

The following additional citizens have submitted the form email below. These submissions were received after the amended Mountainous Planning District Planning Commission packet was posted on the Utah Public Notice website on February 2, 2022.

Charles Huff, Laura Monroya, Verla Whippen, Eileen Barlage, Paul Kalka, Meagan Oltman, Keith Motley, Karen Collett, Carolyn Lewis, Andrew Lewis, Monique Stark, Jim Loveland, James McCloskey, Rachael Neumann, Phyllis Anderson, Jasmine Sayre, Matthew Vukin, Erik Badger, Kristy Carlson, John Barrett, Sarah Hallam, Taylor Cox, Lucy Nebeker, Whitney Brady, Ian Zalles, Terra Pace, Tina Black, Annecia Wolsey, Stephanie Shotorbani, Jadwiga Frasol, Hannah Thielges, Ellen Young, Annie Glenn, Travis Van den Broeke, David Lloyd, Meisha Thomas, Ross Miller, Tony Aversano, Alison Vallejo, Catherine Lilly, Eric Migacz, Karen Migacz, Paula Child, Carol Raborn, Jess Nutt, Jared Crocker, Magali Lequient, Sheila Walsh-McDonald, Amy Schooler, Madisyn Kohler, Leah Pelz, Austin Kohler, Debasish Nayak, Rebecka Olivares, Marie Hotta, Jane Craigo, Olivia Ward, Zach McClellan, Rachel Montague, Beth Lacarra, Audrey Morrison, Emily Mecham, Katherine Meyr, Johanna Purdy, Sean Berry, Robin Shea, Courtney Rada, Deb DenBraber, Megan Dingman, Jacee Andersen, Jamie Lyon, Haley Danylchuk, Casey Sanders, Margaret Paydar, Katelyn Smith, Maya Parsons, Natalie Green, Sean Erickson, Ian Ehrlich, Natasha Crocker, Rob Lea, Catherine Anderson, Dane Taylor, Sharon Mancini, Thomas Grant, Charlotte Localio, Regan Leavitt, Taylor Wagner, Danielle McGuire, Andrea Fredrick, Jake Davies, Megan Christensen, Emily Draper, Suzie Ellison, Caroline Gleich, Eliza Smith, Michael Margolies, Steven Breitling, Sarah Hancock, Juli Gerritsen, Noah Horvath, Kalie Kocherhans, Kirtly Maxfield, Patrick DePaulis, Tracie DePaulis, Mary Paul, Rosie Grant, Kelley Mills, Lisa Mills.

Form email submitted by above list of citizens

Dear SLCo MPD and Commission Wendy Gurr,

Dear Salt Lake Co. Mountainous Planning District and County Planning Commissioners,

Adding a mine within the most densely populated area of our state that already struggles with poor air quality and sensitive water resources is a reckless action jeopardizing the health and frankly, the economic future of our state. To this end, I support the leadership of Salt Lake County's Mountains Planning District and the Salt Lake County Planning Commission to amend the Forestry and Recreation Zones.

I support the following revisions of Salt Lake County Ordinances:

Prohibit the uses of "mineral extraction and processing; mine; quarry; gravel pit; including crushers or concrete batching plants used in connection with and as part of an operation for the removal of sand, gravel and/or rock aggregate in the Forest Recreation Zone and in the Foothills and Canyons Overlay Zone."

Establish a process for the County planning director to decide whether or not a use not listed is prohibited or related to a conditional or permitted use in the relevant ordinances.

A 600 plus acres mine, or any industrialization of the Wasatch's watershed is inconsistent with the values of our communities. It threatens our water, ecosystems and quality of life. I applaud this proposed revision of the ordinance that will speak loudly on behalf of all that depend upon and value the Wasatch Range.

Thank you for your time and attention.

The following additional citizens submitted the form email and added the following additional comments:

Linda Rauter

Our daughter lives in Herriman. We have greatly appreciated the beautiful wilderness areas so near to her home. The mountains are beautiful and provide habitat for large numbers of wildlife. When the proposal to permit a huge mine in Parley's Canyon came to my attention, I was horrified. Likewise the proposal for a gondola in Cottonwood. These proposals are not progress, they are devastation.

Bill Rice

I am horrified to learn of the size and scope of the proposed new limestone quarry in Parley's Canyon.

Paul Steinman

It is almost nauseating to imagine the destruction of an entire mountainside in our backyard. We must prevent these people from destroying such a large portion of Salt Lake City's greatest treasures -- the Wasatch range.

David Rasmuson

I think that we shouldn't have a mine so close to where we live and recreate. Please stop the parleys mine.

Julie Williamson

As a local physician and Salt Lake resident, I am against the proposed mine in Parleys canyon for both the physical and mental health of our community.

Teresa Fuster

A 600 plus acres mine, or any industrialization of the Wasatch's watershed is inconsistent with the values of our communities. It threatens our water, ecosystems and quality of life. I applaud this proposed revision of the ordinance that will speak loudly on behalf of all that depend upon and value the Wasatch Range. Our communities and future selves will be so proud of these revisions and actions to protect parleys both as a beautiful place, but also a staple to our home!

Osman Sanyer

With expected population growth in the Salt Lake Valley, recreation areas will come under increasing pressure. Allowing another mining operation at a valley entry point will result in further degradation of our air, water, and recreational resources. At some point the Salt Lake Valley will become an industrialized waste pit. This is the moment to create regulations to prevent that continuing degradation.

Olivia Webb

The proposal of this mine is not only something the people of Salt Lake oppose vehemently, but it is an unsustainable solution to our state's quickly growing population that only serves those who would profit greatly from a limestone quarrying project in one of the dearest canyons to many Utahns. I am writing to express my support for the leadership of Salt Lake County's Mountains Planning District and the Salt Lake County Planning Commission to amend the Forestry and Recreation Zones. To me, this

seems like a further step in the process of parceling and selling our precious wilderness and recreational resources that has become commonplace in Utah. After a mining project has destroyed this land, we will not be able to restore it.

Mark Baer

It does seem - at least to this observer - that this situation is similar to other 'projects' where the developer threatens enormous development in a play to get the land bought back and 'retired' at a huge premium. Why else would this project be considered on such a grand scale up front rather than starting smaller (like most projects) and then seeking expansion? Essentially, this looks like severe leverage bordering on exploitation. Do you really want to be akin to this?

Jamie Goetz

In short, I am urgently asking you to NOT allow for mining in Parleys Canyon.

