



July 23, 2017

Bureau of Land Management
Vernal Field Office
Attn: Stephanie Howard
170 South 500 East
Vernal, Utah 84078

Sent via email to: blm_ut_vernal_comments@blm.gov

Re: Comments on Vernal Field Office December 2017 Oil and Gas Lease Sale Draft Environmental Assessment

Dear Ms. Howard:

Thank you for providing the National Outdoor Leadership School (NOLS) with the opportunity to comment on the Draft Environmental Assessment (EA) for the December 2017 Oil and Gas Lease Sale. We greatly value your time and careful consideration of these comments. Below we describe our general concerns with lease parcels UT1217-044, 052, 054, 055, 065, 066, 069, 070, 071 and provide additional comments in Attachment A.

With an outdoor education program that has been in operation across Utah's public lands for over 30 years, the NOLS business model relies on the rich outdoor adventure and education opportunities provided by Utah's canyonlands, rivers and mountains. These landscapes provide outstanding opportunities for our students. On courses lasting from 16 days to entire semesters, NOLS students travel on extended backcountry trips learning canyoneering, backcountry travel, river navigation, and leadership skills.

NOLS' Rocky Mountain Program runs many courses every year on the Green River out of the NOLS River Base in Vernal. We are concerned that the proposed leases will have a detrimental impact on the river experience and on NOLS' ability to run courses from our Vernal location, from which we access the area defined by the Vernal Field Office (VFO) 2008 Resource Management Plan (RMP) as the Middle Green River for flatwater canoeing student courses.

NOLS strives to provide a wilderness experience for students. The experience of spending extended periods of time in undisturbed natural settings and places of solitude makes our programs unique and offers students opportunities for growth and learning. Our educational model is fundamentally dependent on wilderness experience.

The success of NOLS operations and the greater river recreation industry depends upon the continuing viability of this portion of the Green River as a natural and wild operating area. Our clientele anticipate natural quiet, dark skies, a natural landscape, and diverse wildlife. Over the past

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twenty years, the wilderness experience offered by this portion of the river has been impaired by encroaching energy development. NOLS instructors today recount instances of students unable to sleep due to noise from well pads and traffic. Continued development on and near the river will further degrade this experience, and our customers will likely choose different locales to spend their time and money. More broadly, the success of the river recreation industry in the region depends on the continuing viability of the Green River as a natural and wild operating area.

We are concerned that the lease and subsequent development of these parcels will have a serious impact on the river experience. Any new natural gas wells and related infrastructure on this parcel would likely be within view of the river during construction, and within earshot of the river throughout the life of the wells. Such intrusions will doubtless impinge on the river traveler's experience and degrade the outstanding values provided by the Green River.

NOLS courses also visit Dinosaur National Monument, which serves as the conclusion of our whitewater boating courses. The proposed leases on and very near the boundary and entrance to Dinosaur National Monument would, if developed, greatly impact NOLS students and other visitors' experience. In our view, in the balance of development and conservation necessary for multiple use land management, the parcels surrounding the national monument, and especially its entrance, are inappropriate for industrial development.

In light of these concerns and the additional technical comments (Attachment A), we request that Bureau of Land Management (BLM) defer the lease of parcels UT1217-044, 052, 054, 055, 065, 066, 069, 070, 071 pending further analysis of their suitability for oil and gas development. Should the VFO move forward with leasing these parcels, NOLS requests a No Surface Occupancy (NSO) stipulation for either a) the entire parcel, or b) NSO such that it excludes the possibility of visually or audibly perceiving drilling or normal well operations from the river or floodplain, as sufficient measures to protect the quality of river experience. The NSO stipulations used for the Lower Green River, UT-S-117 or 119 would likely provide adequate protections for river recreation and to protect the remaining primitive and scenic qualities of the river and the opportunity for solitude and quiet recreation; all of which are critical to NOLS operations on this portion of the river.

We encourage BLM to seek a functional balance between quiet river recreation and oil and gas development. NOLS believes it is possible to have energy development while preserving the river experience for our students and other river users. We are happy to work with you proactively to find opportunities to reconcile the differences between these two industries. Thank you for your time and consideration of these comments.

Sincerely,

Jen Sall
NOLS Rocky Mountain Director
Jen_Sall@nols.edu

Attachments (1): A. Technical Comments on the Draft Environmental Assessment for the December 2017 Oil and Gas Lease Sale.

ATTACHMENT A

Technical Comments on the Draft Environmental Assessment for the December 2017 Oil and Gas Lease Sale.

