

GRAND CANYON TRUST

Honorable Rob Bishop
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March 15, 2013

Dear Representative Bishop,

Thank you for your letter of February 15, 2013 inviting our participation in developing a comprehensive lands bill for eastern Utah. As noted in your letter and our separate reply, we believe that consensus on these issues is possible. Reaching consensus among the stakeholders in the public lands debate will require deliberate steps toward that end. In the past several years, many conservation organizations have engaged as participants in poorly-structured discussions in various Utah counties around land use issues. These processes have faltered. On the other hand, there have been several well-structured Utah collaborations that have succeeded in reaching consensus on formerly divisive land management issues. We'd like this effort to succeed as those have, and we strongly believe that the key to success is time-certain, consensus collaboration guided by a neutral mediator/facilitator.

The Grand Canyon Trust worked closely for six years with the Utah State Trust Lands Administration developing and advocating for the Utah Recreational Land Exchange Act of 2009. This bill provides a template to expedite exchanges of state and federal lands, including language facilitating the heretofore challenging valuation process. We recommend that a SITLA/BLM land exchange be developed as part of any comprehensive land bill to complete reconciliation of land tenure issues. An expeditious land trade would provide needed revenue to the School Trust, while allowing coherent management of federal lands that may receive new protective designations.

We will attempt to honor your request to list our priorities for special designations with the caveat that it is nearly impossible to rank or compare extraordinary lands such as the San Rafael Swell, the Book Cliffs, the Uinta mountains, the La Sal mountains, Elk Ridge, the Dirty Devil River and Glen Canyon; how does one decide whether it is more important to protect irreplaceable cultural resources, life-giving watersheds, or world class wildlands? All equally deserve protection. The list below should serve to begin a dialogue, and goals for protection and

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disposition should be expected to evolve as the interests of various stakeholders emerge through dialogue and a consensus process.

Given the enormous scale of a proposal covering all of eastern Utah with a total land area over 18 million acres, we believe it makes sense to work within smaller areas identified as priorities by stakeholders. We know from our experience working on the Utah Recreational Land Exchange Act, from 2003 until its passage in 2009, that creating legislation of this nature is a very time and resource consuming task. The great amount of work required in landscape-scale land designations makes professional facilitation even more important in this case.

A comprehensive lands bill for eastern Utah should include the following regions, in order of our priorities:

1. Greater Canyonlands Region

"You can talk about the Grand Canyon. You can talk about Yellowstone, Yosemite. I'm biased - I'm not sure they compare with the Canyonlands."

- Stewart Udall

Stretching from Ruby Ranch on the Green River to Hite along the Green and Colorado Rivers, and from the Dirty Devil River and Robbers Roost in the west to Hatch Point in the east, the landscape surrounding Canyonlands National Park is one of the largest intact roadless areas in the lower 48 states and one of the last untouched frontiers of the American West. The Greater Canyonlands Region's rugged landscape features a globally unique collection of historic and cultural resources spanning more than 12,000 years of human history - a historical record that is better preserved here than anywhere else in the world. The region is wildly diverse, ranging from riparian corridors and salt desert scrub at about 3,800 feet to lush meadows and sub-alpine tundra at nearly 11,400 feet in elevation. The region is home to exceptional geologic formations, deep river canyons and unparalleled natural beauty. It includes famous Utah landmarks such as Indian Creek, Lockhart Basin, Fable Valley, Salt Creek, Dark Canyon, Elk Ridge and Robber's Roost. The region boasts many springs, surprising biodiversity, and rich wildlife habitat, well-preserved due to the area's remoteness.

For the Greater Canyonlands Region, we recommend a mix of designations including:

- National Monument or similarly protective designation for the region
- BLM and Forest Service Wilderness, as outlined in the Utah Wilderness Coalition's BLM wilderness proposal and the Grand Canyon Trust/Utah Environmental Congress Unified Wilderness Proposal for Forest Service lands in the Abajo Mountains and the canyons of Elk Ridge

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- Wild, Scenic and Recreational River status for the Green, Colorado and Dirty Devil rivers and important tributaries
- Land Exchange, trading SITLA out of protected lands and into developable lands
- Enhanced protection of historical and cultural resources, including additions to the National Register of Historic Places
- National Conservation Area status for deserving areas not protected by other designations, such as Chippean Ridge
- Comprehensive Travel Management Planning, undertaken by the BLM and Forest Service, through NEPA that adequately assesses and protects cultural, historic, and riparian resources, wildlife habitat, and opportunities for muscle powered recreation
- Mineral withdrawal of certain lands not suitable for wilderness designation