As an Indigenous person, too many times our voices go unheard and our actions unseen. Do not continue the trend of raping indigenous lands across the United States.

Casey Jacketta

In addition, as a mother with a child with asthma & as a seasonal/inversion induced asthma sufferer myself I'm extremely concerned about the additional pollution and reduction in air quality in the valley this mining activity will cause.

SAVE PARLEYS CANYON

A developer is seeking permit from Utah Division of Oil, Gas and Mining (DOGM) to excavate part of lower Parleys Canyon in the FR-20 zone into an enormous (634 acre) gravel and limestone pit.¹ If approved by DOGM, Salt Lake County will then have to decide on granting a conditional use permit for this gravel pit.

- This quarry would eventually be over 50 times the size of the existing 11.2-acre Harpers gravel pit.
- The excavation process would operate over the next 100 years.¹
- Damage from blasting and hauling materials away from the site would leave a large permanent scar.¹

WHY SHOULD OFFICIALS REVISE THE COUNTY'S CONDITIONAL USE ORDINANCE FOR THE FORESTRY AND RECREATION ZONE (FR-20) TO EXCLUDE LARGE SCALE OPEN PIT EXCAVATION AND MINING?

LARGE SCALE OPEN PIT EXCAVATION AND MINING IS NOT CONSISTENT WITH SL COUNTY'S FORESTRY & RECREATION ZONE (FR-20)

- The purpose of FR-20 is to assure that "development is compatible with the protection of the natural and scenic resources of these areas for the continued benefit of future generations."²
- This activity is also inconsistent with the Wasatch Canyons General Plan and the Salt Lake County Resource Management Plan.³
- Much of the remaining undeveloped private property between Parleys Canyon and the southern slope of Little Cottonwood Canyon is surrounded by existing or proposed natural conservation areas.⁴
- Large-scale excavation would destroy the known habitat of elk, moose, black bear, mountain lion, golden eagle and other species.⁵

A REVISION WILL PROTECT SL COUNTY'S AIR QUALITY BY LIMITING THE GENERATION OF FUGITIVE DUST WHICH IS WEAKLY REGULATED BY THE STATE OF UTAH⁶

- The state only inspects gravel pits for dust control every 12-18 months and they are not required to manage their dust when not operating (e.g. at night, on weekends) or when the windspeed exceeds 25 mph.
- Dust from gravel pits carries toxins such as crystalline silica, which is a carcinogen, also known to damage lung tissue and result in chronic respiratory diseases. Residents living within a few miles of existing gravel pits frequently complain about the effects of the dust on their health and their quality of life in general.

A REVISION WILL PROTECT SALT LAKE COUNTY'S WATER SOURCES AND WATER QUALITY

- Gravel pits use large quantities of water for its operations and attempts to suppress the fugitive dust.⁷
- The excavation could very likely disrupt water tables, putting springs and wells in nearby areas at risk.⁸
- Any lapses or accidents in sediment and chemical runoff management from large scale open pit excavation and mining could seriously degrade downstream water.⁹

A REVISION WILL BE IN THE BEST INTERESTS OF SALT LAKE COUNTY'S ECONOMIC GROWTH

- The #1 reason people move to, work, and invest in Utah is our unique outdoor recreation resources.¹⁰
- The #1 reason high-tech employees in the Point of the Mountain area leave Utah is air quality.¹¹

A REVISION WILL PROTECT PROPERTY VALUES AND REDUCE FIRE RISK.

- Gravel pits substantially reduce property values permanently for nearby homeowners.¹²
- Industrial operations and heavy truck traffic increase the risk of fire not just for nearby communities, but all the residential and commercial areas immediately to the west and downwind in the Salt Lake Valley.¹³

This information is provided by a collaboration of individuals dedicated to saving Parleys Canyon.

Sources for this information are listed on the back. Website: www.saveparleys.org. Contact: info@saveparleys.org

References

1. Silver Mine Large Mining Operation Notice of Intent, Utah Division of Oil, Gas and Mining website: <https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/035/M0350054/2021/Incoming/11122021a.pdf> (Table 106.3-1 indicates that 223 acres of the quarry's bench face will not be reclaimed.)
2. http://saltlakecounty.elaws.us/code/coor_title19_ch19.12_sec19.12.010 Salt Lake County Municipal Code 19.12.010
3. Wasatch Canyons General Plan <https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan-summary-jan-2020.pdf>. Salt Lake County Resource Management Plan <https://le.utah.gov/interim/2017/pdf/00005018.pdf>
4. Central Wasatch Commission's National Conservation and Recreation Area map. <https://wildutahproject.maps.arcgis.com/apps/MapSeries/index.html?appid=5b6aad23c87240bc8f3d122c3a0203cc>
5. <https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/035/M0350054/2021/Incoming/11122021a.pdf>
Table 109.2-1
6. Western Resource Advocates <https://westernresourceadvocates.org/clean-air-water/fugitive-dust/#public-health> ; <https://westernresourceadvocates.org/clean-air-water/fugitive-dust/#regulation>
7. https://www.epa.gov/sites/default/files/2019-04/documents/mr_guidanceforapplicationfordustcontrolpermit.pdf "A rule of thumb is 1 acre-foot of water (325,851 gallons) per acre of land."
8. http://wccwrpc.org/HydraulicImpacts_DNRreport.pdf
9. <https://files.dnr.state.mn.us/publications/waters/hdraulic-impacts-of-quarries.pdf>
10. <https://static1.squarespace.com/static/591a01ebcd0f68629f40385f/t/60eddbf56d720f75fb60531f/1626201077655/2018+Outdoor+Partners+Report+UPDATE+7-21.pdf>
11. <https://www.deseret.com/2018/12/19/20661428/what-s-stopping-utah-s-legislature-from-solving-the-air-pollution-problem-inside-the-politics-of-cle>
12. <https://www.plumasnews.com/letter-to-the-editor-the-effect-of-sand-aggregate-mine-on-property-values/> ; http://crushthequarry.org/index.php?option=com_content&view=article&id=63:property-values-decrease-when-a-quarry-is-built&catid=67&Itemid=261
13. <http://www.g-a-l.info/ForestFireReport.pdf>



