

# GRAND CANYON TRUST



Honorable Rob Bishop  
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Washington, DC 20515  
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July 10, 2013

Dear Representative Bishop,

Thank you for your letter of June 3rd, 2013 seeking detailed maps and information with regard to developing a comprehensive lands bill for eastern Utah. We incorporate by reference here the joint comments submitted by members of the Utah Wilderness Coalition and others, and comments submitted on behalf of Utah's National Forest lands by the Utah Environmental Congress, all 501 (c) 3 public lands conservation groups.

While we are supportive of the priorities and positions taken by the above groups our interests on public lands in Utah offer perhaps a wider perspective. As a regional membership organization of 4,000 with diverse programs and twenty-nine staff spread across the Colorado Plateau, we have a number of interests with regard to this initiative that we want to emphasize here. We are interested in the energy development implications of BLM to SITLA land trades, and concerned about the potential development of so-called "immature fuels:" oil shale and tar sands. At the same time, we are vitally interested in conservation gains to be expected in trading SITLA out of isolated holdings surrounded by a matrix of BLM lands while consolidating SITLA blocks for ease of access and enhancement of the state school trust fund. We are also interested in expansion of national park units, new wilderness designation for Forest Service and BLM lands, alternate designations such as NCAs for BLM and National Scenic Areas (NSA) for Forest Service lands, and creative ways to structure this and possible companion bills to create durable legislation that can pass the House, the Senate and the CBO scoring process. We appreciate the Herculean challenge posed by an initiative for six counties and more than 18 million acres of ground. We commit our good faith involvement in working through these issues with you and the other decision-makers and stakeholders. We trust that the other parties will do the same. We remain hopeful that this initiative presents an opportunity for resolution of these complex land tenure issues, and we look forward to continued engagement.

The content of this letter is divided in to two major divisions: National Forest Wilderness and Energy Development, Climate Change, and Land Exchanges. As requested, we will limit our response here to lands within Uintah, Carbon, Emery, Grand, San Juan and Wayne Counties. Should other counties, such as Duchesne or Garfield, that provide natural geographic extensions of the lands already under consideration, become involved, we stand ready to provide information and recommendations for those counties as well.

## **Section One: National Forest Wilderness**

### **Grand Canyon Trust's Involvement**

Since 2003, Grand Canyon Trust has been very active on southern Utah's forests, working on efforts to protect lands through administrative methods concerning livestock grazing, off-road vehicle management, and vegetation management projects. Since 2010, GCT has had dedicated staff working on legislative efforts to permanently protect deserving forest lands. We have joined with the Utah Environmental Congress, the Utah Chapter of the Sierra Club, the Southern Utah Wilderness Alliance, the Wasatch Mountain Club, Canyonlands Watershed Council and others to create and advocate for what we call our Unified Forest Wilderness Proposal. The proposal for National Forest and adjacent BLM lands represents thousands of hours of mapping and field work, tens of thousands of photographs of on-the-ground conditions, and in-depth analysis and consideration of conflicting uses. The proposal represents the consolidation of two earlier statewide Forest Wilderness Proposals, one completed by the Utah Environmental Congress and the other created by the Utah Forest Network. Since 2010, efforts have been underway to unify and update the two proposals into a single, stronger and more widely supported proposal. We have completed the unification mapping process for Forest Service lands in San Juan, Grand and Emery counties. The mapping is complex and very time-consuming, and we are still at work to complete mapping for Wayne and Uintah Counties, and the maps submitted accompanying this letter is meant to serve as a place holder. Complete and updated data for Wayne and Garfield counties will be provided as soon as it is available.

### **Why Forest Wilderness?**

Since 1984, Utah's matchless National Forests have largely been left out of the wilderness debate. Our challenge at Grand Canyon Trust is to work with the rest of the forest community in Utah to make sure forests once again find their place at the center of the debate. The National Forests of Utah are sky islands of biodiversity above the much better known red rock country. These highland emeralds catch and hold water from passing storms, and spread their life-giving bounty down upon southern Utah's iconic desert landscape. What would Utah be without the Fremont River, the San Rafael River, the Price River the Dolores River, Mill Creek, Indian Creek, Muddy Creek, and the other myriad tributaries to the mighty Green and Colorado river systems? Eastern Utah's National Forests are the source of these waters, and, in the nation's second driest state, water matters. Wilderness is important for resilience in the face of climate change, for watershed protection, protection of habitat on which native biodiversity depends, for long-term sustainable economic growth and space outdoors for muscle-powered recreation for an increasingly sedentary populace. Protecting these watersheds will make a true difference for communities downstream. Finally, to the extent that county elected officials are motivated by a desire to resolve the question of wilderness they need to do so for the national forests as well as for the BLM lands downstream. Otherwise conservation advocates will continue to work for protection and designation of forest wilderness even after passage of a six county BLM bill.

### **Climate Change**

The Colorado Plateau is set to be ground zero for climate change impacts. Precipitation is projected to decrease while temperatures rise.<sup>1</sup> Wilderness can help alleviate the impacts associated with climate change and can serve as a central component of a comprehensive response to climate change.<sup>2</sup>

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<sup>1</sup> [http://www.blm.gov/ut/st/en/prog/more/CPNPP/Historic\\_Climate\\_Conditions.html](http://www.blm.gov/ut/st/en/prog/more/CPNPP/Historic_Climate_Conditions.html)

<sup>2</sup> Lovejoy, T.E. Protected areas: a prism for a changing world, *Trends in Ecology and Evolution*

Wilderness contributes to climate change adaptation by furthering our understanding of ecological systems, by sustaining biodiversity, by connecting landscapes, by providing ecosystem services and by fostering human-nature relationships. Since wilderness is managed by minimally invasive, even hands-off methods, wilderness provides a baseline against which to measure highly managed landscapes, furthering understanding of how ecological systems adapt and respond to climate change. The designation of wilderness, particularly large wilderness areas, is the most economical way to sustain biodiversity over the long term. Connectivity across landscapes allowing for movement of wildlife and plants across ecosystems in response to a changing climate is greatly assisted by a wilderness management regime. Ecosystem services such as clean water, carbon sequestration, and flood mitigation are likely to become ever more important in the face of climate change. Finally, wilderness provides a critical window into the past for human relation to the natural world. In an increasingly harried world placed under further duress by climate change, wilderness represents our best opportunity as humans to find vital emotional, spiritual and inspirational connections to nature.<sup>3</sup>

### **Watershed Protection**

In the present, and in light of increasing temperatures and decreasing precipitation, forests become ever more important as a way to catch and hold water vital to communities and wildlife. Protected areas generally produce higher water quality. The City of Salt Lake has proposed and supported wilderness protection for their culinary watersheds in the Wasatch canyons adjacent to the city, and in critical watersheds has applied non-disturbance management regimes even more restrictive than wilderness. In order to better protect areas in the Wasatch that are not already designated as wilderness, Representative Jim Matheson introduced the Wasatch Wilderness and Watershed Protection Act--H.R. 4267 in the 111<sup>th</sup> Congress. Speaking about the bill, Salt Lake City's mayor Ralph Becker pointed directly to the need to protect water resources:

“Congressman Matheson’s Wasatch Wilderness Bill is a proposal critical not just to the 500,000 residents who rely on the pristine water resources of our canyon watersheds, but to every Utahn.”

Salt Lake County Mayor Peter Corroon echoed these sentiments:

“With the significant growth of our population who depend on our mountains for water, it is more important than ever to protect our critical lands. Our mountains are also a place of respite and recreation. We need to maintain these glorious creations of nature for generations to come.”<sup>4</sup>

In addition to water quality, National Forests also provide the great majority of water quantity for communities. In the west overall, most headwaters are located in wilderness and more than half of the water supply comes from National Forest lands. Watershed protection is particularly important given that climate change is expected to decrease snowpack, increase flooding in the winter months, and reduce summer in-stream flows. Water that falls in wilderness headwaters becomes increasingly important for both streamflow and groundwater recharge.<sup>5</sup>

### **Native Biodiversity**

Wilderness not only provides a refuge for native species of plants, birds and wildlife, it offers undisturbed space for species to survive and flourish. Migrating species depend on the intact habitat and forage that wilderness provides. Allowing the space for species to fulfill the life cycle also leads to

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<sup>3</sup> Cole, D.; Boutcher, S. *Wilderness and Climate Change*, USDA FS, Climate Change Resource Center

<sup>4</sup> <http://matheson.house.gov/news-releases/matheson-bill-seeks-to-protect-vital-wasatch-canyons-water-source/>

<sup>5</sup> Cole, D.; Boutcher, S. *Wilderness and Climate Change*, USDA FS, Climate Change Resource Center

