



October 20, 2017

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Re: Public Land Solutions Comments to Farmington Oil and Gas Lease Sale, March 2018 Environmental Assessment DOI-BLM-NM-0000-2017-0006-EA

Dear BLM Planners,

Thank you for the opportunity comment on the Farmington Oil and Gas Lease Sale, March 2018 Environmental Assessment DOI-BLM-NM-0000-2017-0006-EA.

Public Land Solutions writes today to urge you to reconsider the March 2018 Bureau of Land Management (BLM) Farmington Field Office oil and gas lease sale and more carefully analyze how oil and gas development in the region may negatively affect the regional recreation economy, including cultural tourism in the Chaco Canyon area. Specifically we are concerned the BLM did not adequately analyze the negative impacts of leasing parcels 18, 20, 21, and 29 to the cultural tourism of the Greater Chaco area.

Public Land Solutions (PLS) 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 Bureau of Land Management planning and permitting proposals related to oil, gas, coal and potash developments. Our advocacy efforts to protect and enhance recreation assets on public lands include organizing stakeholder workshops, providing detailed comments and proposed maps during BLM comment periods, providing presentations to local and state government, and communicating with a wide range of interested stakeholders.

The Farmington BLM Field Office's Environmental Assessment DOI-BLM-NM-0000-2017-0006-EA (EA) analyzes 25 proposed gas and oil leases in Northwest New Mexico totaling more than 4,400 acres. These proposed leases include eight parcels comprising 1,850 acres that are in close proximity to the Chaco Culture National Historic Park (CCNHP). In particular, we have specific concerns related to four of these parcels because of their potential negative impact to CCNHP and associated cultural tourism—impacts not analyzed by this EA. Over two dozen tribes still hold the Chaco Canyon area sacred and continue to use regional cultural sites for ceremonies and celebrations. And, as a UNESCO World Heritage Site, CCNHP represents perhaps that area's most prominent destination for cultural tourists.

Our public lands bring a wide variety of economic benefits beyond resource extraction, and they must be managed with care and thoughtful consideration for how land use decisions affect local communities over the long term. These decisions affect not just local residents and outdoor businesses, which rely heavily on visitors, but also businesses that have chosen to locate near public lands for quality of life reasons. Environmental Assessment DOI-BLM-NM-0000-2017-0006-EA fails to address the implications of this proposal on the economy of northwest New Mexico. While the EA does address the economic benefits to and from the oil and gas industry, it lacks any analysis of negative implications to any other economic segment in San Juan and Rio Arriba Counties. In the EA, the Interdisciplinary Team Checklist states that while dispersed recreation and tourism is “present” it will not be affected to a degree by this proposal, and “if a decision is made to lease, there would be no effect on recreation because the area is all classified as dispersed recreation with no designated recreations areas.” This view reflects a failure to understand how recreation activity occurs.

BLM planners should incorporate into the EA a broader view of recreation experiences and how to protect and enhance these use patterns. This breadth of recreation opportunities is not necessarily best managed only through SRMAs and focus area polygons and associated development stipulations, rather the BLM should bring a more comprehensive analysis of the recreation experience to this EA. For example, many people approach CCNHP by driving through access roads leading south and west from Highway 550—specifically where lease parcels 20, 21, and 29 are located. The EA should more extensively survey the effects of pollution and increased industrial infrastructure/traffic in conjunction with growing cultural tourism opportunities in the leasing area and remove these parcels from leasing or at least apply a stronger NSO stipulation to protect this cultural tourism experience. This EA should expand its focus from just development activities impacting CCNHP or discrete cultural resources to analyzing the entire cycle of the cultural tourism experience such as access roads, camping areas, viewing areas, and hiking areas. For more information about how the BLM can best balance energy development and recreation see our white paper “Best Practices for Balancing Recreation an Energy Development on Public Lands” at <http://bit.ly/2p4tDnt>.

Even at a basic economic level this EA fails to provide an appropriate level of analysis of the cumulative impacts of leasing on the local economy, instead delaying a more detailed analysis to “a site-specific level of analysis such as those that occur at an APD stage.” The BLM is required to take a hard look at “cumulative” impacts, including effects on “the property’s setting that contribute to its historic significance” and “visual, atmospheric or audible” effects “that diminish the integrity of the property’s significant historic features.” See 36 C.F.R. § 800.5(a)(1), (a)(2)(iv), (v). We are concerned that the BLM has not fully evaluated the cumulative economic impacts of this lease sale and how it would impact future growth opportunities in the local business community.

