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* Colorado Rivers and Trail Expedition * Desolation Outfitters *
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National Outdoor Leadership School * Outdoor Industry Association * OARS *
Outward Bound Wilderness * Red River Adventures *
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World Wide River Expeditions ***

VIA E-MAIL (UT_Pr_Comments@blm.gov) AND FIRST CLASS MAIL

May 1, 2008

Roger Bankert – Field Office Manager
Price Field Office – BLM
West Tavaputs EIS Comments
125 South 600 West
Price, Utah 84501

Re: *West Tavaputs Plateau Natural Gas Full Field Development Plan
Draft Environmental Impact Statement*

Dear Mr. Bankert,

We are writing to you to express serious concerns about the West Tavaputs natural gas development project proposed by Bill Barrett Corporation, and about escalating negative impacts from BLM approved natural gas activities in and around the Desolation Canyon and Jack Canyon wilderness study areas and wilderness inventory areas.

BLM has described the greater Desolation Canyon wilderness area as having “magnificent wilderness qualities” and an area that “represent[s] one of the largest blocks of roadless BLM lands within the continental United States.” The Green River in Desolation Canyon is one of the most incredible and accessible rafting trips in all of the canyon country. For many of us, our businesses and livelihoods depend on the remote nature of this stretch of river (as well as other nearby rivers similarly at risk), its abundance of wildlife, the natural quiet, its dark skies and its wild qualities.

Intense oil and gas development is already taking place north of Sand Wash. The BLM has leased sections surrounding, and encompassing, the Green River just north of Sand Wash. Furthermore, the Vernal Field Office has approved numerous oil and gas development projects that encroach on the Desolation Canyon wilderness characteristics area.

We are desperately concerned that our commercial river running customer base, as well as the do-it-yourself river runners, will choose other places to spend their time and money if the Desolation Canyon area continues to be severely impacted by natural gas

development. Bill Barrett Corporation's proposed plans would put natural gas wells in side canyons that drain directly into the Green River. Also, the company's development activities would almost certainly be seen and heard from the river itself. Anyone that ventures on a hike up one of the beautiful side canyons in the area will certainly have an experience marred by the sights and sounds of oil and gas development. Many of our members and clients recreate and enjoy the peace and quiet found in the Desolation Canyon area and are gravely concerned that the special qualities of this place are in jeopardy of being lost to the sight and sound of natural gas development.

On top of these impacts, the project would also continue the rapid degradation of Nine Mile Canyon, an area that the Bureau of Land Management itself recognizes as "the greatest concentration of rock art sites in the U.S.A." This once remote area where families could spend a quiet day marveling at the "Great Hunt Panel," the "Owl Panel," or one of thousands of other lesser known petroglyphs, is fast becoming a heavily industrialized area with natural gas compressor stations that run 24 hours a day/7 days a week, along with dozens if not hundreds of heavy trucks running up and down the canyon at all hours of the day.

We would like to offer the following specific comments to be considered while analyzing the long term negative impacts from allowing the West Tavaputs project to proceed:

- (1) BLM must fully consider and analyze an alternative that designates the Desolation Canyon and Jack Canyon wilderness inventory areas as "wilderness study areas." Because BLM is considering approving an action that would destroy wilderness values in these two areas, the agency must consider an alternative that would – conversely – protect them as wilderness study areas. BLM has the authority under FLPMA § 202 (43 U.S.C. § 1712) to establish new wilderness study areas.
- (2) The BLM must fully consider and analyze the purchase or exchange of existing leases inside of wilderness study areas and lands with wilderness characteristics.
- (3) Likewise, BLM must not recommend any new leasing in areas with wilderness characteristics.
- (4) BLM should prepare a supplement to the draft environmental impact statement to fully consider, analyze and disclose the final dust report prepared by Constance Silver. Though apparently completed in the fall of 2007, BLM chose not to make the final report available to the public in the draft EIS. A separate public comment period must be provided for that supplemental study.
- (5) BLM must fully consider, analyze and disclose the noise impacts caused by project activities. For example, as currently written, the draft EIS does not take the required "hard look" at noise impacts to natural quiet in Desolation Canyon – a National Historic Landmark. BLM's own river management policy for Desolation Canyon provides that there is to be no drilling authorized "within sight

or sound of the river.” The draft EIS also does not take a hard look at the effects of project related noise to cultural resources. We believe that the noise associated with the proposed natural gas development will directly and indirect adversely effect our ability appreciate cultural resources and the Desolation Canyon area.

- (6) BLM should allow the several local, regional, and national organizations that requested consulting party status to fully participate in the National Historic Preservation Act Section 106 process. To date, BLM has failed in its obligation to “seek” out consulting parties and BLM’s decision to deny groups such as the National Trust for Historic Preservation, Nine Mile Canyon Coalition, and Colorado Plateau Archaeological Alliance consulting party status must be revisited and reversed.
- (7) We ask the BLM to adopt the no action alternative. The certain loss of non-renewable resources such as cultural sites and wilderness quality landscapes is simply too great to permit this project to go forward as proposed. Such a decision is consistent with existing lease rights because it allows Bill Barrett Corporation and other lessees to propose smaller projects that are more narrowly tailored to existing leaseholds.

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

Amy Kleiner-Roberts
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Tom Kleinschnitz
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Stephen Welch
General Manager
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Lannie Yeager
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Bob Quist, Richard Quist, and Clair Quist
Owners
Moki Mac River Expeditions

David Mackay
Owner
Colorado River and Trail Expedition

Lannie Yeager
Utah Regional Manager
OARS

Cc: Honorable Jon M. Huntsman
John Harja, Public Lands Policy Coordinating Office
Jonathan Jemmings, Resource Development Coordinating Committee
Selma Sierra, Bureau of Land Management, Utah State Director