SAVE PARLEYS



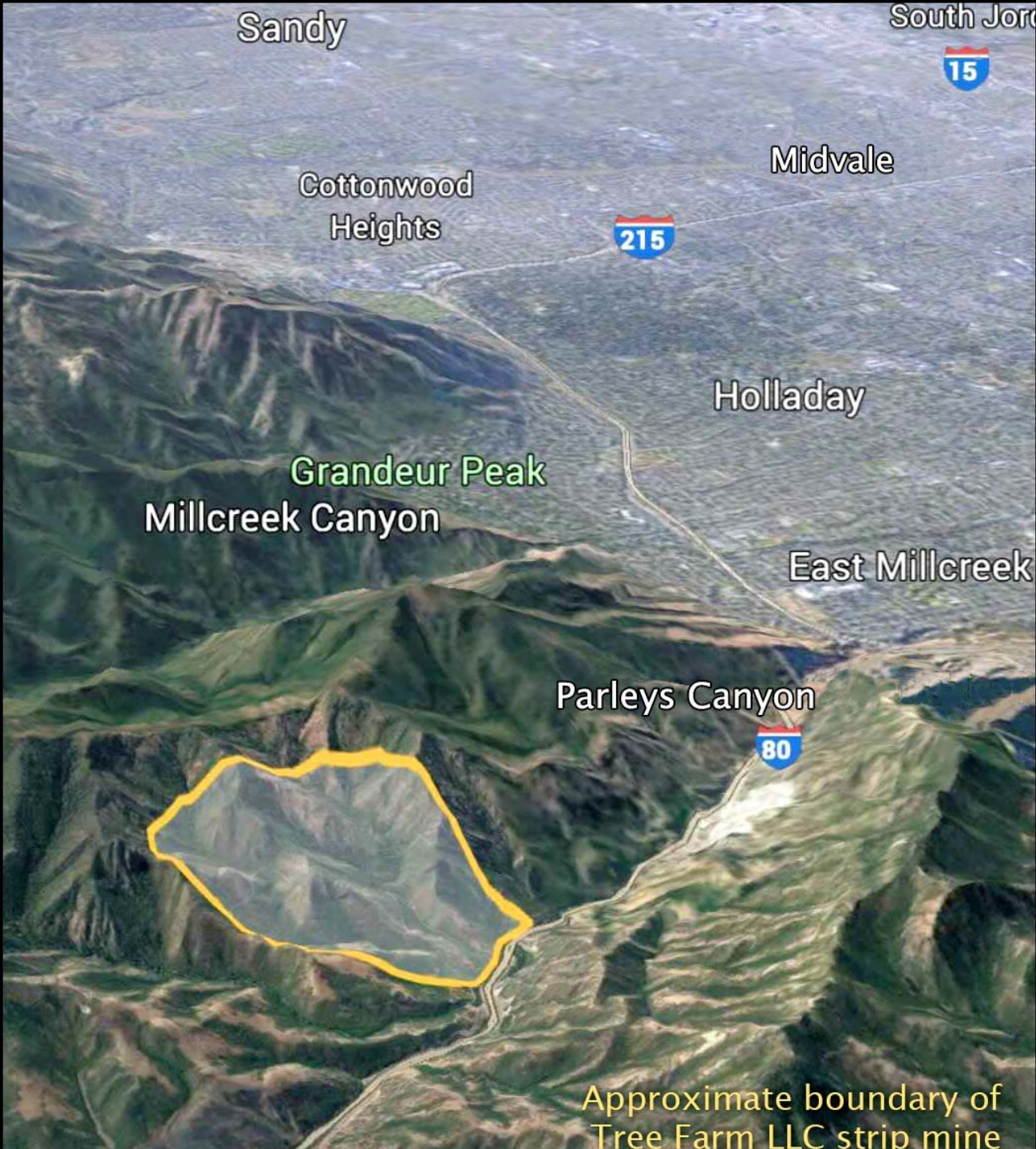


Save Parleys Organization

<http://saveparleys.org>

Mission

Save, Protect, and Preserve the Mountains and Wilderness Lands in Parleys Canyon and the Wasatch Front



**Do you know
about the major
open-pit mine
proposed for
Parleys Canyon?**

**Now know as:
I-80 South Quarry**

Background

Nov 24 To the surprise of residents and communities along the Wasatch Front, the Salt Lake Tribune published an article regarding an application filed with the Department of Oil, Gas, and Mining (DOGM) for both a small mining (<20-acre) and a large mining (634-acre) limestone quarry operation located approximately three miles from the mouth of Parley's Canyon.

Dec 7 DOGM issued a denial letter for the Small Mining Operation (SMO), citing Tree Farm's long-term intent is for a Large Mining Operation (LMO).

Dec 10 The Salt Lake County Council began formal proceedings to amend ordinances to the Salt Lake County Code to prohibit mining in Forestry and Recreation Zones (FR) and Foothills and Canyons Overlay Zones (FCOZ).

Dec 15 DOGM issued a letter of Action Items to Tree Farm, LLC regarding the proposal for the Large Mining Operation.

The mine, once dug out, blasted, and hauled away will permanently scar the mountainside. It will leave residents, recreationists, travelers, and wildlife to live with degraded mountain habitat, water, and air quality.



ARTIST'S RENDITION - BEFORE



ARTIST'S RENDITION - AFTER

About the Proposed Mine

- Total disturbed area would cover up to 634 acres. (One square mile is 640 acres.)
- Expected life of the mine is approximately 100 years.
- To provide a sense of scale: The 116-year-old Bingham Copper Mine covers 1,900 acres. This proposed mine would be nearly one-third that size – an opposing and permanent scar carved into the mountainside.
- The 11.2 acre Kilgore/Harper quarry mine, operating nearby since 1991, is a mere 1.7% the size of the proposed mine.
- The size and scope of the proposed mine make it the largest mining operation within the Wasatch Front since the Point of the Mountain quarry began in 1974.
- Historically these mines cause increased air and dust pollution, which would affect the Salt Lake Valleys residents, businesses, schools, and public open land for decades.

Potential Impacts

- Parleys Canyon is a protected watershed. Up to 20% of SLC drinking water comes from Parleys, and nearly 60% comes from the Wasatch Mountain watersheds.
- Dust on snow threatens premature melting of snowpack – nature's natural reservoir.
- Two watershed reservoirs, located 1.5 and 3 miles from the mine site, are threatened by contamination, increased sedimentation, and turbidity which risks warmer water and the likelihood of algal blooms.
- Unhealthy respirable dust from the mine, carried downwind, could affect tens-of-thousands of homes and businesses along the East Bench.
- Family residences are located as close to one-quarter mile, and thousands of homes reside within a four-mile radius (E. Sugarhouse, Canyon Rim, Millcreek City, Mt Olympus, and Emigration Canyon).
- An embarrassing eyesore that would be visible to millions of visitors to our city and resort towns. ("Utah, a Pretty, Great State.")

