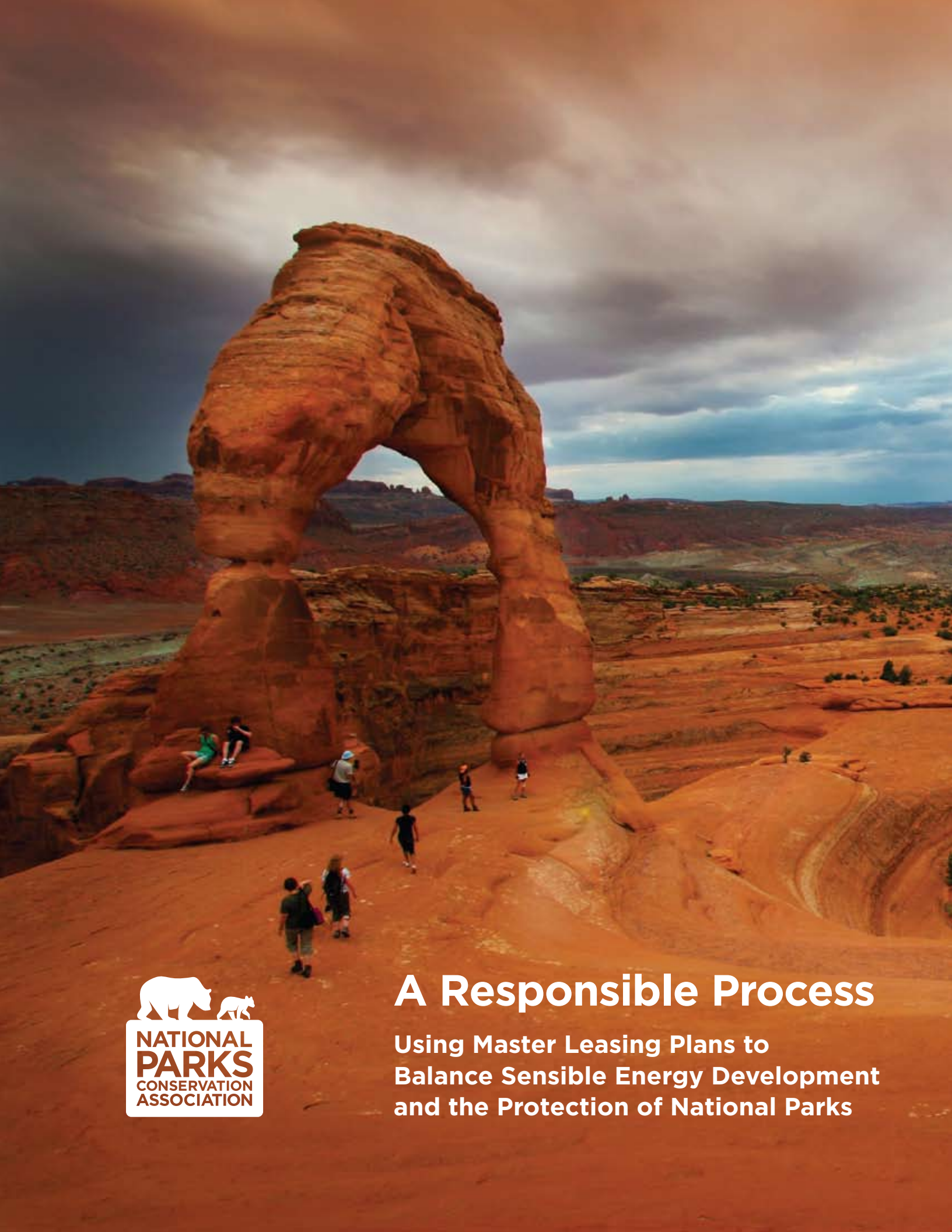


NATIONAL PARKS CONSERVATION ASSOCIATION

A Responsible Process

Using Master Leasing Plans to Balance Sensible Energy Development and the Protection of National Parks

National Parks and Adjacent Oil and Gas Development: Master Leasing Plans Provide a Blueprint for Balance

Introduction

Our National Park System has repeatedly been called “America’s Best Idea.” Our national parks strive to reflect the countless facets of this nation: our landscapes, our culture, and our history. They are those places we are most proud of, the ones that have shaped us, and the ones that we must not neglect.