2. Moab/Colorado River/Labyrinth Canyon Region

Covering lands from Westwater Canyon in the east to Green River in the west and from the face of the Book Cliffs to the La Sal Mountains, Lisbon Valley and the Anticline, lands adjacent to Moab and the Green and Colorado rivers support a myriad of diverse commercial, scientific, cultural, historical and recreational resources. The natural infrastructure found here and its protection is essential to maintaining Moab's thriving economy – now a top tier international destination for world travelers. Featuring world-class whitewater rafting, mountain biking, hiking, backcountry driving and rock and mountain climbing areas, it's no wonder the region is so heavily visited by regional, national and global travelers. The region also contains outstanding cultural and historical resources and stunning scenic and geologic diversity ranging from the hoodoos and spires of the Colorado River Canyons and Fisher Towers at 4,000 feet to the 12,700 foot volcanic peaks of the La Sals, Utah's second-highest and southern Utah's highest mountain range. Preservation of the recreational resources in the region is critical to Utah's economy, and careful protection of the outstanding scenic resources found here is possible without foreclosing carefully planned extraction of energy resources.

For the Moab/Colorado River/Labyrinth Canyon Region, we recommend a mix of designations including:

- BLM and Forest Service Wilderness, as outlined in the Utah Wilderness Coalition's BLM wilderness proposal and the Grand Canyon Trust/Utah Environmental Congress Unified Wilderness Proposal to Forest Service Lands in the La Sal Mountains
- Wild, Scenic and Recreational River Status for the Colorado River and important tributaries such as Mill Creek
- Land Exchange, trading SITLA out of protected lands not already covered by the 2009 Utah Recreational Lands Exchange Act and into developable lands

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- Enhanced Protection of historical and cultural resources, including additions to the National Register of Historic Places
- National Conservation Area status for deserving areas not protected by other designations, such as the Monitor and Merrimac Butte areas
- Comprehensive Travel Management Planning, undertaken by the BLM and Forest Service, through NEPA that adequately assesses and protects cultural, historic, and riparian resources, wildlife habitat, and opportunities for muscle powered recreation
- Protection of municipal watersheds

3. Book Cliffs/ Desolation Canyon Region

The Book Cliffs, which run some 250 miles from near Grand Junction, Colorado to Price, Utah is the longest escarpment in the world. From the Archaic pictographs at Sego Canyon to the remarkably intact Fremont dwellings in Range Creek, the Book Cliffs and Desolation Canyon region deserves protection of its irreplaceable cultural resources. The remote and rugged region represents the last and best wild and untouched stronghold for wildlife in eastern Utah. More than 6,000 hunters visit the massive roadless areas found here each year for some of the most outstanding hunting in the West. The region presents great opportunities for better wildlife and habitat management too, particularly on State lands. Thousands run the world-class river trip found here along the Green River in the shadow of Butch Cassidy's outlaw trail in Desolation and Gray Canyons. Those lucky enough to do so find a landscape little changed since frontier days, despite the proximity of energy development. The Book Cliffs and Desolation Canyon region proves that protection and careful extraction are not mutually exclusive. Since the region has been extensively developed, it is time now to add protection for areas not suitable for energy development.

For the Book Cliffs/Desolation Canyon Region, we recommend a mix of designations including:

- BLM Wilderness as outlined in the Utah Wilderness Coalition's BLM wilderness proposal and Forest Service Wilderness in the Badland Cliffs region of the Ashley National Forest
- Wild, Scenic and Recreational River status for the Green River and important tributaries
- Land Exchange, trading SITLA out of protected lands and into developable lands
- Enhanced protection of historical and cultural resources, including additions to the National Register of Historic Places
- National Conservation Area status for deserving areas not protected by other designations such as Tavaputs Plateau and Nine Mile Canyon Area

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- Creative management, perhaps including ownership transfer to DWR or another public manager, in order to enhance the outstanding wildlife habitat in the Steer Ridge, Went Ridge, She Canyon and Little Creek Ridge block of SITLA lands

