

# OUTDOOR ALLIANCE

July 9, 2020

Anita Bilbao  
Acting Utah State Director  
Bureau of Land Management  
440 West 200 South, Suite 500  
Salt Lake City, UT 84101

**Re: Outdoor Alliance Comments on Utah September 2020 Competitive Oil and Gas Lease Sale (DOI-BLM-UT-0000-2020-0004-EA)**

Dear Ms. Bilbao:

As representatives of the outdoor recreation community, Outdoor Alliance writes to submit comments on the Environmental Assessment (EA) for the Bureau of Land Management's (BLM) Proposed Utah September 2020 Competitive Oil and Gas Lease Sale (DOI-BLM-UT-0000-2020-0004-EA). Through this EA, BLM considers offering 77 parcels comprising 114,049.77 acres located in Juab, Sanpete, Sevier, Emery, Duchesne, Grand, Uintah, and San Juan counties in the BLM's Moab, Richfield, Vernal, Price, and Fillmore Field Offices. The proposed leases directly conflict with high value recreation areas and are also located in areas valuable for wildlife, environmental conservation, cultural resources, and tourism.

In this EA, BLM fails to manage public lands for multiple uses and to consider more limited leasing scenarios pursuant to the National Environmental Policy Act (NEPA). Additionally, BLM disregards many of the likely adverse effects of the proposed lease sale on local communities. To prevent damaging Moab's world class outdoor recreation experiences and recreation economy, BLM should remedy these errors or consider cancelling the auction until a more robust EA can analyze viable alternatives that would protect other multiple uses and reduce environmental and social harms.

Specifically, in this EA:

- BLM fails to properly account for multiple use values;
- BLM fails to analyze several viable alternatives that would protect other multiple uses and reduce environmental and social harms;



- BLM fails to consider the adverse economic impacts the proposed leases would have on local communities.

## **Outdoor Alliance**

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes. Outdoor Alliance members enjoy a diversity of recreation opportunities in the area covered by the proposed lease sale, and these recreational experiences have the potential to be degraded through the proposed action.

## **BLM Fails to properly account for Multiple Use Values in this EA, threatening important recreation areas**

In this EA, BLM proposes to offer some of the same parcels that were offered in a contentious 2008 lease sale.<sup>1</sup> Coincidentally, it too contained 77 parcels, and the sale was so controversial that it prompted lawsuits, a cancellation of the leases, and recently-repealed significant leasing reforms that were intended to incorporate more stakeholder input and balance multiple uses on public lands.

Within the proposed lease sale, 21 parcels (008, 014, 018, 022, 038, 039, 045, 048, 051, 052, 053, 055, 058, 072, 075, 082, 084, 112, 116, 133, 134), totaling 35,251 acres, could significantly impact recreation assets, specifically, nationally significant boating opportunities on the Green River, several important rock climbing sites, and numerous mountain biking and hiking trails (see map below).

