UTAH ASSOCIATION OF COUNTIES
A Unifying Voice for County Government

November 28, 2012

VIA E-MAIL BLM_WO_Information_Quality_Guidelines@blm.gov

Mike Pool, Acting Director mike_pool@blm.gov
Bureau of Land Management (BLM)
1849 C. Street N.W.
Washington D.C. 20240

Sherri Thompson sthompson@blm.gov
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215

Paulette Sanford, Chief Information Officer
Information Resources Governance Division
Information Resources Management Directorate
Bureau of Land Management
1849 C Street, NW, Mailstop 20M
Washington, DC 20240

Re: Joining Uintah County's November 16, 2012
Request for Information Quality Act Review
Based on Significant Data Disputes in the 2012 OSTS PEIS

Dear Mr. Pool, Ms. Thompson and Ms. Sanford:

The 2012 Oil Shale and Tar Sands Programmatic Environmental Statement (OSTS PEIS) rests on the assertion that "there are *no economically viable* ways yet known to *extract and process oil shale for commercial purposes*, and Utah tar sands deposits are *not at present a proven commercially-viable energy source*[.] 76 Fed. Reg. 21003 (2012) (emphasis added). Nothing could be further from the truth. Nothing could be so unsupported by and flatly contrary to current scientific and economic data on the subject. Unless the 2012 OSTS PEIS and its preferred alternative are substantially overhauled to acknowledge the current data on OSTS commercial viability, and the preferred alternative is rationally built upon that data, then the 2012 OSTS PEIS and its preferred alternative will stand as a monumental travesty of NEPA, the Information Quality Act, and their ideals of sound public policy decision-making based on publicly disclosed, true and accurate data.

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Accordingly, the Utah Association of Counties, on motion and unanimous supporting vote by its governing board which represents all 29 counties of Utah, joins in and strongly supports Uintah County's November 16, 2012 letter request to each of you, that the Bureau of Land Management (BLM) consider and analyze new information put forth by Uintah County documenting 2012 technological advances for the extraction of oil from shale and tar sands, and addressing the previously identified scientific controversies relating to the claimed environmental impacts of oil shale and tar sands development.

Utah Association of Counties also joins in and supports Uintah County's additional request that this new information on commercial viability and low environmental impact be analyzed in a supplement with a 45 day public comment period and/or assessed pursuant to the Information Quality Act (IQA) procedures as requested by Uintah County, before the PEIS is finalized and a ROD issues.

Uintah County's November 16th letter thoroughly documents how several companies have very recently completed testing to confirm the economic feasibility of oil shale development and negate outworn assumptions about environmental impact. That letter and all its exhibits are incorporated by reference into this letter as though fully set forth herein.

The entire state of Utah has a huge stake in full and reasonable development of Utah's oil shale and tar sands resources. The environmental review process must be based on accurate data. The 29 counties will not stand by and watch this process be warped by outdated, incomplete and agenda-driven data.

Sincerely,

UTAH ASSOCIATION OF COUNTIES

J. Mark Ward
Senior Policy Analyst and Public Lands Counsel
For the UAC Board of Directors

cc. Utah Assoc. of Counties Executive Committee
Utah Congressional Delegation
Utah Governor's Office
Utah Legislative Leadership