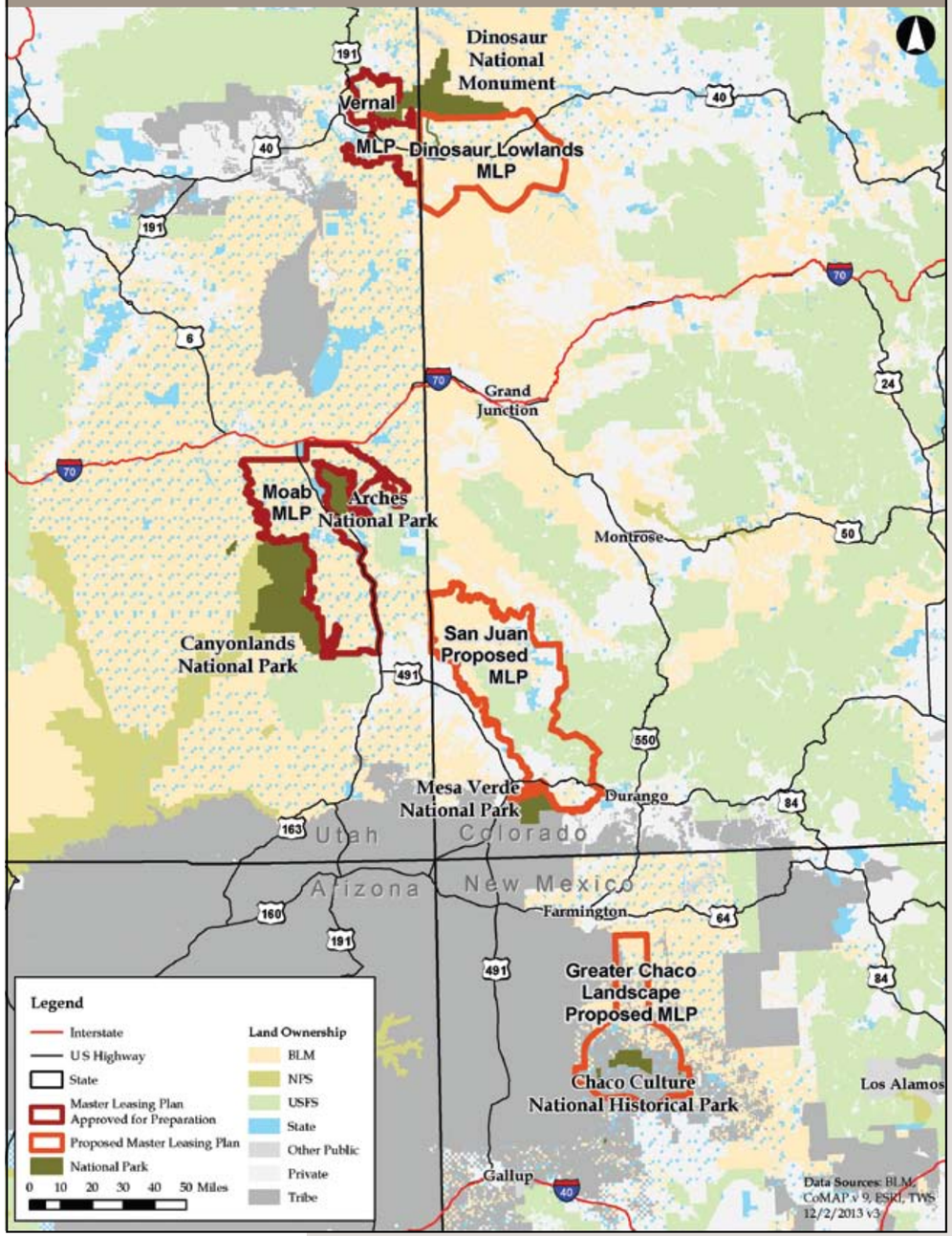
But our national parks are part of a shared landscape. Across the country, especially in the West, our national parks exist next to or near other federal lands, including those managed by the Bureau of Land Management (BLM). The BLM manages millions of acres in the West under the principle of “multiple use,” providing for varying uses and values so that these lands are “utilized in the combination that will best meet the present and future needs of the American people.” Examples of these uses include mining, fishing, camping, livestock grazing, and hunting.

