



Changing Rural Economies: Why Oil and Gas Reforms Should Strengthen Protections for Outdoor Recreation

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Introduction

Economies across America's western states have long depended on oil and gas development. In some places oil and gas is the dominant economic driver and mineral royalties have served as important sources of revenue, funding assets from convention centers to community swimming pools while also supplementing general county operating funds. But energy markets are changing, and many county governments now see the need to plan for this change. Like coal communities, places that plan to pivot early towards new sources of jobs and revenues have a

real opportunity to thrive, while those that wait face sharp declines in jobs, county budgets, and even population.

The BLM’s proposed Fluid Mineral Leases and Leasing Process rule (“Oil and Gas Rule”¹)—released in July of 2023—includes many much-needed and long-overdue reforms to the onshore oil and gas leasing system that will have a significantly positive impact on the ability of communities to prosper as energy markets transition.² These updates include an important opportunity to support communities in transition by requiring a much more in-depth review of the impact of oil and gas leasing on recreation, outdoor access, frontline community quality-of-life, and prospects for future economic prosperity. Among the important proposed updates in this Oil and Gas Rule are provisions to address the “lack of preference criteria to aid in the selection of sale parcels [that] also leads to conflict when leases are offered in areas with sensitive cultural, wildlife, and *recreation resources*.”³

This paper addresses the need to formalize this preference criteria to protect recreation resources and to strengthen provisions related to recreation to create a management protocol that is both effective on the ground and long-lasting. In doing so we will describe how rural communities are adversely impacted by oil and gas leasing, provide case studies that demonstrate such conflicts, and highlight emerging communities in transition whose future prospects will suffer without effective reforms related to outdoor recreation and oil and gas leasing. We will then describe how the draft of the current proposed Oil and Gas Rule will address these problems and provide recommendations for improving the rule.

Background: How Rural Economies Are Negatively Affected by Poorly Planned and Managed Oil and Gas Leases

In addition to climate impacts, noise, air and water quality concerns from industrial operations can harm outdoor recreation experiences. This in turn damages future economic prospects for public land communities both with regard to tourism and attracting business investment. This harm manifests in direct contact for visitors with contaminated air and water and through damage to the reputation of the community. Even when lands are simply leased and not yet developed the shadow of future industrial development inhibits investments in trails and other recreation assets and dampens business recruitment. While tourism officials can spend millions marketing a location for outdoor recreation experiences, if a place has a reputation for industrial traffic, noise, and pollution that degrades the outdoor experience—or is at risk of future development—transitioning beyond resource extraction to a cleaner and more durable

¹ See Bureau of Land Management. “Fluid Mineral Leases and Leasing Process.” 88 Fed. Reg. 47562, found at <https://www.federalregister.gov/documents/2023/07/24/2023-14287/fluid-mineral-leases-and-leasing-process>.

² See Gelles, David, et al. “The Clean Energy Future is Arriving Faster than You Think.” *New York Times*, 17 Aug. 2023, found at <https://www.nytimes.com/interactive/2023/08/12/climate/clean-energy-us-fossil-fuels.html>.

³ See 88 Fed. Reg. 47562, at p. 47565.

economy that includes increasing tourism and diversified business investment will be nearly impossible.⁴

Leasing Low Potential Land Dominates Land Manager Resources That Could Be Better Used for Recreation Management

In the context of oil and gas leasing, low potential lands include places known to have little or no economically viable oil and gas. When land managers spend resources to lease and administer lands with low potential, communities can lose in two ways. First they have very little prospect of additional oil and gas revenues from lands with low potential, and second their local BLM staff is focused on managing oil and gas leases while other more pressing recreation needs take a back seat. Take Farmington, New Mexico where the community spent years and many thousands of dollars marketing itself as an outdoor recreation hub for OHV and other activities. Unfortunately, the initial success of the city's new "Jolt Your Journey" motto was hampered by the lack of recreation planners at the local BLM office that had long been focused primarily on oil and gas development. When Farmington area elected officials began to work in earnest to expand the region's economic prospects, it took several years to even begin to get the BLM recreation resources needed to meet community demands for recreation planning and management. Fortunately, today Farmington is making great progress with recreation investments, primarily because of a very intentional dedication and commitment of resources—supported by local elected officials—supporting the BLM's efforts to facilitate outdoor recreation projects.

