

November 10, 2003

Ms. Sally Wisely
Utah State Director
Bureau of Land Management
Suite 300
324 South State Street
Salt Lake City, UT 84111

Re: BLM's November 2003 Oil and Gas Lease Sale: Parcels UT 019, UT 026, UT 027, UT 028, UT 029, UT 030, UT 031, UT 034, UT036, UT 037, UT 038, UT 039, UT 053.

Dear Director Wisely:

As president of the Outdoor Industry Association (OIA), I am writing to protest oil and gas lease sales proposed for the Bureau of Land Management's (BLM) quarterly auction to be conducted on November 24. Of concern are 13 parcels offered for sale which are wholly or partially contained within BLM Wilderness Inventory Areas (WIA) left exposed by the April 2003 settlement of Utah V. Norton.

OIA was founded in 1989 and provides trade service for over 4,000 manufacturers, distributors, suppliers, sales representatives, and retailers in the outdoor recreation industry.

This November oil and gas lease sale represents the first time WIA lands will be offered for auction. The fact that 13 such parcels will be offered has the potential to radically and permanently alter the Utah landscape with significant long range impacts on economic, tourism, recreational and resource protection/designation options available to citizens, local communities and the state.

The State of Utah is home to a healthy and growing outdoor recreation industry. A 2002 Outdoor Recreation Participation & Spending Study conducted by OIA placed Utah third among the 50 states in per capita participation, with over 1.3 million residents involved in outdoor activities. Additionally, demographic and tourism data demonstrate the increasing popularity of Utah and the Rocky Mountain West, based on the quality of life, natural beauty and recreational amenities offered in the region.

The BLM has a long history of managing and protecting an incredible portfolio of wilderness, roadless and backcountry lands and waters. Beginning in 1978, the BLM inventoried for wilderness character on Utah lands, a process that resulted in the establishment of 3.2 million acres of Wilderness Study Areas (WSA). A second inventory, initiated in 1995 recognized an additional 2.6 acres of WIAs.

The settlement of Utah V. Norton removed BLM's ability to apply WIA protection status on these 2.6 million acres. OIA viewed this as a serious threat to the long-term protection and eventual wilderness designation for these areas that are critical for our customers and our growing industry. Beginning in May 2003, OIA has been in discussions with Gov. Leavitt on the need to 1) recognize both the vitality and impact of the Utah recreation economy and 2) recognize the value of wilderness and roadless areas as the foundation of human-powered outdoor recreation in the state.

In an August 2003 meeting with OIA's Executive Committee, the Governor vowed to pursue interim protection on WIA and other wilderness quality lands until their status could be reviewed and subjected to full public scrutiny and comment under a formal planning process. In his final weeks in office the Governor worked to fulfill that promise by:

- Issuing an Executive Order creating an Outdoor Recreation Economic Ecosystem Task Force to "identify the state's premier outdoor recreation destinations and natural assets," stating, "wilderness is an important component of the outdoor recreation economy and, therefore, possesses economic value for the state."
- Issuing a directive to the State Planning Coordinator to "Use whatever tools the state has at its disposal, including the state's consistency review authority, as applicable, to evaluate and seek appropriate preservation from development for parcels of land that consist of 5,000 contiguous acres or more, are roadless, and have wilderness characteristics."
- Filing, on November 4, 2003, a letter with Director Wisely, in opposition to 15 proposed natural gas wells within the White River Inventory Area, stating:
"...until final management decisions are made (in the

Vernal Field Office Resource Management Plan), the state believes BLM must preserve recreational opportunities within the river corridor.”

In keeping with the overall context of the Governor’s statements and actions; noting his formal opposition to 15 new gas wells in prime recreation corridors, and with particular attention to his call for deferment of development until the RMP process has been completed, OIA opposes and would ask the BLM to defer any proposed oil and gas leases on former WIA acreage until:

- 1) The multiple and competing values, benefits and uses of these areas can be thoroughly researched and vetted through a complete planning process with public input.
- 2) The Governor’s task force has every opportunity to research and review the recreational values and opportunities offered by these lands.
- 3) The state, in conjunction with the BLM, has the opportunity to fulfill the Governor’s directive to the Office of Planning and Budget to protect all parcels of land with 5,000 or more contiguous acres demonstrating wilderness characteristics.

OIA requests that the BLM defer the following parcels from the November 24 auction:

Floy Canyon	Coal Canyon	Desolation Canyon	
Flume Canyon			
UT 029	UT 036	UT 026	UT 053
UT 030	UT 037	UT 027	
UT 031	UT 038	UT 028	
UT 034	UT 039		

Horseshoe Canyon
UT 019

Oil and gas is a vital industry for the State of Utah; important to local, state and regional economies, and important to our national energy needs. However, in formulating land and resource decisions the BLM, the state leadership and the people of Utah must carefully consider and balance competing uses and short-term vs. long-term benefits inherent to and derived from our precious natural resources.