Potential Impacts, continued

- Increased semi-truck traffic along 1-80, estimated at over 140 trucks / 280 trips per day at peak operations.
- Heightened risk of wildfire due to increased mining and trucking operations.
- Increase pollution, including air, dust, water, noise, light and diesel emissions.
- Increased potential of avalanche and rock slides from blasting and crushing operations could threaten homes and outdoor recreation activities
- Destruction to landscape and ecology, and loss of wildlife habitat.
- Nearby Harper quarry has a poor track record of fugitive dust control, and was denied expansion by a Utah Supreme Court ruling in 2004.
- This region of Parleys Canyon is zoned as Forestry and Recreation (FRZ), meant to only allow development that is compatible with the scenery and natural resources of the area.

THIS IS EVERYONE'S BACKYARD SAVE OUR CANYONS



View of northeast slope of Grandeur Peak, looking over Mount Aire Peak.

How you can help

We need individuals, organizations, businesses and governments to engage

1

Send a letter in advance of the Feb. 3 Mountainous Planning Commission and Feb. 16 Salt Lake County Planning commission meetings: wgurr@msd.utah.gov

2

Attend a public hearing. Upcoming SL County Planning Commission public meetings:
Thu, Feb 3rd @ 4:00 pm
Wed Feb 16th @ 8:30 am Details at: saveparleys.org/take-action/

3

Email your legislators and local officials to enact meaningful changes to laws and ordinances to help us prevent degradation of land, water and air resources.

Details at: saveourcanyons.org/resources/contact-your-elected-leaders

Get Involved and Let Your Voice Be Heard

Please join us in the fight to protect our Wasatch Front canyons

- For more information visit us at saveparleys.org
- Follow the news at saveourcanyons.org/the-latest
- We can be reached by email at info@saveparleys.org
- Follow us on social media & get your friends and community engaged
[Twitter](#) | [Instagram](#) | [Facebook](#)



02/02/2022

Wendy Gurr
Salt Lake County Mountainous Planning District
Planning Commissioners
State of Utah
wgurr@msd.utah.gov

Re: Tree Farm, LLC, Notice of Intention to Commence Mining Operations

Dear Ms. Gurr,

I am writing to you regarding the recent Notice of Intention to Commence Mining Operations that Tree Farm, LLC submitted to your office for consideration on November 15, 2021.

I am a member of the Richard's Family Partnership as well as an individual landowner that will be negatively impacted by the proposed mining operation. As way of background, the land that the Richards Family Partnership owns was homesteaded by our great grandfather and currently consists of about 650 acres and 27 water shares. My family and I have a deep connection to the area surrounding Mount Aire and Parley's Canyon.

With the proposed mining operation, I am extremely concerned about a the negative environmental, aesthetic, and overall value of not only my personal land holdings, but of those in the Mount Aire community.

Related to the environmental impact, Tree Farm, LLC itself states that the migratory patterns of big game in the area is likely to be significantly impacted by the proposed mine due to how narrow Parley's Canyon in combination with the proposed scale the mine will eventually attain. Utah has a unique ecosystem, and we all have a vested interest in ensuring that our wildlife is impacted as little as possible by human interference. This mine will prove disruptive to the ecosystem in the direct vicinity and potentially expanding into Millcreek Canyon. I would ask that the Department of Natural Resources complete an extensive study to ensure that the impact on wildlife is duly considered. At this point, frankly, it has not been considered properly.

The impact on wildlife migration is not the only environmental concern related to the proposed mining operation, noise, air, and water pollution are of great concern. The mine is proposing to extract minerals using blasting agents and heavy machinery. The increase in heavy traffic to haul the materials away adds to the noise pollution. The very nature of a large-scale mining operation, such as the one that is proposed, will obviously degrade the serenity and stillness that my family and countless others have come to seek in Mount Aire.

As is well documented, the Salt Lake Valley and surrounding areas rank among the worst in the world in terms of particulate matter in the air that we breathe (especially during winter months). The dust generated from a large mining operation will add to this issue at a point in time when the State is looking to reverse the issue. Do we really want to send more particulates into the air during the ski season for tourists to breath and see? Dust from operations aside, adding hundreds of haul trucks to the

roads will add to the NOx pollution that is already an issue in the area. If you ignore the health considerations of higher air pollution on all demographics, it is harder to ignore the actual economic impact of being a State that accepts and contributes to increased air pollution at the expense of one of its largest economic engines: Tourism.

Water pollution is of substantial concern as well. As the Director of Salt Lake Public Utilities has publicly stated, the Notice of Intention fails to adequately address the potential for water pollution not only in Parley's Creek, but Millcreek as well. Both waterways provide important ecological and recreational benefit. As The Director has stated, more information is needed from Tree Farm, LLC as to exactly what their plan is to mitigate creek and ground water pollution.

We need to determine whether or not the cost to our city, state, health, and overall environment is worth the increased wealth of the few. I personally do not feel the cost to our collective and personal health is not worth the cost to society.

I am pleading with you to please reject the application and Notice of Intention to Commence Mining Operations submitted by Tree Farm, LLC. It does not appear that organization has seriously and properly considered the potential impacts that this operation would have on the area. Please help protect what makes Utah great, the natural beauty of our canyons.

Respectfully,

Jill VomDorp

A black rectangular redaction box covering the signature area.

February 1, 2022

Salt Lake County Mountainous Planning District Planning Commissioners
Salt Lake County Planning Commissioners
State of Utah
Attn: Wendy Gurr (wgurr@msd.utah.gov)

RE: Comment Letter regarding Parleys Canyon Proposed Mine:

- MDP Public Hearing on Thursday, February 3, 2022 at 4:00 PM
- Salt Lake County Planning Commission Public Hearing on Wednesday, February 16, 2022 at 8:30 AM

Dear Salt Lake County Mountainous Planning District and County Planning Commissioners,

I am a partner in the Richards Family Partnership which owns 664 acres of property directly adjacent east or near the land on which the proposed open-pit quarry is intended. I also own a cabin in Mount Air Canyon, which has been a big part of my entire life. I'm writing to you to convey my concerns and opposition of Tree Farm, LLC's proposal to commence mining on its property located in Parley's Canyon.