Significant Resources Are Often Spent By Multiple Stakeholders To Mitigate Conflicts

Even when a BLM office has appropriate recreation staff, current oil and gas leasing requirements can disrupt progress and require vigilant attention from local elected officials and the public. For example, in Grand County, Utah—the home of Moab, a world-famous recreation destination—speculative oil and gas lease nominations continue to threaten recreation assets and utilize resources at regular intervals. In 2020, during just one of many similar occasions, over 120,000 acres were nominated for leasing by a single entity, who did not have the resources or even a solid intention to develop these parcels.⁵ Further, due to the distance of these parcels from known productive oil and gas installations, the economic viability of drilling on the nominated acres was extremely uncertain.

⁴ See Outdoor Alliance and Public Land Solutions. "Outdoor Recreation and Oil & Gas Leasing Reform" (2023), found at https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/64b717f8a7553f53f46c8d59/1689720838274/Report_Rec%2BO%26G+Reform+-+05252023+-+Final-compressed.pdf.

⁵ See Maffly, Brian. "Worried about effects on recreation economy, Moab, Grand County urge feds to cancel energy lease sale." *Salt Lake Tribune*, 9 July 2020, found at <https://www.sltrib.com/news/environment/2020/07/09/worried-about-effects/>.

Meanwhile, this particular nominated acreage was also prime recreation lands used for trails and campgrounds and needed to accommodate the growing demand for outdoor access in the county. Local BLM staff were prevented from deferring the nominations and the only option for Moab, Grand County, and the public to stop what would have likely been a single bidder auction, was to lobby the Utah Governor. It was the Governor's appeal to the Secretary of the Interior which ultimately led to the cancellation of the sale.⁶ The mobilization of these resources and the time and attention of so many elected officials at all levels is extremely inefficient and counterproductive, and further illustrates the need to update our oil and gas leasing system to reflect the economic needs of the 21st century.

Air/Water Quality And Infrastructure Concerns For Rural Economies And Recreation Landscapes

Real or perceived air and water pollution's impacts to recreation lands and waters can also harm a community's ability to diversify its economy by investing in outdoor recreation. Water quality is an essential aspect of any boating, fishing, and wildlife viewing experience, especially where people will have direct contact with the water. In 2014 a 45-year-old oil production well in Utah began leaking 100 barrels an hour into a dry wash near the Green River, eventually forcing crude oil into the river and significantly impairing the river's water quality and imperiling the health of boaters in Labyrinth Canyon, a popular paddling destination between the town of Green River, Utah and Canyonlands National Park. The failed well dumped an estimated 80-100 barrels per hour for over 30 hours into Salt Wash, eventually spilling downstream into the river. A Utah Division of Water Quality official admitted that the "truth is that nobody will ever know how much got in the river, because nobody was sitting here watching it," but a few days later an "eyewitness's photo revealed a large oil slick 30 miles downstream from the incident site" on the Green River, and pools of oily water were observed in Salt Wash.⁷ This example underscores the risks of permitting oil and gas wells near sensitive recreation resources such as rivers and the multiple news outlets covering this spill certainly did not help the region's outdoor recreation brand.

Impacts to air quality from oil and gas developments can also inhibit the ability of local communities to promote a healthy quality-of-life for recruiting residents and attracting tourism for outdoor recreation. In many traditional oil and gas communities across the West, natural factors are exacerbated by intense oil and gas production that contributes significantly to ozone pollution, threats to public health,⁸ and damage to communities that might otherwise seek to brand themselves for outdoor recreation opportunities. Examples of these marginalized

⁶ See Maffly, Brian. "Feds yank oil and gas leases near Arches, Canyonlands parks from upcoming sale." *Salt Lake Tribune*, 12 Aug. 2020, found at <https://www.sltrib.com/news/environment/2020/08/12/feds-yank-oil-gas-leases/>.

