of oil and gas leasing are likely to have a direct effect on the physical setting for recreational activities, resulting in impacts to the tourist industry and economy.	FFSL recognizes that protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality must be given due consideration and balanced against the need for, justification of, or benefit from any proposed use (including mineral leasing) (Utah Administrative Code R652-2-200). By statute, FFSL is required to manage for these five Public Trust values. Mineral leasing may not be allowed in a certain area if a site-specific analysis indicates that it is inconsistent with the protection of the Public Trust.
1	Email, paragraph 16	American Whitewater	NSO classification	1.2	American Whitewater supports the NSO classification of all sovereign lands on the Green and Colorado Rivers. While we understand the leasing of adjacent lands does not fall under the purview of the FFSL, we encourage any NSO stipulation developed for leases proposed on sovereign lands of the Green or Colorado Rivers acknowledge foreseeable impacts to how these leases might cumulatively affect recreation assets and related socioeconomics, and propose mitigating measures to address such negative impacts.	<p>FFSL recognizes that protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality must be given due consideration and balanced against the need for, justification of, or benefit from any proposed use (including mineral leasing) (Utah Administrative Code R652-2-200). By statute, FFSL is required to manage for these five Public Trust values. Mineral leasing may not be allowed in a certain area if a site-specific analysis indicates that it is inconsistent with the protection of the Public Trust.</p> <p>In addition, Utah Administrative Code R652-20 provides rules for the leasing of mineral resources on sovereign lands. One of the rules states that FFSL may require lessees to provide a cultural, paleontological, or biological survey on lands under mineral lease and to be responsible for reasonable mitigative actions as specified by FFSL.</p>

Submission Number	Comment Location	Commenter	Topic	Comment Number	Comment	Disposition/Response to Comment
2	Email, paragraph 11	Sarah Stock	NSO classification	2.1	Another issue of crucial importance is that of leasing for oil and gas resources under the Green and Colorado Rivers. The Colorado River Basin system provides culinary and agricultural water to nearly 40 million people. It is of utmost importance that we preserve the quality of this water by protecting it from oil and gas operations under the rivers. The designation of “no surface occupancy” does not cut it in this regard, as contamination is still possible. There should be no oil or gas leasing allowed under the rivers or other important water ways.	<p>In addition to managing for the Public Trust values of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality, FFSL administers state lands by using multiple-use, sustained-yield principles as required by Utah Code 65A-2-1 and Utah Administrative Code R652-90-800. If mineral extraction from horizontal drilling includes sovereign lands within any legally approved drilling or spacing unit, FFSL is “obligated to receive full value for the public trust resources leased to persons for profit” (Utah Administrative Code R652-20-1000.2(d)(i)). FFSL cannot divest itself from the mineral estate located under Public Trust waters without compensation. Therefore, leases must be issued in such cases. These leases will be issued with a no surface occupancy stipulation.</p> <p>In addition to requiring minimal surface damage in any mineral development activities on sovereign lands, FFSL requires the planned development to not cause pollution or salinity in any navigable lake or stream in excess of the acceptable limits established by applicable ordinance, law, or inter-governmental treaty (Utah Administrative Code R652-20-3000.2).</p>
3	Email, paragraph 1	San Juan County Commission	Consistency, philosophy, planning process	3.1	We have reviewed the Draft Comprehensive Management Plan and Mineral Leasing Plan for State sovereign lands of the Colorado River and find them to be consistent with the goals and policies of the San Juan County General Plan. We concur with the plans’ overall management philosophy of multiple use, sustained yield and coordination with other land owners and agencies. We appreciate your efforts at public outreach during this planning process that including public meetings in San Juan County. We are appreciative of this opportunity to comment.	Thank you for you for taking the time to review the plans and for your comments.