My Great Grandfather homesteaded Mount Aire and our property has been in the Richards Family for well over 100 years. I am very much emotionally and financially invested in the Mount Aire community. My concern is that by allowing another open-pit mine to commence operations in Parley's Canyon, it would be devastating not only for the Mount Aire community, but for the large community that surrounds the area. Additionally, there are numerous environmental and health concerns that need serious consideration prior to granting Tree Farm, LLC permission to proceed with the proposed mine.

Open pit mining operations are devastating to the environment because it exposes dangerous chemicals buried in the Earth's crust. Quite simply, limestone cannot be mined without impacting the environment in a negative way. An open-pit mine will cause vibrations and explosions, land degradation, sinking and landslides, water pollution (toxic water), occupational noise pollution, and harmful air pollution which can lead to health-related problems, including loss of biodiversity. The dust, noise, and shaking alone will have a tremendous negative impact on the Mount Aire community as well as Millcreek and other Salt Lake and Summit County residents. There are too many harmful and unknown factors that could potentially affect the environment by allowing a large limestone quarry. If this project is approved, the beauty of Parleys Canyon and the wildlife will be greatly disturbed.

Furthermore, Tree Farm, LLC has not adequately described how it will ensure that water pollution is mitigated. As per the Director of Salt Lake City Utilities:

"...sediment from the operation could be washed into Parleys Creek, which flows through an open channel through much of the city, including Sugar House Park. The director of Salt Lake

City's Department of Public Utilities, Laura Briefer, said she plans to examine the proposal and identify issues of concern. "We feel we need more information. One [concern] is water quality from the proposed activities. While it's not upstream from our drinking water sources, it is upstream from the city," Briefer said. "We read through the report. It doesn't really take into consideration downstream water-quality issues except to say they are going to put BMTs [best management practices] in place to mitigate the migration of any pollutants or sediments. It doesn't talk about long-term degradation" Groundwater could also be impacted by the mining operations, which could have hydrological connection with Mill Creek Canyon to the south, she said¹"

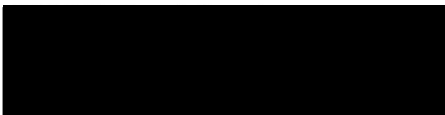
My hope is that Salt Lake County Planning Commissioners will consider my concerns as a representative of the Richards Family Partnership, a member of the Mount Aire community, and as a citizen that will be negatively impacted in Salt Lake County. It is imperative, that much consideration and investigation of all the harmful effects the mine will have not only on the wildlife population, but the health and well being of the citizens of Salt Lake and Summit Counties is needed. To allow Tree Farm, LLC to mine in this location will cause risk and damages to so many who care about this canyon and community.

In closing, I want to express how terrifying it was as a small child, traveling through Parleys Canyon with my family to get to our cabin, and being stopped while there was blasting at the existing mine on the North side of Parleys Canyon. I remember the loud noises, the shaking, and not being able to see anything outside due to the large dust plume. We were not able to travel until it was safe and there was visibility. When we arrived to open the gate at the entrance of Mount Aire Canyon, our car was completely covered with dust particles. I can only imagine the amount of dust particles and harmful pollutants that will travel with a mining operation vastly larger than the existing one I am speaking of. It would be naive to think that the dust pollutants will be contained.

I want to be clear that I am in full support of the Salt Lake County Mountainous Planning District Planning Commission moving forward to amend current codes to prevent future mineral extraction from the mountainous areas of Salt Lake County. These amendments are necessary to ensure preservation, enjoyment, and safety within our canyons and communities.

Respectfully,

Susan Trapp
Richards Family Partnership
Managing Partner



¹ Major Limestone Quarry Proposed for Parleys Canyon. Salt Lake Tribune. November 24, 2021

February 1, 2022

SALT LAKE COUNTY MOUNTAINOUS PLANNING DISTRICT PLANNING COMMISSIONERS
STATE OF UTAH

Attn: Wendy Gurr wgurr@msd.utah.gov

RE: Comment Letter regarding Parleys Canyon Proposed Mine for:

- MDP public hearing on Thursday, February 3, 2022 at 4:00pm

Dear Salt Lake County Mountainous Planning District and County Planning Commissioners,

I am a 48-year resident of Salt Lake City, a husband, and a father. I believe in personal property rights and a limited government. I love Utah and I am proud of my home state. I am writing this letter to register **my support of the proposed amendments** to Section 19.12.030 of the Salt Lake County Code, and encourage the commissioners to support it as well.

I am concerned about our mountains and the ongoing threat of industrialization. More specifically, and more immediately, I am deeply concerned about the recently-proposed "I-80 South Quarry" (aka Tree Farm Silver Mine) in lower Parleys Canyon. **I hold it up as a *perfect example of the very worst type of threat that our mountainous spaces and surrounding communities face*** unless we move aggressively to protect our treasured canyons.

Without delving into myriad concerns, I'll merely summarize that Tree Farm LLC intends to excavate 632 acres of land¹ (56 times more operating acreage than nearby Harper quarry, five times the acreage of Point of the Mountain quarry, and one-third the acreage of Bingham Copper Mine²). The proposed site is three miles up Parleys Canyon, located in FCOZ and FR-20 zone.³ The quarry would have a lifetime of 100 years.⁴ No reclamation would occur until after operations permanently cease, and even then, one-third of the property would *never* be reclaimed.⁵ Parleys Canyon is a high-visibility corridor for tourism⁶, surrounded by recreation trails⁷, home to two watershed reservoirs⁸ and source of 20% of SLC's drinking water.⁹

I present a few points that I hope the committee members will take into consideration:

- The Mountainous Planning Commission's stated goal is "to recommend policies to preserve the mountain environment, enhance the quality of living and experience, and manage uses in the mountains."¹⁰
- Explaining its *raison d'être*, the MPC website states "The Mountainous Planning District is a unique area, not like any other community in the County, in that it serves as a significant recreation resource and a major watershed. Over 5 million visits are made to this area each year. As a result, consideration should be given to the 'regional impact' of these areas and their planning should receive special treatment."¹¹
- Large-scale mineral extraction in our canyons runs contrary to the ideals encapsulated in The Mountain Accord, a good-faith effort negotiated over many years by over 20 organizations & 200 signatories.¹²
- Destructive, large-scale, mineral extraction in our canyons is not compatible with the defined purpose of the forestry and recreation zones in SL County.¹³