⁷ See O'Donoghue, Amy Joi. "Rain drives oil from leak into Green River," *KSL.com*, 28 May 2014, found at <https://www.ksl.com/article/30081832/rain-drives-oil-from-leak-into-green-river>.

⁸ See Hufham, Anastasia. "Oil and gas emission in Utah a threat to public health, report says." *The Times-Independent*, 24 Oct. 2023, found at <https://www.moabtimes.com/articles/oil-and-gas-emissions-in-utah-a-threat-to-public-health-report-says/>.

communities include Bayfield, Colorado,⁹ Vernal, Utah¹⁰ and Pinedale, Wyoming¹¹ that struggle with public perceptions about harmful air quality and media headlines like “Pristine to Polluted”¹² and “Unlocking the mystery of the Four Corners Hot Spot.”

Case Studies: Areas Where Importance of Recreation Led to Lease Deferrals

Precisely because impacts from oil and gas infrastructure to recreation landscapes can negatively impact recreation experiences, damaging the prospects of local recreation economies, a wide variety of stakeholders rightfully become concerned when oil and gas leases are proposed near economically important recreation assets.

Leasing without consideration of the placement and design of industrial infrastructure and necessary access roads significantly degrades the recreation experience. If access roads for oil operations cross recreation trails at multiple points, the trail experience can be significantly diminished. In addition, in places like climbing areas, waterfronts, or camping areas where visitors remain in the same place for extensive periods of time, noise, dust, and congestion from nearby road traffic can undermine the outdoor experience.

San Rafael Swell - Emery County, Utah

Back in 2019 Congress passed the John Dingell, Jr. Conservation, Management, and Recreation Act, and in so doing recognized the exceptional recreation opportunities in Utah’s San Rafael Swell by designating them as Recreation Areas and requiring the BLM to prepare a management plan for their long-term protection and management. This law also designated several new Wilderness areas in the same region. Nonetheless, in 2021 the BLM proposed oil and gas leases on the doorstep of the San Rafael Swell, very near several popular recreation areas.¹³ Not only did this proposal affect some highly significant recreation resources such as the Goblin Valley State Park, highly popular canyoneering in the southern San Rafael Swell (e.g., Little Wild Horse Canyon), and extensive camping and motorized use in and around Temple Wash—the parcels were also adjacent to the newly-established Wilderness areas designated under the “Dingell Act” and within the Temple Wash Recreation Management Zone designated to “to provide outstanding recreation opportunities and visitor experiences while protecting natural and cultural resource values.” Clearly, these were poorly thought-out lease proposals,

⁹ See Thompson, Jonathan. “Unlocking the mystery of the Four Corners Hot Spot.” *The Journal*, 22 Oct. 2015, found at <https://www.the-journal.com/articles/unlocking-the-mystery-of-the-four-corners-hot-spot/>.

¹⁰ See Fahys, Judy. “Pollution Spikes This Winter In Utah’s Oil and Gas Country.” *KUER90.1*, 11 Mar. 2019, found at <https://www.kuer.org/energy-environment/2019-03-11/pollution-spikes-this-winter-in-utahs-oil-and-gas-country>.

¹¹ See Bleizeffer, Dustin. “Winter ozone spikes near Pinedale prompt health advisories.” *WyoFile*, 21 March 2023, found at <https://wyofile.com/winter-ozone-spikes-near-pinedale-prompt-health-advisories/>.

¹² See Bleizeffer, Dustin. “Pristine to Polluted: More drilling proposed near Pinedale despite ozone spikes.” *WyoFile*, 17 May 2011, found at <https://wyofile.com/pristine-to-polluted/>.

¹³ See “In Utah, the BLM Offers a First-of-Its-Kind Proposal for Balancing Recreation and Development.” *Outdoor Alliance*, 7 Dec. 2021, found at <https://www.outdooralliance.org/blog/2021/11/30/in-utah-the-blm-offers-a-first-of-its-kind-proposal-for-balancing-recreation-and-development>.

and fortunately, the BLM recognized the value of these recreation assets and included a first-of-its-kind “Recreation Preservation Alternative”¹⁴ in its environmental assessment acknowledging the significance of recreation as a primary multiple use. Ultimately the BLM removed these important parcels for the lease sale, and while this recreation alternative represents a key step forward in balancing multiple uses on public land, this proposal also underscores the need for the BLM to eliminate from leasing consideration identified recreation assets before such parcels can be nominated.

