



November 12, 2015

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 Draft Environmental Impact Statement

Dear Mr. Porter:

Public Land Solutions welcomes this opportunity to comment on the Moab Master Leasing Plan (MLP) Draft Environmental Assessment (DEIS). 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 this MLP planning process, including organizing stakeholder workshops, providing 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 stakeholders interested in this project. Through this entire project we have sought to find a balanced approach for multiple uses in the Moab MLP planning area while advocating for protecting and enhancing Moab's world-class recreation assets that attract visitors from all over the world and support our thriving regional economy.

Public Land Solutions greatly appreciates all of the work that has gone into the creation of the BLM's draft 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. The Moab MLP will bring a new level of certainty to local and regional businesses that rely on the recreation economy as well as to oil, gas, and potash companies interested in resource extraction in the Moab area.

Public Lands Fuel a Thriving Outdoor Recreation Economy in Moab

Public lands are big business for Moab's outdoor recreation economy. Two of the nation's most iconic national parks—Arches and Canyonlands—are local to Moab and bring thousands of visitors each year into Utah. Moab's main street is bustling with visitors that have come to enjoy a broad range of recreation opportunities on lands that surround the parks including jeeping, hiking, mountain biking, climbing, and river running. In order to maintain a healthy, thriving, and diverse local economy in Moab, the BLM must protect recreation assets on and access to public lands. By enacting this MLP we can protect our parks and public lands that drive our diverse outdoor recreation economy while ensuring oil and gas drilling occurs responsibly and in the right places.

From visiting Arches and Canyonlands to biking the Slickrock Trail or rafting the Green River, opportunities abound to enjoy the Moab area's great outdoors. By attracting hundreds of thousands of visitors, public lands pump money into the local economy, sustain businesses, and create jobs. Small businesses thrive in Moab because public lands present world-class recreation opportunities at places such as Castle Valley, the Colorado River Corridor, Gemini Bridges, and Indian Creek. The stunning landscapes of Arches and Canyonlands National Parks are critical economic drivers for the local economy: according to a National Park Service report (<http://bit.ly/1hCdECx>), in 2013 national parks in the Moab area saw more than 1.5 million visits and generated over \$146.5 million in direct spending. The BLM can be a good neighbor and protect these parks through this MLP by ensuring that responsible oil and gas development and mining occurs in the right places.

Tourists and travelers spent a record \$7.5 billion in the Utah economy during 2013, generating a record \$1.02 billion in total state and local tax revenues. Recreation activities on BLM's public land in Utah generated at least \$70.4 million in economic activity in 2011 and accounted for over 900 jobs. Travel, tourism, and recreation account for 47 percent of all private employment in Grand County. About two thirds of Grand County residents say public lands are "extremely important" to their business, and over a third of families have a family member who works in tourism or recreation related a business tied to public lands.

Recreation and tourism creates permanent jobs for the Moab area. Tourism and recreation produce more revenue than drilling and mining in Grand County. In 2013, oil and gas drilling generated less than 10% of county revenues. Moreover, as we found out in the latest recession (and more recently with the price of oil below \$50/barrel), the oil and gas and mining industry is subject to booms and busts and local communities can't depend on those jobs over the long run. On the other hand, Grand County's tourism and recreation economy held strong during the recession. The tourism and recreation industry creates permanent jobs—not jobs that can be eliminated or outsourced due to variation on commodity prices.

Other economic sectors are also growing along with tourism and recreation as a result of Grand County's public lands and high quality of life. From 2001 to 2013 Grand County employment grew significantly in several areas that include high paying jobs: finance and insurance (+61%), health care (+56%), and professional and technical services (+32%)—all grew faster than the overall increase in employment (+25%). Along with tourism and recreation, these economic sectors are thriving because of the proximity of high quality natural landscapes in the Moab area, many of which provide unsurpassed opportunities for outdoor recreation.

The Moab Master Leasing Plan Strikes the Right Balance Between Providing Resource Extraction Opportunities and Protecting Important Recreation Assets

This Moab MLP project represents a model effort for how local communities can work with land managers to strike the right balance between energy development and the protection of public lands and a robust outdoor recreation economy. For example, in 2014 the Moab community stepped-up to work with BLM and held several stakeholder meetings that included a wide array of stakeholders. This work helped BLM identify where there is conflict between uses and where there is agreement. The BLM and everyone from the state director to the head of BLM to Interior Secretary Sally Jewell herself have participated in these stakeholder conversations.

With this planning process the BLM has set the right course by fostering collaboration, recognizing the need to strike a balance, and creating a bottom-up approach to land management. The foundation has

been built to create a plan that will benefit conservationists, the outdoor recreation and tourism industry, the oil and gas industry, and other local stakeholders.

Public Land Solutions Recommendations to Improve Draft Moab Master Leasing Plan

We understand that the Moab MLP will not affect valid and existing leases (nor state and private lands) and that existing mineral lease revenue to local government will continue; some 24 percent of the MLP area is already leased and only about 40 percent of those leases are actually developed. Accordingly, existing leases will continue to produce oil and gas via the extensive unit agreement on the Big Flat area north of Moab for decades to come. And those mineral lease revenues will continue as long as the resource holds out. However, a strong Moab MLP that protects recreation resources on public lands outside of these leases is critical to 45 percent of all jobs in Grand County and our more than \$200 million local tourism and outdoor recreation economy. Accordingly, we have the following requests 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 (Please see attached list).
- Apply a 1-mile NSO setback from key routes, trails, climbing, canyoneering, and filming locations. (specific routes listed below.)
- Apply an NSO stipulation to all special recreation management areas and related focus areas. (Listed below.)
- Increase protection along the Green River for recreation opportunities, water quality, scenic values, and archeological resources by focusing development outside Upper Ten Mile (east of the wash), Labyrinth Canyon and tributaries to the Green River, 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 work on this important planning process. Many Utahns depend on the recreation assets within the Moab MLP planning area and we believe this plan is an essential process to optimize and maintain both resource extraction and the recreation economy of the region.