Another of the multiple uses is oil and gas development. Oil and gas production has long been a part of the West, but recent advancements in hydraulic fracturing technology have spurred a tremendous increase in the amount of new wells being drilled. The BLM is responsible for maintaining a balance among all the different uses of lands under its management, but this balance has been challenged by the surge in oil and gas production.

In order to better resolve potential conflicts between oil producers and other users on sensitive BLM lands, the Obama Administration instituted a “smart from the start” leasing process called Master Leasing Plans (MLPs). These public processes examine how oil and gas is leased in particularly controversial areas, such as lands with high recreational and ecological values, including many lands near national parks.

Cover: Visitors in Arches National Park ©Jf123/Dreamstime
Left: Canyonlands National Park ©Sportstock/ISTOCKPHOTO

Master Leasing Plans Near National Parks in the South West



Map: Alison Gallensky at Rocky Mountain Wild

If properly developed and implemented, MLPs provide an opportunity to drastically reduce conflicts between oil producers and other users—including national park visitors. The BLM can accomplish this by identifying, through the MLP process, areas where leasing can proceed in a well-planned, minimal impact way as well as where leasing is not appropriate due to other uses and sensitive resources. This approach of planning first and leasing later can provide certainty for all users.

However, Master Leasing Plans are at risk of becoming the best idea that no one has ever heard. That's because too often the BLM is eliminating critical areas from consideration for developing MLPs or they are implementing them too slowly to keep pace with the oil and gas boom across the West. In addition, the National Park Service is not actively advocating for MLPs on the landscapes they share with the BLM.

How Can Master Leasing Plans Protect National Parks?

If done well, Master Leasing Plans can help ensure that oil and gas development near sensitive places like national parks is planned with consideration and care for the many non-drilling uses of the land. Ideally, the outcome is a collaboratively-planned blueprint for future leasing and development. MLPs are designed to zoom in on especially controversial areas identified within a BLM Field Office Resource Management Plan, or RMP.

Resource Management Plans are Insufficient to Protect National Parks

The BLM plans for oil and gas drilling on a large scale as part of what are called Resource Management Plans. These plans can cover millions of acres, taking a very broad look at the mineral rights under the jurisdiction of each BLM field office. Their immense scale and infrequent updates means that RMPs are not very useful for resolving fast-developing conflicts in sensitive areas. As the pressure to drill on public lands in the West intensified, it became clear to local citizens, businesses and state and federal agencies that a more precise tool was needed, and the Department of the Interior (DOI) responded in 2010 by creating Master Leasing Plans.

In their 2010 oil and gas leasing reform guidelines, Department of the Interior defines a Master Leasing Plan as:

> "A plan that includes analysis of a distinct geographic area that takes a more closely-focused look at RMP decisions pertaining to leasing and post-leasing development of the area. The MLP also establishes a guiding framework for the development of the area and provides a vision for how future development will proceed."[1]

MLPs are much more narrowly focused, honing in on the most delicate situations—including development near national parks and other lands with high ecological and recreational value. Developing an MLP for an especially-sensitive area can lead to a simpler leasing process, and fewer leasing appeals, called "protests," because controversial issues can be resolved earlier.

1 Chapter V of BLM's Handbook on Planning for Fluid Mineral Resources, available at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_handbook.Par.73097.File.dat/Master%20Leasing%20Plans_Chapter%20V_.pdf.

Above: Colorado River in Canyonlands National Park ©NPS

Threats to National Parks from Nearby Oil and Gas Development

Without careful planning, many national parks in the West could suffer negative side-effects of oil and gas development outside their borders. Although traditional oil and gas drilling still occurs, much of the current development is driven by new technologies in hydraulic fracturing. NPCA's *National Parks and Hydraulic Fracturing: Balancing Energy Needs, Nature, and America's National Heritage* outlines some impacts experienced by parks:

Air Quality

The production of oil and gas using hydraulic fracturing emits more pollutants than traditional oil and gas extraction methods, including hydrocarbons, methyl mercaptan, carbon monoxide, nitrogen oxide and ozone. Additionally, high concentrations of methane have been found near drilling sites. These pollutants can harm park natural and cultural resources and visibility, and long-term exposure to poor air quality could cause health problems including neurological and respiratory issues, as well as cancer.