Zion National Park - Toquerville, UT

Another example of an ill-considered lease proposal affecting recreation occurred in 2017 when BLM proposed leases next to Zion National Park that required Utah’s Governor to intervene and protect this valuable landscape.¹⁵ Despite Zion as a major economic driver in Washington County, Utah, generating almost \$275 million in economic output in 2015 and supporting almost 3,000 jobs, the BLM proposed leases were located within 1.5 miles of the park and squarely within the park’s scenic viewshed. Two of the proposed leases straddled the Kolob Terrace Road, which is the primary access route to the park’s western trailheads and the use of which the BLM’s own draft environmental analysis described as “heavy.”

After significant opposition to these leases from local government, the business community, and local residents, and over 40,000 comments from the general public, then-Utah Governor Gary Herbert sent a letter to the BLM opposing leases so close to Zion National Park, saying that, “the preservation of this unique experience is important to the surrounding communities.”¹⁶ The BLM ultimately canceled the Zion leases, issuing a decision to defer three controversial lease parcels in direct proximity to the park. In a press release, the BLM’s Utah State Director Edwin Roberson said, “based on the environmental review and recognizing the rapid growth of recreational visits and tourism on adjacent public lands, the BLM believes that deferring these parcels for further review is the right decision.” Had these parcels with obvious recreation and economic value—other than for oil and gas development—been ineligible for leasing an enormous amount of work and wasted resources could have been avoided.

Recreation Opportunities for Transitioning Communities with Emerging Recreation Economies: Caliente, Nevada

Many of these recreation conflicts with oil and gas developments concern emerging recreation economies that represent future conflict zones. One such place is Caliente, Nevada that is

¹⁴ *Id.*

¹⁵ See Maffly, Brian. “BLM yanks oil and gas leases proposed near Zion after complaints from residents.” *Salt Lake Tribune*, 3 June 2017, found at <https://www.sltrib.com/news/environment/2017/06/03/blm-yanks-oil-and-gas-leases-proposed-near-zion-after-complaints-from-residents/>.

¹⁶ See Brean, Henry. “BLM pulls plan to auction oil and gas leases near Zion National Park.” *Las Vegas Review-Journal*, 2 June 2017, found at <https://www.reviewjournal.com/news/nation-and-world/blm-pulls-plan-to-auction-oil-and-gas-leases-near-zion-national-park/>.

working hard to develop its outdoor recreation economy—as recognized by the BLM that has set aside local landscapes for special recreation management designations and promoted them for recreation opportunities.¹⁷ Caliente is a growing town of approximately 1,200 that benefits from a local landscape hosting a wide range of recreation opportunities like hiking, climbing, mountain biking,¹⁸ and off-roading.

For the last several years Caliente has aggressively planned for developing a local outdoor recreation economy featuring significant investments in mountain bike trails from federal, local and nonprofit grants. In September 2019 Caliente hosted its first annual Mountain Bike Festival¹⁹ at nearby Barnes Canyon²⁰ where more than 200 cyclists competed on Barnes Canyon and Kershaw-Ryan State Park²¹ single-track trail networks as well as the Caliente Super Park²² flow trails, dirt jumps, and pumptrack. Many volunteers collaborated on the construction of the new trails to support the event, and many Caliente locals viewed this event as the beginning to a growing mountain bike movement in Lincoln County.²³

Despite all this work and enthusiasm to develop the Caliente area for outdoor recreation, the BLM put up for auction parcels containing these trails for oil and gas development which could significantly degrade the riding experience and put these investments at risk. The Interior Department’s own 2021 Report —*Interior Department Report Finds Significant Shortcomings in Oil and Gas Leasing Programs*²⁴—acknowledges that this speculative approach contributes to unbalanced land management. Fortunately, after outreach and complaints by the outdoor recreation community²⁵ the BLM ultimately removed the Barnes Canyon parcels from

¹⁷ See Bureau of Land Management. “Barnes Canyon Trailhead.” Found at <https://www.blm.gov/visit/barnes-canyon-trailhead>.

