

Master Leasing Plan (MLP) Assessment
San Rafael River

Utah State Office
Price, Richfield and Moab Field Offices
November 2010

Name and Location of MLP Area: San Rafael River, east-central Utah

Internal or External Proposal?

DESCRIPTION:

EXTERNAL – Southern Utah Wilderness Alliance (SUWA), August 17, 2010.

The 848,726 acre proposal area is in east-central Utah and includes the majority of the San Rafael Desert between the San Rafael Reef and the Green River. The western boundary of the proposed area follows state road 24 in a southwesterly direction to the Dirty Devil River. The southern boundary follows the northern and western boundaries of the Dirty Devil and Horseshoe Canyon South WSAs to the Maze portion of Canyonlands National Park. The eastern boundary follows the western boundary of Canyonlands National Park north along the western bank of Green River to Ruby Ranch then crosses the river in a northeasterly direction to the Bookcliffs. The northern boundary follows the southern boundary of Desolation Canyon WSA thence in a direct western line to Mexican Mountain WSA. The area includes lands within the Richfield, Price and Moab Field Offices

INTERNAL: BLM developed a similar but smaller area of consideration. The internally proposed area utilizes the same western boundary of the SUWA proposal as far as the Dirty Devil River but does not use the WSA boundaries or the National Park Service boundary to delineate the southern boundary. The southern boundary uses land line descriptions north of the WSAs to the western boundary of the North Horseshoe Canyon WSA. The eastern boundary follows the western bank of the Green River to Interstate 70 thence along US highway 6 to the northwest, excluding those portions of the SUWA proposal east of the Green River. BLM's decision to place the boundary along the western bank of the Green River was made because the portions of the SUWA proposal east of the river are included in a separate MLP proposal and are addressed there. The BLM proposal encompasses lands within the Richfield and Price Field Offices and has excluded those lands that SUWA proposed within the Moab Field Office.

Map A illustrates the boundaries of the MLP proposals (external and internal) including the authorized, pending and deferred leases within the proposed area. Map B shows existing oil and gas fields, producing oil and gas wells, shut in oil and gas wells, and plugged/abandoned wells. The Utah BLM recommendation is the internal San Rafael River MLP as delineated on the map San Rafael River A.

Does the area meet the criteria and qualify for MLP analysis?

Although there has been leasing in the proposed MLP area, there has not been any discovery of oil or gas in the vicinity. However, the State Director proposes to exercise his discretion to take a closer look at the area and recommends that an MLP be prepared for the internally proposed area delineated on the attached maps. The internal boundaries were created within the same

general area of the external proposal but adjusted to better fit the criteria and to include sold-but-not-issued leases and leases which had been suspended as a result of previous litigation.

Background Information:

1. What Resource Management Plan(s) are applicable to the MLP area?

Price Field Office Record of Decision and Approved Resource Management Plan (RMP); dated October 31, 2008¹ (as maintained).

Richfield Field Office Record of Decision and Approved Resource Management Plan (RMP); dated October 31, 2008² (as maintained).

Moab Field Office Record of Decision and Approved Resource Management Plan (RMP); dated October 31, 2008³ (as maintained). [External Proposal only]

2. Potential resource issues raised in the MLP proposal

Potential resource value issues raised in the MLP proposals include impacts from leasing on dust melting snow, regional climate change, global climate change, wildlife, sensitive plants, endemic pollinators (bees), Citizen Wilderness Proposals (CWP), an area considered and not designated as an Area of Critical Environmental Concern (ACEC), a river segment determined as suitable for designation as a Wild and Scenic River (WSR), and areas for recreational activities such as river running, primitive hunting, and hiking. Wildlife issues from the external proposal include: big game and large mammal habitat (desert bighorn and pronghorn antelope); sensitive fauna (Colorado River endangered fish); and habitat for state “wildlife species of concern” (ferruginous hawk, burrowing owl, short-eared owl, and long-billed curlew, peregrine falcon and bald eagle, to name a few). The external proposal also states that the area encompasses five Citizen Wilderness Proposal areas (Price River, Desolation Canyon, Lost Spring Wash, Mexican Mountain, and Sids Mountain) which SUWA contends that the BLM should consider at this time.