Water Quality

The process of hydraulic fracturing involves pumping large amounts of water, mixed with sand and chemicals, deep into underground layers of rock. Once that chemical brine has done its job underground, much of it returns to the surface and needs to be disposed. This toxic wastewater cannot be reused except in other fracking jobs, and available disposal options—including reinjecting into the ground and transporting to waste water treatment facilities—each carry a risk of spill and contamination.

Water Quantity

Depending on the type of shale, fracking a well can require millions of gallons of water. In the arid West, which already deals with issues of drought and rising demand for water, there is simply not much water to spare for fracking activities. The problem is exacerbated by the fact that once water is withdrawn for fracking, it becomes contaminated with chemicals and is injected deep underground, unusable for decades and perhaps centuries.

Habitat Fragmentation and Wildlife Impacts

Animals do not recognize national park boundaries, and for many species that move across park borders, intense development of adjacent lands is a major problem. Species like pronghorn, elk, deer and grouse are finding their habitats fragmented by the development of well pads and associated roads and pipelines. The intense mechanical activities at well sites and the thousands of trucks on formerly quiet roads can drive animals off and also increase collisions.

Impacts to the National Park Visitor Experience

Even though oil and gas development does not typically occur inside national parks, a visitor's experience may be significantly impacted by adjacent development. Noise from air compressors and truck traffic occurs around the clock, and can make a tranquil park experience all but impossible. The burning off of excess natural gas, known as flaring, along with nighttime lighting from various drilling equipment can light up the night skies to such an extent that it is visible from space, obliterating the stunning views of the Milky Way that draw many visitors to our national parks. Vistas and views from parks can be cluttered with rigs and drilling infrastructure over 100 feet high.

Above: Arches National Park ©Scott Kirkwood/NPCA **Right:** Pronghorn antelope ©Rich Phalin/ISTOCKPHOTO

Master Leasing Plans Help National Parks by Ensuring their Voice is Heard

According to BLM's 2010 oil and gas leasing reform guidelines, a Master Leasing Plan may be necessary where "additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development" and "where there are impacts on the resources or values of any unit of the National Park System.....as determined after consultation or coordination with the NPS."[2] In addition, the leasing reform guidelines list important national and local resource issues that should be considered when developing an MLP. One of those issues is "nearby state, tribal, or other Federal agency lands, including NPS [National Park Service] and FWS [Fish and Wildlife Service] lands that could be adversely affected by BLM-authorized oil and gas development." Therefore, where national park units are at risk, the NPS should be a cooperating agency in the MLP process and advocate strongly for the protection of their resources and landscapes.

By advocating for and participating in the MLP process, the National Park Service can help ensure that both park resources and tourism economies of local communities are protected. At the same time, the BLM can fulfill its mandate to manage for multiple uses, providing oil and gas leases where appropriate and providing protection for landscapes, recreation and other uses where drilling is inappropriate. MLPs provide an opportunity to plan for balance, making sure controversial leasing decisions are "smart from the start."