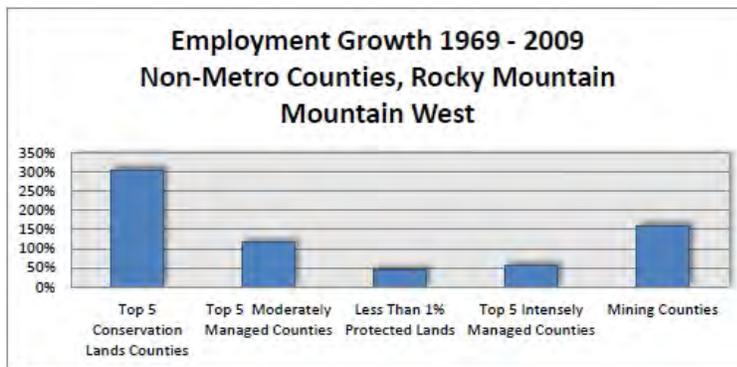
greater genetic diversity and the perpetuation of these species.<sup>6</sup> Wilderness areas across the globe are the only home of native biodiverse “hot spots,” defined as an area containing over 1,500 endemic vascular plant species. A 2003 study recognized the North American Deserts complex of the southwestern United States, including the Colorado Plateau, as one of five of these biodiverse hot spots. These biodiverse hot spots contain more than 44% of the total plant species and 35% of all animal species on earth, even though they represent just 1.4% of the Earth’s surface.<sup>7</sup> Wilderness protection for the most biodiverse areas of the Colorado Plateau – the National Forests – is critical to the preservation of global biodiversity. Scientist Thomas Brooks, one of the study’s authors says:

“By targeting the ... hotspots plus the five high biodiversity wilderness areas, we could save a vastly disproportionate number of the world's species. The conservation community would be wise to allocate their scarce resources accordingly.”<sup>8</sup>

One of the study’s authors quite correctly points out that high biodiversity wilderness areas such as those found across the Colorado Plateau also provide “critical ecosystem services to the planet. That means they regulate clean water for the planet, reduce the effects of global warming, encourage pollination and wildlife migration - and, of course, have enormous recreational, aesthetic and spiritual value to people.”<sup>9</sup>

### Economic Prosperity

Only relatively recently quantified, the scale of the outdoor recreation economy is massive. Nationwide, recreation is directly responsible for 6.1 million American jobs (far surpassing the 2.1 million jobs provided by domestic oil and gas production)<sup>10</sup>, \$646 billion in outdoor recreation spending each year, \$39.9 billion in federal tax revenue, and \$39.7 billion in state/local tax revenue. Utah alone benefits from \$12 billion in annual spending, 122,000 direct local jobs, \$3.6 billion in wages and \$856 million in state and local tax revenues related to outdoor recreation. The large majority (82%) of Utah residents



Employment growth rates between 1969 and 2009 by land management category, from Southwick Associates

participates in outdoor recreational pursuits, and visitors and migrants alike are drawn by Utah’s outstanding opportunities to recreate outdoors.<sup>11</sup>

The power of the outdoor industry has gained more recognition of late, with Governor Herbert’s office’s release of a [Vision for Outdoor Recreation](#), elevating the industry to a level on par with fossil fuel development in state

government, appointing a director of an office to focus on outdoor recreation and a set of guidelines for ensuring recreational resources in the

<sup>6</sup> <http://www.wilderness.net/NWPS/valuesEcological>

<sup>7</sup> <http://www.ens-newswire.com/ens/aug2003/2003-08-19-10.asp>

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> Outdoor Industry Association, *The Outdoor Recreation Economy, Take it Outside for American Jobs and a Strong Economy*, 2012

<sup>11</sup> Outdoor Industry Association, *The Outdoor Recreation Economy, Take it Outside for Utah Jobs and a Strong Economy*, 2013

form of protected lands are maintained and enhanced.

All this economic activity of course, depends on the “natural infrastructure” of protected lands, of which wilderness is an essential part. People don’t travel great distances to mountain bike through a gas field, to jeep through clear cuts or to hike beside an open pit mine. Though nearly all western counties see revenue from extraction, recreation and amenities economies, economic activity is more robust in areas where lands are public and where they are protected. Conversely, the presence of lands managed for the extraction of natural resources is associated with relatively slow growth.<sup>12</sup> Increased tourism is only part of the economic benefits of protected lands. Diversification from dependence on boom and bust cycles of resource extraction, attractiveness of a community for retirees and in-migrants, retention of cultural and historic resources and preservation of landscapes for increased water quality are all benefits of protected lands and wilderness – they increase a community’s quality of life. Protected natural landscapes are important to the well-being of both individuals and of the community. Research has shown high correlations between the presence of protected lands such as National Parks, National Monuments, Wilderness and all common measures of economic vitality - employment, per capita income, total aggregate income and population growth.<sup>13</sup>

### **Forest Lands in San Juan County – The Abajos and Elk Ridge**

Surrounded by BLMs on three sides and directly proximate to Canyonlands National Park, the peaks of the Abajos and the mesas, buttes and canyons falling from Elk Ridge offer truly outstanding scenery, opportunities for primitive and unconfined recreation, matchless solitude, and cultural and historic treasures with almost no equal anywhere. Miles and miles of rugged and primitive system trails allow the visitor to escape it all in this remote and special place. The forests remain exceedingly beautiful and wild, harboring large populations of big game such as deer and elk, black bear, mountain lions, Mexican spotted owl (the largest contiguous critical habitat in the United States), ringtails, numerous species of bat, Yavapai land snails, Abert's tassel-eared squirrel, and a few remaining sage grouse as well. The Abajos and Elk Ridge present one of the last opportunities in the nation to protect a productive, contiguous wilderness landscape that retains much of its original pre-settlement vitality. This is one of the last great places, largely unexplored by Anglo-Americans until late in the last century. Utah’s last wild wolf was killed here in the 1920s, making it the last region in the state with its full complement of natural predators. Ancient forests of Engelmann spruce and subalpine fir, ponderosa pine and aspen still exist unlogged here along with spring-fed pockets of maple, aspen, box elder and birch. Many outfitters rely on the primitive nature of these mountains and canyons for hunting, packing, bicycle touring, and for extended backpack trips with at-risk youth.

The region is often compared to Zion National Park, and deservedly so - towering sandstone cliffs replete with ponderosa pine forest, amphitheaters, alcoves, hoodoos, serpentine canyons studded with hidden microclimates of ferns and flowers nurtured ancient peoples here just as they fascinate visitors today. Elk Ridge is headwaters for the canyons of Cedar Mesa, Arch Canyon, Grand Gulch Primitive Area, White Canyon, the Dark Canyon BLM Primitive Area, Canyonlands National Park’s Needles District, Salt Creek Archeological District, Beef Basin and Indian Creek. The cultural record preserved here is truly astonishing. From local collections to the Smithsonian Institution, an incredible array of artifacts has

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<sup>12</sup> Southwick Associates, *Conserving lands and prosperity: Seeking a proper balance between conservation and development in the Rocky Mountain West*, 2012, p. 14

<sup>13</sup> Power, Thomas M. *The Economics of Wildland Preservation*, University of Montana Economics Department, 2000, pp. 23-24

been found here, and just as many remain untouched, hidden in ruins, dry alcoves and caves in the canyons, mesas and benches. Mesa Verde and Chaco styles of Ancestral Puebloan rock art and architecture blend in the region, square and round kivas existing in close proximity. Nearby, Archaic Barrier Canyon, Clovis and Fremont peoples lived where contemporary Ute and Navajo lived and hunted. The Monticello Ranger District is literally surrounded by protected archeological areas, including Butler Wash, Cedar Mesa ACEC, Grand Gulch Primitive Area, Dark Canyon, Beef Basin, Canyonlands NP, Salt Creek Archeological District, Lavender Canyon ACEC, Indian Creek, Newspaper Rock, Hammond Canyon Archeological Protection District and Cliff Dweller's Pasture RNA. The region is rich in historic and contemporary Native American use as well. A great Navajo leader of the 19<sup>th</sup> century, Chief "Hastiin Ch'ilhaajin" Manuelito was born on the district between the Bears Ears, and White Mesa Utes continue to own inholdings and run livestock on the Ranger District. The area is still used regularly for subsistence and sacred purposes today by many tribes. Wilderness designation is an ideal tool to protect fragile and irreplaceable cultural and archaeological resources, as less motorized and mechanized access to sites means less looting and plundering. Bearing in mind that both preservation and traditional use are important, the wilderness proposal boundaries have been drawn carefully here to allow for both. With few inholdings, conflicts and competing management challenges are low. One large roadless area here is even known on the USGS topo maps as "the Wilderness," a strong testament to the rugged and wild character of this truly outstanding area. Just south of there, Cliff Dwellers Pasture RNA protects both outstanding plant communities and cultural resources. Just to the west, the specially designated Hammond Canyon Archaeological Scenic Area protects cultural resources as well.