[Note: There are actually nine areas involved – missing in SUWA’s proposal is any mention of San Rafael River, Sweetwater Reef, Flattops, Dirty Devil, Duma Point, and Labyrinth Canyon, which are within the proposal area. Sids Mountain and Price River, although described in the SUWA proposal, are not in the proposed area.]

3. How does the current Plan address these issues?

The decisions within the Approved RMPs were developed through an interdisciplinary process and extensive public participation including SUWA. The RMPs also considered provisions of other state, county and federal plans, habitat management plans, endangered species recovery plans, and numerous activity plans and policies. The issues identified have been addressed in the current RMPs.

Consultations under Section 7 of the Endangered Species Act were based on appropriate surface disturbing activities and a Biological Assessment was completed. The effects determinations for each listed species based on conservation measures,

¹ Accessed online at: <http://www.blm.gov/ut/st/en/fo/price/planning.html>.

² Accessed online at: http://www.blm.gov/ut/st/en/fo/richfield/planning/rmp/rod_approved_rmp.html.

³ Accessed online at: <http://www.blm.gov/ut/st/en/fo/moab/planning.html>.

stipulations and notices are affirmed by USFWS in their Biological Opinion (Price RMP, Appendix R-4; Richfield RMP, Appendix 4; and Moab RMP, Appendix B). The RMPs detail fluid mineral development best management practices (Price RMP, Appendix R-14; Richfield RMP, Appendix 15; and Moab RMP Appendix A). Sensitive species and other wildlife specific stipulations/notices were developed in cooperation with the State of Utah's Division of Wildlife Resources and USFWS (Price RMP, Appendix R-3; Richfield RMP, Appendix 11; and Moab RMP Appendix A). Specific raptor best management practices were also adopted (Price RMP, Appendix R-5; Richfield RMP, Appendix 10; and Moab RMP Appendix R). The RMPs also include map delineations of protected areas for multiple species (Price RMP, Maps R-3, R-4, R-6 to R-9; Richfield RMP, Maps 5 – 10 and Moab RMP, Maps 9, 10, 24-29, 32-33).

Within Price RMP, additional special status species decisions address compliance with BLM manual 6840, implementation of conservation plans or alternative management strategies, application of emergency procedures, prohibition of surface disturbing activities that may affect listed species or critical habitat, maintenance/update of conservation agreements, and protection of greater sage grouse habitat (conservation strategy, leks and winter) (RMP, pages 79 & 80). Similarly, the Richfield RMP and Moab RMP special status species desired outcomes and management guidance are detailed on page 89 and 117-125, respectively.

Likewise, wildlife and fisheries decisions in each plan include (but are not limited to) provisions for predator control coordination, recognize/implement State of Utah wildlife management plans, utilize mitigation options, minimize habitat fragmentation, maintain riparian/wetland areas at proper functioning condition, achieve desired plant community, allocate forage/browse, enhance forb production for pronghorn, convert livestock from sheep to cattle within bighorn sheep habitat, address migratory birds (conserve habitats and promote healthy vegetation communities), introduce or augment fish and wildlife species populations in coordination with Utah Division of Wildlife Resources, and incorporate raptor best management practices (Price RMP, Appendix R-5; Richfield RMP, Appendix 10 and Moab RMP Appendix R). Manipulation of fish habitats for maintenance, recovery and enhancement are also detailed in the Price RMP (pages 81-85).

Management considerations in selecting the approved RMPs include (but are not limited to) stipulations for all surface disturbing activity authorizations and include the following resources/programs: air quality, cultural resources, visual resource management, wildlife, threatened and endangered species, special status species, wild horses and burros, BLM Natural Areas, off highway vehicle & travel management, recreation, livestock grazing, lands & realty, energy and mineral development, and special designations (Areas of Critical Environmental Concern and Wild and Scenic Rivers).

