December 14, 2018

Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, CO 81652

Bureau of Land Management
White River Field Office
220 E. Market St.
Meeker, CO 81641

Bureau of Land Management
Grand Junction Field Office
2815 H Road
Grand Junction, CO 81506

Bureau of Land Management
Little Snake Field Office
455 Emerson St.
Craig, CO 81625

Bureau of Land Management
Royal Gorge Field Office
3028 E. Main St.
Canon City, CO 81212

Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

Re: Public Land Solutions Comments to Colorado March 2019 Oil and Gas Lease Sale:

- **Colorado River Valley/Grand Junction FOs (DOI-BLM-CO-N040-2018-0087-EA)**
- **Royal Gorge FO (DOI-BLM-CO-F020-2019-0001-EA)**
- **White River/Little Snake/Kremmling FOs (DOI-BLM-CO-N050-2018-0126-DNA)**

Dear BLM Planners,

Public Land Solutions welcomes the opportunity to comment on the Colorado Bureau of Land Management's (BLM) Statewide March 2019 Competitive Oil and Gas Lease Sale. Through this sale, the BLM is offering 26 parcels comprising 14,051.740 acres in the Colorado River Valley, Grand Junction, Royal Gorge, White River, Little Snake, and Kremmling Field Offices for oil and gas leasing in a competitive lease sale scheduled for the week of March 28, 2019.

As recreation advocates, Public Land Solutions is concerned that the BLM is ignoring potential impacts of this proposed lease sale on specific recreation assets, related socioeconomics, and other important values. Because the direct, indirect, and cumulative effects that would result from implementation of this lease sale could be detrimental to recreation opportunities and the potential for local communities to invest in a recreation economy, we urge the BLM to fully evaluate the cumulative impacts of this competitive lease sale on the recreation economy of the state and its various regions, including how these sales would impact the local business community and socioeconomics regionally. We urge the BLM to defer these leases until it conducts a hard look environmental analysis and proposes leasing stipulations or other measures to minimize/mitigate oil and gas development impacts on recreation assets and associated socioeconomics.

Public Land Solutions

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. While 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 primary focus is the protection and enhancement of recreation assets and opportunities to develop durable and robust recreation economies. 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 governments, and communicating with a wide range of interested stakeholders. Public lands are diverse economic drivers, and the economics of the 21st century require thoughtful consideration regarding how land use decisions affect local economies over the long-term with regard to how properly managed recreation assets support tourism economies, business recruitment and employee retention.

Colorado Recreation and Socioeconomics

The state of Colorado contains world-class recreation resources—much of it on BLM lands—which support 229,000 direct jobs, drive the state's $28 billion outdoor recreation economy, generate $9.7 billion in wages and salaries, and contribute $2 billion in state and local tax revenue. Nationally, $887 billion outdoor industry brings jobs to communities across the country in many ways. Recreation visitors bring needed dollars to cities and towns that have recreation assets like rivers, trails, and other outdoor spaces where fishing, hunting, boating, hiking, biking, climbing and a long list of other outdoor activities take place. Outdoor recreation companies, both large and small, are choosing to locate in these communities because their employees want to live in places with access to the great outdoors.

Responsible oil and gas development also creates jobs in Colorado communities and provides important revenue to supplement the income generated by tourism and recreation. However, many communities in Colorado and across the country that have previously depended primarily upon resource extraction have begun to diversify their economies into the recreation sector. This statewide lease sale presents significant potential to harm recreation resources and the outdoor recreation brand of local communities affected by this lease sale. Given the importance of recreation on Colorado's public lands, it is critical that the BLM defer leases and/or implement appropriate protections, including measures designed to protect Colorado's recreation resources and scenic public lands.