Proposed wilderness units for the Abajos and Elk Ridge (Monticello Ranger District) include Dark Canyon, Dark Canyon Extensions, Seven Sisters Buttes, Butler Wash Extension, The Wilderness, Chippean Ridge, Recapture Creek, Hammond/Notch Canyon and Arch Canyon. The Ranger District contains the following IRAs, protected under the 2001 Roadless Area Conservation Rule: Ruin Canyon IRA, Shay Mountain IRA, Blue Mountain IRA, Allen Canyon – Dry Wash IRA, Hammond – Notch Canyon IRA and Arch Canyon IRA. These protected IRAs form the cores of our proposed wilderness units.

| <b>Abajo Mountains and Elk Ridge Proposed Designations – San Juan County</b> |                |  |
|--|----------------|--|
| <b>Unit Name</b>   | <b>Acreage</b> | <b>Natural Features of Note</b>  |
| Dark Canyon, Dark Canyon Extensions  | 32,712         | Ruin Canyon IRA, Steamboat Point, Deadman Point  |
| Seven Sisters Buttes   | 11,983         | Davis Canyon, Boundary Butte   |
| Butler Wash Extension  | 2,207          | Contiguous to Butler Wash UWC unit and Canyonlands NP, Needles District  |
| The Wilderness   | 60,562         | Shay Mountain and Blue Mountain IRAs, Tuerto Canyon, Hop Creek, Red Ledges, Mount Linnaeus                             |
| Chippean Ridge   | 36,460         | Allen Canyon – Dry Wash IRA, Cliff Dwellers Pasture RNA, Reef of Rocks, Deep Canyon, Chippean Ridge, Mancos Jim Butte, |
| Recapture Creek  | 6,417          | Johnson Creek, Recapture Creek   |
| Hammond/Notch Canyon   | 27,301         | Hammond – Notch Canyon IRA, Hammond Canyon Archaeological Scenic Area  |
| Arch Canyon  | 27,126         | Arch Canyon IRA, Butts Point, Texas Canyon   |

## **Forest Lands in San Juan and Grand Counties – The La Sal Mountains**

The La Sal Mountains are a laccolithic intrusion of liquid magma thrust between the surrounding soft sedimentary strata, born just after the Colorado Plateau began to rise roughly 35 million years ago. Along with their fellow laccoliths, the Abajos and the Henry Mountains, our nation's youngest mountain ranges provide water to the canyons, farms and faucets below while wearing a cloak of wildlife-harboring forest in otherwise dry and hostile land. Just to the north and west, the collapsed salt domes of the Spanish and Castle valleys are home to the majority of southeastern Utah's citizens. The La Sals protrude from the earth's mantle like cut gems, sharp, faceted and glittering, their center peak named Mt. Tukuñnikivatz, Ute for "last place in the sun" as night falls. The La Sals are Utah's second highest mountain range and southern Utah's highest, snow-capped peaks towering over red rock canyons and mesas. So scenic are they that most visitors and many locals believe the La Sals to be designated wilderness, though they, as yet, are not.

The La Sals host an unusually large population of bear, mountain lions, and elk. Remote and undeveloped, the forests allow bear and other wildlife to range from alpine tundra in the high peaks to the Dolores or Colorado Rivers, a descent of roughly 4,000 feet, and in some cases cross only one or two narrow roads. The hunting is legendary, and the habitat unspoiled. The range is home to outstanding fishing in the lakes and streams, and a recently discovered population of endangered native Greenback cutthroat trout in the Mt. Peale proposed wilderness would be well-served by such a designation.

Many people think the La Sals are already wilderness for good reason. The proposed wilderness units here suffer an embarrassment of riches. Containing ample solitude, outstanding opportunities for primitive and unconfined recreation, unique scenic, geologic, historic and archaeological resources, they are poster children for the qualities envisioned for protection by the Wilderness Act. Laccolithic intrusions capping redrock mesas and canyons cut into steep, jumbled and highly erosive sedimentary layers are rare, and they exist nowhere else on Earth like they do in Grand and San Juan counties. From alpine tundra to mixed conifer, to habitat-rich aspen forests, gamble oak, ponderosa pine, mountain brush, Piñon/juniper, desert brush and grasslands, this landscape has an outstanding diversity of scenery and habitat types. Thanks to their extensive use in advertising, the central peaks of the La Sals are among the most famous steep sided mountains in the world.

Proposed for wilderness in the La Sals are the three core units encompassing the range's major peaks – Grand View/Mt. Waas, Mount Peale and South Mountain, all of which are covered by Forest Service Inventoried Roadless Areas (IRA), protected by the Roadless Area Conservation Rule. Away from the high peaks, but still heavily forested, and in the critical groundwater recharge zone for Moab's culinary aquifer, are the Mill Creek, Beaver Canyon and Mary Jane Canyon proposed wilderness units, all of which are contiguous to larger areas of proposed BLM wilderness. Finally, riding the Colorado state line east of the La Sal State Forest blocks, Sinbad Ridge Proposed wilderness dips in to remote and little visited canyons between the peaks and the Uncompaghre Plateau. In addition to IRAs, the La Sals are home to the 2,500 acre Mt. Peale Research Natural Area (RNA), the most protective designation the Forest Service can assign an area – more protective even than wilderness. Proposal boundaries have been drawn to eliminate most management conflicts and non-conforming uses, cherry stemming (excluding) roads and routes in the range. Working extensively with mountain bikers in Moab, we propose that a series of non-motorized corridors be excised from some of the units to allow mountain biking to continue while preserving the wilderness character adjacent to both sides of the bike trails.

In addition to wilderness, we propose a National Scenic Area (NSA) for the La Sal Mountains with a special focus on careful protection for Moab watershed. National Scenic Areas are parallel in many ways to National Conservation Areas (NCA) on BLM lands. While they provide some protections, NSAs are not as protective or limiting in management as is wilderness allowing a wider range of uses and management regimes.<sup>14</sup> Presumably, legislation would initiate a planning process for the NSA as similar legislation has mandated for NCAs on BLM lands. Home to the majority of the population in southeast Utah, the Moab and Castle Valleys rely on the health of the La Sals for their drinking and irrigation water. The La Sals are also among the most scenic mountains in America, and while large areas of them do not qualify for wilderness designation due to road networks, range developments and other non-conforming uses, the mountain range still deserves protection for its scenic, wildlife and watershed values. NSA designation for an area detailed in the chart below and in an accompanying map should emphasize minimization of ground disturbing activities and take special care to better manage springs, streams, lakes, riparian areas and land management uses and practices which may degrade water quality.

| <b>La Sal Mountains Proposed Designations – Grand and San Juan Counties</b> |                |  |
|---|----------------|--|
| <b>Unit Name</b>  | <b>Acreage</b> | <b>Natural Features of Note</b>  |
| Mary Jane Canyon  | 13,886         | Adjacent to UWC Mill Creek Unit  |
| Beaver Creek  | 7,984          | Beaver Creek Canyon, tributary to the Dolores River  |
| Porcupine Rim Extension   | 92             | Adjacent to UWC Porcupine Rim Unit   |
| Mill Creek  | 4,442          | Adjacent to UWC Mill Creek Unit and WSA, Mill Creek Canyon   |
| Grand View/Mt. Waas   | 19,104         | Headwaters of Mill Creek, Manns Peak, Miners Basin, Burro Pass, Haystack Mountain  |
| Sinbad Ridge  | 3,051          | Roc Creek, virgin ponderosa pine forests, adjacent to a large roadless area in Colorado  |
| Mount Peale   | 11,665         | Highest peaks in the range - Mt. Tukuhnkivatz, Mt. Mellenthin, Mt. Peale, Brumley Creek, Mount Peal RNA  |
| South Mountain  | 13,985         | La Sal Pass, South Mountain, Doe Creek Canyon, Pack Creek Canyon   |
| <b>La Sal Mountains National Scenic Area</b>                                | 132,390        | To protect wilderness and non-wilderness lands with a high degree of scenic integrity, and to prioritize preservation of Moab’s culinary watershed |

**Forest Lands in Emery County – The Wasatch Plateau**

*“Along a base line nearly 50 miles in length the Tertiary strata bend upward to the summit in a single sweep, diversified by minor inequalities arising partly from minor fractures, partly from erosion, but never of such magnitude as to mask the general plan of the uplift, nor even to greatly disfigure its symmetry. The minor features, though elsewhere they might seem of considerable moment, are mere ripples upon the great wave”*

-Clarence E. Dutton, Report on the Geology of the High Plateaus of Utah, 1880.