Again, BLM should focus on the wilderness characteristics of the lands in these 13 parcels. The agency has inventoried these lands and deemed them to have significant wilderness values. Development for oil and gas will significantly alter those wilderness qualities. In the short term, development, construction, roads, noise and visual impacts will significantly alter the wilderness, recreational, habitat and other values found in these areas. In the long term such development could disqualify these lands from formal wilderness - or other - designation and protection.

Energy development is a short-term use with significant long-term impacts. While these parcels could arguably be reclaimed and returned to recreational and other uses after drilling, the characteristics, values and benefits necessary or desirable for wilderness, roadless or pristine backcountry designation will be permanently altered and may be gone entirely. Agency visitation numbers demonstrate that a formal designation - Wilderness, Roadless Area, National Monument, National Park - can dramatically increase interest in and visitation to a local area. Short-term economic gains from energy development could remove these resource designation options and their long-term economic benefits to local communities and the state. As Gov. Leavitt said in his Executive Order, "...appropriate management and preservation of Utah's outstanding natural areas is essential to the continued vitality of the outdoor recreation experience."

The November sale and energy development on parcels containing WIA lands represents an unprecedented and dangerous bifurcation of these potential wilderness tracts. Many parcels offered in this November sale are small in size. However, leasing of these parcels will radically alter the landscape. UT 026, UT 027 and UT028 cut into the heart of the Desolation Canyon wilderness definitions and characteristics. Similarly with UT 029, UT 030, UT 031 and UT 034 in Floy Canyon; and UT 039 in Coal Canyon.

It's no surprise that recreation visits to BLM lands in Utah topped 10,000,000 last year. From the numerous slot canyons and deep river gorges to the awe inspiring ridges and plateaus, outdoor recreation abounds in Utah's pristine landscapes. A number of the areas proposed for oil and gas leasing exemplify the natural beauty of Utah's wild landscapes. Outdoor enthusiasts cherish areas in the Unitah

Basin for their solitude and primitive recreational opportunities. The following are just a few examples of Utah's recreational gems.

Potential oil and gas drilling in Desolation Canyon seriously jeopardizes the areas recreational opportunities. Outdoor enthusiasts seek out Desolation Canyon because of its remoteness and exceptional wilderness qualities. The area provides a quiet and much sought after retreat for canoeists, birdwatchers, hikers, backpackers and rafters. The rugged and varied terrain makes this area particularly appealing to the adventure seeker. Towering gray cliffs are offset by the tranquility of the winding Green River. The Green River is an exceptionally popular paddling spot, attracting thousands of people to the area each year. Parcels UT 026, UT 027 and UT028 are only a few miles upstream from Sandwash Boatramp, the rafting put-in point for Desolation Canyon - one of Utah's most popular and remote whitewater rafting stretches. Noise, odor and runoff pollution would affect downstream recreation and could compromise the businesses of local outfitters and guides.

Coal Canyon, containing parcels UT036, UT037, UT038 and UT039, is yet another example of an area with outstanding recreational opportunities. Oil and gas leasing threaten the areas solitude and spectacular scenery. Parcel UT036 is particularly notable for its outstanding cultural resources. The canyon walls of this parcel contain extensive petroglyphs, which draw hikers, academics and outdoor enthusiasts alike. A number of areas inventoried in Coal Canyon were found to lack wilderness qualities as a direct result of their proximity to oil and gas fields. It is important that we not let the remaining wilderness quality lands like those found in parcels UT036, UT037, UT038 and UT039 become degraded as well. The WIAs are a natural extension of the Coal Canyon WSA and enhance the recreational opportunities found there. Impressive panoramic vistas cover much of the area and attract hikers, backpackers, horseback riders and photographers. The unique geological features of the area like the steep ridges and V-shaped canyons are a draw for outdoor enthusiasts. Coal Canyon is also a well established and popular upland game hunting ground. Oil and gas wells would reduce game habitat and limit hunting opportunities.

Horseshoe Canyon is an exceptionally beautiful recreation destination adjacent to Canyonlands National Park. It

boasts an extensive series of canyons to be explored, over a vast and remote terrain. Among the characteristics attracting outdoor enthusiasts to the canyon are numerous petroglyphs and pictographs flanking the canyon walls. These ancient markings are truly a sight to behold and only enhance the majesty of the sheer cliff walls. Hiking and horseback riding opportunities abound for those of all skill levels. The cultural history and opportunities for exploration in Horseshoe Canyon make this area a recreational treasure.

Desolation, Horseshoe and Coal canyons are just three prime examples of recreational havens subject to lease in a November auction. We ask that you seriously reconsider opening any of these 13 parcels in WIAs to oil and gas leasing. To do so would jeopardize the integrity of Utah's precious landscapes and recreational retreats, and would disregard the long term viability of these parcels of land. We appreciate your time and serious consideration of this protest.

Sincerely,

Frank Hugelmeyer
President/CEO
Outdoor Industry Association