The EA notes that “standard terms and conditions, lease stipulations listed in the BLM FFO RMP (as amended), and BIA stipulations per Navajo Area BIA Surface Management Agency Lease Stipulations for Federal Oil and Gas Lease Offerings would apply” to these leases. However, the 2003 RMP governing lease stipulations for this area is largely outdated, and in fact did not even consider the impacts caused by hydraulic fracturing and only provided a cursory look at impacts from methane emissions. These are two significant negative effects causing

widespread impacts to the San Juan Basin and are problems likely to be exacerbated by this leasing proposal.

Of significant concern to regional cultural tourism is the reputation northwest New Mexico has earned for its methane emissions from oil and gas developments. This drilling proposal presents not only environmental/health concerns due to methane emissions, but also harm to the region's brand as a world class destination for cultural tourism at Chaco Canyon. This EA fails to consider these negative impacts to the regional economy and therefore the BLM should remove the following proposed leases that fall adjacent to and around the CCNHP boundary: parcels NM-201803-018, NM-201803-020, NM-201803-021, and NM-201803-029.

We raise the following specific concerns that could impact the experience of cultural tourists and the associated economy of the Greater Chaco region.

- **018** (80 acres). This parcel is adjacent Highway 550 close to the junction to the approach road to CCNHP, and contains steep terrain. The easternmost edge of the parcel is near enough to potentially fall within the Rincon Largo District's foreground/midground zone, is entirely within the viewshed of Farmer 18 Pueblito, and is likely eligible for the National Register of Historic Places.
- **020** (320 acres). This parcel is adjacent to the approach road to CCNHP, has been found to have fragile soils resources, and contains steep terrain. The parcel is within the background zone of Bis sa'ani, and any large facilities and/or clusters of facilities should require special Best Management Practices or mitigations to reduce visual contrast.
- **021** (160 acres). This parcel is adjacent to the approach road to CCNHP and contains known water features. Large facilities and/or clusters of facilities may require special Best Management Practices or mitigations to reduce visual contrast. The parcel is within the background zone of Bis sa'ani, and any large facilities and/or clusters of facilities should require special Best Management Practices or mitigations to reduce visual contrast.
- **029** (130 acres). This parcel is adjacent to the approach road to CCNHP, is an area containing known water features, and contains steep terrain. Large facilities and/or clusters of facilities may require special Best Management Practices or mitigations to reduce visual contrast. The parcel is near enough to be within the background zone of Bis sa'ani.

The development of these parcels will damage and degrade the cultural tourism experience of visitors to CCNHP and thus limit future potential for the local economy. Over the last several decades oil and gas drilling in northwest New Mexico has released large amounts of pollution into the atmosphere, giving rise to the area's reputation as the nation's "Methane Hotspot." See "The Biggest Methane Leak in America Is in New Mexico," Scientific American, October 10, 2014 (<https://www.scientificamerican.com/article/the-biggest-methane-leak-in-america-is-in-new-mexico/>). This pollution produces regional haze, and is known to cause respiratory, nervous system, and cardiovascular complications, as well as cancer. This leasing proposal will only further harm the region's ability to diversify its economy through cultural tourism opportunities in the following ways because of this ongoing damage to the area's brand as a world class-destination for cultural tourism. Air quality issues make it nearly impossible for a destination to compete for visitor dollars or investments from other industries and businesses who will then in turn have trouble recruiting employees.

Moreover, the BLM has acknowledged that the Farmington Field Office's 2003 Resource Management Plan (RMP) is insufficient for oil and gas drilling in the Mancos Shale underneath Greater Chaco. Therefore, further analysis of water quality impacts is needed to ensure public health, and environment and cultural resource protections before this leases sale proceeds. And there is a long history of stargazing in the Chaco area; indeed in 1998 the CCNHP built a public observatory for the many visitors who come to experience the night sky in the park. This proposal stands to harm the experience of cultural tourists hoping to experience night skies.

In sum, cultural tourists eager to visit Chaco Culture National Historic Park will be much less inclined to visit the region given this reputation, and if they do come to Chaco they are less likely to return or give the place positive reviews when they experience oil and gas leasing and industrial developments adjacent to the park boundary and approach road. Given that over 90% of San Juan Basin has been leased, this leasing proposal nearest to the area most significant tourist attraction is very ill advised.

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Chaco Culture National Historic Park is an important economic driver to northwest New Mexico, with long-term growth potential. Yet, as noted above these leases have the potential to jeopardize San Juan County's cultural tourism, outdoor businesses and associated economic benefits. We urge you to revisit this proposal and analyze potential impacts to recreational experiences and the local tourism economy and remove the parcels noted herein from the March 2018 leases sale.

Thank you again for the opportunity to comment on the Farmington Oil and Gas Lease Sale, March 2018 Environmental Assessment DOI-BLM-NM-0000-2017-0006-EA.

Sincerely,



Jason Keith
Managing Director
Public Land Solutions