¹⁸ See Timbers, Becky. “Mountain Biking in Caliente, Nevada.” *Two Wheeled Wanderer*, 25 Nov. 2022, found at <https://www.twowheeledwanderer.com/posts/caliente-nevada-mountain-biking/>

¹⁹ See “Caliente Holds Inaugural Mountain Bike Festival.” *Lincoln County Record*, 5 Oct. 2019, found at <https://lccentral.com/2019/10/05/caliente-holds-inaugural-mountain-bike-festival/>

²⁰ See “Barnes Canyon Mountain Bike Trails.” *Trailforks*, found at <https://www.trailforks.com/region/barnes-canyon-21898/?activitytype=1&z=12.2&lat=37.59223&lon=-114.44804>.

²¹ See “Kershaw-Ryan State Park.” *Nevada State Parks*, found at <https://parks.nv.gov/parks/kershaw-ryan>.

²² See “Caliente Bike Skills Park and Trails.” *Trailforks*, found at <https://www.trailforks.com/region/caliente-bike-skills-park-and-trails-21899/?activitytype=1&z=13.6&lat=37.62185&lon=-114.51009>.

²³ Another bicycling event—the ninth annual Park to Park Pedal Extreme Nevada 100—attracted more than 100 cyclists pedaling through Lincoln County along Highway 93 through Caliente, Pioche and four of Nevada’s state parks: Kershaw-Ryan, Cathedral Gorge, Spring Valley and Echo Canyon. Lincoln County also includes the beautiful Rainbow Canyon, where visitors can spend their time hiking, auto touring and rock climbing. Other local hiking destinations around Lincoln County include Eagle Valley, Panaca, and Alamo. Auto tourists can also explore the “Extraterrestrial Highway” that runs adjacent to the Nevada Test and Training Range and includes Area 51.

²⁴ See *Interior Department Report Finds Significant Shortcomings in Oil and Gas Leasing Programs (2021)*, found at <https://www.doi.gov/pressreleases/interior-department-report-finds-significant-shortcomings-oil-and-gas-leasing-programs>.

²⁵ See Outdoor Alliance Comments on Notice of Competitive Oil and Gas Internet Lease sale, Nevada December 2019, found at https://www.blm.gov/sites/default/files/NV_OG_20191217_Outdoor_Alliance_Protest_508.pdf.

consideration,²⁶ but not after “the burden and expense ... fall[ing] on BLM to process those parcels, triggering the dedication of BLM staff resources to analyze marginal lands that companies may not be interested in bidding on and that may never be leased, much less developed.”²⁷

Emerging recreation communities near public lands across the country are currently facing or will soon face serious challenges to pivoting their economies as energy markets change. Local residents may or may not have the resources to overcome the disadvantages placed upon them by the existing outdated leasing system. Without this important rule that will update the oil and gas leasing system, communities across the west will have little chance of rebuilding their economies as oil and gas revenues decline. As the Caliente area works to grow its regional recreation economy to attract jobs offering of all types, the leasing of low and no potential lands for oil and gas could diminish opportunities for further trail development and outdoor access. Leasing these lands could leave the community in a lose-lose situation, with minimal chance of receiving mineral lease revenues from these areas while simultaneously threatening further trail investments.

Bureau of Land Management’s Oil and Gas Rule

Clarifying Filtering Criteria for Recreation

Federal law requires that energy development on federal land not impair the productivity of recreational use and associated economic activity. As the social and economic importance of outdoor recreation increases, it is critical that recreation assets be given the same level of consideration during land use planning as energy development. A fundamental principle of the FLPMA is that outdoor recreation is one of the “major” uses of public lands, alongside grazing, energy development, fish and wildlife, rights-of-way, and timber production.²⁸ In addition, the Multiple Use Sustained Yield Act (MUSY) mandates that public resources are managed “so that they are utilized in the combination that will best meet the needs of the American people,” and that renewable resources shall be managed in a manner that avoids “impairment of the productivity of the land.”²⁹

Fortunately the BLM’s Oil and Gas Rule would go a long way towards effective and appropriate management of oil and gas leasing that would protect outdoor recreation assets and the communities that depend upon them. These reforms are supported by a wide range of outdoor

²⁶ See Bureau of Land Management December 2019 Competitive Oil and Gas Lease Sale, found at https://www.blm.gov/sites/default/files/NV_OG_20191217_DR_Signed.pdf.

