July 9, 2020

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

RE: Access Fund, Salt Lake Climbers Alliance, and Friends of Indian Creek Comments to UT September 2020 Oil and Gas Lease Sale

Access Fund, Salt Lake Climbers Alliance, and Friends of Indian Creek (the "Climbing Organizations") welcomes this opportunity to comment on the Bureau of Land Management (BLM) September 2020 oil and gas lease sale (DOI-BLM-UT-0000-2020-0004-EA). The parcels proposed for leasing in this auction attracts thousands of climbers from the US and abroad each year. The Climbing Organizations are concerned by the extraordinarily large volume of leases in this sale and the potential impacts to climbing and other recreational activities in the area. Accordingly, we urge the BLM to follow the state of Utah's lead and cancel this lease sale.

Climbing Organizations

The Access Fund is the national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 7 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with nearly 20,000 members and 130 affiliates.

The Salt Lake Climbers Alliance (SLCA) is a 501(c)(3) non-profit organization that exists to provide a unified voice for climbers in Utah's Wasatch area through advocacy, stewardship, community, and education. BENM is a world-class climbing area that many Utahns travel to every weekend, including SLCA members.

The Friends of Indian Creek (FOIC), a 501(c)(3) organization, works with land managers to promote responsible climbing, and provides resources that help alleviate recreation's impact throughout southeastern Utah. Founded in 2005, the mission of the Friends of Indian Creek is to promote responsible recreation to ensure the conservation of Indian Creek's natural resources and primitive character.

Leasing Proposal is Controversial and Threatens Important Recreation Areas

The Bureau of Land Management (BLM) recently released a proposal to lease 114,050 acres of public land across the state of Utah for oil and gas development, most of which is located near

Moab in Grand County between Canyonlands and Arches National Parks.[1] The proposed leases directly conflict with high value recreation areas, proposed sensitive wildlife protection zones, and are located within only a few miles of three national parks, a state park, and the original boundary of Bears Ears National Monument. One lease is within 1/10 of a mile of the Green River near where a massive oil spill occurred only a few years ago.[2]

The sheer size of this proposed lease sale—in an oil field with a significant number of existing federal and state leases—rivals only the notorious "77 Leases" from 2008 that was so controversial that it prompted lawsuits, a cancellation of the leases, and significant oil reforms designed to incorporate more stakeholder input and balance multiple uses on public lands.[3] Those reforms were abolished a few years ago by the current administration, and now the BLM is moving forward with this extensive oil and gas lease proposal that is again widely opposed by citizens groups, recreation organizations, the businesses community, and local government.

Climbing Resources in the Bears Ears National Monument Planning Area

The extensive region affected by the proposed leases in the September 2020 auction encompasses several important established climbing areas. These include Spring Canyon, Hell Roaring Canyon, Mineral Canyon, and The Tombstone/End of the World Butte (see Figure 1). These locations are significant backcountry traditional climbing objectives that are unique given their remote and pristine condition. Climbing sites around Bartlett Wash and Tusher Canyon also stand to be impacted 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. Moreover, the region is already covered with dozens of existing federal and state leases. Only a few years ago, this area was in development at a very high rate, and if the price of oil recovers the impacts from the existing and proposed leases could turn this unique and valuable climbing area into an industrial zone. In addition to the climbing areas in Grand County affected by this proposal, Muleshoe Canyon in San Juan County and Paiute, Shoshone and Goshute Walls in Sevier County could also be negatively impacted by oil and gas development.

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[1] An interactive map from the Outdoor Alliance, at https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=91208a5c4b354eb8834181ff8bbae11c shows how this proposal conflicts extensively with the abundance of popular and economically productive recreation in the Moab area. Make sure to select both the oil/gas and recreation layers to see all the data and deselect layers to focus on the most relevant data.

