



January 20, 2017

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**RE: Public Land Solutions Comments to San Rafael Desert Master Leasing Plan  
Preliminary Alternatives**

Dear BLM Planners,

Public Land Solutions welcomes this opportunity to provide comments to the San Rafael Desert Master Leasing Plan (MLP) preliminary alternatives. 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 have been involved at the local, regional and national level during every step of MLP planning processes in both Colorado and Utah—in particular the Moab MLP—including organizing stakeholder workshops, providing detailed comments and proposed maps during the Bureau of Land Management’s (BLM) preliminary alternatives comment period, providing presentations to local and state government, and communicating with a wide range of interested stakeholders. We have also provided scoping comments (June 17, 2016) to this planning initiative, as well as supplemental comments (August 5, 2016) recommending planning area expansion to protect valuable recreation sites located just outside of this planning area but which will be affected by this plan.

Through all of these projects we have sought to:

- Find a balanced approach for multiple uses in MLP planning areas,
- Incorporate local stakeholder input efficiently and productively, and
- Advocate for protecting and enhancing the world-class recreation assets that attract visitors and businesses now and in the future.

The San Rafael Desert MLP preliminary alternatives provide an encouraging outline for a balanced approach to oil and gas development in the MLP planning area. These preliminary concepts go a long way to accomplishing the planning objective for recreation of “providing for multiple recreational uses of the public lands and sustain a wide range of recreation opportunities and potential experiences for visitors and residents, while supporting local economic stability and sustaining the recreation resource base and sensitive resource values.”

While we appreciate the many protections afforded important recreation assets found in the planning area, such as along the Green River, there are additional areas where added safeguards

should be considered to protect recreation opportunities such as at the Robbers Roost Country just south of the planning area boundary. Also, some of the management stipulations proposed in this plan, such as viewshed protections, should be more consistent with standards in the neighboring Moab Master Leasing Plan. Finally, we believe that the planning area boundary should be expanded in a few specific areas to include important recreation experiences.

The San Rafael Desert MLP will involve approximately 525,000 acres in Utah's Emery and Wayne counties. This MLP process will enable the BLM to resolve long-standing lease protests and suspensions, bring updated analyses to potential development scenarios, address potential resource conflicts, environmental impacts and mitigation strategies, and consider a range of new conditions including prohibiting surface occupancy or closing certain areas to leasing. As with the Moab MLP, this planning initiative is good for the recreation community because it brings far more targeted consideration to protecting and enhancing recreation assets than is found in the current resource management plans governing the planning area. This landscape level approach is also very important to local communities who stand to benefit from economic aspects of providing quality recreation opportunities in and around the planning area. A strong San Rafael Desert MLP that protects recreation resources is critical to increasing the number of jobs in Emery and Wayne counties and Utah's more than \$200 million local tourism and outdoor recreation economy.

This plan will also bring much needed certainty to the oil and gas community regarding what opportunities exist and what conflicts are likely to arise under various development scenarios. We understand that the San Rafael Desert MLP will not affect valid and existing leases (nor state and private lands) and that local government will benefit from mineral lease revenues if oil and gas is found and successfully developed. This MLP will also address the interests and concerns of stakeholders who like to see stronger environmental protections to the MLP planning area.

### **Recreation in the San Rafael Desert MLP Planning Area**

We appreciate the focus in the planning alternatives on recreation assets in the planning area. In particular, the preliminary alternatives for this MLP do a good job of protecting high quality recreation experiences at the Labyrinth Canyon and Dirty Devil/Robbers Roost Special Recreation Management Areas, the Green River/Labyrinth Canyon and Horseshoe Canyon Rims, recreational focus areas, key observation points, and travel corridors. We also endorse strong management direction to preserve night skies. This landscape-wide analysis of the planning area is a significant improvement on the 2008 Price and Richfield Resource Management Plans as it will bring more critical consideration whether over the long term certain recreation areas (SRMAs, focus areas and other dispersed locations) have higher levels of protection. Indeed, many recreation focus areas and SRMA acreage are currently open to oil and gas development and we believe that the following additional stipulations should be afforded these locations to protect and enhance recreation experiences in the MLP planning area:

- 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, camping (including popular dispersed camping sites), and filming locations.
- Apply an NSO stipulation to all special recreation management areas and recreation focus areas.
- Increase protections along the Green River and San Rafael River for recreation opportunities, water quality, scenic values, and archeological resources by focusing development elsewhere.
- Require development companies to apply best management practices throughout the San Rafael Desert MLP planning area and apply an NSO stipulation to preclude mineral development 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.