<sup>14</sup> [http://en.wikipedia.org/wiki/National\\_Scenic\\_Area\\_%28United\\_States%29](http://en.wikipedia.org/wiki/National_Scenic_Area_%28United_States%29)

The Wasatch Plateau is big country. Seen for hundreds of miles to the east, its imposing eastern scarp reaches from the dry desert floor in rugged cliffs almost to the clouds and to summer lightning storms. Headwaters for stunning and internationally renowned desert landscapes, the Wasatch Plateau provides an island of lush habitat for wildlife. This cool forested island high above the San Rafael Swell provides refuge for an incredible diversity of species. From the Wasatch Plateau flow numerous sources of life-giving water that nourishes the surrounding desert, among them Muddy Creek, and the San Rafael River. Viewed from east to west, the Wasatch Plateau is the first in a series of high plateaus that act as a division between the Colorado Plateau and Great Basin ecoregions. The area, locally called the Manti Top or the Manti Mountains, rises to more than 11,300 feet elevation at its high point. On the east, the Plateau ascends to top a dramatic sheer escarpment 1,000 to 2,000 feet above Castle Valley. The high elevation top contains several notable peaks and broad, rolling ridges, mixed conifer forests, open wildflower-filled meadows and dense Aspen stands. The Plateau is noted for its excellent fall colors. A popular spot for hunters, birders, hikers, horseback riders, anglers, and car-bound sightseers, the area contains many special places that are deserving of wilderness protection. The area contains high naturalness, outstanding opportunities for solitude and primitive and unconfined recreation, as well as stunning geology, endemic plant communities and dramatic scenery. Scenic peaks and ridges on the Plateau present stark white outcrops contrasting with the dark green of spruce-fir forests, providing a satisfying scenic experience. From remarkable stone ramparts to high alpine peaks, lakes and meadows, the Wasatch Plateau's wide array of terrain and vegetative types makes it a truly extraordinary place. The Wasatch Plateau is well suited to birding, hiking, backpacking, horseback riding, hunting, fishing, photography, and canoeing and fishing on numerous lakes.

When considered for wilderness protection, roads and popular ATV trails that compose the Arapeen ATV trail system eliminate some places from consideration for wilderness. Our wilderness proposal for the area has eliminated most management conflicts, seeking to strike a balance for human users while considering the best interest of the land as well. A truly vast area, there is room here to preserve the wild and primeval character of a rugged landscape while allowing for motorized recreation where appropriate. Subsurface coal leases are also present in the area, making some parts of our proposed wilderness provisional, in order to accommodate the valid existing rights of coal leaseholders where surface disturbance might harm wilderness characteristics. We look forward to resolving these issues and advancing wilderness that meets the needs of all stakeholders.

A route known as Skyline Drive runs from north to south along the length of the Plateau. The route provides access to fishing, camping, hiking, and equestrian trails. The route offers views of the Plateau itself and the desert country to the east. The summit of the Plateau is defined by a long narrow platform that never reaches more than 6 miles in width. To the east, the land drops off dramatically through a series of striking white, pink, pale orange and buff-colored cliffs. The lower terraces and benches, at intervals of about three to six miles, reveal older and older strata as they descend. Geologically complex and fascinating, the Wasatch Plateau contains Cretaceous, Laramie, Tertiary, and Jurassic formations.

Long known among hunters and anglers, the Wasatch Plateau is a place of remarkable beauty. From the low elevation benches covered with Piñon Juniper forests and sage and forb communities to majestic Aspen stands to high elevation fields of wildflowers to mixed conifer forests, the Wasatch Plateau provides an amazing diversity of habitat types. In addition to deer, elk, black bear, coyotes and beaver and other small mammals, the Wasatch Plateau is home to many avian species, snakes, lizards and other reptiles. The area in general contains winter and summer range for mule deer. Excellent habitat for

Canada Lynx, one individual released in Colorado visited the area in search of a new home range. The game rich drainages and tablelands of the Wasatch Plateau served as hunting ground for numerous native peoples. By about 2,000 years ago, the Fremont developed relatively sophisticated farming techniques in the drainages of the Plateau, utilizing runoff to grow corn and other crops. Between 1250 and 1500 AD, the Fremont culture was supplanted by Ute, Paiute, Shoshone peoples, who also called the area home.

Emery County’s portion of the Wasatch Plateau contains the Nelson Mountain Research Natural Area, established in 1988 to protect the entire top of a mesa that contains pristine woodlands and shrub communities typical of 8- 9000 foot elevation areas of the intermountain West. Emery County contains the following IRAs, all protected under the 2001 Roadless Area Conservation Rule, which form the cores of our proposed wilderness units: Nuck Woodward, East Mountain, Gentry Mountain, Straight Canyon, North Horn, Biddlecomb – Rock Canyon and Muddy Creek – Nelson mountain. Proposed wilderness units in Emery County are East Huntington Canyon, Nuck Woodward – Gentry Mountain, East Mountain, Trail Mountain, Mahogany Point, Kilpack Canyon, South Horn Mountain, Nelson Mountain and Muddy Creek.

| <b>Wasatch Plateau Proposed Designations - Emery County</b> |                |  |
|---|----------------|--|
| <b>Unit Name</b>  | <b>Acreage</b> | <b>Natural Features of Note</b>  |
| East Huntington Canyon                                      | 8,040          | Trough Springs Ridge   |
| Nuck Woodward – Gentry Mountain                             | 15,222         | Nuck Woodward IRA, Gentry Mountain IRA, Tie Fork Canyon, Wild Cattle Ridge     |
| East Mountain   | 35,776         | East Mountain IRA, Seeley Mountain, Scad Valley, Rilda Canyon                  |
| Trail Mountain  | 16,665         | Straight Canyon IRA  |
| Mahogany Point  | 10,957         | North Horn IRA, Reid and Nelson Swale, East Rim                                |
| Kilpack Canyon  | 9,583          | Biddlecomb – Rock Canyon IRA   |
| South Horn Mountain   | 21,808         | Biddlecomb – Rock Canyon IRA, Biddlecomb Hollow                                |
| Nelson Mountain   | 32,704         | Muddy Creek – Nelson Mountain IRA, Slide Hollow, Blue Trail Creek, Youngs Peak |
| Muddy Creek   | 15,300         | Muddy Creek – Nelson Mountain IRA, Wash Rock Canyon                            |

**Forest Lands in Wayne County – Thousand Lake and Boulder Mountains**

*“Indescribable or unspeakable: That is the ineffable. The ineffable, by definition, is beyond expression. What Gloria and I see from the heights of Thousand Lake Mountain... is, to us, ineffable. It is beyond expression, even comprehension. We look out upon a convoluted jumble of practically every landscape form imaginable - a library of earth history, a museum of nature’s surreal art.*

*There are cliffs and buttes, mountains and mesas, canyons and valleys, domes and pinnacles, rounded slopes and numberless smaller forms, all painted in a rainbow spectrum of glorious hues, sculptured into shapes-designs-patterns that astonish with strange and endless diversity.*

*We cannot possibly do justice to those vistas in written or spoken words. We cannot even verbalize them to ourselves while looking. Language was not designed for the articulation of mystic profundities, or the conveying of emotional nuances, except in the vaguest way...*

*Emotions overflow when I attempt, so feebly, to describe the Plateau as I know and feel it. After 40-odd years it is more wonderful to me than ever."*

-Ward J Roylance

The proposed wilderness complex north of Bicknell and Torrey on Thousand Lake Mountain is a place of superlatives. From the 11,300 foot volcanic mesa cap of Flat Top to Cathedral Valley and the archaeologically intact coves of Paradise Draw to the east at the border of Capitol Reef National Park, the terrain here is rough, broken and rugged. The scenery is almost matchless; a visitor has a hard time divining the straight line boundary between the forest and Capitol Reef. The terrain, diversity and views found on the forest are truly National Park caliber, from the bristlecone pine capped Ant Hill to Velvet Ridge, the area is home to outstanding wildlife habitat, unmapped cultural resources, and outstanding opportunities for primitive and unconfined recreation, solitude and wonderful scenic, geologic and other natural features. Engelmann spruce, subalpine fir, aspen and mixed conifer surrounding high pure lakes give way to stunning redrock mesas topped with Piñon/juniper and desert grassland communities. Offering excellent summer and winter range for big game, grizzly bears were sighted here as late as 1923. Areas were recommended for wilderness in the Forest Service's own Roadless Area Review and Evaluation II in the 1970s, recommendations that were traded away in the 1984 wrangling for enlargement of the High Uintas wilderness. It's time to correct that mistake on the part of the conservation community. With old timber sales, roads and popular ATV trails drawn out or cherry-stemmed in the wilderness proposal, management conflicts are minimal to non-existent. Thousand Lake Mountain, Wayne Wonderland and McDonald Basin are all outstanding candidates for wilderness protection. Protected by the 2001 Roadless Area Conservation Rule, IRAs on Thousand Lake in Wayne County are McDonald Basin IRA, Thousand Lake Mountain IRA, Lookout Peak IRA and Wayne Wonderland IRA, all of which form the cores of our proposed wilderness units.