Management decisions to provide for continued protective management of the relevance and importance values of those potential ACECs not designated is addressed in the respective RMPs (Price RMP Table R-3, Pages 43-48; Richfield RMP, Table R-2, pages 37-52; and Moab RMP Table 2, pages 30-33).

Portions of the Lower Green River area (ecology, scenic, vegetation and cultural R&I), overlap the Horse Canyon WSA which is managed under the Interim Management Policy for Lands Under Wilderness Review (IMP) and are thus closed to oil and gas leasing. Outside of the WSA, the scenic, ecology and vegetation R&I values occur only beneath the rim of Labyrinth Canyon. R&I values are maintained by VRM Class II (Wild and Scenic River suitability determination), travel limited to designated routes and closure to oil and gas leasing under the Three Rivers Mineral Withdrawal. Primitive recreation opportunities are maintained and include limitations on development of facilities. Surface disturbance is also precluded within riparian/floodplains areas. Cultural resources are protected by law and policies. Additional protections are not warranted to maintain the R&I values.

Within the Temple Cottonwood Dugout area (cultural R&I), the cultural resources are protected by statute and policies. As such, more restrictive protections are not warranted to manage the R&I values.

The San Rafael River eligible segment that extends from state road 24 to the conjunction with the Green River was not determined to be suitable for designation as a wild and scenic river (Price RMP, page 49).

Non-WSA areas with wilderness characteristics were considered throughout the planning process. As discussed in the RMPs, areas not selected for the management of wilderness characteristics are managed under other resource management decisions which can provide some measure of protection for those characteristics but does not entirely preclude surface disturbing activity.

The RMPs specifically identify river running (boating – rafting, canoeing and kayaking), hunting, and hiking (Price RMP, page 37; Richfield RMP, page 32 and Moab RMP, page 29) as available recreational opportunities. Visitors to the planning areas come for non-motorized and motorized activities which inherently conflict with one another.

Each RMP establishes goals and objective for the management of air quality that reflect standards set by regulatory agencies (State of Utah and Environmental Protection Agency) (Price RMP, Page 31; Richfield RMP, Page 27; and Moab RMP, Page 23). Air quality decisions (Price RMP, pages 64-65; Richfield RMP, pages 70 - 71; Moab RMP, pages 52-53) are set to ensure that BLM authorizations comply with applicable laws, regulations and implementation plans. As such, site specific proposals for oil and gas development activity would incorporate quantitative air quality analysis methods in consultation with the State of Utah and EPA. The Proposed RMPs (Price, pages 3-2 to 3-8; Richfield, pages 3-3 to 3-18; and Moab, pages 3-1 to 3-12) contains (including but not limited to) specific discussions of global climate change, prevention of significant deterioration, visibility, and pollution sources among other parameters.

A listing of RMP protesting parties and a summary of issues are contained in the Director's Protest Resolution Report prepared on October 28 (Richfield and Moab)

and 29 (Price), 2008⁴. Challenges to the RMPs were appropriately addressed during the planning process. RMP decisions were reviewed against the protest merits and specifically addressed non-WSA lands with wilderness characteristics, ACECs and wild and scenic river designations. For example, the SUWA (et al) protests claimed that the BLM did not properly consider the most current wilderness characteristics information and did not consider impacts of all lands that contain wilderness character. SUWA disputed the boundary delineations made by the BLM and therefore maintained that the BLM ignored vital information. In his reports, the Director affirmed the BLM's process and stood on its subsequent decisions within each planning area.

If MLP analysis is warranted, describe how and when MLP analysis will likely occur:

The RMPs for these areas were completed in 2008. An MLP would be a “stand-alone” effort and not part on an ongoing or planned RMP revision. Upon receiving a decision from the director on Utah's proposed MLP submission, the MLP would be prioritized and initiated as budgets allow.