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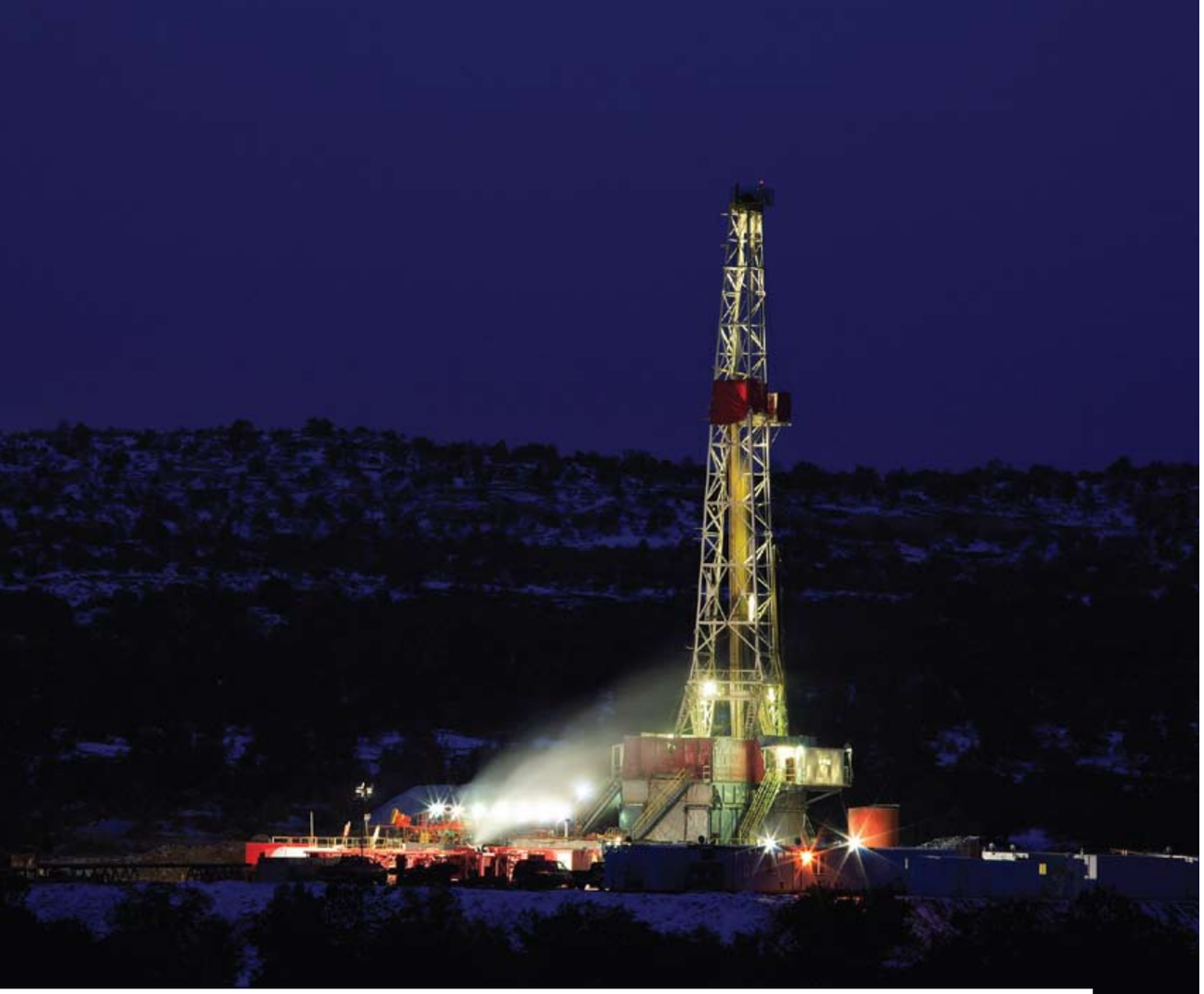
2 http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2010/IM_2010-117.html



Threats to Gateway Community Tourism Economies from Oil and Gas Development

We often hear of the jobs and quick riches that oil and gas development will bring to communities. But many of those communities already have vibrant economies that depend on nearby national parks and the many recreational values they provide—values that can easily be destroyed by uncontrolled oil and gas development. For example, visitors to Colorado's Mesa Verde National Park spent more than $43 million in 2011, supporting more than 550 jobs. Visitors to Arches and Canyonlands National Parks contributed more than $150 million dollars to the local economy during the same time. National Parks are not subject to the same kinds of booms and busts that the energy industry is, thus their contribution to local economies is stable and enduring, and they need to be protected from potentially harmful impacts of unplanned development.

Which Parks Are At Risk?

Some national parks have already been damaged by the recent boom in oil and gas production. For example, the landscape surrounding Theodore Roosevelt National Park in North Dakota has been fundamentally changed by an influx of thousands of new wells in just the past few years. There was no Master Leasing Plan done before the leasing boom at Theodore Roosevelt National Park, but some other parks may be spared the impacts if leasing is done with proper care.