*"The Aquarius Plateau should be described in blank verse and illustrated upon canvas. The explorer who sits upon the brink of its parapet looking off into the southern and eastern haze, who skirts its lava cap or clambers up and down its vast ravines, who builds his campfire by the borders of its snow-fed lakes or stretches himself beneath its giant pines and spruces, forgets that he is a geologist and feels himself a poet."*

-Clarence E. Dutton, Report on the Geology of the High Plateaus of Utah, 1880.

Written in 1880, Dutton's words ring nearly as true today – the rim of Boulder Top from Donkey Point above Blind Lake is one of the few places on the lower 48 where one can look out at nearly 200 miles of undeveloped scenery, gazing past the Waterpocket Fold to the Henry Mountains. Boulder Mountain south of Torrey, Teasdale and Grover is some of Utah's absolute best primeval forest. Topped by another 11,300 foot plateau, this one much larger (some 50,000 acres around 11,000 feet) and with many more lakes, Boulder Mountain and the Aquarius Plateau form the highest forested plateau in the world. Craggy cliffs, pure spring and runoff-fed mountain lakes, a thick and mostly unmolested Aspen belt make the hunting and fishing here the best in southern Utah, and some of the best in the western United States. The north slope of Boulder Mountain in Wayne County is little roaded, full of springs, lakes and a true refuge for wildlife. The basalt cap of Boulder Top is like a slice of Alaska dropped atop Utah's legendary canyon country. The fishing, hunting and opportunities for primitive and unconfined recreation are phenomenal. The remote and nearly inaccessible reaches of the plateau top and the quiet lakes just under the cliff band provide standout opportunities for solitude. State lands to the west on the Awapa Plateau harbor the largest population of pronghorn antelope in the state.

| <b>Thousand Lake and Boulder Mountain Proposed Designations - Wayne County</b> |                             |  |
|--|-----------------------------|--|
| <b>Unit Name</b>   | <b>Acreage<sup>15</sup></b> | <b>Natural Features of Note</b>  |
| McDonald Basin   | ~4,366*                     | McDonald Basin IRA, adjacent to Capitol Reef NP  |
| Thousand Lake Mountain   | ~26,660*                    | Thousand Lake Mountain IRA, Flat Top, Reese Creek, East Fork Red Canyon, The Ant Hill  |
| Wayne Wonderland   | ~22,529*                    | Lookout Peak IRA, Wayne Wonderland IRA, Adjacent to Capitol Reef National Park, Paradise Draw, Spring Canyon                         |
| Boulder Mountain   | ~52,659*                    | Boulder Mountain – Boulder Top – Deer Lake IRA, Bluebell Knoll, Government Point, Grass Lake, Raft Lake, Blind Lake, Fish Creek Lake |
| Dark Valley  | ~16,972*                    | Dark Valley IRA, Dark Valley Draw, Giles Hollow  |
| Happy Valley   | ~6,179*                     | Happy Valley IRA, Twin Peaks, Nixon Canyon, Lion Mountain  |
| Fremont Gorge  | ~1,327*                     | Adjacent to Fremont Gorge UWC BLM proposed wilderness and Capitol Reef National Park   |

### **Forest Lands in Uintah County – The Uinta Mountains**

More similar to the high benches and lofty peaks of neighboring Colorado or the Northern Rockies of Wyoming and Montana than the high plateaus of Utah, the Uinta Mountains in northeastern Utah are unique in many ways – one of which is that they are the highest and only major range of mountains in the continental United States that run east-west instead of north-south. Born 50-70 million years ago, their east-west trend may relate to stress and fracture patterns in the continental plate due to the uplift of the Colorado Plateau. A testament to the interconnectedness of the natural world, without the Colorado Plateau the Uintas would not exist as they do. The Uintas are also unique for their large stands of Lodgepole pine, the only such major stands in Utah. The distinctive purple quartzite that makes up the monolith of the Uintas towers over the Uinta basin to the south and Wyoming’s Red Desert to the north. The upwarp waters the surrounding semi-deserts – home to over 1,000 lakes and more than 400 streams. Great for hunting, hiking, pleasure driving, biking, fishing, wildlife watching, the Uinta Mountains are among the best of the best. The proposed wilderness units in Uintah County, like the High Uintas Wilderness, offer outstanding opportunities for solitude and primitive and unconfined recreation, possess a high degree of naturalness and are replete with unique scenic, historic, geological and cultural resources.

Designated in 1984 as Utah’s largest wilderness, The High Uintas wilderness stopped where politics drew the lines, not because of human impacts that disqualified the area. Much of the land proposed for wilderness in Uintah County is directly adjacent to the designated wilderness; no impact separates the wild landscape across county lines, and those areas are noted in their name “High Uintas Extensions,” and in the chart below. Other wilderness units in Uintah County are easily identified because the boundaries are determined by distinct and obvious human impacts such as roads and logging. Proposed wilderness units in Uintah County include High Uintas Extensions, Dyer Mountain, Mount Lena – Spruce Creek and Ashley Gorge. Inventoried Roadless Areas in Uintah County protected by the 2001 Roadless Area Conservation Rule cover significantly more land than we have proposed for wilderness, and are

<sup>15</sup> \* Unification GIS mapping is not yet complete. Acreage numbers for Wayne County are provisional and subject to change.

named by number. They include 0419020 (High Uintas), 0401004 (Dyer Mountain), 0401002 (Mount Lena/Spruce Creek) and 0401005 (Ashley Gorge).

| <b>Uinta Mountains Proposed Designations - Uintah County</b> |                             |   |
|--|-----------------------------|---|
| <b>Unit Name</b>   | <b>Acreage<sup>16</sup></b> | <b>Natural Features of Note</b>   |
| High Uintas Extensions                                       | ~88,714*                    | Directly contiguous to the High Uintas Wilderness, designated in 1984, 0419020 IRA, Ice Cave Peak, Marsh Peak, Pearl, Blue, Deadman and Red Belly Lakes |
| Dyer Mountain  | ~8,883*                     | 0401004 IRA, Brush Creek, Anderson Creek  |
| Mount Lena – Spruce Creek                                    | ~9,616*                     | 0401002 IRA, Pot Creek, Kettle Creek  |
| Ashley Gorge   | ~29,214*                    | 0401005 IRA, Taylor Mountain, Ashley Creek, Black Canyon  |

## **Section Two: Energy Development, Climate Change, and Land Exchanges**

Any “grand bargain” envisioned necessarily involves important choices about the Colorado River Basin’s energy, land, water, and climate future. In the face of climate change and its worsening regional impacts, Grand Canyon Trust supports public policies steering away from carbon and water-intensive energy development, toward energy conservation and renewable energy development, and toward land uses and allocations that conserve ecological systems and native biological diversity.

Oil and greenhouse gas emissions resulting from developing the Green River Formation’s unconventional fuels would be globally and regionally significant. The Green River Formation harbors the world’s largest oil shale deposit. The U.S. Geological Survey estimates that between 353 billion and 1.146 trillion barrels in the Green River Formation “have a high potential for development.”<sup>17</sup> According to a report on oil shale GHG emissions by Dr. Adam Brandt, Dr. Jeremy Boak, and Dr. Alan Burnham,<sup>18</sup> “full-fuel-cycle carbon dioxide (CO<sub>2</sub>) emissions from oil shale derived liquid fuels are likely to be 25-75% higher than those from conventional liquid fuels.” In Canada, average emissions for tar sands development are estimated to be 3.2 to 4.5 times as intensive per barrel as for conventional crude oil produced in Canada or the United States.<sup>19</sup>

For perspective, the U.S. petroleum industry has in its entire history produced about 220 billion barrels of oil, and the most current estimate of world crude proven reserves is 1.342 trillion barrels.<sup>20</sup> Scientists at the Potsdam Institute estimate that developing more than about one fifth (representing 565 gigatons of CO<sub>2</sub> emissions) of the world’s proven reserves (representing 2795 gigatons of CO<sub>2</sub> emissions) risks

<sup>16</sup> \* Unification GIS mapping is not yet complete. Acreage numbers for Uintah County are provisional and subject to change.

