



July 12, 2017

Vernal Field Office.  
Bureau of Land Management  
170 South 500 East  
Vernal Utah, 84078  
[UT\\_Vernal\\_Comments@blm.gov](mailto:UT_Vernal_Comments@blm.gov)

**Re: Public Land Solutions Comments to Preliminary EA for the Green River District, Vernal Field Office December 2017 Competitive Oil and Gas Lease Sale**

Dear BLM Planners,

Thank you for the opportunity comment on the Preliminary EA for the Green River District, Vernal Field Office December 2017 Competitive Oil and Gas Lease Sale.

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 (BLM) 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. We greatly value our public lands and benefit directly when they are managed with care and thoughtful consideration for how land use decisions affect local outdoor businesses which rely heavily on tourism and outdoor recreation.

We are concerned that the BLM has not fully evaluated the economic impacts of this lease sale and how it would impact future growth opportunities in the local business community. We are also concerned for the potential impacts of the proposed lease sale on specific recreation assets and other valuable resources and we question the merits of offering oil and gas leases in such close proximity to Dinosaur National Monument, one of Uintah County's crown jewels.

In particular, we are concerned about the following proposed leases that fall adjacent to and around Dinosaur National Monument (DNM) boundary:

- Five parcels (063, 064, 069, 070, 071) fall w/in 5 miles of DNM's boundary and are near the Quarry Visitor Center as well as the Quarry Exhibit Hall and Fossil Discovery Trail.
- Eight parcels (058, 059, 060, 063, 064, 069, 070, 071) fall w/in 10 miles of the DNM's boundary.
- Parcels 065, 067 and 072 that are located approximately 18-28 miles southwest of DNM and also visible from the Visitor Center.

The development of these parcels will damage and degrade Monument resources and thus limit future potential for the local economy in the following ways:

- **Tourism.** Ample evidence suggests that the growth in oil and gas has inhibited visitation to DNM in recent years. According to the BLM, “Dinosaur National Monument (a major recreation amenity) has seen a decline in visitation of over 40 percent from 1999-2014 (1999 being the year in which Uintah County reversed years of declining oil and gas production); oil production increased over 358 percent during the same time period. During that time period, natural gas production increased over 339 percent.” (See [https://eplanning.blm.gov/epl-front-office/projects/lup/68430/87868/105214/MLP\\_FEIS\\_Chapter-4.pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/68430/87868/105214/MLP_FEIS_Chapter-4.pdf) at p. 4-106). Development of the proposed parcels near Dinosaur National Monument will significantly affect future economic prospects for the local towns and cities of Jensen, Maeser, Vernal and Naples, gateway communities that benefit from tourism and visitation to the monument.
- **Air Quality.** Air quality issues make it nearly impossible for a destination to compete for visitor dollars or investments from other industries who will then in turn have trouble recruiting employees. It is well known that oil and gas activity in the Uintah Basin, has led to wintertime ozone levels around DNM exceeding National Ambient Air Quality Standards (Preliminary EA, p. 16). These leases will further impair the region’s air quality and ability to attract diverse business investments.
- **Water Quality.** Development along the Green River and Bush Creek parcels will threaten local water quality and the recreational opportunities these waters support such as fishing and rafting. And with along with air quality, water quality issues are likely to effect the ability of the region to attract diverse industries going forward.
- **Light Pollution.** Flaring and artificial lighting from oil and gas development will compromise the DNM’s dark night skies, which are now almost entirely free of artificial light. For visitors from urban areas, night skies are a key attraction, and degrading this aspect of the outdoor experience will make the region less competitive in tourism markets.
- **Viewsheds and Soundscapes.** Development of these leases will be visible from important park viewpoints, including the Green River District Entrance Road, Quarry Exhibit Hall and the Plug Hat and Escalante Overlooks. Construction noise and operational traffic will be audible from the Canyon Visitor’s Center, the Quarry Visitor’s Center, the monument entrance road in Jensen, UT (HWY 149) and other key sites. High quality views and quiet landscapes are primary reasons that many people visit particular areas to recreate, and impeding these key values further degrades the outdoor experience, making it harder and harder for Uintah County to compete with other outdoor communities.

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Dinosaur National Monument is an important economic driver in Uintah County, with long term growth potential. Yet, as noted above these leases have the potential to jeopardize Uintah County’s 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 removed these parcels from the Utah December 2017 lease sale.

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

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