



United States Department of the Interior

NATIONAL PARK SERVICE
CAPITOL REEF NATIONAL PARK
TORREY, UTAH 84775



IN REPLY REFER TO:

L30

March 17, 2006

Connie Seare
Bureau of Land Management
Utah State Office
P.O.Box 45155
Salt Lake City, UT 84145-0155

Dear Ms. Seare:

Capitol Reef National Park is in receipt of the BLM Notice of Competitive Oil and Gas Lease Sale, scheduled to be posted on May 16, 2006. Several of the parcels are in the vicinity of the park, and three are adjoin the park boundary.

The lands within Parcels UT0506-120 through UT0506-137 are in close proximity to the park. Within Township 26 South, Range 6 East, SLB&M, several sections (26, 27, 28 & the northern half of 35 - included in UT 0506-126 & UT 0506-127) contact the park boundary. Therefore the potential exists for oil and gas exploration or development to affect park resources. All parcels are within Wayne or Emery County, and surface management is administered by either the BLM Price Field Office or the Richfield Field Office. We recognize that parcel-specific NEPA compliance and documentation would be completed for actual exploration or development that may occur. The park would provide site-specific comments at that time, but we believe it to be helpful to offer general comments now so that park concerns may be addressed early in the lease review process.

Our concerns are outlined below.

Viewshed

Several of the parcels are visible from the park. Much of the viewshed in the lease area shows little evidence of human activity except for dirt roads and minor developments associated with grazing operations. Views to the outside of the park are integral to the views within the park, and together provide a pastoral panorama. Facilities constructed on lease areas visible from the park should be designed such that visual impacts are minimized, e.g., via muted and non-reflective colors on buildings and other structures. We recommend that no surface occupancy be permitted on those lands immediately adjacent to the park (sections 26, 27, 28 & the north half of 35), T 26 S., R 6 E., SLB&M.

Capitol Reef National Park was designated Class I under the 1977 amendments to the Clean Air Act. Exploration for and operation of oil and gas wells could affect the park's air quality, and potential lessees should be notified during the leasing process that appropriate mitigation requirements will be incorporated into operations to minimize adverse impacts.

Access and Traffic

Parcels UT0506-120 through UT0506-137 could potentially be accessed via the Caineville Wash Road or the Hartnet Road, which pass through the park south of the lease area. The park's 2001 General Management Plan does not contemplate development of these roads to a standard necessary for the commercial use associated with the potential lease of these parcels. It should be stipulated that access to lease parcels will not be permissible via the portions of the Caineville Wash Road or the Hartnet Road that pass through the park. For those parcels adjacent to the park boundary, it is important that access to the parcels not pass over park lands, and that any roads into the parcels terminate prior to reaching the park boundary. The boundary has been surveyed in this remote portion of the park, although it is not fenced in many areas.

Soundscape

Capitol Reef National Park enjoys extremely low background sound levels. This soundscape is important to visitor enjoyment at the park, and enhances the perception of solitude for park visitors. Oil and gas exploration or development on parcels near the park have the potential to adversely impact the park's soundscape. Enclosures, acoustically designed buildings, mufflers, etc. would be appropriate to minimize noise impacts. On the parcels adjacent to the park boundary, it may be appropriate to limit the operation of mechanized equipment to hours between 0800 and 1700.

Night Skies

Viewing night skies is an increasingly important visitor activity in the park, and minimizing artificial lighting within and near the park is important to permit a remote experience for park visitors. On parcels where night lighting is necessary, all lighting sources should be shielded such that light is not projected skyward without first being reflected to the ground. In cooperation with the BLM and the park, lessees should determine which type of light source would be least intrusive.

Wildlife

Mule deer, peregrine, and prairie falcons are among the wildlife species potentially using the lease area. Although activities in the lease area may not have significant impacts on park wildlife, potential impacts could affect park wildlife management.

Vegetation

Non-native vegetation should not be used in reclamation of disturbed lands. Only appropriate native species, as determined by the BLM in cooperation with the park, prior to development, should be used in reclamation activities. Several rare and federally listed plant species occur in the lease area, and impacts to these species on BLM lands could affect management of these

species on park lands. The park should be included in any consultations with the USFWS under § 7 of the Endangered Species Act.

Watersheds

Operations on leases which may drain into park watersheds should use appropriate containment systems to prevent runoff, e.g., containerized mud systems for drilling, berms, etc. Down-hole disposal of chemicals should be prohibited, and operators should submit emergency response plans that explicitly address accidental oil or chemical spills.

Wilderness

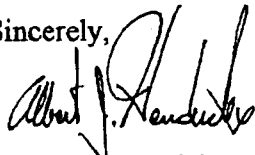
Much of the lease area lies within proximity of park proposed wilderness. Oil and gas leasing and development have the potential to impact wilderness values and impact the experience of park visitors. The recommendations presented above under soundscape, night sky and viewshed would minimize impacts to wilderness values.

Cultural Resources

The park is aware of some archeological sites on park lands in the vicinity of the proposed lease parcels that are adjacent to the park, and the potential exists for additional archeological sites and other historic properties to be located. Consultation with the park's cultural resource staff should occur to assure that impacts to cultural resources within the park near these parcels will not occur.

As the BLM considers oil and gas leases near Capitol Reef National Park, we hope that the concerns identified above will be examined, and the park looks forward to working with the BLM in addressing these concerns on a parcel-specific basis should the BLM consider issuing permits for exploration or development on any of these parcels. Please do not hesitate to contact me should you have any questions.

Sincerely,



Albert J. Hendricks
Superintendent

CC: NPS Utah State Coordinator