Arches National Park and Canyonlands National Park, Utah

The Master Leasing Plan concept has its origins in a near disaster for some of America's most iconic national parks. In 2008 BLM offered 77 oil and gas leases near Moab, Utah, close to Arches and Canyonlands National Parks. If those leases had been granted, oil and gas infrastructure would have been visible from both parks, popular trails would have been paved to make way for truck traffic, and Moab's keystone recreational economy may have taken a nosedive. Local voices in opposition to the leases were finally heard by the BLM in 2010, which instituted the MLP process to examine leases with a landscape-scale—not lease-by-lease—approach. The Moab MLP, now under development, is the first of its kind not tied to a Resource Management Plan amendment or revision process, and a draft is expected in 2014.

There was no Master Leasing Plan done before the leasing boom at Theodore Roosevelt National Park, but some other parks may be spared the impacts if leasing is done with proper care.

Left: Drilling rig operating outside The Island In the Sky near Canyonlands National Park ©Rblekicki/BIGSTOCKPHOTO **Below:** Hiker at double arch in Arches National Park ©Scott Kirkwood/NPCA

Chaco Culture National Historical Park, New Mexico

Between 850 and 1250 AD, thousands of people known as the Chacoans or Ancestral Puebloans lived in what is now northwest New Mexico. The grand ruins of Chacoan architecture remain protected as part of the Chaco Culture National Historical Park (NHP) and the Chaco Culture World Heritage Site, a fascinating glimpse into a little-known part of our history. Additionally, Chaco Culture NHP was named the world's newest International Dark Sky Park in August 2013, one of only four national parks to receive that honor. Consequently, the park is a major draw for campers and astronomers, as well as those interested in history and ancient cultures.

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The area around Chaco, however, is under intense pressure for oil and gas development. The BLM's current Resource Management Plan for the Farmington, New Mexico area leaves approximately 93% of the area open to oil and gas drilling with only minimal protections for the park. Some recent lease sales have included leases as close as one half mile from the park boundary. Poorly-planned development near Chaco Culture NHP could degrade the park's air and water quality and illuminate its dark night skies, threatening its designation as an International Dark Sky Park and World Heritage Site.

After deferring leases near the boundaries of Chaco Culture NHP several times since 2009, the New Mexico BLM now has the opportunity to incorporate a Master Leasing Plan into a Resource Management Plan Amendment analyzing new oil and gas development activity within the Mancos/Gallup Shale Play, which includes Chaco Culture NHP and the surrounding landscape. Additionally, as part of the planning process, the BLM has the opportunity to gather and study new ethnographic information on the landscape around Chaco Canyon. This information would provide the BLM with a detailed and comprehensive overview of the landscape around Chaco Canyon—its cultural resources and its significance to modern tribes and pueblos—which could then be used in the preparation of the MLP.

Dinosaur National Monument, Colorado and Utah

Situated on the remote northern border between Utah and Colorado, Dinosaur National Monument appeals to a wide variety of visitors. Thousands of dinosaur fossils have been found in the park, and more than 1,500 can be seen in the cliff face at Carnegie Quarry. More adventurous visitors can hike and camp among the miles of canyons and desert, or raft on the Green and Yampa Rivers.

But intense pressure from the oil and gas industry to drill in the area is causing conflicts. The BLM field office in Utah has agreed to begin a Master Leasing Plan process. Right across the border, Colorado's White River Field Office has been reluctant to develop a MLP, despite complaints from the National Park Service and from conservation and recreation groups over a proposal to drill more than 20,000 new wells in the area. A key concern for the National Park Service and others is the cumulative impacts to air quality from thousands of new wells added to existing oil and gas wells in Colorado and Utah's Uinta Basin near the park. Preparing a Master Leasing Plan for the area around Dinosaur National Monument could identify a balance between those who want to produce oil and those who want to enjoy their national park and surrounding wild landscapes.

Colorado's White River Field Office has been reluctant to develop a MLP, despite complaints from the National Park Service and from conservation and recreation groups over a proposal to drill more than 20,000 new wells in the area.

