



Utah Rock Art Research Association
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September 2020 OIL & GAS LEASE SALES DOI-BLM-UT-0000-2020-0004-EA
<https://eplanning.blm.gov/eplanning-ui/project/2000028/510>

Request for Consulting Party Status and Comments

The Utah Rock Art Research Association (URARA) requests the opportunity to be a consulting party to and comment on the above noted Oil and Gas Lease Sale.

We have a long history of working with Utah BLM and each Utah field office, and would like to continue this partnership. Thank you for accepting us as a consulting party in the development of these activities.

URARA is the largest organization actively engaged in the conservation and preservation of petroglyphs and pictographs (rock art) in the state of Utah.

Our mission is:

- To lead in the preservation and understanding of the importance of rock art
- To encourage the appreciation and enjoyment of rock art sites
- To assist in the study, presentation, and publication of rock art research

We are engaged with land managers on federal, state, county, and city lands, assisting with and consulting on land use activities that may impact rock art. We are a resource for government agencies, municipalities, communities, and private land owners, to aid in identifying, preserving, and protecting these cultural resources within their boundaries and/or jurisdictions.

Our concerns for this lease sale are:

- Less than 15% of BLM lands within the State of Utah have been surveyed for cultural resources. Lease sales have the potential to threaten cultural resources that are unknown at this time.
- It is also our understanding that all undertakings associated with oil and gas development on these leases will be handled through site specific NEPA and NHPA – Section 106 processes if, and when, lease development proceeds. However, these processes and this lease process focus only on future direct impacts associated with development and often ignore the cumulative impact of roads, pipelines, storage facilities, and other requirements of resource development companies which may occur within or outside of the lease parcel. These impacts also have to be given weight in the leasing and development decisions.
 - Many of the leases proposed in this sale are in areas of high tourism, particularly in the Moab area and around national parks. Roads in these areas are already heavily used with high traffic and limited parking. Additional traffic created by viability testing and development of oil and gas in these areas would further exacerbate these issues and the presence of large vehicles could constitute a safety issue.

- There seems to be a lack of consideration of visual impacts in this lease sale on areas of high tourism use including national parks and other areas of high tourist visitation.
- The Federal Land Policy and Management Act of 1976 requires that “public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use”. This requirement seems to be superseded by a misguided attempt to encourage oil and gas development at all costs by the current administration and in this lease sale.
- Climate change is the existential crisis of our time. Immediate action must be taken to avert a disaster twenty to thirty years down the road. The impact of oil and gas must be considered in terms of its impact on climate change and implications for humans everywhere.

We wish the following parcels: 53, 56, 113, 117, and 120 to be deferred in this lease sale due to the presence of important cultural resources. We will be happy to discuss the nature and location of these cultural resources in private with BLM officials.

Thank you for including our comments and accepting us as a consulting party in these processes. Please notify us of any oil and gas undertakings arising out of this lease sale. Ultimately our goal is to preserve cultural resources for current and future generations to enjoy, study, and appreciate.

Sincerely,
Troy Scotter, URARA Conservation & Preservation Chair
www.utahrockart.org