Describe the process used for review:

For each of the proposals (the external and the internal) interdisciplinary teams looked at a range of GIS layers to determine if the proposal area fit the four criteria listed to require a MLP. The following GIS layers were reviewed as part of the interdisciplinary review process: existing leases, wells (active and plugged-and-abandoned), land ownership, deferred parcels, unissued leases with pending protests, leases which are under suspension due to court decisions, and expressions of interest (EOI) - all overlaid with resource data. The resource data included WSA's, citizen proposed wilderness areas (Red Rocks), ACEC's, Wild and Scenic Rivers, BLM natural areas, management decisions regarding oil and gas leasing surface disturbance, and especially sensitive wildlife habitat data like sage grouse and white tailed prairie dog. Mineral potential was also reviewed as part of this process.

Describe how and why each of the following criteria are met or not met:

1. A substantial portion of the area to be analyzed in the MLP is not currently leased.

MET = EXTERNAL – 70% unleased BLM land.

MET = INTERNAL – 52% unleased BLM land.

2. There is a majority Federal mineral interest.

MET = EXTERNAL – 83% Federal.

MET = INTERNAL – 87% Federal.

⁴ Accessed online at: http://www.blm.gov/wo/st/en/prog/planning/protest_resolution/protestreports.html. Scroll down to Utah and click on the respective Price, Richfield and Moab reports.

3. **The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the general area.**

Industry interest has been expressed in the past several years, resulting in some new leasing. There are some Stiles parcels (parcels from the December 2008 sale that were withdrawn) along the western bank of the Green River. The area has had some exploration for oil and gas over the years, which has resulted in numerous plugged and abandoned wells west of the Green River. There has been no production (no discovery), therefore this criterion has not been met.

4. **Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are:**

This criterion is not met because there is no new information or changed circumstances including air quality from that analyzed in the 2008 RMPs. There also are not any impending conflicts with any National Park System, national wildlife refuge, or National Forest wilderness area. However there are sold-but-not-issued and suspended leases with wildlife and wilderness character issues.

