



April 11, 2016

Lance Porter  
District Manager, Canyon Country District  
Bureau of Land Management  
82 East Dogwood  
Moab, Utah 84532

**RE: Public Land Solutions Comments to Moab Master Leasing Plan DEIS  
Recommendations**

Dear Mr. Porter:

We greatly appreciate all of the work that has gone into the creation of the Bureau of Land Management's (BLM) draft Master Leasing Plan (MLP) to manage oil, gas and potash development and to protect recreation resources on public lands in and around Moab. We support the draft MLP and view the plan as a critical tool for protecting the recreation economy of the Moab area while simultaneously allowing new oil, gas, and potash development in appropriate places. A strong Moab MLP that protects recreation resources on public lands is critical to 45 percent of all jobs in Grand County and our more than \$200 million local tourism and outdoor recreation economy. We are appreciative that the BLM has been working hard on this initiative and will soon release a Final Environmental Impact Statement (FEIS).

Public Land Solutions is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions. We would like to take this opportunity to reiterate our position on protecting the many important recreation assets found in the Moab MLP planning area. We have the following requests, which the BLM analyzed in the DEIS Alternative C, to protect and further enhance recreation experiences in the MLP planning area:

- Broaden the proposed "No Surface Occupancy" (NSO) stipulations for developed recreation sites, such as overlooks/viewpoints, campgrounds, and trailheads, to a 2-mile setback.
- Apply a 1-mile NSO setback from key routes, trails, climbing, canyoneering, and filming locations.
- Apply an NSO stipulation to all "special recreation management areas" and related "focus areas."
- Increase protections along the Green River for recreation opportunities, water quality, scenic values, and archeological resources by focusing development outside of Upper Ten Mile (east of the wash), Labyrinth Canyon and tributaries to the Green River at Red Wash, and Hatch Point.

- Protect both the Green and the Colorado Rivers for water quality and recreation activities by requiring development companies to apply best management practices throughout the Moab MLP planning area and apply an NSO stipulation to preclude mineral activities within public water reserves, 100-year floodplains and within 660 feet of intermittent and perennial streams, rivers, riparian areas, wetlands, water wells, and springs.

We support your detailed work on this important planning process. Eastern Utah businesses depend on the recreation assets within the MLP area and we believe this planning process is the best way to enhance and maintain both resource extraction and the recreation economy of the region.

Sincerely,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith  
Managing Director  
Public Land Solutions  
478 Millcreek Drive  
Moab, UT 84532  
[www.publiclandsolutions.org](http://www.publiclandsolutions.org)

CC: Jenna Whitlock, Utah BLM State Director  
Beth Ransel, Field Manager BLM Moab Field Office