One area of improvement that BLM planners should incorporate into the plan alternatives is the need for a broader view of recreation experiences and how to protect and enhance these use patterns. The Richfield and Price RMPs from 2008 acknowledge that in the planning area recreational activities include:

[c]amping, scenic driving, enjoying natural and cultural features, hiking, backpacking, canyoneering, mountain biking, horseback riding, hunting, rock climbing, boating (rafting, canoeing, and kayaking), four-wheel driving, rockcrawling, ATVing, and dirt biking, among others. Commercial outfitters provide services for many activities including hiking, hunting, four-wheel driving, ATVing, and horseback riding, among others. These commercial activities generate jobs and revenues for the counties where the activities occur.

See Richfield RMP, 35 (2008).

This breadth of recreation opportunities is not necessarily best managed through SRMA and focus area polygons and associated development stipulations, and we urge the BLM to bring a more comprehensive analysis of the recreation experience to this plan. For example, many people approach the Robbers Roost Country east of the Dirty Devil River by driving through the MLP planning area and camping on BLM lands at the head of the canyons currently open to oil and gas development. Instead of providing specific development stipulations only to SRMA and focus area polygons, the planning alternatives for this MLP need to more extensively survey the effects of increased industrial traffic in conjunction with growing recreation opportunities in the planning area (and the many high-quality recreation opportunities lying just outside the planning area) and apply an appropriate NSO or at least CSU stipulations to protection these increasingly popular recreation activities.

As noted in our previous comment letter, several important recreational assets can be found in and adjacent to the MLP planning area (see attached map). Most of these have been identified in the MLP preliminary alternatives and include: canyoneering in Robbers Roost Country, hiking and canyoneering in Horseshoe Canyon, boating on the Green River in Labyrinth Canyon, boating and canyoneering on the San Rafael River, mountain biking in and around June's Bottom and Bull Bottom, and OHV on Green River Road and to Chaffin Ranch Geyser and Trin Alcove Bend. This plan should expand its focus from just where the activities occur to analyzing the entire cycle of the recreation experience such as access roads, camping areas, hiking access portals and so forth. While this holistic approach to the recreation experience is captured somewhat in the preliminary alternatives, the draft plan can improve in this area by strengthening the development stipulations to protect the overall recreation experience.

Accordingly, we encourage the BLM to more broadly apply NSO and CSU stipulations to areas that reflect the entire experience of the recreational user who visits the planning area. This would mean applying NSO stipulations to areas currently zoned as CSU, such as along the southern boundary of the planning area, and along the travel corridors identified in Alternative B. In addition, the plan alternatives should consider both NSO and CSU stipulations the areas outside of the current planning area that we believe should be added to this plan. See below.

## **Recommended Planning Area Boundary Expansions**

### Horseshoe Canyon to Glen Canyon NRA

A glaring omission in the MLP planning area boundaries as currently constituted is the gap on the southeast side of the MLP planning area between Horseshoe Canyon and the Glen Canyon National Recreation Area boundary. A landscape level approach to this plan would include this area (currently open to leasing under the Price and Richfield RMPs) to address viewshed protections and the canyoneering opportunities found at High Spur, Water and Big Spring Canyons. Viewshed protections in the MLP alternatives are considerably weaker than in the adjacent Moab MLP where the BLM instituted broader buffers next to Arches and Canyonlands; we believe the same should be adopted for the San Rafael Desert MLP in order to make this plan truly landscape level.

### Robbers Roost/Dirty Devil Canyons

The famous Robbers Roost Country, bordering the Dirty Devil River and the existing San Rafael Desert MLP boundary, contains numerous slot canyons that are increasing in popularity (i.e., Buck Canyon, Chambers Canyon, White Roost, Ho Hum Canyon, No Man's canyon and others). This location also deserves analysis through this planning initiative and could be added by moving the existing boundary to the south. See the attached map.

### Blue John

As with the Robbers Roost Country to the west, the popular canyons found at Blue John Canyon hosts several important canyoneering slot canyons in and around Blue John Canyon (location for much of the film 127 Hours). By expanding the MLP boundary to Glen Canyon NRA and around the Robbers Roost Country, this important area could also be added to complete the landscape level planning objective of this MLP.

### San Rafael Reef Front Country

The land between State Highway 24 and the Cracked Canyon and San Rafael Reef Wilderness Study Areas contains important climbing and canyoneering areas. This premier recreation country also hosts Goblin Valley State Park, several new mountain biking trails, popular camping areas, and key viewsheds that are fundamental to all these recreation experiences. These locations are increasing in visitation especially during weekends and holidays. We urge the BLM to add this important area to the MLP planning area and protect some of the best and most popular recreation areas in Emery and Wayne counties. This can be accomplished by moving the MLP boundary west from Highway 24 to the boundary to the two WSAs.