<sup>17</sup> Birdwell, J.E., Mercier, T.J., Johnson, R.C., and Brownfield, M.E., 2013, In-place oil shale resources examined by grade in the major basins of the Green River Formation, Colorado, Utah, and Wyoming: U.S. Geological Survey Fact Sheet 2012–3145, 4 p., available at <http://pubs.usgs.gov/fs/2012/3145/>.

<sup>18</sup> Adam Brandt, Jeremy Boak, Alan Burnham, “Carbon Dioxide Emissions from Oil Shale Derived Liquid Fuels”.

<sup>19</sup> National Energy Technology Laboratory, Development of Baseline Data and Analysis of Life Cycle Greenhouse Gas Emissions of Petroleum-Based Fuels, DOE/NETL-2009/1346 (2008), 13, table 2-4.

<sup>20</sup> Birdwell, J.E., Mercier, T.J., Johnson, R.C., and Brownfield, M.E., 2013, In-place oil shale resources examined by grade in the major basins of the Green River Formation, Colorado, Utah, and Wyoming: U.S. Geological Survey Fact Sheet 2012–3145, 4 p., available at <http://pubs.usgs.gov/fs/2012/3145/>.

severe climate change.<sup>21</sup> Alberta's bitumen (tar sands) reserves, whose development Dr. James Hansen says would be "game over" for efforts to avert the most severe climate change, are estimated at 176.8 billion barrels (28.11×10<sup>9</sup> m<sup>3</sup>). Depending on deposit grade and per-barrel emissions, oil barrels and greenhouse gas emissions resulting from Green River Formation oil shale development could exceed that of Alberta's tar sands by 2 – 7 times.

Grand Canyon Trust is thus deeply concerned about the global and regional effects of commercial scale oil shale and tar sands development that, together, will inordinately and negatively impact the Colorado Plateau. The Colorado River Basin is already considered "ground zero" for climate change impacts. Resulting greenhouse gas emissions would exacerbate those impacts, which include warming, drying, more severe drought, reduced river flow and water availability, diminished snow-packs, and more severe fires. Oil shale and tar sands development would also industrialize vast acreage, and require dedicating significant portions of Utah's water rights to industrial purposes. This would foreclose and displace other land uses, forever changing the character of both Utah's backcountry and its traditional agricultural communities.

For these and other reasons, Grand Canyon Trust does not support committing land, water, and limited public resources to carbon-intensive energy systems. Such allocations entrain long-term patterns of energy use and involuntarily commit future generations to their deleterious effects. Thus, given the State of Utah's favorable disposition toward unconventional fuel development, Grand Canyon Trust does not in the context of the "grand bargain" support legislative proposals to transfer surface and mineral rights to oil shale and tar sands deposits from federal to SITLA control. The Trust is also concerned about transfers of surface and mineral rights to SITLA that would facilitate oil and gas development given resulting greenhouse gas emissions, wildland industrialization and potential groundwater and special status species impacts; any foregoing proposals should at least include provisions requiring the use of best-in-class technologies and monitoring techniques to reduce and track greenhouse gas emissions and mitigate the risk of on- and off-site soil, air and water contamination and impacts to special status species.

Recognizing that these significant challenges do exist in the realm of land exchange proposals, the Grand Canyon Trust does have a long history of working with the Utah State Trust Lands Administration (SITLA) on land exchanges. We have worked to help the state trade into federal lands in transportation corridors, as additions to communities and for conventional minerals development in the Utah Recreational Land Exchange Act of 2009. We support the consolidation of federal lands for better management of the federal estate and we support SITLA acquiring lands for feasible economic development to fund the school trust. In this process, we hope for additional consolidation of federal lands to facilitate wilderness designation on National Forest Lands and BLM lands and other types of protective designations for federal lands. We would specifically support proposals to develop water-thrifty renewable energy facilities on brown fields, reclaimed lands, and lands near existing development that would not impact special status species. The Trust also supports SITLA acquisitions for non-extractive purposes, such as of parcels near communities whose sale and development would not impact special status species.

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<sup>21</sup> Meinshausen, M., Meinshausen, N., Hare, W., Raper, S. C. B., Frieler, K., Knutti, R., Frame, D. J. & Allen, M. 2009. Greenhouse gas emission targets for limiting global warming to 2°C. *Nature*, doi: 10.1038/nature08017 available at <http://www.riversimulator.org/Resources/ClimateDocs/GreenhouseGasEmissionTargetsForLimitingGlobalWamingTo2Cmeinshausen2009.pdf>

Representative Bishop, thank you again for the opportunity to participate in this important effort to resolve land tenure issues in eastern Utah. We continue this dialogue in good faith and with anticipation of success. We have enjoyed productive discussions and field trips already undertaken with delegation staff and we look forward to the events and field trips scheduled for the August recess. We look forward to continuing to work actively with you and others to help develop administrative and/or legislative solutions that substantively resolve conflicts and address conservation needs in eastern Utah. Please don't hesitate to contact us for clarification, further supporting information or with any questions or comments about the content here, our conservation interest, or our participation in this initiative.

Sincerely,



Bill Hedden  
Executive Director



Tim Peterson  
Utah Wildlands Program Manager

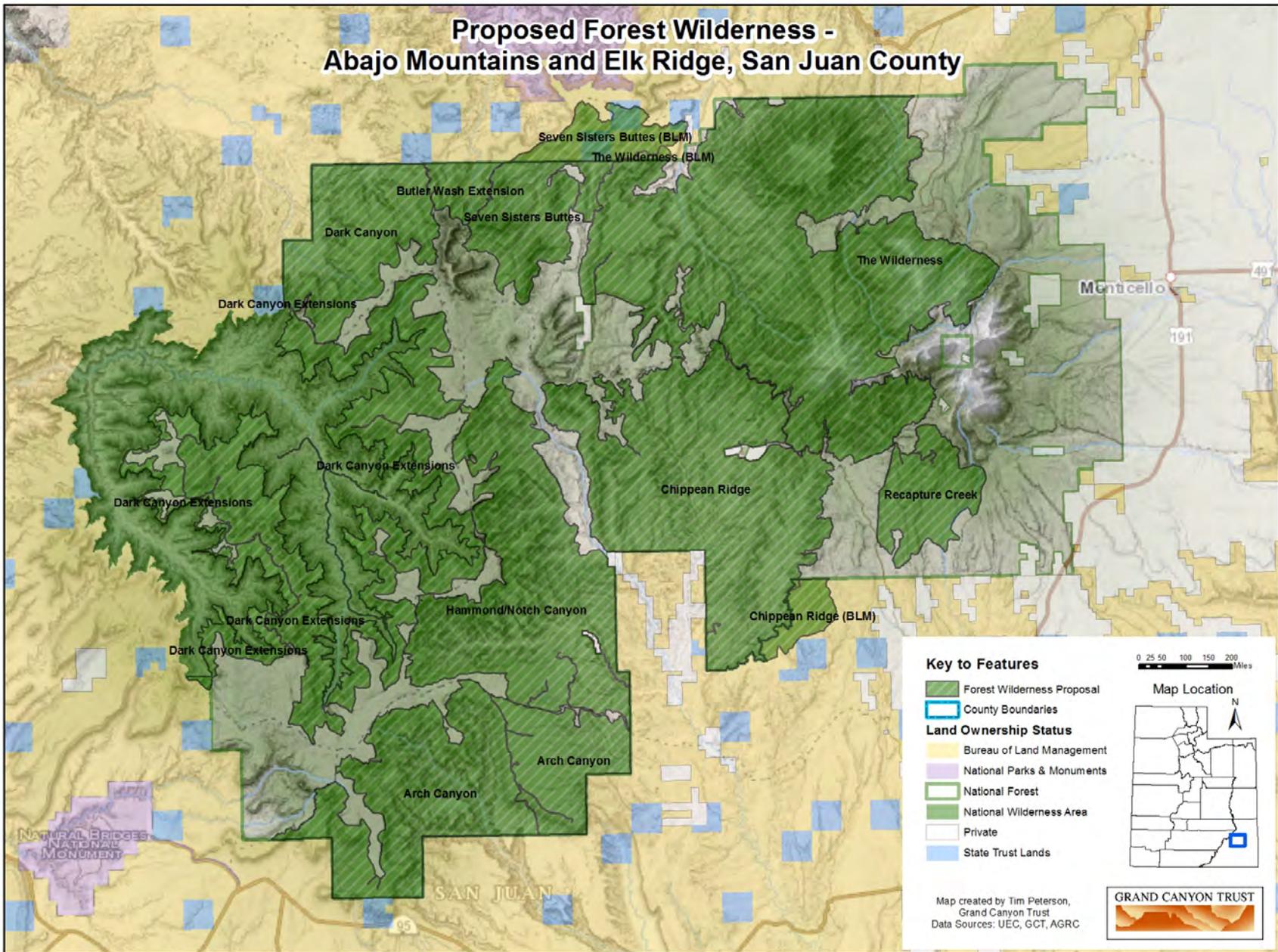
Cc:

