



Trust Lands Administration
Deputy Director Scott Ruppe
675 East 500 South, Suite 500
Salt Lake City, UT 84102

Delivered via e-mail

Re: Expanded operations at gravel pit on Bluff Bench & potential Bears Ears land exchange

Dear Mr. Ruppe:

We understand and support SITLA's mission to deliver income to its beneficiaries and to maximize value of lands under the Trust's management. While we have had disagreements with SITLA decisions in the past, we have always strived for a positive working relationship with the Trust Lands Administration, based on open and honest communications. We hope to continue a productive dialogue regarding trust lands within and adjoining Bluff's town boundaries.

In particular, I write to raise two issues of importance to our residents concerning SITLA holdings on the Bluff Bench. First, we have concerns over the significant expansion of operations at the gravel pit on SITLA land above Bluff. We hope to work with SITLA and the pit operator to mitigate current and potential impacts on Bluff. Second, we've recently learned about SITLA's proposed trade of lands within the Bears Ears National Monument, and we urge SITLA to rethink retaining ownership of lands north of Bluff in and adjacent to our town limits.

Bluff's concerns with the gravel pit above our town

The "Crows Nest" gravel pit above Bluff has long been a source of concern for town residents. Over the years, residents have been impacted by dust descending from the operation and the noise from large machinery at the site. Worries over increased flooding potential have also been raised, and the town invested significantly in new flood mitigation in Calf Canyon to allay some

of these fears. However, in the past, the pit was only intermittently operated and impacts were occasional in nature.

Over the last three months, operations at the pit have expanded dramatically. The footprint of the gravel operations appears to have increased 200-300%, with large equipment driving across the tops of the cliffs above town much closer than in the past. Operations have been more consistent, with noise commencing at first light and running until dusk five days per week. The significantly enlarged site also sheds more dust than in past years and increases our concerns about potential flooding impacts. Finally, the substantially larger footprint creates an increased need for a solid reclamation plan backed with sufficient bonding to ensure reclamation occurs.

All of the above concerns could and should be addressed via robust engagement with the town of Bluff and the creation of the required operational and reclamation plans called for in the operator's lease with SITLA. However, it appears that no such operational or reclamation plans have been created. Said plans certainly have not been shared with the town of Bluff.

Furthermore, the operator's lease with SITLA requires it to "...obtain a conditional use permit from the applicable local land use authority as part of the plan of operations submitted to SITLA." However, the operator has never approached the town of Bluff for such a conditional use permit in the five months since the lease was signed in November of 2021.

As such, we ask that SITLA request the operator to suspend operations at the pit until such time as it complies with its lease. In particular, an operations and reclamation plan should be created to address the concerns raised above. In addition, the operator should comply with the lease requirement for it to seek a conditional use permit from the town of Bluff.

Bluff requests SITLA trade all lands on the Bluff Bench within Bears Ears National Monument

We have been informed that SITLA has been in detailed discussions with the Department of the Interior (DOI) about a potential land trade that would exchange lands within Bears Ears National Monument for more productive lands in other areas of the state. Maps shared with us that were publicly posted on the SITLA GIS servers show that SITLA does not intend to trade out significant acreage north of Bluff that is within Bears Ears National Monument and which is also within or adjacent to Bluff town boundaries.

As you likely know, the town of Bluff has supported protecting our watershed and lands surrounding Bluff as part of Bears Ears National Monument. Our town's economy is largely supported by tourism and the protection of public lands is critical to the future economic health of our community. Likewise, the lands north of Bluff are the watershed for our culinary water supply and development there poses risks to the lifeblood of our community.

Public reports suggest that SITLA may be desiring to keep lands north of Bluff for a future solar development, which our Town Council has previously raised significant concerns about with

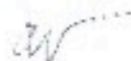
SITLA. While we support clean energy development, we contend that better locations exist for such developments. In particular, if proximity to an electrical substation is beneficial, such a substation exists just a few miles east of Bluff in an area that would not create visual or flooding concerns for anyone.

Accordingly, we request SITLA rethink retaining ownership of lands north of Bluff in Bears Ears National Monument and instead considers trading into lands more appropriate for the type of development SITLA envisions there.

Conclusion

We would welcome the opportunity to speak with you or the appropriate people on your staff regarding these matters. We believe that common-sense solutions, good operational/reclamation plans, and alternate land trades could produce a win-win for Bluff and the beneficiaries SITLA serves.

Sincerely,



Mayor Ann Leppanen

April 5, 2022

CC:

- Nada Culver, BLM Deputy Director
- Greg Sheehan, BLM Utah State Director
- Mack McDonald, San Juan County Chief Administrative Officer