[2] See https://www.moabsunnews.com/news/article ce055ca4-e673-11e3-be35-001a4bcf6878.html

[3] See https://www.eenews.net/stories/1059969555

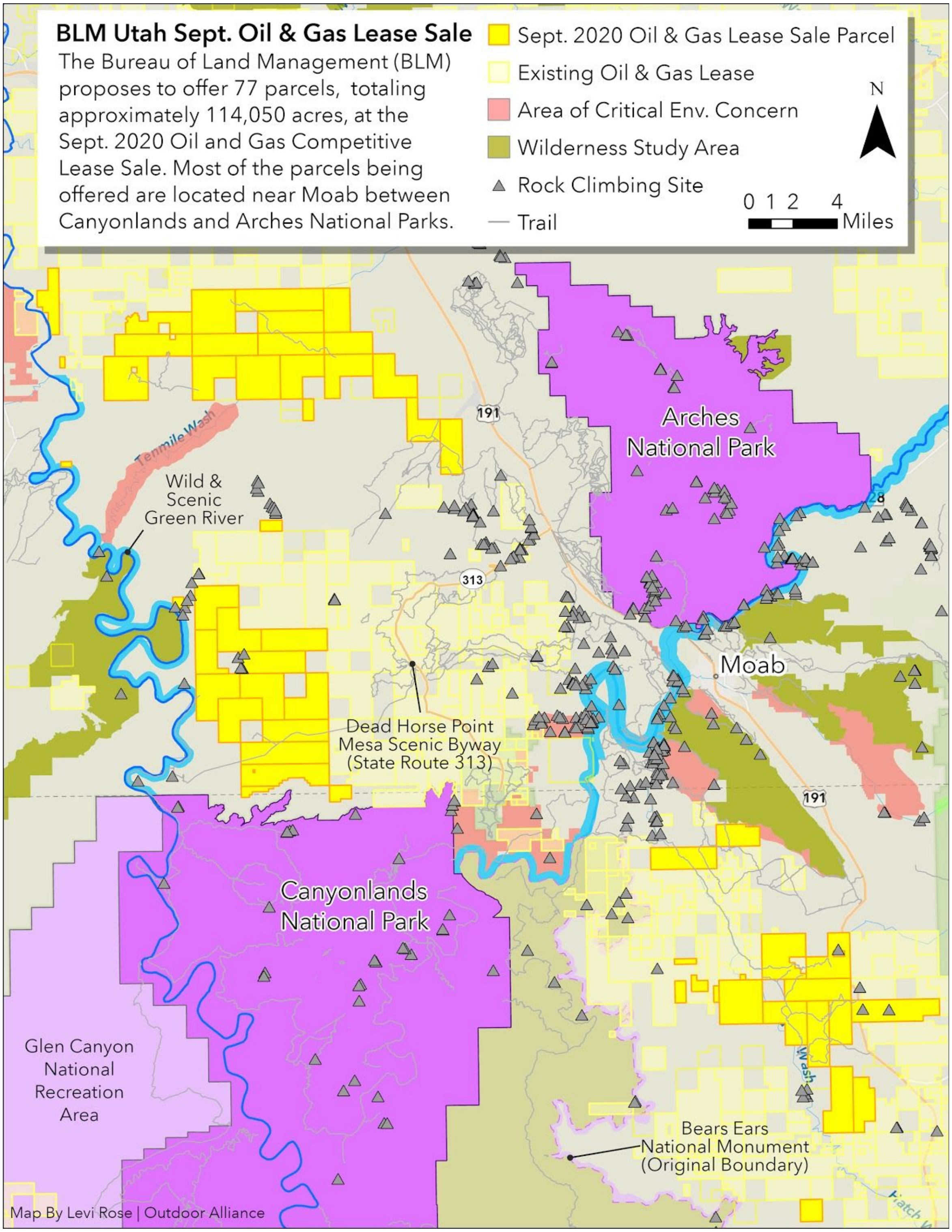

Figure 1. Map of Moab area leases (proposed and existing), national parks, and rock climbing sites (Outdoor Alliance, June 2020)

Industrial Impacts Inconsistent with Outdoor Recreation

The 2015 Moab Master Leasing Plan, which governs much of the oil and gas leasing and production in this sale, did not contemplate the massive scope of new leases now being offered all at once, especially given the extensive existing oil and gas leases in the region. If developed, we can expect what were once popular high-quality recreation areas to compete with increased industrial vehicle traffic, expanded roads systems, marginalized air and water quality, and new safety concerns—all which will transform Moab's outdoor recreation brand into an industrial hot spot.