Through these lease sale Environmental Analyses (EAs) and Determination of NEPA Adequacy (DNA) documents, the BLM has failed to take the required "hard look" at potential environmental impacts on recreation from oil and gas leasing. Under the National Environmental Policy Act (NEPA), the BLM must consider the "reasonably foreseeable" impacts of oil and gas leasing on recreation before committing to these lease sales. In the Colorado River Valley/Grand Junction EA, the BLM recognizes that "economic activity associated with tourism and recreation can be an important contribution to local communities and their economies," citing the point that in 2016, "visitors spent approximately $168.1 million in Garfield County and $283.8 million in

Mesa County and overnight travel contributed to an estimated 1,802 jobs in Garfield County and 3,127 jobs in Mesa County." Similarly, the Royal Gorge EA acknowledges "in 2016, visitors spent approximately $64.8 million in Fremont County and $3.0 million in Baca County and overnight travel contributed to an estimated 825 jobs in Fremont County and 41 jobs in Baca County." Furthermore, these EAs recognize that "potential impacts due to oil and gas development can be concerns for communities that promote recreation and tourism…. through increased traffic and traffic delays, noise, and visual impacts." Indeed, in theses EAs the BLM recognizes that

> … if development were to occur, the introduction of roads, well pads and increased traffic to the developed site would increase the amount of development, noise and travel into the area. This would have a direct impact on the physical setting. Residents and visitors may be less likely to visit the trails system with the changes. Indirect impacts to the economic and tourism industry may be impacted negatively if recreationists are displaced by the development.

However, the BLM fails to consider mitigating measures including site-specific measures to address any identified socioeconomic issues resulting from disturbance and drilling on a leased parcel. Instead the agency deflects its responsibility to take a hard look at the cumulative impacts of this statewide lease sale by asserting that

> … it is unknown when, where, how, or if future surface disturbing activities associated with oil and gas exploration and development such as well sites, roads, facilities, and associated infrastructure would be proposed…. Due to energy market volatility and the dynamics of the oil and gas industry it is not feasible to predict the exact effects of this leasing action, as there are no guarantees that the leases will receive bids, and that any leased parcels will be explored or that exploration will result in discovery of viable fluid mineral production.

Even though the BLM acknowledges that these leases are likely to have a direct impact on the physical setting resulting in impacts to the tourist industry and related economy, the agency does not consider—much less implement—any potential future mitigation related to foreseeable impacts oil and gas development will have on recreation assets and associated socioeconomics. Potential mitigating measures to address such impacts could involve several different options: for example, see Best Practices for Balancing Recreation and Energy Development on Our Public Lands.[1]

In order to take the "hard look" required by NEPA, the BLM is required to consider the incremental impact of these lease sales "when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7. These EAs neglect to consider how these lease sales might cumulatively impact recreation assets and

[1] Found at https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS_Balancing-Rec-and-Energy-Report-web.pdf

related socioeconomics, nor do they propose any mitigating measures to address such negative impacts.

The BLM's multiple-use mandate prohibits the management of public lands primarily for energy development or in a manner that unduly or unnecessarily degrades other "co-equal" uses such as "outdoor recreation, fish and wildlife, grazing, and rights-of-way must receive the same consideration as energy development." 43 U.S.C. § 1732(a), 43 U.S.C. § 1702(l). Therefore, we urge the BLM to develop a more appropriate set of EAs for this statewide lease sale that either defers these leases or implements the following standards for protecting recreation assets:

- NSO stipulation for a 1-mile radius from developed recreation site boundaries.
- NSO stipulation 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 recreation areas.
- NSO stipulation to all VRM Class II areas in Special Recreation Management Areas and a Baseline CSU stipulation throughout the remainder of SRMAs.
- Apply an NSO stipulation to Recreation Focus Areas

BLM planners should develop EAs for these leases with a broader view of recreation experiences and how to protect and enhance these use patterns. The 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 hard look comprehensive analysis of recreation use patterns and how these leases might affect those experiences and related socioeconomics.

* * *

Recreation is an important economic driver to the state of Colorado, with long-term growth potential. We urge you to analyze potential impacts of the parcels listed under this sale to recreational experiences and the local tourism economy to the communities and residents of Colorado. Thank you for the opportunity to comment on this lease sale and please feel free to contact me directly with any questions or comments at Jason@publiclandsolutions.org.

Sincerely,

Jason Keith

Jason Keith
Managing Director
Public Land Solutions