Sincerely,



Jason Keith
Public Land Solutions



2-mile NSO set-back from the following developed recreation sites:

Amasa Back Trailhead	Ledge Campground Loop
Anticline Overlook	Ledge Group Area
Bartlett Campground	Lone Mesa Group Sites, A, B, C, D, E
Big Bend Campground Overflow	Lone Mesa Viewpoint
Big Bend Recreation Site	Looking Glass Rock Interp. Site
Blue Hill Trailhead	Lower Gemini Bridges Trailhead (Private)
Bridger Jack Mesa Camping Area	Mill Canyon Dinosaur Trailhead
Canyon Rims Entrance Area	Mineral Bottom River Access
Canyonlands Overlook	Minor Overlook
Cliffline Interpretive Site	Moab Brand Trails Mountain Bike Trailhead
Copper Ridge Dinosaur Tracks Trailhead	Moab Rim Trailhead
Corona Arch Trailhead	Monitor and Merrimac Trailhead
Courthouse Rock CG & Mill Canyon Dinosaur Trackway	Monitor and Merrimac Viewpoint
Cowboy Camp Camping Area	Moonflower Canyon Camping Area
Creek Pasture Camping Area	Needles Overlook
Dewey Bridge Recreation Site	Newspaper Rock
Donnelly Canyon Day Use Area	Oak Grove Campground
Drinks Canyon Recreation Site	Plateau Viewpoint
Fisherman's Point Beach Access	Poison Spider Mesa Trailhead
Gold Bar Campground	Potash Boat Ramp
Hal Canyon Campground	Sandy Beach River Access
Hamburger Rock Campground	Shay Mountain Vista
Hatch Point Campground	Superbowl Campsite
Horsethief Campground	Takeout Beach River Access
Hunter's Canyon/Spring Camping Area	Trough Springs Canyon Trail Trailhead
Indian Creek Falls Group Campsite	Upper Big Bend Camping Area
Jaycee Park Campground & Portal Trail	White Wash Campground and Trailhead
Kane Creek Trailhead	William's Bottom Camping Area
Kings Bottom Campground	Wilson Arch
Ledge Campground Loop	Windwhistle Campground

1-mile NSO set-back from the following routes and trails, climbing, canyoneering sites, and filming locations:

Trails

Klondike Bluffs bicycle trails	Kokopelli's Trail
Bar M bicycle trails	Hunter Canyon hiking trail
Porcupine Rim trail	<u>Jeep Routes</u>
Magnificent Seven/7 Up bicycle trail systems	Metal Masher (Arth's Rim) jeep route
Ahab bicycle trails	Gold Bar Rim jeep route
Lower Monitor and Merrimac bike trail	Golden Spike jeep route

Poison Spider jeep route
 Cliffhanger jeep route
 Chicken Corners jeep route
 Top of the World jeep route
 Moab Rim jeep route
 Behind the Rocks jeep route
 Kane Creek jeep route
 Lockhart jeep route
 Seven Mile Rim jeep route
 Secret Spire jeep route
 Jug Rock Equestrian Trail System
 Jewel Tibbets hiking trail
 Trough Springs hiking trail
Climbing & Canyoneering
 Indian Creek
 Wall Street
 Ice Cream Parlor
 The Tombstones of Kane Creek
 Needle Rock (Tombstone)
 Long Canyon/Day Canyon/Culvert Canyon
 Cameltoe Canyon

Granary Canyon
 Rock of Ages
 Repeat Junior
 Winter Camp Slot
Filming
 Needles Overlook
 Colorado River corridor and Corona Arch
 Green River Canyon
 Kane Creek corridor
 Looking Glass Rock
 View from Dead Horse Point
 Potash Road/Shaffer Basin (including Fossil Point)
 Long Canyon
 Highway 211 (including Newspaper Rock)
 Highway 313
 Monitor and Merrimac/Determination
 Towers/Mill Canyon
 Gemini Bridges
 Jewell Tibbetts Arch
 White Wash

NSO stipulation applied to all Special Recreation Management Areas and Focus Areas:

Canyon Rims SRMA
 Labyrinth Rims/Gemini Bridges SRMA
 South Moab SRMA
 Indian Creek SRMA
 Dolores River Canyons SRMA
 Hatch Wash Hiking and Backpacking Focus Area
 Needles and Anticline Roads Focus Area (Utah Scenic Backways)
 Bar M Mountain Biking Focus Area
 Bartlett Slickrock Freeride Mountain Bike Focus Area
 Gemini Bridges/Poison Spider Mesa Focus Area

Colorado Riverway SRMA
 Goldbar/Corona Arch Hiking Focus Areas
 Klondike Bluffs Mountain Biking Focus Area
 Labyrinth Canyon Canoe Focus Area
 Mill Canyon/Upper Courthouse Mountain Biking Focus Area
 Mineral Canyon/Horsethief Point Competitive BASE Jumping Focus Area
 Seven Mile Canyons Equestrian Focus Area
 Spring Canyon Hiking Focus Area
 Tusher Slickrock Mountain Biking Focus Area
 Behind the Rocks Hiking Focus Area
 24 Hours of Moab Mountain Biking Focus Area