- Permitting large rock quarries to operate in our canyons does not respect the purpose of FCOZ.¹⁴ Rather, the process *obliterates* the environment, and *disregards* public interest, for the benefit of a sole commercial entity.
- A large quarry in our canyons is discordant with the stated vision of the Wasatch Canyons General Plan (WCGP).¹⁵
- A quarry in our canyons is not compatible with “one of the most important topics discussed”: Watershed protection, according to the Wasatch Canyons General Plan.¹⁶
- It should be noted that the Wasatch Canyons General Plan *expects* that the County will amend zoning ordinances as needed to ensure that the plan’s vision is met.¹⁷
- The Wasatch Canyon General Plan states that “The County will support the Utah Division of Wildlife Resources in the implementation of the Utah Wildlife Action Plan.”¹⁸
- The Utah Wildlife Action plan identifies several at-risk species¹⁹ found in our canyons, and specifically Parleys Canyon, including the Bonneville Cutthroat Trout ²⁰ ²¹ and the Golden Eagle. A quarry in Parleys could threaten²² those species.
- Federal laws from 1914 *withdrew* Parleys and other canyons from surface disposal on public land.²³ With the same goals in mind, it seems appropriate that the County restrict similar conditional use on *private land* in our canyons.
- A quarry in our canyons runs contrary to the stated goals of the The Salt Lake City Watershed Management Plan.²⁴
- In 2004, the Utah Supreme Court determined that “the allowance of a gravel pit also appears to be inconsistent with the stated purpose of the FR-20 zone...”²⁵
- SL County has already established specific zoning for gravel extraction: “The purpose of the S-1-G zone is to permit extraction of gravel and similar natural resources in the county.” ²⁶

I believe in personal property rights. However, when one owner’s property rights substantially impinge on the property rights of nearby landowners (in degradation of quality of life, dimishment of property value, a threat to air and water quality, and a risk to water rights), then there is reason for additional scrutiny. Tree Farm may argue that it has a right to do what it wants on its own property, but Tree Farm is incapable of *keeping* what it’s doing on it’s own property. The same is true of any gravel excavation project. Indeed, the regulations are written in a way so as to *allow* pollution from gravel pit operators. Our mountains are not the place for a rock quarry. Please support the proposed amendment to remove mineral extraction from conditional uses allowed, and help us to protect our city’s greatest treasure, our mountains.

Regards,
 Justin Wilde
 48-year, life-long resident of Utah
 Homeowner in Mount Aire

Endnotes

1. Tree Farm LLC's Large Mine Operation Notice of Intent ("NOI"), page 8: "Tree Farm will disturb a maximum area of 634 acres on the property." Page 39 topo map shows that mine boundaries encompass numerous ridgelines and peaks. Page 8: "It is assumed that all 634 acres will be disturbed at one time during the life of the mine." Page 42 final stage elevation map: the low end of the quarry flanks I-80, and the open pit penetrates into the south side of Parleys Canyon, clearly visible from I-80. The mine "floor" sits at 5300 ft elevation, with highwalls rising to over 7500 ft elevation, nearly a *half-mile* vertical. Per Google Maps, this massive crater will be carved approximately 1.55 miles deep into the mountainside.
<https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/035/M0350054/2021/Incoming/11122021a.pdf>
2. a. Tree Farm: 634 acres (NOI, ppg 7-8)
b. Harper quarry: 11.2 acres (per Greg Baptist)
c. Point of the Mountain quarry: 111 acres *
d. Bingham Copper Mine: 1900 acres **
* <https://fs.ogm.utah.gov/FILES/MINERALS/PERMITS/049/M0490071/2020/Incoming/01232020.pdf>,
** https://en.wikipedia.org/wiki/Bingham_Canyon_Mine
3. NOI page 28: "Tree Farm will access the site via the Mount Aire exit [132] and the UDOT frontage road along the south side of I-80"
4. NOI page 8: Lifetime of mine will be "~100 years"
5. NOI, page 13: "The size and nature of the site will not allow for concurrent reclamation... all acreage to be disturbed will be covered in topsoil and re-vegetated when mining permanently ceases at the site." Page 8: "The pit slope benches will be reclaimed at the end of the mine life." NOI, page 8, Table 106.3-1 "*Approximate Disturbed Area and Timeframe*" shows that of 634 acres, a "Bench Face area" of "223 acres" "will not be reclaimed"
6. The proposed ISQ site flanks I-80 in lower Parleys, and the crater would be highly visible from the highway in both directions. See artists' rendition "Before and After" at <https://saveparleys.org/>. NOI maps on pages 39, 42, 43.
7. https://www.alltrails.com/explore/us/utah/salt-lake-city?b_tl_lat=40.734183702876976&b_tl_lng=-111.82245548857297&b_br_lat=40.659217990953266&b_br_lng=-111.6624985840363
8. Per Google Maps, Mountain Dell reservoir is 1.54 miles away, and Little Dell reservoir is 3.16 miles away
9. "Based on the City's review of other water user claims filed by other parties in the Parleys drainage, it appears that Tree Farms water rights holdings are very limited. This leads me to the conclusion that any water right possessed by the Tree Farms and described in the Small Mine NOI and Large Mine NOI appear to be inadequate to meet the operational demands of the mine, particularly since water quality issues and dust emissions associated with the proposed mine would be reliant on a reliable source of water to mitigate. The City cannot make water available to the mine."
https://fs.ogm.utah.gov/bbooks/2022/01_Jan/Docket/2022-002_S0350053_TreeFarm/2022-002_20220125.8_SaltLakeCitysPetitionToIntervene.pdf
10. Page introduction, <https://slco.org/planning-transportation/mountainous-planning-district/>
11. Frequently Asked Questions, <https://slco.org/planning-transportation/mountainous-planning-district/>
12. "The Central Wasatch mountain range is beloved by those of us who live along both sides of its ridge line. We hike, we bike, we ski, we discover wildlife, we ramble and amble and find solitude amid one of the world's most spectacular backyards. And even as these mountains are a source of peace and spiritual renewal, they are also our source for water and, literally, the reason life is possible in Utah's arid climate." <https://cwc.utah.gov/mountainaccord/>
13. "The purpose of the forestry and recreation zones is to permit the development of the foothill and canyon areas for forestry, recreation, and other specified uses to the extent such development is compatible with the protection of the natural and scenic resources of these areas for the continued benefit of future generations."
https://library.municode.com/ut/salt_lake_county/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.1255FRFRFRERFOREZO
14. Chapter 19.72 - Foothills and Canyons Overlay Zone
https://library.municode.com/ut/salt_lake_county/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.72FOCAOVZOFC
15. "The visioning effort identified as top priorities[:] protecting the qualities that collectively characterize the Canyons and celebrating the area's natural significance."