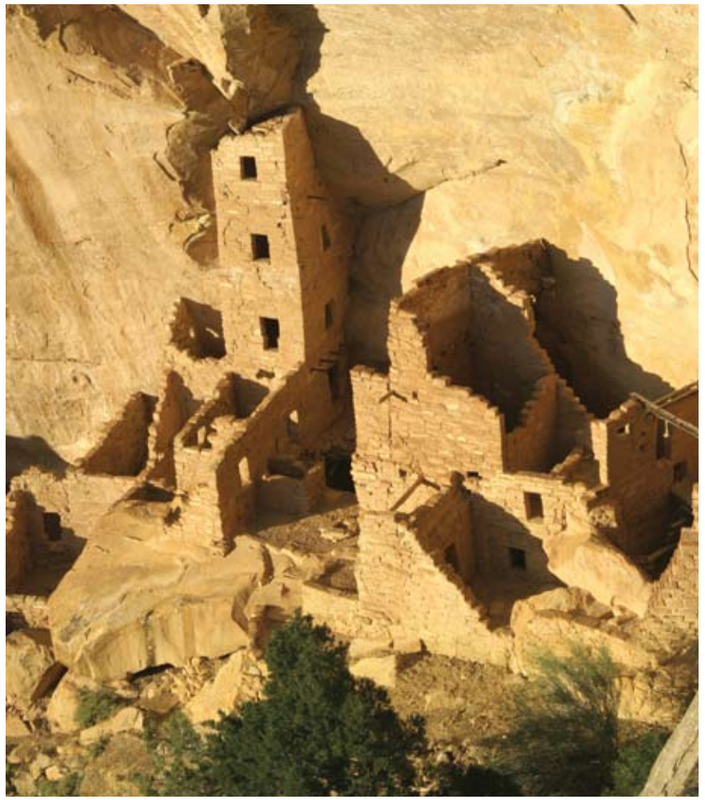
Left: Native American archeological ruins in Chaco Culture National Historical Park ©Wilsilver77/Dreamstime **Above:** Petroglyphs at Dinosaur National Monument ©Rinusbaak/Dreamstime

Mesa Verde National Park and Yucca House National Monument

One of our earliest parks, Mesa Verde in southwest Colorado, was established to protect the incredible cliff dwellings of Ancestral Puebloan people. Nearby Yucca House National Monument protects one of the country's largest archaeological sites. Together, these sites provide a fascinating glimpse into the history of our country.

However, the BLM has repeatedly offered large oil and gas lease sales near the borders of these parks, including a group of eight leases covering more than 10,000 acres near Mesa Verde in February 2013. Each time leases have been offered, the public, including many in the local communities, have protested the proposals. The result is an exhausting stalemate—exactly the kind of situation that a Master Leasing Plan is designed to resolve. Local citizens have formally proposed a Master Leasing Plan for the area near these parks, however the BLM eliminated the proposed area for consideration during their Resource Management Plan (RMP) revision process for the planning area adjacent to Mesa Verde. If the BLM had agreed to develop a Master Leasing Plan for the area, many of the issues now being protested in the RMP Revision, including poor analysis and mitigation of impacts to the national park, could likely have been avoided.

Below: Cliffside dwellings at Mesa Verde National Park ©Duncan Gilbert/Dreamstime



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What Can Happen When Drilling Is Done Without a Master Leasing Plan?

When Theodore Roosevelt first visited North Dakota in 1883, it was a remote wilderness. He fell in love with the wildlife and the "perfect freedom" of the area, and was inspired to purchase a ranch in the western part of the state, along the Little Missouri River. In the 1970s, Roosevelt's ranch and two large parcels of land representing the best in wild North Dakota country were preserved as the Theodore Roosevelt National Park.

In recent years, however, the hydraulic fracturing boom has changed the landscape of western North Dakota. More than 20,000 wells have been drilled in the western half of the state since 2008, and the park units are surrounded by wells, infrastructure, trucks and roads. Visitors have a hard time finding a hotel room or a place to eat, as space is taken by the temporary workforce. Nights that once were some of the darkest and quietest in the country are now clouded with light and noise pollution from constant flaring and industrial operations.

The oil and gas development rush reached Theodore Roosevelt National Park before a Master Leasing Plan could be developed. Under current BLM guidance, Master Leasing Plans can only be prepared in areas that are not already "substantially leased," meaning Theodore Roosevelt National Park might not qualify for a Master Leasing Plan today. The situation at Theodore Roosevelt National Park is a lesson about how a park can be severely damaged by a lack of planning.

