



Nine Mile Canyon Coalition

P.O. Box 402
Price, Utah 84501

Stephanie Howard
BLM Vernal Field Office

Re: November 2016 Oil and Gas Lease Sale. Project # UT-G010-2016-033-EA.

Dear Stephanie Howard:

Our comments and concerns relate to parcels 9 & 10 in the proposed lease sale. Before getting into specifics, we are disappointed in the entire approach. When does BLM recognize that special areas, like Nine Mile Canyon are deserving of special consideration? Your RMP makes it clear Nine Mile Canyon is special. It designates the area as both an ACEC and a SRMA. Both the SRMA and ACEC direct that an activity plan must be prepared with special emphasis on cultural resources and scenic vistas. The ACEC additionally calls for special emphasis on recreation, special status plants and wildlife.

The required activity plan(s) to address these special resources has yet to be prepared. An SRMA plan is currently being prepared covering both the Price and Vernal Nine Mile Canyon SRMAs. It seems premature to throw oil and gas leases into the mix before required planning has been completed and the special resources adequately attended to. The subject EA admits there will be adverse impacts to all those special resources identified in the RMP. There is no specific disclosure of what those impacts are, just that the special emphasis resources will be degraded. In other words, BLM cares not one whit about their identified special emphasis resources, the agency proposes to lease them anyway despite RMP direction to enhance those values and the required plans not being complete.

We request the leasing of these parcels be deferred until such time as the activity planning required in the RMP has been completed and the sensitive resources addressed.

Specific Comments

Proposed Action and Alternatives

BLM makes no attempt to even guess about how these leases might be accessed. In terms of development, it is fairly obvious all the traffic would be on the Nine Mile Canyon Road. This road is a BLM Nationally designated, Backcountry Byway. There is no analysis of how increased heavy truck traffic on the road would affect the road itself or the backcountry byway experience. Likewise, if oil and gas is produced, there will be a need for new pipes, pumps, compressors to get the product out. The most likely route for this infrastructure again is in the

bottom of Nine Mile Canyon, the area with the highest user sensitivity. Since these pipelines are typically buried, inadvertent discoveries of buried cultural resources are almost assured. These discoveries are an adverse effect that would have to be mitigated, preferably by avoidance. Avoidance is best achieved by not leasing these parcels.

Similarly, parcels 9 & 10 come with NSO provisions. The EA makes no attempt to guess where these leases might be drilled from. The answer is obvious, they will be drilled from private lands in the bottom of the canyon where only standard drilling stipulations apply. This moves the impacts to the part of the canyon most sensitive for cultural, scenic and recreational resources. If these leases are not deferred, it is imperative the NEPA analysis include consideration of the transportation and development impacts for these parcels.

Affected Environment

Cultural resources are abundant in the Nine Mile Canyon area. The EA discusses hundreds of sites surrounding parcels 9 & 10. It does not identify the sites that are present on the lease parcels or the potential for subsurface cultural resources where ancillary facilities are constructed off lease.

Recreation is totally, inadequately addressed in this EA. This is particularly disturbing for a SRMA. Instead of describing the market niche, opportunities and experiences, all the EA provides is a laundry list of recreational activities that may occur in the ACEC/SRMA. Recreation activities are not the same as recreation opportunity and experience. The affected environment should describe the existing opportunities and experience available as well as the desired opportunity and experience called for in the RMP. Much of parcels 9 & 10 are within a semi-primitive non-motorized ROS Class. *(Note, since the RMP was signed the terminology was changed so now the SPNM ROS Class is now "backcountry.")*

The document makes no mention of the fact the Nine Mile Canyon Road is a Back Country Byway. This is a national BLM designation. Nine Mile Canyon was one of the first backcountry byways, dedicated in person, on site by the BLM Director. We would expect this designation would still carry some importance for the BLM. In any case, the EA fails to identify the byway, the opportunity and experience available to users and their reasons for being there. The byway also helps point out the visitors to Nine Mile Canyon are very sensitive to changes in the environment. The BLM's original byway designation documentation contain excellent information on visitor experience and opportunities.

