

THE UTAH WILDERNESS COALITION

Honorable Robert F. Bennett
Wallace Bennett Federal Building
125 State Street, Suite 4225
Salt Lake City, Utah 84138-1188

March 26, 2010

Dear Senator Bennett:

Thank you for your letter dated March 3, 2010. The Utah Wilderness Coalition (UWC) appreciates your testimony this past year at the House hearing for America's Red Rock Wilderness Act and looks forward to working with your office and others to reach agreement on legislation that will protect the incredible wilderness found in San Juan County. We see this as one of the greatest opportunities ever to protect a core region of the redrock.

Process: We'd first like to recommend a process for resolving public land issues based on our experiences in Washington, Beaver, Piute and Emery Counties.

We've learned that conflicts over maps can at times be resolved in the field. We've found this especially true on our trips with Emery County interests. This can be time consuming, so it is important to focus the trips on areas where conflicts exist and avoid areas where there is already agreement. We've found these trips tend to lead to more frank discussions than discussions in a room and a better understanding of the relative value of different areas.

Our experience with field trips in Emery County has been much more productive than the field trips in which we participated in Washington County, despite the number of miles we all put on vehicles in the latter process. In Washington County we would stop at an overlook point where we got a broad view and discuss philosophical points or generalities of the area. In contrast, in Emery we are doing the hard work of actually traveling to and viewing specific locations where there are conflicts, and then hearing out different views. It is more time consuming to be sure—but it also accomplishes a great deal more in trying to narrow the divide between interests. We feel we understand far more about the views of Emery County interests than we ever did about those of the Washington County commissioners, for example. We're also pleased we've built some relationships with the Emery County process that never occurred in Washington County.

Based on our experiences, we suggest a series of meetings over maps to first determine where there is common agreement for San Juan County, and then a series of field trips targeting areas where there is conflict. It is likely there may still be disagreement at the

end of such a process. We then think it is important that there be negotiations between the key parties with a skilled experienced facilitator.

Interests should not be excluded from the process. For example, the UWC must be at the table to ensure resolution of outstanding conflicts in San Juan County. The UWC represents the Utah and American citizens who have worked the longest to secure protection for Utah's wilderness and have the greatest knowledge of the areas at issue, and our interests cannot be represented by any other organization or individual. We've worked to secure wilderness legislation in both bodies of the U.S. Congress and built up a co-sponsorship that reflects our ability to develop broad national consensus on wilderness issues in Utah. We recognize that no interest—including ours—will get all that it seeks, but we look forward to engaging with your office to reach an agreement that is a step forward for wilderness.

Priority List: While we would like to work with you to develop meaningful wilderness legislation, we are concerned that your request that we prioritize lands for wilderness designations may not lead to the best outcome, and is inconsistent with the UWC's policies and current positions.

First, we believe that wilderness-quality lands that meet wilderness criteria are equally deserving of wilderness designation.

Second, we have already undertaken the difficult task of prioritizing our interests by including the lands most deserving of wilderness protection in America's Red Rock Wilderness Act. We are the only interest that has a public, transparent, and longstanding proposal for this area, one that is supported by numerous members of the United States Congress. All these areas are important to us—that's why they make up our proposal.

Third, we are concerned that asking various interests to commit to a list of priorities before discussions begin will dramatically inhibit open and honest discussion and jeopardize the ability to have constructive dialogue. Lines in the sand may be drawn before discussions even begin.

We worry that using prioritized lists oversimplifies a generally complex public lands situation in San Juan County. We are particularly interested in how you intend to use these priority lists in order to best facilitate compromise. Where conflicts exist between uses, we hope that parties can find a solution rather than simply look at who has that particular place higher prioritized. This information should be taken into consideration, rather than simply dividing the wilderness pie based on lists.

It is also very difficult to prioritize areas that represent different values. Some of our areas protect cultural resources, some riparian and wildlife values, and some recreation values. Because of the complexity of the public land values in San Juan County, this list will wrongly convey a desired certainty that does not exist. Lastly, since no other interest has a proposal, others may find it advantageous to ask for things they may not really want, simply to create negotiating fodder.

