



December 17, 2018

Sheri Wysong
Fluid Mineral Leasing Coordinator
Utah State Office
Bureau of Land Management
440 West 200 South, Suite 500
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Email: blm_ut_lease_sales@blm.gov

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

- **Vernal FO (DOI-BLM-UT-G010-2019-0006-EA)**
- **Price FO (DOI-BLM-UT-G020-2019-0002-DNA)**
- **Monticello FO (DOI-BLM-UT-Y020-2019-0004-DNA)**

Dear Ms. Wysong,

Public Land Solutions welcomes the opportunity to comment on the Bureau of Land Management's (BLM) Utah March 2019 Competitive Oil and Gas Lease Sale. Through this sale, the BLM is offering 156 parcels comprising 217,519 acres in the Canyon Country, Green River, and West Desert District areas for oil and gas leasing in a competitive lease sale scheduled for the week of March 26, 2019. This March 2019 lease sale also includes 116 parcels that were deferred from the BLM's December 2018 lease sale due to court order requiring lengthier comment periods on environmental compliance documents.

As recreation advocates, Public Land Solutions is concerned that the BLM disregards potential impacts from this proposed lease sale to specific recreation assets and other important values. We believe that the BLM has not adequately analyzed the potential impacts of this proposed lease sale on specific recreation assets. Because the direct, indirect, and cumulative effects that would result from implementation of this lease sale could be detrimental to recreation and the local communities that have invested in recreation assets, the BLM should fully evaluate the cumulative impacts of this competitive lease sale on the region's recreation economy and how it would impact future growth opportunities in 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.

Utah Recreation and Socioeconomics

The state of Utah contains world-class recreation resources, many located on BLM lands, which support 110,000 direct jobs and drive the state's \$12.3 billion outdoor recreation economy. Popular recreational activities within the planning areas covered by these environmental compliance documents include camping, hunting, hiking, horseback riding, scenic driving, off road driving, fishing, floating the Green and White rivers, backpacking, and organized/competitive events, dirt biking, cultural tourism, antler shed gathering, mountain biking, and rock climbing. The national \$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 many of the above-listed 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 Utah communities and provides important revenue to supplement the income generated by tourism and recreation. However, many communities in Utah 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 Utah's public lands, it is critical that the BLM defer leases and/or implement appropriate protections, including measures designed to protect Utah's recreation resources and scenic public lands.

Leasing Proposals Fail to Take Hard Look at Impacts to Recreation and Socioeconomics

Through these lease sale Environmental Analyses (EAs) and Determinations of NEPA Adequacy (DNAs), the BLM has failed to take the required "hard look" at potential environmental impacts on recreation from oil and gas leasing. In the Vernal EA, the BLM recognizes that the issuance of leases "does convey an expectation that drilling and development would occur" and that "should construction and drilling occur, the sights and sounds associated with the development of oil and gas related activities would be apparent to visitors participating in recreation related activities ... and would reduce primitive recreational opportunities in proximity to development." Furthermore, the EA notes that "cumulative impacts include noise light and traffic from oil and gas drilling and production in the area which would change the recreational experience of the area." However, other than Visual Resource Management protections, the Vernal EA considers no mitigation for potentially negative impacts from oil and gas leasing to recreation assets and associated socioeconomics despite the recognition that such impacts are foreseeable.

The Price DNA states that the proposed action is in conformance with the Price Field Office Resource Management Plan (RMP), which has a goal to "manage oil and gas leasing, exploration, and development while minimizing impact to other resource values." However, the Price DNA provides no stipulations or management considerations to mitigate impacts to recreation because "selling the lease to

the parcel is not a surface disturbing activity, and therefore would not result in impacts to recreation.” The Price DNA states further that the “direct, indirect, and cumulative impacts to socioeconomics from oil and gas leasing was considered in detail” in the Price RMP and therefore this DNA need not look at those considerations. However, the Price RMP’s analysis primarily discussed direct economic benefits from oil and gas development, not potentially negative impacts from oil and gas development on other uses that generate economic benefits such as recreation.

The Price RMP did not adequately analyze how oil and gas developments might affect recreation activity and related socioeconomics, nor did it consider mitigating measures to protect recreation and related socioeconomics in any significant detail. The RMP does impose stipulations to mitigate impacts to a range of values and resource considerations, but recreation and related socioeconomics are not among them. The RMP (at 2) does state that “there may be a need to evaluate management prescriptions and resource allocations to address the increases in recreation and visitor use, including scenic quality and open spaces, as well as the increased interest in oil and gas development.” Because none of the RMP’s Best Management Practices for oil and gas leasing (“state-of-the-art mitigation measures applied on a site-specific basis to reduce, prevent, or avoid adverse environmental or social impacts”) relate to recreation assets and associated socioeconomics, the Price DNA is inadequate and the BLM should conduct a more appropriate analysis considering how this leasing proposal might impact recreation.¹

Likewise, the Monticello DNA states that “impacts to recreation from leasing are contained in the analysis for the Monticello RMP” and “potential impacts to socio economics from oil and gas leasing are adequately analyzed and documented in the environmental analysis prepared for the Monticello RMP.” Similarly, the Monticello RMP provides no detailed consideration of how the leases proposed in the DNA might affect recreation. The RMP does direct that “all lands are available for leasing subject to standard lease terms, unless otherwise specified in the plan.” But while some recreation management zones and developed recreation sites governed by the Monticello RMP require an NSO stipulation, most of the recreation in the Monticello FO is dispersed recreation and not located within these designations. Therefore, this DNA and the Monticello RMP are inadequate for considering how this leasing proposal could negatively impact recreation assets and related socioeconomics.

Under NEPA, the BLM must consider the “reasonably foreseeable” impacts of oil and gas leasing on recreation before committing to these lease sales. 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 economy, the agency will 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.

In order to take the “hard look” required by NEPA, 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 and DNAs acknowledge foreseeable impacts but neglect to consider how these lease sales might cumulatively impact recreation assets and related socioeconomics, nor do they propose any mitigating measures to address such negative impacts.

¹ For more information about how to avoid conflicts with recreation assets while leasing for oil and gas projects, see [Best Practices for Balancing Recreation and Energy Development on Our Public Lands](https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS_Balancing-Rec-and-Energy-Report-web.pdf) found at https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS_Balancing-Rec-and-Energy-Report-web.pdf.

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 considerate 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

It is our belief that 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.

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Recreation is an important economic driver to the state of Utah, 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 Utah. 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
Managing Director
Public Land Solutions