

SLFO DOI-BLM-UT-W010-2019-0001-EA (Box Elder)

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Comments

Comment 1

ID:

Comment Title: NPCA comments regarding impact to Golden Spike National Historic Park

NPCA expresses strong concerns regarding the potential surface disturbance and damage to leases 397, 398, 400, 401 and 403 and their overlay or proximity to the Transcontinental Pacific Railroad grade and more broadly to the resources connected to Golden Spike National Historic Park. Because of the direct overlay that could result in negative impacts to the Area of Critical Environmental Concern as well as a site on the National Register of Historic Places, we request the BLM defer lease parcels 397, 398, 400, 401 and 403.

The BLM must defer these parcels in order to preserve historic resources contained with the 232 acre ACEC. On page 16 of the BLM EA, the document notes "The relevant and important value for this ACEC is historic resources, namely the grade of the former first Transcontinental Railroad. The ACEC is subject to No Surface Occupancy for mineral development." Due to this fact, the BLM defer these parcels and remove them for future mineral development as prescribed by previous BLM guidance.

Additionally we have concerns with parcels 392, 393, 394, 395, 396 and 404 due potential conflicts with the Transcontinental Railroad National Backcountry Byway. Page 17 of the BLM planning document notes, "Parcel 397 actually overlaps the entire BLM railroad grade right of way from Ramola to Matlin. Parcels 400, 401, and 403 straddle the railroad grade. Parcels 398, 399, 402, and 404 lie within less than a mile of the railroad grade. Parcels 392, 393, 394, 395, and 396 lie within 1 to 5 miles of the railroad grade." These parcels are both connected to the larger historic record of Golden Spike and the transcontinental railroad that is critical to remain intact and preserved.

There are also serious engineering and technical limitations that give reason to deferring parcels that conflict with the Transcontinental Railroad grade. On page 20 of the EA, the BLM notes, "The CPRR grade is a part of the Transcontinental Railroad Grade Backcountry Byway and is maintained by the BLM to accommodate passenger vehicles or off-highway vehicles (refer to section 3.3.3). The CPRR grade is not designed to accommodate vehicles greater than 10,000 lbs. The allowable average daily vehicle traffic for light vehicles (< 6,000 lbs) is 10 vehicles per day and for heavy traffic (> 10, 000 lbs) is 1 vehicle per day. Oil and gas vehicle traffic (refer to sections 2.2.1, and 2.2.2) may cause serious damage to the grade (BLM 2018)." The potential likelihood of damage due to heavy industrial traffic is to great of risk to permit oil and gas development that could permanently alter historic resources connected directly to the railroad grade.

In addition to deferring parcels that are in direct conflict with the ACEC, Golden Spike NHP, and the Transcontinental Railroad, we urge the BLM to work with the National Park Service, outdoor recreation interests as well as regional and historic preservation interests to determine where oil and gas should occur in the future, and proactively plan to ensure future conflicts with these historic assets are avoided.

In summary, NPCA requests the BLM defer parcels 392- 404, with specific emphasis on parcels in direct conflict with historic resources documented above. We appreciate the opportunity to submit comments regarding this important land planning process and look forward to the BLM ensuring protection of Golden Spike NHP and historic resources connected to it in northern Utah.

For NPCA,

Jerry Otero
 Senior Southwest Energy Program Manager

Submission Classification

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