



United States Department of the Interior

NATIONAL PARK SERVICE
Southeast Utah Group
Arches and Canyonlands National Parks
Hovenweep and Natural Bridges National Monuments
2282 S. West Resource Boulevard
Moab, Utah 84532-3298

IN REPLY REFER TO:

L3215

October 25, 2011

Ms. Shelley J. Smith
Bureau of Land Management
82 East Dogwood Street
Moab, UT 84532

Dear Ms. Smith:

Thank you for the opportunity to review the Environmental Assessment (EA) that you prepared for the February 2012 federal oil and gas lease sale of parcels in the Moab Field Office. We greatly appreciate BLM efforts to consult and coordinate with NPS and address our concerns related to air quality and other issues. Discussions among BLM and NPS air-resource specialists have been particularly productive in determining the most appropriate approaches for addressing air quality at this phase of the development process. We endorse BLM's intent to include a lease notice that specifies required Best Management Practices (EA p. 37) for development projects related to this lease sale. As requested in our previous scoping comments, we also ask that BLM include a lease notice to inform potential lessees that additional air quality control measures may be imposed prior to granting a Permit(s) to Drill, pending the outcome of future regional modeling studies, other analyses, or changes in regulatory standards. For this lease notice, we recommend the following language modified from previous language prepared by BLM –

The lessee/operator is given notice that prior to project-specific approval, additional air quality analyses may be required to comply with NEPA, FLPMA, and/or other applicable laws and regulations. Analyses may include dispersion modeling for deposition and visibility impacts analysis, control equipment determinations, and/or emission inventory development. These analyses may result in the imposition of additional project-specific air quality control measures.

Please get in touch with me if you'd like to discuss our comments or other aspects of this process. We appreciate the opportunity to participate in this effort.

Sincerely,

Kate Cannon
Superintendent
Southeast Utah Group