Visual Resources are correctly identified as being inventoried as Class II for parcels 9 & 10. Yet you have it in VRM Management Class III. This is curious situation for an ACEC that has scenic resources as one of the relevant and important values. There is no discussion of the scenic quality, distance zones and viewer sensitivity that is important in making determinations on impact to scenic resources. In this case, we have high quality scenery, most of the views are foreground and the users are highly sensitive.

Environmental Effects

Cultural Resources consideration is inadequate. Instead of disclosing impacts, which you admit are likely, the approach seems to be that compliance with 106 NHPA will take care of it all. Thanks for telling us you will obey the law, but we are more interested in how you manage the remarkable cultural resources of Nine Mile Canyon.

ACEC Just how does leasing for Oil and Gas comport with managing to “enhance cultural, special status species, scenic vistas, recreation and wildlife” as stated in the RMP? This EA makes clear the proposed action would not enhance those values and would in fact lead to their degradation. It appears the RMP is in conflict with itself by also allowing for oil and gas leasing. Leasing is a discretionary action, BLM’s RMP commitment to enhance those values is not. In this case, the conflict should be resolved in favor of the SRMA/ACEC by deferring the leases.

The analysis of Recreation is entirely inadequate. Curiously it identifies a loss of primitive recreation opportunity even though none is recognized in Chapter 3. There is no discussion of the impacts to the most common recreational visitor to Nine Mile Canyon, people driving the byway for pleasure and stopping to visit numerous road side attractions. There is no discussion of visitor sensitivity that we assert is high, or discussion of how the lights, noise, odors, dust and traffic would affect them. Instead we are told those impact would be mitigated to a level where they would not be as bad as they could be. This is hardly meaningful disclosure of the current situation regarding Nine Mile Canyon and how it would change under the proposed action.

The visual resources section makes an unsupported conclusion that any development would meet the VRM Class III Management Class. There is no evidence/analysis offered to support this conclusion. Moreover, it is easily demonstrated that O&G development can and does violate Class III Standards.

In this case, we have high quality scenery, most of the views are foreground and the users are highly sensitive. Given those conditions, it is highly unlikely oil and gas extraction from parcels 9&10 could occur without violating Class III Standards. Impacts to scenic resources are often cumulative in nature. You might fit one well into the landscape and meet a VRM III standard. At some point, too many wells become just too much and the landscape character is altered to the point it violates the standard.

Meeting the VRM Class III standard is a matter of plan compliance; it fails as NEPA analysis. The impact we are interested in is the change from the existing environment, not the management class. In describing impacts, they should be compared against the existing, inventory Class II.

Again, this section does not anticipate that most of the impact will occur in the canyon bottom, in the foreground, in high quality scenery being viewed by sensitive users. This makes it highly unlikely development could be managed within Class III standards.

Cumulative Impacts

This section fails to adequately address parcels 9&10 for scenic and recreational resources. For scenic, it does not address the existing visual blight in the canyon such as the Dry Canyon Compressor, tanks at Water Canyon, the county salt shed and others. For the typical visitor/viewer driving the byway, these facilities already have a cumulative effect. Development of these leases will only further expand the industrial footprint and would eventually lead to serious degradation of the scenic and recreational resources of Nine Mile Canyon as a whole. The cumulative impact analysis also fails to address known projects being planned such as the Gate Canyon Road project, road realignment and bridge construction at Minne Maud and Cottonwood, oil transmission pipelines, etc.

Conclusion

With respect to parcels 9&10, the EA does not support the issuance of a FONSI. The analysis is simply lacking for the sensitive resources. It seems likely the issuance of these leases would not be in conformance with your RMP. We do not see how you can enhance scenic, cultural and recreation resources while degrading them. For these reasons, we request parcels 9&10 be removed from the November 2016 lease sale. Completion of the RMP directed activity plans should occur before any consideration is given to leasing in Nine Mile Canyon ACEC/SRMA.

Sincerely yours,

A handwritten signature in cursive script that reads "Dennis J. Willis". The signature is written in black ink and is positioned above the typed name.

Dennis Willis
President, Nine Mile Canyon Coalition
(435)650-0850