Representative Jason Chaffetz  
Representative Jim Matheson  
Senator Mike Lee  
Senator Orrin Hatch  
Chairman Ron Wyden  
Ranking Member Edward Markey  
Ranking Member Raul Grijalva

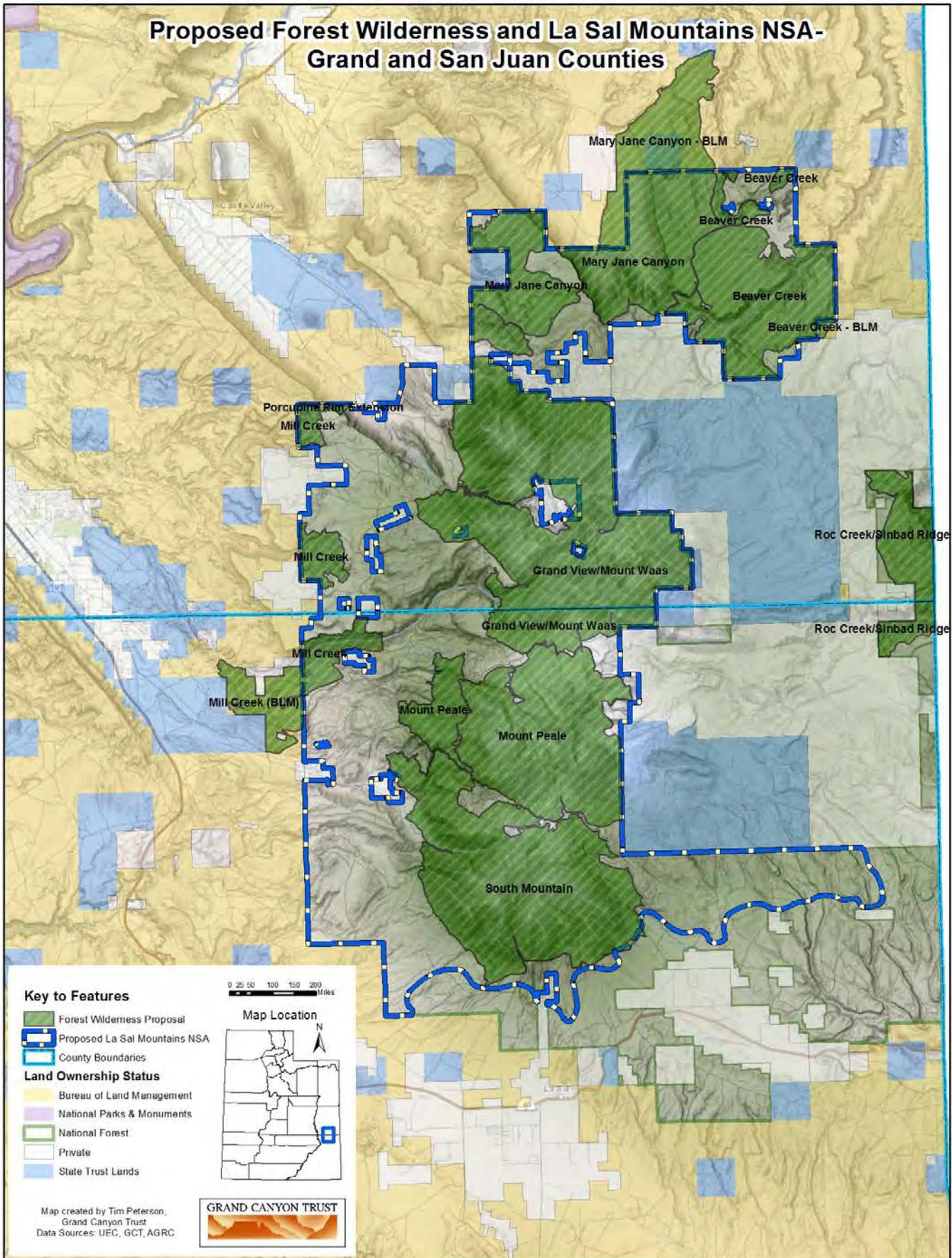
Attachments:

Maps of Proposed Forest Wilderness

# Proposed Forest Wilderness - Abajo Mountains and Elk Ridge, San Juan County



# Proposed Forest Wilderness and La Sal Mountains NSA- Grand and San Juan Counties



Mary Jane Canyon - BLM

Beaver Creek

Beaver Creek

Mary Jane Canyon

Mary Jane Canyon

Beaver Creek

Beaver Creek - BLM

Porcupine River Extension

Mill Creek

Mill Creek

Mill Creek

Mill Creek (BLM)

Grand View/Mount Waas

Grand View/Mount Waas

Roc Creek/Sinbad Ridge

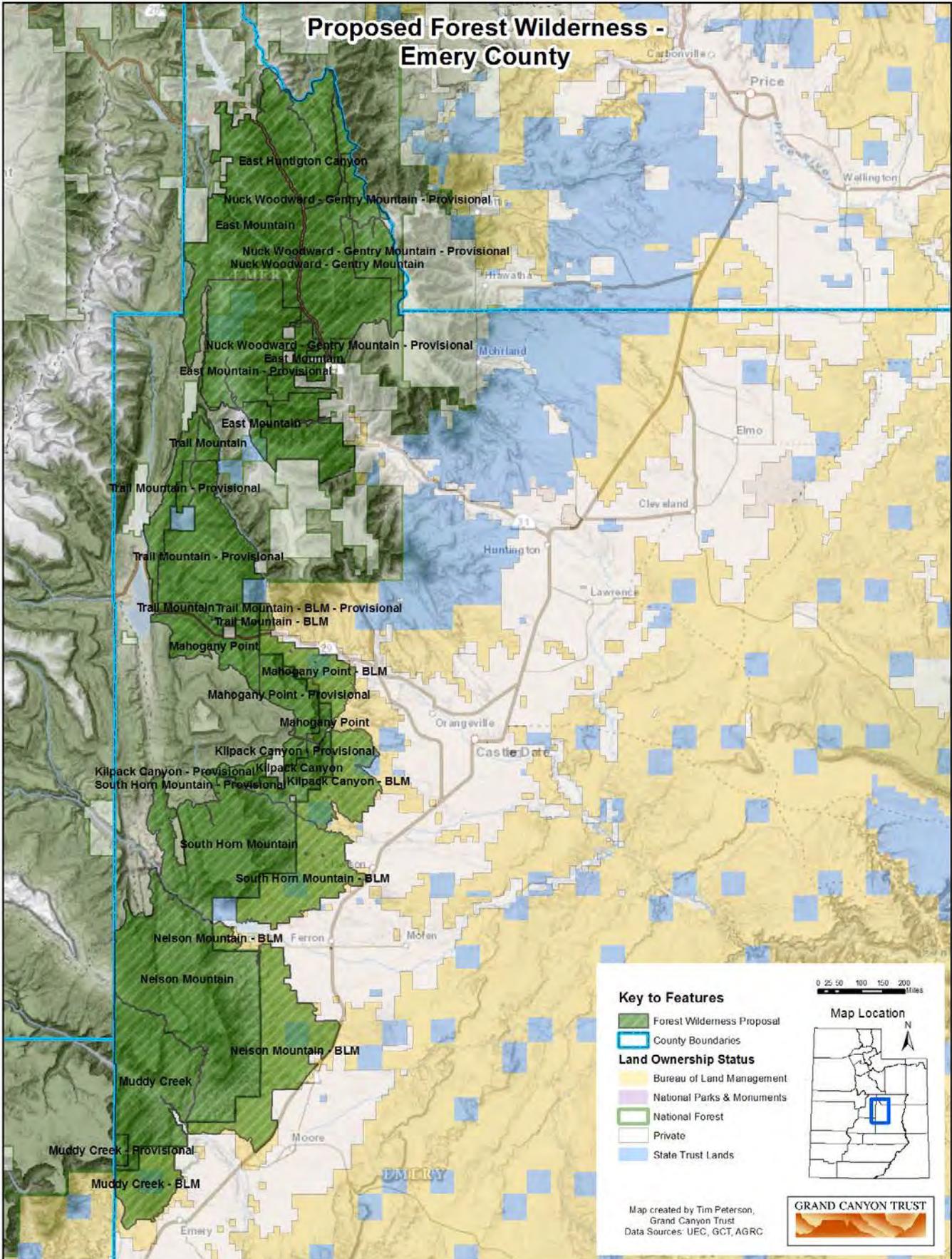
Roc Creek/Sinbad Ridge

Mount Peale

Mount Peale

South Mountain

# Proposed Forest Wilderness - Emery County



### Key to Features

- Forest Wilderness Proposal
- County Boundaries
- Land Ownership Status**
- Bureau of Land Management
- National Parks & Monuments
- National Forest
- Private
- State Trust Lands