The BLM acknowledges there is likely to be impacts: during oil well development, there would be emissions from earth-moving equipment, vehicle traffic, drilling, and completion activities. Air pollutants would be emitted from vehicle tailpipes. Fugitive dust concentrations would increase with additional vehicle traffic on unpaved roads and from wind erosion in areas of soil disturbance. Drill rig and fracturing engine operations would result in polluting emissions. These temporary emissions would be short-term during the drilling and completion phases, but during well production there would be continuous emissions from separators, condensate storage tanks, and daily tailpipe and fugitive dust emissions from operations traffic. During the operational phase of a well, a range of emissions would result from the long-term use of storage tanks, pumps, separators, and other equipment. Additionally, road dust would be produced by vehicles servicing the wells. All this in a region very active with mountain bikers, rock climbers, equestrians, OHV enthusiasts, trail runners, hikers, auto-tourists, canyoneers and many other outdoor enthusiasts seeking quality experiences in a natural environment without the negative impacts of industrial development.

BLM Failed to Consider Oil & Gas Impacts on Outdoor Recreation

Despite the importance of outdoor recreation to the Moab economy, the BLM proposal's socioeconomic analysis only considers the marginal benefits *to* the community *from* oil and gas developments—which are few—such as royalty payments to counties (which ironically, the administration has deferred during the COVID pandemic), and temporary jobs for local contractors to build roads, clear drill pads, truck in water, and construct associated support facilities. Local restaurants and hotels may also see a short-term uptick in business from the few dozen but mostly temporary oil workers. But this economic activity is miniscule compared to that which is generated by the outdoor recreation economy, especially now that royalty payments to counties are deferred. Unfortunately, the BLM proposal provides no meaningful cumulative impact analysis of how these leases will impact outdoor recreation. Recent studies that analyze US Dept. of Commerce data conclusively indicate that financial investments in conserving public lands generate more than double the number of jobs than oil and gas investments.[4]

The Moab MLP also did not foresee potential for this broad and simultaneous scope of development, and in any case there have been significant changed circumstances since that plan

[4] See https://www.bu.edu/pardee/files/2020/06/Employment_Impacts_of_Conservation_Spending-Peltier2020.pdf

was completed such as evolving recreation use patterns and new and significant wildlife protection areas. The BLM's own policies—when developing the Moab Master Leasing Plan—required parcel specific environmental analysis, something the BLM has failed to do in this proposal. While the BLM does provide mitigating "stipulations" and "lease notices" in the proposal such as "no surface occupancy" and "controlled surface use" restrictions, these mitigating measures fail to prevent the long-term marginalization of air and water quality, and visual impairments to the regional landscape and entire ecosystem.

But perhaps most significant is that even though site specific parcels may have a no surface occupancy limitation, the oil and gas produced from these wells that was directionally drilled from an adjacent parcel (which would cause air/water/noise/visual impacts) all must still be transported to market via 1) new gas pipelines (if the pipelines are even operating, if not this gas will likely be flared or released into the atmosphere), or 2) via truck in the case of oil. All of the oil produced from the proposed leases in this sale located in and around the popular recreation areas just north of Canyonlands National Park would have to be trucked out Highway 313, one of the busiest and important highways in Grand County that services many BLM recreation areas as well as Canyonlands National Park and Dead Horse Point State Park. The vastly increased volume of industrial traffic on Highway 313 is simply inconsistent with Moab's world-class outdoor recreation economy. These considerations were ignored in the BLM's proposal.

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The BLM should cancel this unprecedented lease sale to prevent damage to Moab's world-class outdoor recreation experiences that support an economic sector far more valuable than the oil and gas industry. Cancelling the auction would recognize that economic trends show recreation offers more sustained yield than the oil and gas industry regarding economic growth and landscape conservation. This is especially important given the current, unprecedented unemployment rates across America. Cancelling the auction would also acknowledge the overwhelming position of the business community, local government, outdoor recreation groups and other public stakeholders that massive oil and gas leasing in the region does a disservice to the future of Moab and Grand County.

Sincerely,

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Access Fund

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