



December 13, 2018

Mary Jo Rugwell
Bureau of Land Management
Wyoming State Office
5353 Yellowstone Dr.
Cheyenne, Wyoming 82009

Re: Public Land Solutions Comments to Wyoming March 2019 Oil and Gas Lease Sale (DOI-BLM-WY-0000-2019-0001-EA)

Dear Ms. Rugwell,

Public Land Solutions welcomes the opportunity to comment on the Bureau of Land Management's (BLM) Wyoming First Quarter 2019 Competitive Oil and Gas Lease Sale (DOI-BLM-WY-0000-2019-0001-EA). Under the BLM-Modified Alternative, the BLM is offering 144 parcels comprising approximately 158,048 acres across the state for this competitive oil and gas lease sale scheduled for the week of March 19, 2019.

As recreation advocates, Public Land Solutions (PLS) is concerned that the BLM is ignoring potential impacts of this proposed lease sale on specific recreation assets 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.

Public Land Solutions 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 government, 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, both with regard to recreation assets and tourism economies and business recruitment and employee retention.

The state of Wyoming contains world-class national parks and recreation resources, which support 50,000 direct jobs and drive the state's \$5.6 billion outdoor recreation economy. Nationally, the \$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 our employees want to live in places with access to the great outdoors.

Responsible oil and gas development also creates jobs in Wyoming communities and provides important revenue to supplement the income generated by tourism and recreation. However, across the country communities 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 Wyoming's public lands, it is critical that the BLM defer leases and/or implement appropriate protections, including measures designed to protect our communities' national parks, recreation resources and scenic public lands. 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](#).

Although the EA acknowledges that “recreation-related visits in these areas contribute to the quality of life of Wyoming residents, stimulate economic activity, and support employment opportunities” and contributes “\$173 million in economic activity across the state, and directly and indirectly (including induced) support 1,675 jobs and \$52.3 million in labor income for Wyoming residents,” the recreation analysis in the Affected Environment section of this Environmental Assessment is inadequate and does not provide a meaningful consideration of how these lease sales might affect recreation experiences and associated economic benefits. While the EA states that “[t]ourism is one of Wyoming's largest industries, and much of the state's tourism is attributable to the outdoor recreation supported by the state's open and scenic spaces,” and acknowledges that some of these leases are within Special Recreation Management Areas (SRMAs) or Dispersed Recreation Use Areas (DRUAs), the EA only refers the public to underlying Resource Management Plans—many of which are outdated and/or provide little-to-no analysis of recreation opportunities and values—to consider how these leases might affect Wyoming's recreation experiences and associated economy.

While the EA also acknowledges that “the presence of oil and gas facilities would likely diminish the recreational experience and a decline in recreational use of an area due to oil and gas development would potentially affect local, state, and regional revenues generated through recreation,” the BLM's analysis seems to dismiss those impacts by noting that the lease proposals consist of “only a small fraction of the recreational opportunities supported by BLM administered lands across the state.”

Similarly, the section in the EA regarding Socioeconomics within the project area falls short because it does not consider—other than noting that “resource development can have an adverse effect on other socioeconomic values people derive from these natural landscapes”—how these proposed leasing activities might affect socioeconomics related to the existing and potential recreation economy throughout Wyoming. Nor does the EA analyze potential mitigating measures to protect recreation assets and associated socioeconomics from negative impacts from oil and gas leasing.

Therefore, we urge the BLM to implement the following standards for protecting recreation assets when considering these leases, specifically:

- 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 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 an EA 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 Wyoming, 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 Wyoming. Thank you for the opportunity to comment on this EA and please feel free to contact me directly with any questions or comments at Jason@publiclandsolutions.org.

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