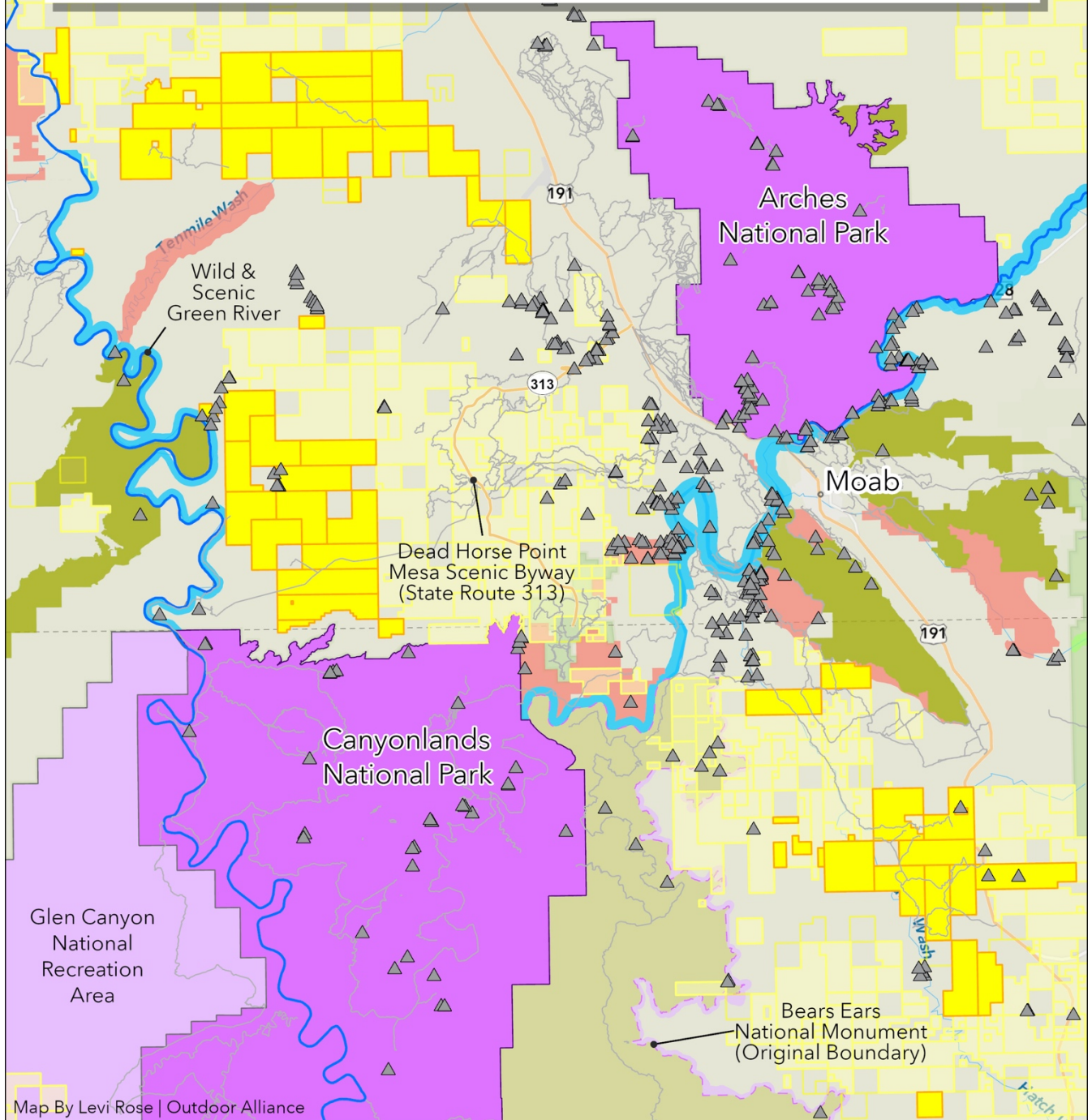
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<sup>1</sup> See, Josh Lappen, The Short Life of The BLM's Master Leasing Plans, <https://west.stanford.edu/news/blogs/and-the-west-blog/2018/master-leasing-plans> (last visited July 9, 2020).

## BLM Utah Sept. Oil & Gas Lease Sale

The Bureau of Land Management (BLM) proposes to offer 77 parcels, totaling approximately 114,050 acres, at the Sept. 2020 Oil and Gas Competitive Lease Sale. Most of the parcels being offered are located near Moab between Canyonlands and Arches National Parks.

- Sept. 2020 Oil & Gas Lease Sale Parcel
  - Existing Oil & Gas Lease
  - Area of Critical Env. Concern
  - Wilderness Study Area
  - Rock Climbing Site
  - Trail
- 0 1 2 4 Miles



Map By Levi Rose | Outdoor Alliance

This EA proposes leases (Parcels 045, 048, 075, 133, 134) adjacent to the Green River<sup>2</sup> and will negatively impact Labyrinth Canyon on the Lower Green River, which was recently designated in the John D. Dingell, Jr. Conservation, Management, and Recreation Act as a Wild and Scenic River. Proposed lease parcels 045, 048, 075, 133, and 134 would affect the viewshed of boaters—and potentially impair the water quality—on the Green River, which includes two important sections, Labyrinth Canyon and Stillwater Canyon. The popular trip through Labyrinth Canyon on the lower Green River can be enjoyed almost any time of the year. This backcountry stretch is unique, as it is an easy flatwater run suitable for canoes, kayaks, and rafts of all types. Labyrinth Canyon was named by John Wesley Powell during his 1869 expedition for its meandering course. The canyon is a geologic wonderland with canyon walls composed of layered sandstone. Below Labyrinth Canyon lies Stillwater Canyon, where the Green River winds through Canyonlands National Park. Amazing rock formations and scenery on a grand scale along with ruins and rock art sites provide plenty of opportunities for exploration. Here the river provides access into the Doll House and the Maze. In addition to visual,<sup>3</sup> safety, and water quality impacts to the Green River located adjacent to these proposed leases, this EA fails to acknowledge the socioeconomic benefits of boating on the Green River. The EA identifies recreational impacts as an issue not included in further analysis, but does not clearly provide rationale for how there would be no impacts of a leased and developed parcel 045, 048, 075, 133, or 134.

