

OUTDOOR INDUSTRY ASSOCIATION \* UTAH RIVER COUNCIL \* LIVING RIVERS \* COLORADO PLATEAU RIVER GUIDES \* HOLIDAY EXPEDITIONS \* RIVER RUNNERS FOR WILDERNESS \* DESOLATION OUTFITTERS \* CENTENNIAL CANOE OUTFITTERS, INC. \* COLORADO RIVERKEEPER \* AMERICAN RIVER TOURING ASSOCIATION, INC. \* OUTWARD BOUND WILDERNESS \* DINOSAUR EXPEDITIONS \* OARS \* ADVENTURE BOUND RIVER EXPEDITIONS \* RIVER RUNNERS TRANSPORT \* BILL DVORAK'S KAYAK AND RAFTING EXPEDITIONS INC. \* RED RIVER ADVENTURES \*

**BY ELECTRONIC MAIL ([UT\\_Vernal\\_Comments@blm.gov](mailto:UT_Vernal_Comments@blm.gov))**

July 23, 2007

Bill Stringer - Vernal Field Office Manager  
Bureau of Land Management  
Attn: Enduring Resources' Rock House Gas Well Environmental Assessment  
170 South 500 East  
Vernal, UT 84078

Dear Mr. Stringer:

We write once again to express our serious concerns with the escalating potential for negative impacts of BLM-approved natural gas activities in and around Utah's last wild and natural section of the White River. As you may recall, a number of local and regional businesses and associations, individuals, and conservation organizations provided your office with detailed comments on the draft Vernal field office resource management plan. These comments urged the BLM to put in place protective management for the entire White River Wilderness Inventory Area (WIA), the proposed White River Area of Critical Environmental Concern (ACEC), and the proposed inclusion of a segment of the White River in the National Wild and Scenic Rivers System. We have also submitted written comments to you from time to time on specific project proposals that have threatened the integrity of the White River and requested that you exercise your discretion to protect this important resource.

Specifically, a number of outfitters and concerned organizations have submitted comments regarding the various incarnations of the “Enduring Resources’ Saddletree Draw Leasing and Rock House Development Proposal Environmental Assessment (EA)” – most recently in the fall of 2006. For many of us, our businesses and livelihoods rely on the remote nature of this stretch of river (as well as other nearby rivers similarly at risk) as well as its abundance of wildlife, natural quiet, dark skies, and wild character. We are seriously concerned that our customers will choose other places to spend their time and money if the White River continues to be so severely and negatively impacted by natural gas development. In addition, many of our members recreate on the White River to enjoy the peace and quiet found there. They are gravely concerned that the special qualities of this place will be lost to the sights and sounds of natural gas development.

We have previously stated our overwhelming desire that new gas development not significantly affect the remarkable White River corridor between the Bonanza Bridge and the Enron take-out. Unfortunately, Enduring Resources’ Rock House project would be the “death knell” of the area’s wild qualities, natural soundscape, and remarkable visual character. It would destroy the remaining wilderness character and outstanding recreational qualities of the White River. The EA for this proposed project is a severely inadequate environmental document that fails to analyze the impacts of the gas wells and associated infrastructure on the natural environment. In addition, it cannot begin to account for the cumulative impacts from present and future natural gas development in the White River area.

We adamantly disagree with the EA's assertion that this development would have only "minor" or "insignificant" impacts to the river's natural quiet, the opportunity for wild and primitive recreation, and the overall visitor experience. The BLM must prepare a comprehensive environmental impact statement (EIS) that fully analyzes these impacts along with the effects of the gas wells and associated infrastructure on the BLM's White River WIA, the proposed White River wild and scenic river corridor, and the proposed White River ACEC. It must account for the cumulative impacts associated with continuing gas development, new roads, new pipelines, and new compressor stations in and around the BLM's White River WIA.

We conclude that the EA fails to take an accurate or hard look at the project's impacts to the White River's wilderness qualities and opportunities for solitude and primitive recreation (canoeing, rafting, kayaking, hiking, camping, and photography). For example, those floating down the river will have the sound of a riverside generator and views of intrusive roads to remind them of the surrounding development, if this project is approved. Likewise, if they should hike to the Goblin City overlook to enjoy a view once glimpsed by Major John Wesley Powell, it will be marred by the sights and sounds of gas wells. These are possibly the most egregious and destructive elements of the current project proposal. The BLM must consider an alternative that would eliminate the riverside generator, water lines, and roads from the area between Saddletree and Atchee washes and that would eliminate visual and auditory impacts from the Goblin City overlook. Such an alternative would completely reject any leasing in the disputed lease UTU-81737. Development in this lease would clearly have a disastrous impact on the area.

The EA, as drafted, shows that the BLM considers recreational opportunities, wilderness characteristics, and solitude to be of lower priority than natural gas development. Such a determination is contrary to the specific mandate given to the BLM in the Federal Land Policy and Management Act. In order to give these resources the same weight and value as natural resource extraction the BLM must fully consider and analyze a lease exchange/buyback alternative. The dismissive and incorrect analysis of this alternative contained in the present EA is insufficient. As this is the only feasible alternative that would fully protect the unique resources of this special area, this is the alternative that the BLM should select.

Natural gas development is already beginning to intrude on this largely pristine environment; any new development activities approved by this project will only exacerbate these intrusions. When considered together, past, present, and future development will significantly impair the river's important recreation and wilderness values. Therefore, we request that the BLM (1) prepare an EIS to evaluate this project; (2) that it fully consider an alternative which would remove the water pumps, generator, and lines from the critical, high-use area between Saddletree and Atchee washes while eliminating visual and auditory signs of gas wells from the Goblin City overlook (an alternative that must consider the cancellation of UTU-81737); and (3) that it fully consider and select a lease exchange/buyback alternative in order to preserve this amazing area.

Thank you for your time and consideration of these comments. Please keep us notified of upcoming opportunities for public input in the NEPA process.

Sincerely,

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