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Dear Bureau of Land Management,

Thank you for the opportunity to comment on the September 2018 proposed oil and gas lease sales. These comments refer to the cluster of parcels 8080 - 8090 in western Huerfano County, near Great Sand Dunes National Park and Preserve. *The proximity of the proposed sales to such a valued national treasure certainly warrants extreme care in evaluating the potential impacts of gas and oil exploration and extraction activities in the proposed areas.* All of the parcels 8080 - 8090 are within seven miles of the park; with portions of parcels 8080, 8086, 8088, 8089, and 8090 within two miles of the park. Parcel 8086 begins only about a mile from the park's wilderness boundary.

1) Concern for the potential impact of gas and oil exploration and extraction activities on wilderness. The Wilderness Act of 1964 recognized the importance of protecting and preserving unique natural areas by specifically protecting them from human activity while offering humans the opportunity to visit these areas and enjoy their long-recognized benefits. Protected wilderness characteristics that could be negatively impacted by mineral extraction activities include:

- a) Dark night sky.** Great Sand Dunes has been recognized as one of the best places to observe the dark night sky due to there being so little light pollution in the area. Marvelling in wonder at the vast amount of visible stars in the sky at night is an activity enjoyed by thousands of visitors each year. *What specific precautions will be taken to ensure no increase in light pollution or atmospheric clarity degrading emission particles in the region due to exploration and extraction activity?*
- b) Natural quiet.** The park's wilderness area is well known for its natural quiet. This is not a subjective opinion - all parks monitor ambient noise and Great Sand Dunes consistently ranks among the quietest of National Parks. Noises from human machines are simply not heard in the wilderness area. *How will you ensure that characteristic will still be protected if exploration and extraction activities are occurring within a mile or two of hikers in the wilderness area?*
- c) Air quality.** Clean air is a highly valued wilderness characteristic for the dual reason of clear scenic views and environmental health. *How will you assess all the possible impacts to air quality by exploration and extraction activities and how will you ensure that air quality will not be degraded by*

those activities? How do you determine what amount of degradation is "acceptable" and why?

- 2) Concern for increased spread of invasive species of non-native plants.** Areas that experience a lot of traffic and human activity inevitably see an influx of invasive species inadvertently transported with the assistance of humans, and large-scale human activity often creates micro-environments that invasive species are particularly well adapted to colonize. *What steps will be taken to reduce this risk?*

- 3) Concern around increase in seismic activity.** The proposed lease area has a history of some seismic activity. The USGS has clearly determined that the increase in seismic activity in midwest and central states is due to oil production activities. *What steps will be taken to ensure human activity in the proposed parcels does not lead to an increase in seismic activity in the area?*

- 4) Concern around water quality.** The drainage in the proposed parcels moves away from the park, but we not only care about the park, we care about its neighbors as well. Quality groundwater is an important resource. *How will you ensure that groundwater quality won't be negatively impacted by the fracking process? What chemicals are injected into the earth during fracking? What impact can those chemicals have on groundwater safety and quality?*

We hope that each of these concerns will be fully addressed in the Environmental Assessment and look forward to reading the study thoroughly when it is complete. National parks and wilderness areas are wonderful places, but perhaps their greatest beauty is they were set aside to be preserved for future generations to enjoy as we enjoy them today. All of us are charged with being stewards of such special places and we must be very careful not to jeopardize the health such a spectacular and unique gem as Great Sand Dunes National Park and Preserve for short-sighted gains.

Sincerely,

Lucy Adams
President, Friends of the Dunes

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