"Wasatch Canyons General Plan Update, Chapter2: Parleys Canyon", page 24

https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

16. "One of the most important topics when discussing the Wasatch Canyons is watershed protection. The lakes and streams in the Wasatch Canyons provide over half of the drinking water for people in Salt Lake City, Cottonwood Heights, Holladay, Millcreek and parts of unincorporated Salt Lake County. The Wasatch Canyons are home to some of the cleanest water sources in the nation. It is common in many cities and towns for the water to travel hundreds of miles to reach residents' faucets, but Wasatch Canyons water can take less than 24 hours to reach your glass."

"Wasatch Canyons General Plan Update, Chapter2: Parleys Canyon", page 28

https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

17. "The County will consider the need to periodically update County ordinances related to development siting, access, floodplains, water protection, and the structural design of buildings to ensure that health and safety requirements and the General Plan Vision and County goals are being met."

"Wasatch Canyons General Plan Update, Chapter2: Parleys Canyon", page 42

https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

18. "Wasatch Canyons General Plan Update, Chapter2: Parleys Canyon", page 46

https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

19. "Utah Wildlife Action Plan, 2015-2015", "Species of Greatest Conservation Need - Introduction and Table"

https://wildlife.utah.gov/pdf/WAP/Utah_WAP.pdf

20. "The Bonneville Cutthroat Trout (BCT) is listed as a "Tier I Conservation Species" by the State of Utah, as a "Sensitive Species" by the US Forest Service, as a "Rangewide Imperiled (Type 2) Species" by the Bureau of Land Management, and as a "Vulnerable Species" by the State of Idaho." "Bonneville Cutthroat Trout"

WesternNativeTrout.org, Updated Jan 2018

https://westernnativetrout.org/wp-content/uploads/2018/03/BonnevilleCT_WesternNativeTroutStatusReport_UpdatedJanuary-2018.pdf

21. "The Canyon creeks harbor rainbow, brook, Bonneville cutthroat trout, and brown trout, all the result of stocking programs in streams and surrounding lakes"

Wasatch Canyons General Plan, Wildlife, page 15

https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

22. NOI, page 23: "Figures 10 and 11 show two potential golden eagle nests on cliffs in the project boundary. It is unknown how recently these nests have been used"...

23. "Federal laws that are specifically applicable to the Wasatch mountains are a Public Law of 1914 (30 Stat. 714, Public Law 199, September 19, 1914), withdrawing lands from surface disposal for City Creek, Red Butte, Emigration, and Parley's Canyons and a Public Law of 1934 (48 Stat 808, 809 Public Law 259, May 26, 1934), reserving additional lands from mining and mineral patents in Millcreek, Big Cottonwood, and Little Cottonwood Canyons to protect the municipal water supply."

"Salt Lake County Resource Management Plan July 2017," page 66

<https://le.utah.gov/interim/2017/pdf/00005018.pdf>

24. "The management emphasis prioritizes water quality first and multiple use of the watershed second. The Wasatch Canyons are protected to maintain a healthy ecological balance with stable environmental conditions, healthy streams and riparian areas, and minimal sources of pollution. Existing and potential uses that could lead to the deterioration of water quality are limited, mitigated, or eliminated."

"The Salt Lake City Watershed Management Plan", 1999, Page 4

<http://www.slcdocs.com/utilities/PDF%20Files/slcwatershedmgtplan.pdf>

25. "The allowance of a gravel pit operation also appears to be inconsistent with the stated purpose of the FR-20 Zone, which is 'to permit the development of the foothill and canyon areas of the county for forestry, recreation, and other specified uses to the extent that such development is compatible with the protection of the natural and scenic resources of these areas for the continued benefit of future generations.' Salt Lake County, Utah, Code § 19.12.010. The considerable damage that would necessarily result to both the natural and scenic resources from any gravel pit operation would be inconsistent with this purpose."

Justia US Law, "Carrier v. Salt Lake County"

<https://law.justia.com/cases/utah/supreme-court/2004/carrie112304.html>

26. SL County code, Zoning, Chapter 19.42

https://library.municode.com/ut/salt_lake_county/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.42GREZO_19.42.010PUPR

From: [Tod Young, former Planning Commissioner, SLCo](#)
To: [Wendy Gurr](#)
Subject: No Mine. Prohibit Mineral Extraction in Forestry and Recreation Zone.
Date: Wednesday, February 2, 2022 9:13:28 PM

Dear SLCo MPD and Commission Wendy Gurr,

Dear Planning Commissioners of Salt Lake County and the Mountainous Planning District:

I support the leadership of the Planning Commissions to amend the Forestry and Recreation Zones.


I strongly support and recommend the following revisions of Salt Lake County Ordinances:

"Mineral extraction and processing; mine; quarry; gravel pit; including crushers or concrete batching plants used in connection with and as part of an operation for the removal of sand, gravel and/or rock aggregate in the Forest Recreation Zone and in the Foothills and Canyons Overlay Zone shall be prohibited," and

Establish a process for the County planning director to decide whether or not a use not listed is prohibited or related to a conditional or permitted use in the relevant ordinances.

Industrialization, existing or proposed, of the Wasatch's watershed is inconsistent with the values of our communities. It threatens our water, ecosystems and quality of life. I applaud this proposed revision of the ordinance that will speak loudly on behalf of all that depend upon and value the Wasatch Range.

Thank you for your time and attention.

Sincerely,
Tod Young, former Planning Commissioner, SLCo

Sandy (Granite), UT 84092

From: [Jeff Myers](#)
To: [Wendy Gurr](#)
Subject: Parley's Canyon
Date: Thursday, February 3, 2022 10:06:53 AM

Dear Ms. Gurr,

We strongly oppose the proposed new mine in Parley's Canyon. We live nearby in SLC and recreate on the canyon.