The Utah Division of Forestry, Fire, and State Lands (FFSL) jointly manages the segment of river adjacent to these parcels with the BLM. Their Final Comprehensive Management Plan identifies the need to “balance recreation needs, development, and protection of the natural environment.” However, the objectives specifically state that any new development shall not inhibit or negatively affect existing recreation or prevent future recreation infrastructure.<sup>4</sup>

The EA incorrectly identifies Wild and Scenic River as “not present” within the area impacted by the proposed action. Parcels 133 and 134 are 3.9 miles from the beginning of Labyrinth Canyon section and were designated as Scenic in the John D. Dingell, Jr. Conservation, Management, and Recreation Act this past year. Contamination of groundwater, leaks, or spills from oil and gas drilling on either parcel could cause severe impacts to this section of Green River. BLM needs to address the Wild and Scenic Rivers

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<sup>2</sup> See <https://www.americanwhitewater.org/content/River/detail/id/3765>.

<sup>3</sup> Parcels 045, 048, and 075 are partially managed as VRM Class II, which is managed as NSO in the Moab MLP (UT- S-404). This stipulation, as well as the one-mile set-back from the Green River (UT-S-407) protect the visual values along the Green River.

<sup>4</sup> [https://ffsl.utah.gov/wp-content/uploads/GreenRiver\\_Final\\_CMP\\_January\\_2020\\_Compressed.pdf](https://ffsl.utah.gov/wp-content/uploads/GreenRiver_Final_CMP_January_2020_Compressed.pdf)

resource as “present with potential for relevant impact that need to be analyzed in detail in the EA” to accurately analyze the proposed action and ensure protection *and* enhancement as outlined in BLM Manual 6400.

The region affected by the proposed leases in the September 2020 auction also implicates several important established climbing areas. These include Spring Canyon,<sup>5</sup> Hell Roaring Canyon,<sup>6</sup> Mineral Canyon, and The Tombstone/End of the World Butte<sup>7</sup> (see map below). These locations are significant backcountry traditional climbing objectives that are unique in their relatively pristine condition. Climbing sites around Bartlett Wash and Tusher Canyon also stand to be affected by this lease sale. While some of the parcels near these climbing areas are zoned with “no surface occupancy” stipulations from the 2015 Moab Master Leasing Plan, the regional impacts will still negatively affect the climbing experience because development on adjacent parcels for directional drilling will still require pipelines, flaring, emissions, and a significant increase in industrial truck traffic.

For all the foregoing reasons, BLM should defer the twenty-one parcels (008, 014, 018, 022, 038, 039, 045, 048, 051, 052, 053, 055, 058, 072, 075, 082, 084, 112, 116, 133, 134) implicated in this lease sale and uphold its statutory duty to manage public lands for multiple use.

### **BLM fails to analyze several viable alternatives that would protect other multiple uses and reduce environmental and social harms**

In the EA, BLM analyzes only two alternatives: offering all of the nominated parcels assessed in the EA for lease, and the “no action” alternative in which a lease sale is not held and no parcels are offered. But in light of the clear multiple use conflicts, BLM should have analyzed a middle option: offering fewer parcels in this lease sale, limited to those with minimal multiple use conflicts. BLM asserts that the majority of parcels leased in the Moab region are likely to never see drilling due to their low potential and/or high cost of exploration and development.<sup>8</sup> However, the parcels in the Moab region that BLM does expect to go into production will require access roads and related infrastructure that will have adverse effects on the scenic, environmental, and recreational values of the area.<sup>9</sup> Additionally, even the lease of areas with a low likelihood of commercial viability will lead

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<sup>5</sup> See <https://www.mountainproject.com/area/106371459/spring-canyon>.

<sup>6</sup> See <https://www.mountainproject.com/area/106319075/hell-roaring-canyon>.

<sup>7</sup> See <https://www.mountainproject.com/area/105716814/lost-world-butte-area>.

<sup>8</sup> BUREAU OF LAND MGMT., ENVTL. ASSESSMENT, COMPETITIVE OIL AND GAS LEASE SALE 19–20 (2020) (Docket No. DOI-BLM-UT-000-2020-0004-EA) (“EA”).

<sup>9</sup> See *id.*

to potentially destructive exploratory activity, create a cloud of uncertainty for the area's recreation economy, and impair long-term planning efforts.

When low potential lands are leased to private developers, those developers may hope that energy prices will rise, that new ways to extract marginal energy will be found, or that the leases can later be sold to another company. However, speculative leases prevent conservation of environmentally valuable areas and often foreclose valuable uses like recreation, scenic and cultural resource preservation, designation as wilderness, or even renewable energy production. All low potential lands should be deferred from this lease sale and a viable alternative offering fewer parcels, limited to those with high development potential and minimal multiple use conflicts must be considered.