0 25 50 100 150 200 Miles

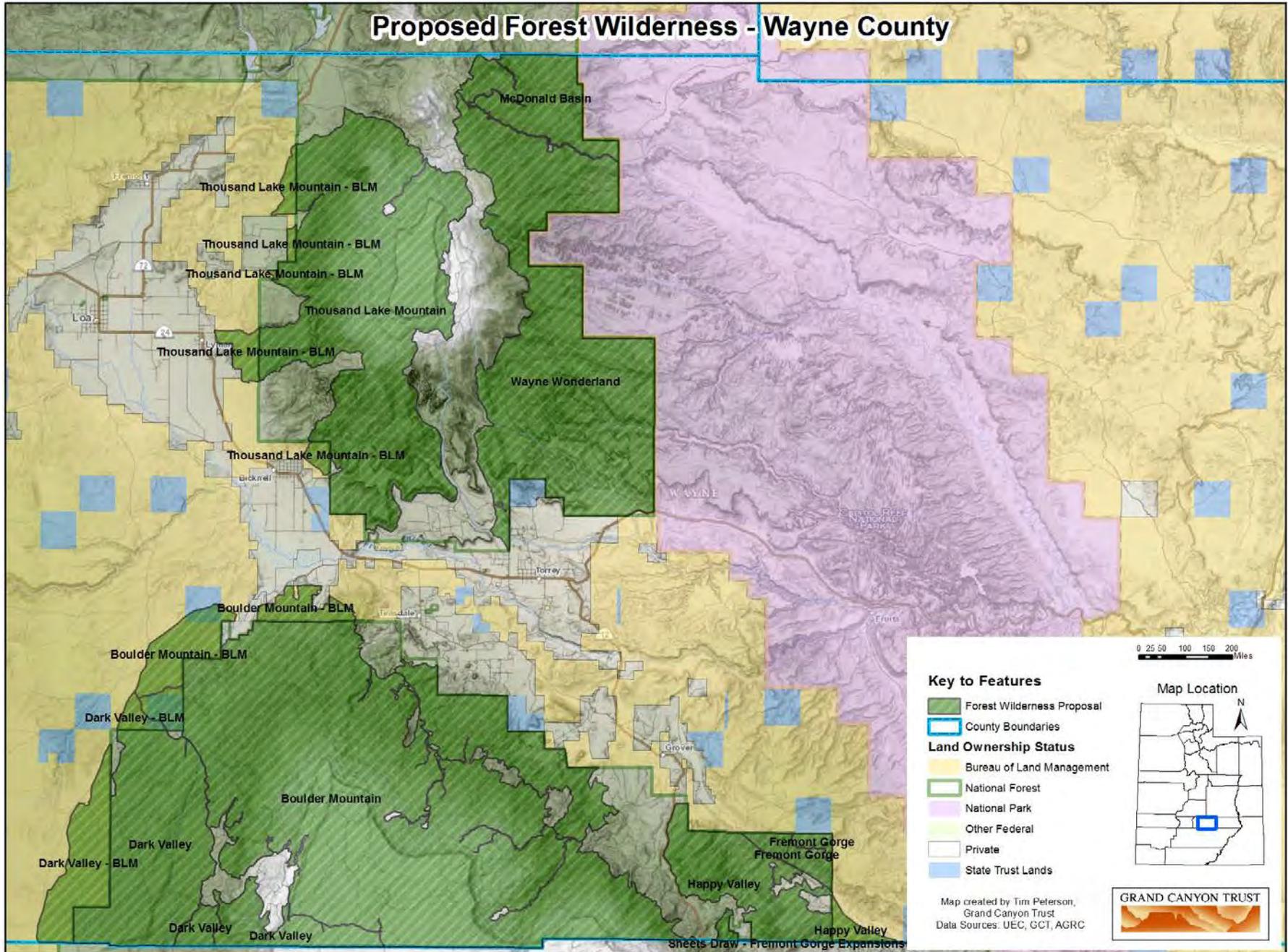
### Map Location



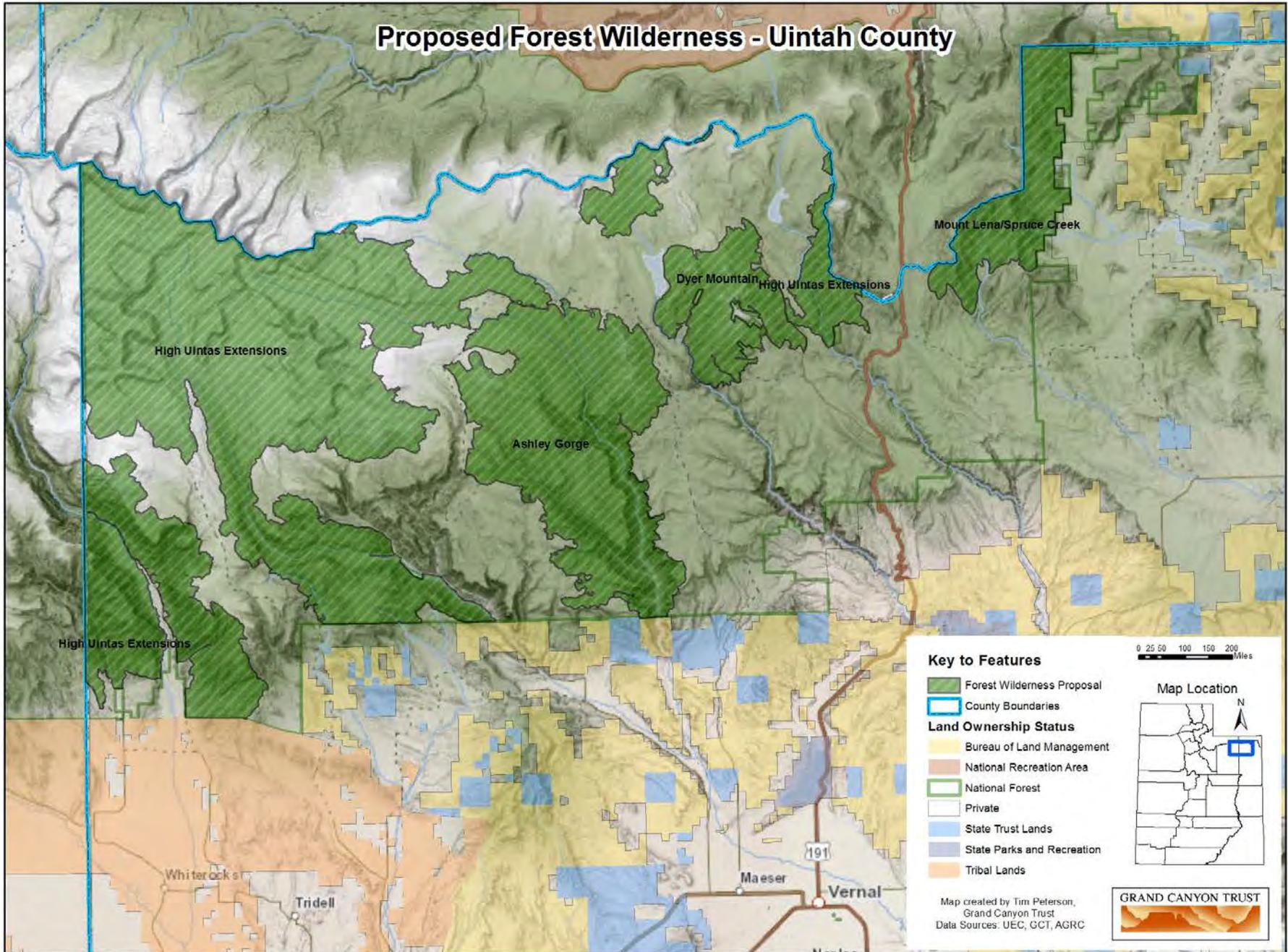
Map created by Tim Peterson,  
Grand Canyon Trust  
Data Sources: UEC, GCT, AGRC



# Proposed Forest Wilderness - Wayne County



# Proposed Forest Wilderness - Uintah County



### Key to Features

- Forest Wilderness Proposal
- County Boundaries
- Land Ownership Status**
  - Bureau of Land Management
  - National Recreation Area
  - National Forest
  - Private
  - State Trust Lands
  - State Parks and Recreation
  - Tribal Lands

0 25 50 100 150 200 Miles

### Map Location



Map created by Tim Peterson,  
Grand Canyon Trust  
Data Sources: UEC, GCT, AGRC

