

March 9, 2017

Mr. Dave Corry
Bureau of Land Management
St. George Field Office
345 East Riverside Drive
St. George, UT 84790

Re: Draft EA for the St. George Field Office's June 2017 Oil and Gas Lease Sale

Dear Mr. Corry,

Thank you for the opportunity to offer comments on the Draft Environmental Assessment (EA) for the St. George Field Office's June 2017 Oil and Gas Lease Sale. As business people who operate in Washington County, we are proud of our magnificent public lands and benefit directly when they are managed with care and thoughtful consideration for how land use decisions affect local businesses like ours, which rely heavily on tourism and outdoor recreation.

That is why we feel compelled to submit this comment letter. We are concerned that the Bureau of Land Management (BLM) has not fully evaluated the economic impacts of this lease sale and how it would impact the local business community. We are also concerned for the potential impacts of the proposed lease sale on specific recreation resources, including the Flying Monkey mountain bike trail and close-by climbing areas. Finally, we cannot but help question the merits of offering oil and gas leases in such close proximity to Zion National Park, Washington County's crown jewel and economic engine.

We were surprised to read in the Draft EA how much the BLM has emphasized the economic benefits of oil and gas drilling over tourism and recreation. To the best of our knowledge, there has not been a successful oil and gas well drilled in the general vicinity of the proposed leases in years, if not decades. Meanwhile, tourism, so much of which is driven by outdoor recreation on our public lands, has become one of Washington County's biggest job creators. We request that you conduct a more comprehensive evaluation of socioeconomic costs and benefits, particularly in regard to tourism and outdoor recreation, before moving forward with the lease sale.

We are also concerned that the BLM has not fully evaluated potential impacts on specific recreation resources. For example, the Draft EA notes that the Flying Monkey mountain bike trail runs through two lease parcels near Zion National Park. However, the BLM appears to downplay any potential impacts on users of that trail by stating that the experiences of trail users "are not dependent on pristine natural settings." Further, the Draft EA does not discuss potential safety issues related to oil and gas development in such close proximity to this popular trail. Also, the popular hiking at Toquerville Falls and rock climbing at Lamb's Knoll is near these leases and industrial activity would negatively impact those experiences.

Finally, we are deeply troubled by how close the proposed leases are to Zion National Park and the lack of protections to address potential impacts on the park. Zion is a major economic driver in Washington County, generating almost \$275 million in economic output and supporting almost 3,000 jobs in 2015. Yet, these leases are located within 1.5 miles of the park and squarely within the park's scenic viewshed. Additionally, two of the proposed leases straddle the Kolob Terrace Road, which is the primary access route to the park's western trailheads and the use of which the Draft EA describes as "heavy." And because of important timing restrictions on these leases (to protect critical mule deer habitat), drilling

would need to take place during the heart of the tourist season. There are potentially significant impacts on the park and park visitation that are not examined in the Draft EA.

We urge you to revisit this proposal and more appropriately include in your analysis potential impacts to recreational experiences and the local tourism economy. We cannot take our recreation economy for granted and we must recognize that increased industrial development near the Park, and near our trails and climbing areas will have a serious effect.

Thank you again for the opportunity to comment on the Draft EA.

Sincerely,

Desert Pearl Inn
Springdale, UT

Canyon Offerings
Springdale, UT

Zion Canyon Massage
Springdale, UT

Zion Arborist
Springdale, UT

Marcia Pierce-Rasmussen
Asst Broker at ERA Brokers
Hurricane, UT

David J. West Gallery
Springdale, UT

DeZion Gallery
Springdale, UT

Zion Guru
Springdale, UT

Flanigan's Inn
Springdale, UT

Canyon Vista Lodge
Springdale, UT

Sol Foods Supermarket
Springdale, UT

Red Desert Adventures
Springdale, UT

Hoodooos General Store
Springdale, UT

Zion Adventure Company
Springdale, UT

Deep Creek Coffee Company
Springdale, UT

Western Spirit Cycling
Moab, UT

SAW Zion
Springdale, UT

Escape Adventures
Las Vegas, NV

Zion Cycles
Springdale, UT

Magpie Adventures
Moab, UT

Coyote Industries
Springdale, UT

Rim Mountain Bike Tours
Moab, UT

Worthington Gallery
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Bit and Spur
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