We therefore urge you to consider holding off on the priority lists until after we have the opportunity to engage in discussions with the San Juan County commissioners and others. We could do a better job in prioritizing our own areas after we learn what is important to them. If you decide not to change the process, we request that the lists of all parties be made public as starting points for discussion, and that there be an agreement that they are all subject to change, in order to foster understanding among the parties involved.

Principles:

First, we think legislation should address the following issues, in order of priority:

1. Designate wilderness
2. Resolve RS 2477 issues
3. Exchange out SITLA lands
4. Expand national park units.

There are some general principles that guide us for wilderness. Generally, we want to protect areas that have the least protection and face the greatest threats. For this reason, generally we would rate the lands within America's Red Rock Wilderness Act as follows:

1. Non-WC¹, Non-Wilderness Study Area (WSA) lands
2. WC, non-WSA lands
3. WSA lands. **This is based on the assumption that the WSAs would not be released. Our rankings below reflect the assumption that the status quo would remain in place for these already protected areas.**

Although we've ranked wilderness regions below, and the units within those, please recognize that a more vulnerable non-WSA in a lower priority region still most likely ranks above a WSA in a higher ranked region based on the assumption stated above.

The Utah wilderness debate has reached the point where we believe reasonable people agree that the older WSA inventories were flawed. Your Washington County legislation recognized this when it designated non-WSA units such as Black Ridge and Doc's Pass as wilderness. The WSAs have now been protected for over twenty years and should, absent extraordinary circumstances, be assumed to be protected. We are willing to discuss whether a change is necessary, should a compelling reason be raised, although we are aware of none for the WSAs in San Juan County. Again, we appreciate that your Washington County legislation largely followed this principle.

Generally larger and more remote areas—in the very unlikely scenario of all other things being equal—are more valuable than smaller or more accessible areas. For that reason, we've grouped units in regions. It is important to us to protect a complex of units in order to create a large network of protected areas. And so, all things being equal, it

¹ By WC we refer to those lands BLM has re-inventoried and found to possess wilderness characteristics.

would be more important to protect the same amount of acreage in a related complex, such as that found in what we have described as the Glen Canyon wilderness, than to protect the same acreage scattered over isolated parcels.

It is easy, however, for wilderness consideration to become an acres game. Often the real issue with protecting a wilderness area is the boundaries, including the cherry stems. Acreage is a poor measurement of the value of a wilderness bill. With the wrong boundaries and cherry stems, a wilderness area with a great deal of acreage may be of less value than a much smaller area with more legitimate boundaries.

With the understanding that our priorities will naturally shift as we learn more from others, in what we hope will be a good faith open and in-depth process, here is an initial list to begin discussions.

We recommend that the two units that cross the boundary between Grand and San Juan Counties (Behind the Rocks and Hunter Canyon) be omitted from this process and be dealt with in their entirety in another process. We recommend the same for the small sliver of proposed wilderness just north of Canyonlands National Park.

1. **Arch Canyon Wilderness.** Closing the two ORV routes that currently bisect this unit—one that crosses the stream dozens of times, and that which accesses Hotel Rock on the mesa above.

2. **Glen Canyon Wilderness.** This includes Nokai Dome, Redrock Plateau, Upper Red Canyon, the Needle, Copper Point, Fort Knocker Canyon and White Canyon.

a. The highest priority is Redrock Plateau not including the WSA. In this area, the ORV route in Moqui Canyon must be closed at the top of the sand slide to prevent ORVs from entering Moqui Canyon. This access is currently facilitating illegal ATV travel up into the WSA on top of Mancos Mesa.

b. White Canyon

c. Nokai Dome

d. Upper Red Canyon

e. Fort Knocker

f. The Needle

g. Copper Point

h. WSA on Mancos Mesa

i. WSA for Cheesebox Canyon

There should also be a discussion as to whether there should be an expansion of Glen Canyon National Recreation Area and Natural Bridges National Monument. A review of the NPS wilderness recommendations for GCNRA shows the connection to our wilderness proposal for adjacent BLM lands such as Nokai Dome. These roadless areas, which are currently divided by arbitrary political boundaries, could be given to one agency and designated as wilderness for consistent management.

