



## United States Department of the Interior



NATIONAL PARK SERVICE  
Southeast Utah Group  
Arches and Canyonlands National Parks  
Hovenweep and Natural Bridges National Monuments  
2282 S. West Resource Boulevard  
Moab, Utah 84532-3298

IN REPLY REFER TO:

April 20, 2018

### Memorandum

To: Bureau of Land Management, Utah State Office  
Attn: Sheri Wysong

From: Superintendent, Southeast Utah Group, National Park Service

Subject: September 2018 Oil and Gas Lease Sale – Scoping Comments

Thank you for the opportunity to comment on the September 2018 Oil and Gas Lease Sale. Issues of concern to us include the potential effects of the project on air quality and air quality related values (AQRV's), visual resources and viewsheds including the quality of night skies, and natural soundscape conditions.

The activities associated with this sale have the potential to affect air quality and AQRVs (deposition and visibility) in Canyonlands National Park. Because ozone concentrations in the region are approaching the National Ambient Air Quality Standards, effects of oil and gas activities on ozone formation are of particular concern. Consistent with the Interagency Memorandum of Understanding concerning air quality analyses and mitigation for federal oil and gas decisions, we ask that BLM consult with the NPS Air Resources Division and other members of the Utah air resources technical advisory group in determining the most appropriate type of air quality analyses to conduct for the proposed lease sale. In addition, we ask that BLM include a lease notice informing potential lessees that additional air quality mitigation measures may be imposed prior to granting permits to drill, pending the outcome of future regional modeling studies and/or other analyses.

We are also concerned about the proliferation of pads and roads associated with potential future exploration and production activities enabled by the proposed lease sale. Construction of well pads and increases in vehicle could result in increased emissions of fugitive dust from unpaved pads and roads. Dust emissions have the potential to affect air quality and air quality related values such as visibility. Views of the surrounding landscape through clear, clean air is important to visitor enjoyment of Canyonlands National Park. Similarly, clean clear air is important to visitors seeking to view the dark night skies while visiting Canyonlands National Park, which is a certified International Dark Sky Park.

We are also concerned about potential impacts of oil and gas exploration and drilling activities on natural soundscape conditions experienced by visitors to Canyonlands' Horseshoe Canyon Unit nearby. Noise

propagation modeling has indicated that noise generated by unmitigated drilling operations can be heard more than six miles away from the source under some conditions.

We ask that BLM address these issues in the Environmental Assessment and identify appropriate lease stipulations to mitigate potential impacts.

If you have any questions regarding these comments, please contact me at 435-719-2101 or at [kate\\_cannon@nps.gov](mailto:kate_cannon@nps.gov).

Thank you for the opportunity to comment.