²⁷ See *Interior Department Report Finds Significant Shortcomings in Oil and Gas Leasing Programs (2021)*, found at <https://www.doi.gov/pressreleases/interior-department-report-finds-significant-shortcomings-oil-and-gas-leasing-programs>.

²⁸ 43 U.S.C. § 1702(l).

²⁹ 16 U.S.C. § 531(a).

recreation and outdoor business groups and companies.³⁰ Under the Oil and Gas Rule, when determining whether the BLM should offer lands specified in an expression of interest at a lease sale, the agency would evaluate its obligations under the Federal Land Policy and Management Act (FLPMA) to manage public lands for multiple use and sustained yield and give preference to lands upon which a “prudent operator” would seek to expand existing high potential operations, while also avoiding parcels with: 1) important fish and wildlife habitats; 2) historical properties, sacred sites, and other lands with high value cultural significance; and 3) “the presence of *recreation* and other important uses or resources, giving preference to lands that would not impair the value of such uses or resources.”³¹

This preference criteria are highly significant in that for the first time the agency would be required to consider recreation when leasing and thus comply with the responsibilities created by FLPMA with regard to protecting outdoor recreation—and primary multiple use under the law. However, the BLM can strengthen and improve the Oil and Gas Rule to better protect outdoor recreation and local economies while also allowing for appropriate developments.

Recommendations for Strengthening the Oil and Gas Rule

While the preference criteria in the BLM’s Oil and Gas Rule is a significant improvement to the status quo and would avoid many of the problems outlined in the case studies above, strengthening this provision in a few key ways will make it much more effective in protecting recreation assets and economies, while also bringing more certainty and efficiency to oil and gas operators.

Formalize and Strengthen Recreation Preference Criteria

One way to strengthen these provisions is to formalize the recreation filtering criteria by creating a presumption of no leasing proximal to identified recreation assets or values and designate lands that meet the specific recreation preference criteria. Also, the agency should ensure it has the most robust understanding of local recreation locations and use patterns, while also acknowledging an expansive definition of what constitutes “outdoor recreation.”

The BLM should take steps to engage with local outdoor recreation groups and interests anywhere that it is proposing oil and gas leasing to ensure that the agency understands proposal impacts to recreation experiences and local economies. As part of every environmental assessment analyzing oil and gas leasing proposals, the BLM should require an

³⁰ See Outdoor Alliance, Public Land Solutions, The Conservation Alliance, and Outdoor Industry Association Comments to Proposed Bureau of Land Management Rule re Fluid Mineral Leases and Leasing Process, 22 Sept. 2023, found at <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/65146092da7bec0e3cba9e53/1695834258468/OA+PLS+TCA+OIA+fluid+mineral+leasing+comments+%281%29.pdf>

³¹ 88 Fed. Reg. 47562, at p. 47565.

intentional step of researching and consulting with local stakeholders with an interest in outdoor recreation to ensure informed decision making.

Accurate Recreation Inventories Must Inform Leasing Proposals

Another way the BLM can exercise “reasonable diligence” in developing leases, and to safeguard “the public welfare” under the Mineral Leasing Act is to should ensure that parcels proposed for leasing, as well all as surrounding landscapes, have been recently inventoried for recreational resources and that appropriate outreach and consultation with regional recreation advocates and interest groups has taken place. Any parcels overlapping lands where impacts would be in direct conflict with the recreation experience, cause visual impairment to the landscape or cause other impairments such as access conflicts, or where a current and comprehensive inventory of recreational resources has not been conducted, should not be available for a lease sale or should be deferred from leasing. In order for the BLM to ensure that it has a the most comprehensive understanding of the presence of recreation activities, the agency should partner with key stakeholders such as the Outdoor Alliance who possesses the most extensive recreation data set in the country.³²

Proactively Exclude Recreation Lands from Lease Nominations and Expressions of Interest

Additional important reforms BLM should implement to protect recreation assets and local economies relate to designating up front which lands should be off limits for leasing, removing from leasing consideration important high value recreation landscapes that are critical for local communities to diversify into the outdoor recreation economy. Doing so will save limited land managers resources, prevent conflicts among multiple uses, and protect valuable recreation areas that can instead be managed for tourism and local quality of life benefits for communities across the West.