3. The Canyonlands Wilderness. This includes Hatch Wash, Dead Horse Cliffs, the Gooseneck, Demon's Playground, Lockhart Basin, Indian Creek, Harts Point, Bridger Jack Mesa, Shay Mountain, Butler Wash, Hunter Canyon, Behind the Rocks, and Dark Canyon.

The priorities for Canyonlands Wilderness are:

- a. Hatch Wash
- b. Bridger Jack Mesa
- c. Shay Mountain
- d. Non-WSA portions of Dark Canyon
- e. Harts Point
- f. Lockhart Basin
- g. Indian Creek - non WSA
- h. Butler Wash.
- i. Small units adjacent to park (Dead Horse Cliffs/Gooseneck/Demon's Playground)
- j. WSA portion of Dark Canyon
- k. Indian Creek WSA

There should be a discussion as to expanding the Needles portion of Canyonlands National Park to the east. We are generally supportive of this effort, with amendments to the map that former Superintendent Dabney prepared, and with the travel map of the sort that was utilized with the Washington County legislation for the Beaver Dam Wash NCA.

4. Cedar Mesa Wilderness: This includes Allen Canyon, Mancos Jim Butte, Hammond Canyon, Comb Ridge, Fish and Owl Creek Canyons, Road Canyon, Lime Creek, Valley of the Gods, San Juan River, Tabernacle, Tuwa, and Grand Gulch.

Similar to other areas with adjacent land management designations, arbitrary political boundaries separate certain BLM units adjacent to USFS land in the Abajos. This occurs for units like Arch Canyon, Hammond Canyon, Shay Mountain and Dark Canyon. It may be best to unite these areas—which are now arbitrarily divided by political boundaries—within a single agency and designate the whole as wilderness. Generally, the land should be directed to the agency with the largest portion of the roadless area involved.

The priorities for Cedar Mesa Wilderness are:

- a. Hammond Canyon
- b. San Juan River
- c. Tuwa Canyon: It should be discussed whether it would be better to have this unit incorporated into Natural Bridges National Monument,
- d. Comb Ridge
- e. Non-WSA portion of Grand Gulch

- f. Non-WSA portion of Fish and Owl Creek
- g. Valley of the Gods
- h. Road Canyon (including non-WSA)
- i. Lime Creek
- j. Allen Canyon
- k. WSA portion of Grand Gulch
- l. WSA portion of Fish and Owl Creek
- m. Tabernacle: It should be discussed whether this unit should be incorporated into Glen Canyon National Recreational Area, so there would be consistent river management from Mexican Hat downstream to the take-out at Clay Hills Crossing.
- n. Mancos Jim Butte

5. **Hovenweep Wilderness:** We think there should be a discussion about protecting the cultural resources of this area by expanding the Canyons of the Ancients National Monument in Colorado into Utah. We could accept the inclusion of our proposed wilderness units in this area into a National Monument, with a map of off-highway vehicle routes as was done with the Beaver Dam Wash NCA in the Washington County legislation, as a substitute for wilderness.

6. **Dolores River Headwaters**

- a. Coyote Canyon.

We also incorporate by reference the USFS lands priorities raised in letter by the Grand Canyon Trust and the Utah Environmental Congress. We also support the proposals by the National Parks Conservation Association and Grand Canyon Trust for the expansion of Canyonlands National Park.

Thank you for your willingness to address these important issues of wilderness designation, and for your attention to our concerns. We look forward to a full and open process to resolve these issues.

On behalf of our nearly 200 member organizations,

The Utah Wilderness Coalition

Cc:

Senator Dick Durbin
Representative Maurice Hinchey
Representative Jim Matheson
Chairman Jeff Bingaman
Chairman Raul Grijalva
Ranking Member Rob Bishop