**BLM fails to consider the adverse economic impacts the proposed leases would have on local communities.**

Outdoor Alliance is concerned that these proposed leases and subsequent ground disturbing activities will impair recreation assets and experiences, particularly boating on the Green River, and these impacts will in turn negatively affect the City of Green River, which is working hard to develop its recreation amenities and boost its outdoor recreation economy. The City of Green River lies in between two recently designated Wild and Scenic River segments—Desolation and Labyrinth Canyons—and is working under grants with the Utah Office of Outdoor Recreation Industry and Emery County Travel Bureau, along with other state and local agencies, to develop river access and amenities in town that would encourage contiguous recreational use on the river between these two river segments.<sup>10</sup> These efforts from the City of Green River are promoting water-based recreation on the Green River as a strategy to capture outdoor recreation tourists and boost the town's economy. Impacts to scenery and water quality from parcels 045, 048, 133, and 134 could have a direct effect on these efforts. Protecting southeastern Utah's recreation assets from the impacts of oil and gas leasing is consistent with the BLM's multiple use mandate and will help accomplish the goals of Secretarial Order 3366<sup>11</sup> to "elevate the priority of outdoor recreation on public lands and waters managed by the Department of Interior."<sup>12</sup> To support the area's growing outdoor recreation economy, BLM should defer parcels 045, 048, 133, and 134.

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<sup>10</sup> See, Green River Visioning Conceptual Study Report, *available at* [https://www.greenriverutah.com/Phase%20I%20Strategic%20Plan\\_FINAL.pdf](https://www.greenriverutah.com/Phase%20I%20Strategic%20Plan_FINAL.pdf).

<sup>11</sup> See [https://www.doi.gov/sites/doi.gov/files/uploads/signed\\_so\\_3366.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/signed_so_3366.pdf).

<sup>12</sup> See <https://www.doi.gov/pressreleases/zinke-signs-secretarial-orders-increase-recreational-opportunities-public-lands-and>.

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 scope of this proposed lease sale include boating, mountain biking, hiking and backpacking, trail running, horseback riding, scenic driving, and off-road driving. 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 outdoor activities take place. Outdoor recreation companies, as well as businesses beyond the traditional outdoor recreation economy, are choosing to locate in Utah communities because their employees want to live in places with access to the great outdoors. We believe that the potential to expand the benefits from Utah's outdoor recreation economy should be given strong consideration especially in public land use planning documents such as this EA.

Responsible oil and gas development also creates jobs and revenue in Utah communities. However, many communities in Utah and across the country that have previously depended primarily on resource extraction have begun to diversify their economies in ways dependent upon access to outdoor recreation opportunities. This lease sale presents significant potential harm to recreation resources, the outdoor recreation brand of local communities like Green River, and the desirability of these communities as draws for more diversified economic activity. 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.

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Outdoor Alliance is concerned that in this EA the BLM fails to analyze potential impacts from these proposed lease sales on specific recreation areas. Because the direct, indirect, and cumulative effects that would result from implementation of this lease sale would be detrimental to recreation experiences and local communities that have invested in recreation assets, the BLM should better analyze the effects of this competitive lease sale on the region's recreation economy and how it would inhibit future growth opportunities in the local business community and socioeconomics regionally. Outdoor Alliance urges the BLM to defer the leases noted herein, and provide a more appropriately detailed EA that considers how to best implement its multiple use mandate and protect recreation as a primary multiple use of our public lands consistent with the Federal Land Policy and Management Act (FLPMA).

Best regards,

A handwritten signature in black ink, appearing to read "Louis Geltman", with a stylized flourish at the end.

Louis Geltman  
Policy Director  
Outdoor Alliance

cc: Kent Hoffman, Utah BLM Deputy State Director of Minerals

Adam Cramer, Executive Director, Outdoor Alliance  
Chris Winter, Executive Director, Access Fund  
Beth Spilman, Interim Executive Director, American Canoe Association  
Mark Singleton, Executive Director, American Whitewater  
Kent McNeill, CEO, International Mountain Bicycling Association  
Todd Walton, Executive Director, Winter Wildlands Alliance  
Tom Vogl, Chief Executive Officer, The Mountaineers  
Phil Powers, Chief Executive Officer, American Alpine Club  
Mitsu Iwasaki, Executive Director, the Mazamas  
Keegan Young, Executive Director, Colorado Mountain Club  
Chad Nelson, Chief Executive Officer, Surfrider Foundation