The BLM should establish clear guidelines for designating lands that meet the specific recreation preference criteria and at a minimum ensure the following areas are included when determining “the presence of recreation and other important uses or resources”:

- Developed recreation sites such as campgrounds, boat ramps, bike trails and other “fixed” locations;
- Documented locations with “activity-based” recreation opportunities such as canyoneering and off-trail hiking;
- Special recreation management areas (SRMAs) and extensive recreation management areas (ERMAs);
- Recreation focus areas;

³² See for example the Outdoor Alliance’s maps and data website found at <https://www.outdooralliance.org/maps-and-apps>.

- Locations where recreation has been protected/enhanced/supported by funding from the Land and Water Conservation Fund;
- Locations where the BLM has issued a special recreation permit; and
- Important viewsheds and soundscapes for these locations.

The BLM should also require the following additional stipulations and conditions for leases in proximity to the above noted locations to protect and enhance important recreation experiences and economies:

- No surface occupancy (NSO) within 2 miles of developed recreation sites, such as overlooks/viewpoints, campgrounds, and trailheads.
- 1-mile NSO setback from key routes, trails, climbing, canyoneering, boating, camping (including popular dispersed camping sites), and filming locations.
- Increase protections along river recreation opportunities to protect water quality, scenic values, and archeological resources.

BLM planners should utilize the formal nominations process as a mechanism to exclude these locations from potential leasing, and decline any expressions of interest that implicate these important recreation landscapes. Doing so would prioritize *The Bureau of Land Management's Blueprint for 21st Century Outdoor Recreation*³³ that “presents several major shifts in how the agency prioritizes and supports outdoor recreation.” According to the BLM, this Blueprint includes the “core strategy” of prioritizing “recreation investments and to carefully consider current and future recreation demands and program needs by developing national- and state-level action plans.” These national and state action plans would provide a “bureau-wide assessment of recreation program needs, including prioritized projects, and data.”

The BLM should aggressively pursue these plans to better meet the needs and desires of outdoor recreation enthusiasts and local communities. For both this oil and gas rulemaking and the BLM’s *Blueprint for Outdoor Recreation* to be successful, the agency must ensure it has the most robust understanding of local recreation locations and use patterns, while also acknowledging an expansive definition of what constitutes “outdoor recreation.”

Recreation Resources Preservation Alternative

If the BLM nonetheless does include recreation lands—or recreation adjacent lands—to any lease sale proposal, related environmental analyses should include a “Recreation Resources Preservation Alternative” such as was issued in the BLM Utah 2022 First Competitive Oil and Gas Lease Sale (DOI-BLM-UT-0000-2021-0007-EA April 2022) in order to effectively “preserve,

³³ See *The Bureau of Land Management's Blueprint for 21st Century Outdoor Recreation* (2023), found at <https://www.blm.gov/sites/default/files/docs/2023-08/Blueprint%20for%2021st%20Century%20Outdoor%20Recreation508.pdf>.

to the extent practical, the recreational opportunities that could be impacted by development of the parcels.”³⁴

Conclusion

To support oil and gas communities who depend on BLM lands, changing energy markets will require new leasing guidelines. Recognizing the need to consider the effects of oil and gas development in the context of the agency’s growing role in outdoor recreation, rural economies, and community quality of life is essential to meet the changing needs of the American public.

³⁴ See BLM Utah 2022 First Competitive Oil and Gas Lease Sale DOI-BLM-UT-0000-2021-0007-EA, June 2022. Found at https://eplanning.blm.gov/public_projects/2015573/200495437/20062742/250068924/2022-06-29_2022-1st-DOI-BLM-UT-0000-2021-0007-Final.pdf.