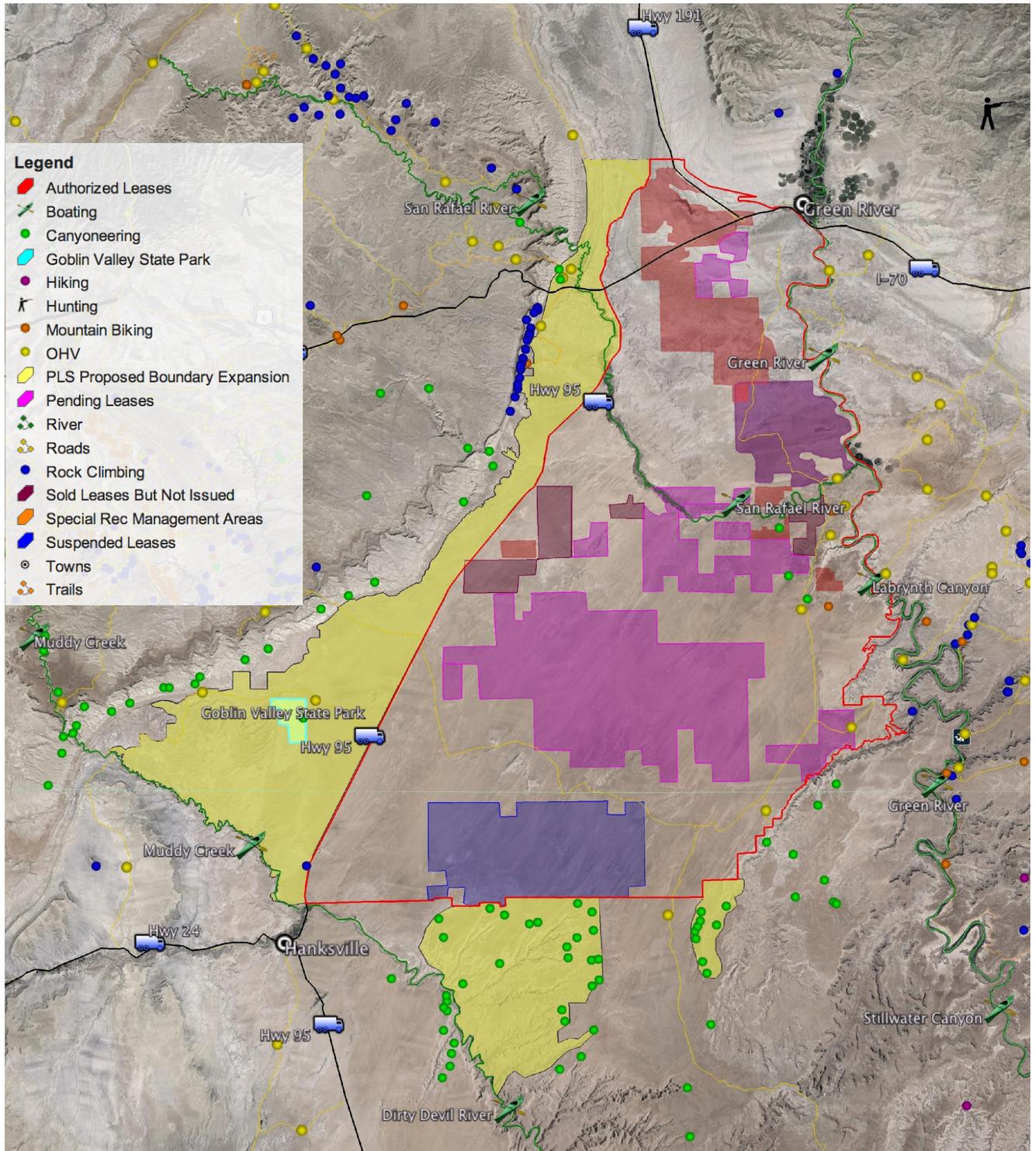
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Public Land Solutions appreciates the opportunity to comment on the San Rafael Desert Master Leasing Plan preliminary alternatives. We encourage you to consider our recommended changes, including a more comprehensive analysis of the recreation experience—instead of managing simply through SRMA and focus area polygons—and applying appropriate development stipulations that will protect and enhance the entire use patterns of various recreation activities. More complete safeguards will ensure that the recreation experience is maintained at its current high quality and that the potential for a thriving recreation economy benefiting local communities remains. As noted herein, we also recommend expanding the planning area boundary to include several high-quality recreation locations located just outside the current management boundary. Please let us know if you have any questions or comments and we look forward to working with the BLM through this entire planning process.

Best regards,



Jason Keith  
Managing Director  
Public Land Solutions



**San Rafael Desert Master Leasing Plan  
Recreation Assets, Proposed Boundary Expansions and  
Existing Oil and Gas Leases**