Above: Casa Rinconada timelapse in Chaco Culture National Historic Park ©NPS

“The Moab 77” and the Story of How Master Leasing Plans Began

In December 2008, the outgoing Bush Administration prepared to auction off leases for tar sands, oil shale, natural gas and oil development on millions of acres of public land. As part of the on-shore energy harvest, the Utah Bureau of Land Management offered up 77 oil and gas leases on 130,000 acres of public land—including several on pristine lands near Arches National Park.

There was immediate outcry from the public and local businesses that rely on the millions of tourist dollars brought in by visitors to the Moab area each year. In response to this upwelling, the Obama Administration switched course on oil and gas development in close proximity to national parks and monuments, canceling many of the Utah BLM’s 2008 leases. Interior Secretary Ken Salazar assembled a group of BLM and National Park Service employees to review the leases. Their analysis, the “Stiles Report” released in October 2009, was an indictment of the lack of advance planning that led to haphazard development, such as the 77 proposed leases.

In 2010, the Department of the Interior announced a series of leasing reforms, including Master Leasing Plans, to create a more balanced approach to oil and gas leasing and development of public lands. Now, nearly three years into the reforms, the BLM is evaluating 17 Master Leasing Plans in four states.

Above: The Organ, a huge sandstone tower at Arches National Park ©Utah Images/Alamy

Moving Forward with Master Leasing Plans

Master Leasing Plans can only fulfill their promise of better protection of national parks and a smoother leasing process if they are a done through a well-developed, collaborative process, and adopted and used by the BLM in a consistent and timely manner. Though the Master Leasing Plan tool was introduced in 2010, BLM field offices have been slow to embrace and apply it to areas under their control. Currently, only three MLPs are underway, and of those only one—the Moab MLP—has a direct national park connection. However MLPs have been proposed near Dinosaur National Monument, Chaco Culture National Historical Park, and Mesa Verde National Park.

Despite the lack of enthusiasm from some BLM Field Offices, the Department of the Interior continues to advocate for Master Leasing Plans as an essential tool for ensuring balanced development of our public lands. Most notably, in October 2013, Interior Secretary Sally Jewell called Master Leasing Plans an example of “the type of new, smart, balanced development” needed for “guiding development to areas of highest resource value and lowest environmental concern.”

The National Park Service also shares responsibility for ensuring the successful development and implementation of Master Leasing Plans whenever park values are threatened by energy extraction on adjacent federal lands. The agency can sometimes be reluctant to take part in land management processes outside park boundaries, but the NPS needs to recognize that the parks—and the economies they support—are at risk from poorly planned oil and gas development. A stronger voice from the National Park Service, an agency with as much respect and national popularity, can help encourage BLM field offices to develop Master Leasing Plans in areas where parks may be affected.

Conclusion

For more than a century, our national park system has been one of our nation’s proudest accomplishments. Recent polling shows that parks continue to occupy an important place in the nation’s hearts, with over 95% percent of Americans viewing national parks as something that the federal government should be protecting and supporting.

Americans also want to protect other federal land uses and the multiple economic and recreational benefits they provide. Among those uses are hunting, fishing, camping, motorized and non-motorized recreational vehicle use, and grazing as well as oil and gas extraction. Americans want to find a way that each of these uses can coexist, and it’s the responsibility of the Bureau of Land Management, working in conjunction with the National Park Service, to ensure the proper balance between energy production and the protection of our most sacred places. Master Leasing Plans are a good tool for creating this balance—they hone in on the most controversial areas and find ways to avoid conflict. Americans don’t have to face the false choice of being pro-national parks or pro-oil production; we can work to find a balance through simple “smart from the start” planning.

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Visitors to National Parks in Utah, New Mexico and Colorado contributed more than $1.1 billion to area economies in 2011. **Above:** River camping in Canyonlands National Park on the shore of Green River. ©marekuliasz/ISTOCKPHOTO

SINCE 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System. NPCA, its members, and partners work together with the National Park Service to protect the park system and preserve our nation's natural, historical, and cultural heritage for generations to come.