Thanks you,

Jeff & Xochitl Myers



SLC 84108

Sent from my iPad

From: [Studio PK](#)
To: [Wendy Gurr](#)
Subject: Parleys canyon quarry
Date: Wednesday, February 2, 2022 11:18:13 PM

I do not support the in parleys canyon. Resources should be used to protect our environment, habitats, ecosystem, rain collection/infiltration and not destroy them.

Thank you.
Krysta Dimick

Sent from my iPhone

From: [Catherine Raney](#)
To: [Wendy Gurr](#)
Subject: Public Comment Letter - 180 Quarry
Date: Wednesday, February 2, 2022 6:47:00 PM

Dear members of the Mountainous Planning District Commission,

I'm writing to ask you assure the proposed amendments to Sections 19.12.030, 19.72.190, and 19.76.030 of the Salt Lake County Code to prevent any new mining or industrial excavation activity in the Wasatch canyons and foothills and recommend their approval. The proposed mine is 634 acres and almost 1500 feet deep, making it one of the largest mines within the Wasatch front and certainly the closest to our capital city.

This mine would go against the stated value of the Forest and recreation zones to protect the natural and scenic resources of the areas for continued benefit of future generations. It will displace wildlife, endanger our air and water quality, limit recreational opportunities and permanently change the landscape of the Wasatch Mountains. (Entire ridgelines per the mining application are to be removed and will not be reclaimed.) The space of land for this mine is a major habitat for elk, moose, deer and recently bald eagles spotted, all of which will be displaced. Again going against the convenience of preserving the natural and scenic resources of the area per the forest and recreation zones and FCOZ intended purposes.

There is currently a mine within Parleys Canyon that even at its size of under 50 acres has a dramatic impact on the air quality and water resources. This new mine is 50 times (+) larger, and much closer to the water resources for that of our state's most populated city. This proposal is contrary to the foothill canyon master plan and the goals and objectives of our city and state to improve our air quality, and reduce carbon emissions.

As Governor Cox shared in his state address this past January, "Our goal should never be to grow for growth's sake. We must prioritize a quality of life that all Utahns can enjoy." I share a few takeaways from the 2021 Report for the Governor on Utah's Land, Water, and Air as prepared by the Janet Quinney Lawson Institute for Land, Water & Air at Utah State University, that I hope you will also further consider.

- Utah experienced severe and exceptional drought in 2021, especially during the early growing season, which resulted in reduced forage for wildlife and livestock. The loss of forage from drought can have long-lasting economic and ecological consequences.
- Although growth brings many benefits to the state, negative impacts of development include decreasing air quality, decreasing water quality, and loss of animal habitat.
- Utah's population and economic growth projections show water demand exceeding current reliable supply in the next two decades, unless we increase conservation and reallocate water currently used in one sector to another use.
- Environmental changes have increased the stressors on water quality. Those changes increase the transport of pollutants and reduce natural retention and filtration processes.
- Utah has significant air quality challenges, and the impact of poor air quality on Utahns' health and economy are incontrovertible.
- The demand for outdoor recreation on Utah's public lands and waters has grown

consistently over the past decade.

- *Please note gateway communities listed are Park City, Springdale and Moab. The I-80 Quarry is proposed directly within the path of Park City.*
- Outdoor recreation plays a vital role in Utahns' quality of life as well as the health of the state's economy.

Please support the changes proposed by Salt Lake County Council. As elected officials and commissions it is your responsibility to ensure the safety, well-being and quality of life of the residents of Utah. This mine has the potential to negatively impact the entire Wasatch Front now and for future generations to come.

Sincerely,

Catherine Raney Norman

From: [Valoree Dowell](#)
To: [Wendy Gurr](#)
Subject: No Mine. Prohibit Mineral Extraction in Forestry and Recreation Zone.
Date: Wednesday, February 2, 2022 8:15:26 PM

Dear SLCo MPD and Commission Wendy Gurr,

Dear Salt Lake Co. Mountainous Planning District and County Planning Commissioners,

Though I live in Minnesota now, I was born and raised in Salt Lake, with the magnificent Wasatch literally in my backyard. If it weren't for the air pollution that threatened my life, I would live there still.

So I was disappointed to learn that there are still entities looking at those mountains as commodities to be exploited and essentially destroyed.

Adding a mine within the most densely-populated area of the state, which already struggles with poor air quality and sensitive water resources, is a reckless action jeopardizing the health and economic future of the state. I know this from personal experience. After years of pollution-triggered bouts of asthma, bronchitis and pneumonia every winter, I was instructed by my physician to "find a source of reliable clean air in the winter." And I left my home in 2017.

To this end, I emphatically support the leadership of Salt Lake County's Mountains Planning District and the Salt Lake County Planning Commission to amend the Forestry and Recreation Zones.

I support the following revisions of Salt Lake County Ordinances:

Prohibit the uses of "mineral extraction and processing; mine; quarry; gravel pit; including crushers or concrete batching plants used in connection with and as part of an operation for the removal of sand, gravel and/or rock aggregate in the Forest Recreation Zone and in the Foothills and Canyons Overlay Zone."

Establish a process for the County planning director to decide whether or not a use not listed is prohibited or related to a conditional or permitted use in the relevant ordinances.

A 600 plus acres mine—or any industrialization of the Wasatch's watershed—is anathema. It threatens water, ecosystems, habitat and quality of life. In Minnesota we just recently stopped another mine, this in the watershed of the Boundary Waters Wilderness Area. Degrading our precious and irreplaceable natural assets is unconscionable, and thus I applaud this proposed revision of the ordinance that will speak loudly on behalf of all that depend upon and value the Wasatch Range.

Thank you for your time and attention.

Sincerely,
Valoree Dowell



Marine on Saint Croix, MN 55047

From: [Oskar Bates](#)
To: [Wendy Gurr](#)
Subject: We strongly oppose mining operations in Parleys canyon.
Date: Thursday, February 3, 2022 9:42:29 AM

This proposal is dangerous and wrong. We as a state need to do everything we can to protect our environment, and our water quality. I am highly concerned about the impacts of mining in the canyon on our water supply for the future. Also, seeing how Kennecott copper mine produces 40% of the valley's emissions, I am not happy about the proposal for more massive mining operations and their impact on our air quality. Let alone the further desecration of these mountains, on stolen Gosiute Shoshone lands, for the profit of a settler few. Humble yourselves and see that allowing the industrial digging of these sacred mountains is wrong.

Sincerely, concerned,

Oskar Bates

LANDBACK