



July 31, 2018

Bureau of Land Management
Utah State Office
Attn: Sheri Wysong
440 West 200 South, Suite 500
Salt Lake City, Utah 84101
Email: blm_ut_lease_sales@blm.gov

Re: Public Land Solutions Scoping Comments to Utah December 2018 Oil and Gas Lease Sale (DOI-BLM-UT-0000-2018-0003-OTHER_NEPA)

Dear BLM Planners,

Public Land Solutions welcomes the opportunity to provide scoping comments to Utah's statewide December 2018 Oil and Gas Lease Sale. This abbreviated public process would seek to auction off approximately 329,826 acres on Bureau of Land management (BLM) lands in Utah for oil and gas leasing. The high volume of acres offered in this lease sale has not been seen in decades, includes many areas with high value recreation assets, and offers almost 100 parcels in the Uinta Basin that the Environmental Protection Agency has designated as a "nonattainment" area because the region has failed to meet standards for ozone levels. We urge the BLM to fully evaluate the economic impacts of this unprecedented lease sale and how it would impact future growth opportunities in the local business community.

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 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. Public lands are diverse economic drivers. The economics of the 21st century require thoughtful consideration regarding how land use decisions affect local economies over the long-term, both with regard to recreation assets and tourism economies and business recruitment and employee retention.

Utah has world-class national parks and recreation resources which support thousands of jobs locally and drive the State of Utah's \$12 billion outdoor recreation economy. Responsible oil and gas development also creates jobs in our community and provides important revenue to supplement the income generated by tourism and recreation. However, this massive lease sale presents a significant potential to harm recreation resources and the outdoor recreation brand of local communities affected by this lease sale. Given the investment of time and energy by so many stakeholders in Utah's public lands, it is critical that BLM defer the specific leases noted

below and implement appropriate protections, including measures designed to protect our communities' national parks, recreation resources and scenic public lands.

Specific leases offered during this December 2018 Oil and Gas Lease Sale that have particular recreation value include the following:

- **Emery County** - Parcel 257 (Keg Point Road scenic road, Green River Towers climbing, Horseshoe Canyon hiking)
- **Carbon County** - Parcels 226-228 (Price Canyon hiking and hunting)
- **Duchesne County** - Parcels 086-087 (Nine Mile Canyon cultural tourism)
- **Uintah County** - 152-156, 178-180, 209-211, 233-234 (White River boating); 261-262 (McCoy Flats mountain bike trails); 120-124, 141, 147, 157, 166-167, 169, 195-196, 318-321, 353-359 (Book Cliffs hunting areas)
- **Grand County** - Parcels 246-247, 255-256, 258-259 (White Wash Sand Dunes OHV area and hiking); 297-298 (Book Cliffs hunting areas); 246-247, 257 (adjacent to town of Green River overlooking the river)
- **San Juan County** - Parcels 277 (Canyon Rims Viewpoint), 299-300, 323-324, 360 (Indian Creek approach road, Church Rock climbing), 364-365 (Hovenweep National Monument)

To protect these and other valuable recreation assets, we urge you to defer these leases and implement the following standards when considering these leases:

- NSO stipulation for a 1-mile radius from developed recreation site boundaries
- NSO stipulation for mineral leasing within 0.5 miles of the centerline of high use routes (motorized) and trails (non-motorized)
- NSO stipulation for a 0.5-mile radius around high use climbing, mountain biking, boating and canyoneering areas
- NSO stipulation to all VRM Class II areas in Special Recreation Management Areas (SRMA)
- Apply an NSO stipulation to hiking and backpacking focus areas
- NSO stipulations to Recreation Focus Areas, and apply the Baseline CSU to the remainder of the SRMA outside of the Focus Area

Recreation is an important economic driver in Utah, with long term growth potential. We urge you to analyze potential impacts to recreational experiences and the local tourism economy from the December 2018 Oil and Gas Lease Sale.

Sincerely,



Jason Keith
Managing Director
Public Land Solutions

Utah Recreation Assets