1) Recreation Analysis

The EA fails to analyze leasing effects on recreation, especially river recreation on the Green River. This specific area and form of recreation was given a “PI” classification, indicating that the interdisciplinary team as a resource or issue is present with potential impact that needs to be analyzed in detail in the EA. EA Appendix E – Interdisciplinary Team Checklist states:

“Parcels 044, 052, 054, 055, 065, 061, 066, 071 occur adjacent to, or in close proximity to the Green River. Potential impacts to recreationists floating the river due to oil and gas development include noise and visual impacts due to the sights and sound of oil and gas development and production. Future detailed analysis of proposed development plans would be necessary in order to mitigate the impact to river recreationist by considering topography, proposed locations of development and equipment, and timing drilling and construction operations to occur during times of the year when recreationists are likely not on the river.”

The EA provides only a brief analysis of potential impacts to Special Recreation Management Areas (SRMAs) and provides no analysis of impacts to river recreation or the Green River as a recreation resource. The Upper, Middle, and Lower sections of the Green River as recognized by the VFO BLM 2008 RMP are all major recreation resources. The parcels of concern to NOLS fall within the Middle section. This section, despite receiving lower use than the Upper and Lower sections, likely sees as much as, or more recreational use than, the SRMAs considered. The cumulative impacts of energy development on river recreation should be thoroughly analyzed in this and future lease sale EAs in the VFO’s scope. The VFO 2008 Resource Management Plan defines goals and objectives in its Recreational Resources section as follows (emphasis added):

- ***Ensure the continued availability of quality outdoor recreation opportunities and experiences that are not readily available from other sources; protect the health and safety of visitors; protect natural, cultural, and other resources; encourage public enjoyment of public lands; and enhance recreational opportunities.***
- *Work collaboratively with affected user groups and organizations, state and local officials, and other interested parties to provide for site-specific or area-specific comprehensive integrated activity level planning.*
- ***Ensure there is a spectrum of recreation opportunities and settings through comprehensive integrated activity level planning.***

The Middle Green River is a critical part of the spectrum of recreation opportunities administered by the VFO. River recreation is a diverse category of recreational activities, many of which are growing

quickly in interest and participants. The Middle Green River provides unique river recreation opportunities in the VFO. The flatwater sections of the Middle Green River are especially well-suited for canoeing, kayaking, stand-up paddleboarding, rafting, and tubing, most of which provide opportunities for quiet, solitude, exercise for physical and mental health, wilderness experiences, wildlife viewing, fishing, and hunting. Notably, non-commercial recreational users don't need permits to float this section of the river, unlike much of the Upper and Lower sections, and it very friendly to novice river recreationists, making this a valuable resource to local and regional residents. This section of river deserves greater consideration and protection from developments that impair the quality of the river experience.

2) Non-WSA lands with wilderness characteristics

The EA identifies multiple parcels as inventoried Lands with Wilderness Characteristics, including Big Wash (Parcel ID #s 027, 028, 029, 030), Currant Canyon (Parcel ID #s 022, 024, 025, 032), Pete's Wash (Parcel ID #s 031A, 031B, 037, 039), and Sheep Wash (Parcel ID #s 034, 035, 036, 037). The EA states explicitly that these LWCs were inventoried after the completion of the 2008 VFO RMP. NOLS believes this should remove these lands from consideration for leasing until they can be properly analyzed in the RMP framework for whether they are appropriate areas for oil and gas leasing.

Leasing of these parcels should be deferred or an NSO stipulation attached to prevent haphazard loss of wilderness characteristics without consideration in the context of the greater landscape. Energy development and its associated roads in these areas would absolutely, and likely irreversibly, degrade the wilderness character. The 2008 RMP is the foundation for VFO's decision-making around leasing, and defines the following goals and objectives for non-WSA lands with wilderness characteristics (emphasis added):

Goals and Objectives:

- ***Protect, preserve, and maintain the wilderness characteristics (i.e., appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude) of non-WSA lands with wilderness characteristics (see Figure 12a).***
- ***Manage these primitive and backcountry landscapes for their undeveloped character and provide opportunities for primitive recreational activities and experiences of solitude.***

WC-2 The 106,178 acres of non-WSA lands with wilderness characteristics will be managed with the following common prescriptions:

- *VRM Category II*
- ***Closed to oil and gas leasing, except for the White River area which will be open to leasing, subject to major constraints, (NSO)***
- ***Closed to solid mineral leasing***
- ***Closed to disposal of mineral materials***
- *Closed to woodland product harvest*
- ***Avoidance area for rights-of-way***
- *OHVs will be limited to designated routes, except for the upper portion of the Lower Flaming Gorge wilderness characteristics area, which will be closed.*
- *No motorized vehicles will be allowed to travel on a single path up to 300 feet from designated routes to access a camp.*
- *Retain public lands in federal ownership*