- **multiple-use or natural/cultural resource conflicts;**

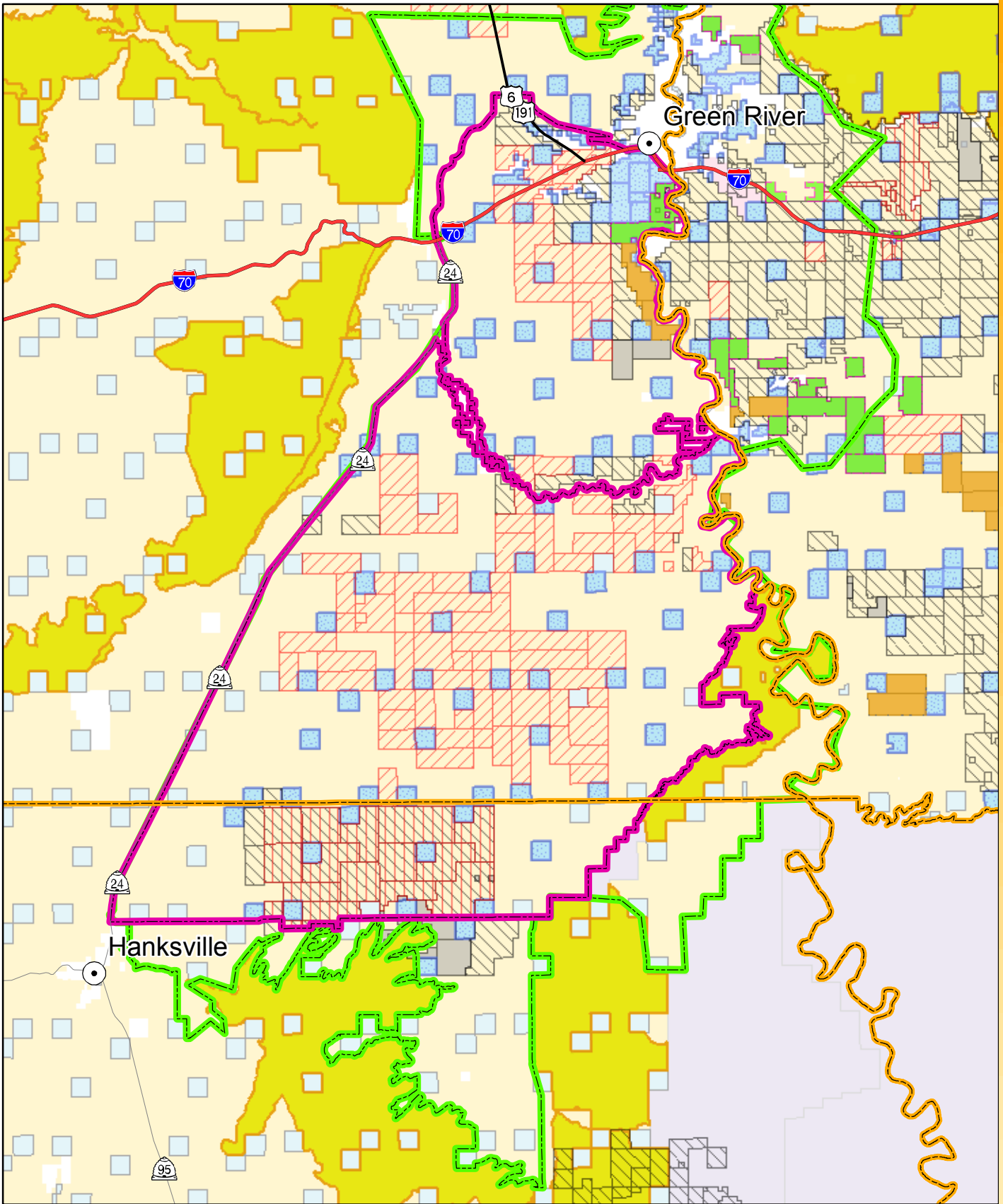
The area contains several protested (sold-but-not-issued) and suspended leases with wildlife and wilderness character issues. The area also contains four “Stiles” parcels within the northern portion of the internal proposal where conclusions/recommendations were to lease, while some of the parcels were recommended for deferral in order to verify wilderness review.

- **impacts to air quality;**

Air quality is not a resource specifically at issue in the external proposal, however air quality will be analyzed in any document that is completed before leasing is commenced in the area.

- **impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or impacts.**

The southeastern border of the external proposal is contiguous to a portion of Canyonlands National Park, but the external proposal boundary is not. However, the BLM will continue to coordinate with the National Park Service (NPS) while conducting analysis near this National Park unit. There are not any national wildlife refuges, or National Forest wilderness areas near these MLP proposal areas. When conducting the analysis for this area the BLM will also coordinate with the Utah Division of Wildlife Resources, the US Fish and Wildlife Service, the US Forest Service and the State of Utah School and Institutional Trust Lands Administration and the NPS.



No warranty is made by the BLM for use of the data for purposes not intended by the BLM. This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers.



