



Public Comments for the BLM's Environmental Assessment of Expression of Interest 266 (EOI-266).

Paul Mohai <pmohai@umich.edu>

Tue, Jul 23, 2013 at 8:52 PM

To: es_eoi_nominations@blm.gov

Cc: Caroline Mohai <cmohai@med.umich.edu>, "Strohl, Derek" <dstrohl@blm.gov>

Bureau of Land Management
7450 Boston Blvd.
Springfield, VA 22153

Attention: Kemba Anderson

Dear Ms. Anderson, attached please find our comments on the Bureau of Land Management's Environmental Assessment of Expression of Interest 266 (EOI-266).

If you could confirm with us that you have received this e-mail and our comments, it would be greatly appreciated. Many thanks.

Sincerely,

Paul Mohai
734-255-2124

Caroline Mohai
734-663-6106



Comments on BLM Draft EA for EOI 266 from P & C Mohai.docx

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Bureau of Land Management
7450 Boston Blvd.
Springfield, VA 22153

Attention: Kemba Anderson

Subject: Public Comments for the BLM's Environmental Assessment of Expression of Interest 266 (EOI-266).

Date: July 23, 2013

Dear Ms. Anderson:

We own one of the properties (which includes our vacation home) inside one of the two 40 acre parcels that are being considered for oil and gas leasing by the BLM and discussed in the BLM's Environmental Assessment of Expression Of Interest 266 (EOI-266). Our property is also part of Duna Vista Resorts. We have owned this property since 2005 and are very familiar with the aesthetic, wildlife, forest, water, beach, recreation, and related values that make Duna Vista Resorts and Pentwater Township a desirable destination for tourists, vacationers, vacation home owners, and retirees. Indeed, this area of Michigan is the epitome of the State's popular "Pure Michigan" advertising campaign.

We have reviewed thoroughly the Draft Environmental Assessment (EA) for Expression of Interest (EOI) 266 and we are very concerned about the potential harms that could result to the existing values of this area from selling oil and gas leases in the two 40 acre parcels in Pentwater Township and covered by the EA. Even though in the EA the BLM states that the selling of oil and gas leases does not constitute an authorization to drill wells in those two parcels, nor obligates the successful lease bidder to drill a well, it is clear that the purpose of offering up such leases is for anticipated oil and/or gas extraction activities. Indeed, in a number of places in the EA it is stated that "it is reasonable to expect the development of one well in the future." Such development includes a myriad of activities that could produce significant harms on the existing aesthetics and tranquility, plant and wildlife, recreation and tourism, and home values in the area. By the BLM's own accounting in the EA, these harms could include clear cutting of trees and complete removal of vegetation to construct well pads and construct roads, drilling, noise, noxious smells, truck traffic, and related activities. At the same time, by the BLM's own accounting, the expected economic benefits of oil and gas leasing and development in this area are expected to be very small.

We participated in a conference call with the BLM on May 8, 2013 where it was stated that for this area of Michigan maximum oil and gas lease bids would likely be no more than about \$3.25 per acre. Furthermore, lease rentals would be no more than \$1.50 per acre in the first five years of the lease and \$2.00 per acre in the second five years. Thus, the expected maximum revenue from the selling and rental of the leases on the 80 acres over a 10 year period would be no more than about \$1660. We believe this is a trivial amount compared to the much more significant harms that oil and gas drilling and development could impose on the environmental, recreation and tourism, and home values that currently exist in Duna Vista Resorts specifically

and in Pentwater Township generally. Furthermore, the BLM acknowledges in the EA that Oceana County is not an area that has high potential for oil and gas development and in fact in 2012 the County did not receive any payments directly related to oil and gas production on federal lands. Especially revealing, the BLM states that: "The project [drilling a well in the Decision Area] would likely bring very small revenues in the form of royalty payments, severance taxes, and rent monies to the state and county, wages, and salaries... [and others]."

Indeed, given the trivial amount of revenues and economic benefits likely to result from oil and gas leasing and development and the rather large potential harms that could occur on existing environmental, recreation, tourism, and home values in the area, we do not understand why the "No Action" alternative was not given serious consideration. We suspect that if a formal and proper benefit-cost analysis were conducted, such analysis would reveal that the "No Action" alternative would be the preferred alternative. Because of the small economic benefits expected from oil and gas leasing and development on the two 40 acre parcels evaluated in the EA and the much greater potential harms to existing economic and environmental values, we oppose the selling of oil and gas leases on the two 40 acre parcels in the Decision Area in Pentwater Township.

Sincerely,

Paul and Caroline Mohai

Duna Vista Resorts Home Owners and Members

5669 W. Duna Vista Drive
Pentwater, MI 49449

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