1:446,765 00-0.8 1.6Miles



Internal Analysis Area
External Analysis Area

Leases At Issue

Issued_Suspended Sold_Not Issued

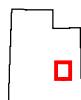
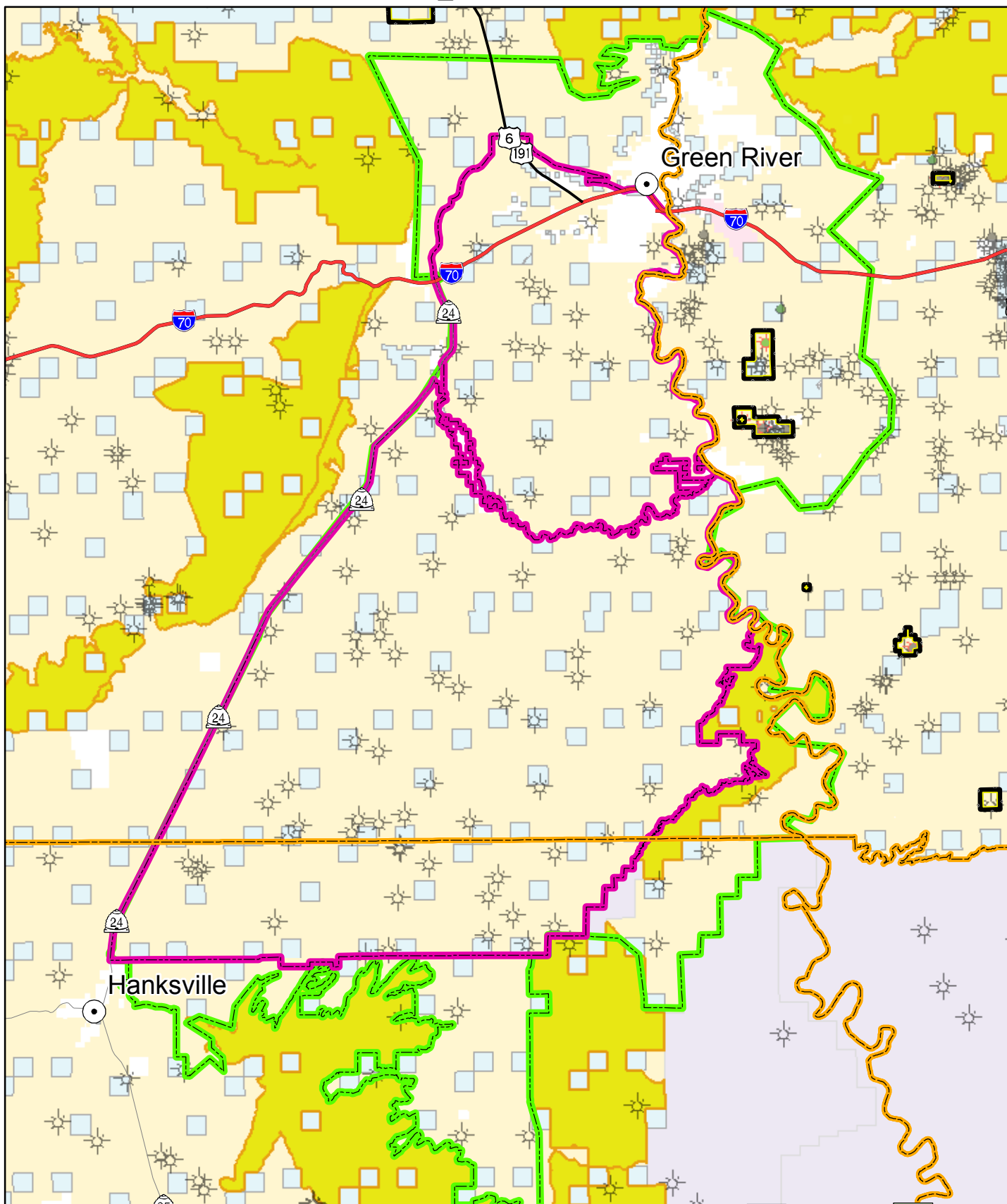
Closed Defer Lease

Authorized Parcels
Deferred Parcels
SITLA Parcels

BLM
BLM Wilderness
WSA

USFS
NPS
N. A. Res.
State
Private
Military





No warranty is made by the BLM for use of the data for purposes not intended by the BLM. This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers.



1:446,765 0 1.5 3 6Miles

- | | | | | |
|----------------------|--------------------------|--------------------|--------------|--------|
| ✱ Abandoned | Wells | ● Shut In Gas Well | ■ BLM | ■ USFS |
| ✱ Producing Gas Well | ● Shut In Oil Well | ■ BLM Wilderness | ■ NPS | |
| ✱ Producing Oil Well | ■ Oil and Gas Fields | ■ WSA | ■ N. A. Res. | |
| | ■ Internal Analysis Area | | ■ State | |
| | ■ External Analysis Area | | ■ Private | |