4. San Rafael Swell Region

Utah's San Rafael Swell is truly superlative. At different times considered for designation as a National Park, a locally-driven National Monument, and BLM wilderness, most who visit the Swell would be surprised by its lack of permanent protection. A magnificent uplift composed of Coconino Sandstone, Kaibab Limestone, the Triassic Age Moenkopi and Chinle Formations, Wingate, Kayenta, and Navajo Sandstones, the Swell covers a 50 by 80 mile region broken into weird and wonderful canyons, gorges, mesas, buttes, plateaus, hoodoos, grabens and reefs. The Swell is home to seven Wilderness Study Areas, eight rare plant species, desert bighorns, pronghorn antelope, coyotes, bobcats and the golden eagles. Paleontological resources found locally in a higher density at Cleveland-Lloyd Dinosaur Quarry than anywhere else on Earth draw worldwide scientific attention. In 1936, Bob Marshall identified more than 2 million acres in this singular region for preservation. More recently, along with Cedar Mesa, the area was one of two highlighted for possible Antiquities Act Monument designation in Utah, and the region's important resources entirely justify such designation. The area is home to a convergence of ancient cultures. The mysterious Archaic people left signs of their passing here in pictographs at the Head of Sinbad and Black Dragon Wash, the Fremont people at the Rochester and Buckhorn Wash panels and throughout the geologically stunning canyons of the region. More recently Utes, Spanish explorers, trappers, 19th century outlaws and early cattlemen left signs of their passing. Home to standout opportunities for spring boating, hiking, biking, climbing, scrambling and backcountry adventure, the Swell is a recreation paradise, and the highly diverse geography allows many uses to occur without much user conflict. From the Wedge Overlook and the Little Grand Canyon to the slot canyons of Little Wild Horse, the Swell is a truly matchless landscape.

For the San Rafael Swell Region, we recommend a mix of designations including:

- BLM and Forest Service Wilderness, as outlined in the Utah Wilderness Coalition's BLM wilderness proposal and the Grand Canyon Trust/Utah Environmental Congress Unified Wilderness Proposal to Forest Service Lands in the Wasatch Plateau
- Wild, Scenic and Recreational River Status as appropriate for the Price and San Rafael rivers and Muddy Creek
- Land Exchange, trading SITLA out of protected lands and into developable lands
- Enhanced Protection of historical and cultural resources, including additions to the National Register of Historic Places

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- National Conservation Area status for deserving areas overlapping or not protected by other designations such as the Temple Mountain mining district, Red Ledges and Molen Reef
- Mineral withdrawal of select lands not suitable for wilderness designation

5. Glen Canyon/San Juan River Basin Region

Home to such internationally famous landmarks as the Goosenecks of the San Juan, Muley Point, Valley of the Gods, Cedar Mesa, Comb, Lime and Velvet ridges, the Glen Canyon/San Juan River Basin region combines haunting beauty, a remarkable diversity and density of cultural sites and the full suite of recreational opportunities. Once inhabited by far more people than live in the area now, the region was an early cultural melting pot of Mesa Verde and Chaco Canyon Ancestral Pueblo cultures, where distinct styles of architecture and pottery merged in fascinating ways. Still sacred to many contemporary tribal peoples today, the region is truly alive with opportunity for protection, study and reflection on human history. Like no place else on Earth, the combination of cultural, scenic, geologic and recreational resources is highly deserving of protection.

We recommend more protective measures for Hovenweep National Monument and the extraordinarily dense archaeological resources on surrounding BLM lands. The 400-acre Square Tower Unit should be expanded to approximately 8,000 acres of surrounding lands. The Trust for Public Land has been in discussion with nearby private landowners interested in selling their property to facilitate expansion of the monument. Designation of a BLM monument or NCA in Utah mirroring Canyons of the Ancients National Monument in Colorado would provide needed protection to this sensitive area where protection now stops abruptly at the state lines. New land designations here would likely bring additional tourism revenues to San Juan County.

For the Glen Canyon/San Juan River Basin Region, we recommend a mix of designations including:

- BLM Wilderness, as outlined in the Utah Wilderness Coalition's BLM wilderness proposal
- Wild, Scenic and Recreational River Status for the Colorado and San Juan rivers and important tributaries
- Land Exchange, trading SITLA out of protected lands and in to developable lands
- Enhanced Protection of historical and cultural resources, including additions to the National Register of Historic Places
- National Conservation Area status for deserving areas either overlapping or not protected by other designations such as Alkalai Ridge, Butler Wash and the Squaw, Pappoose and Cross Canyon areas on eastern Utah's border mirroring the Canyon of the Ancients National Monument in Colorado

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- Comprehensive Travel Management Planning should be undertaken, by the BLM and Forest Service, through NEPA that adequately assesses and protects cultural, historic, and riparian resources, wildlife habitat, and opportunities for muscle powered recreation
- Protection of municipal watersheds
- Mineral withdrawal of lands not suitable for wilderness designation
- Consolidation of ownership and expansion of Hovenweep National Monument

6. Fremont River Headwaters/Wayne Wonderland Region

From Thousand Lake High Top to the Waterpocket Fold, Wayne County locals have long considered the majestic region adjacent to the Fremont River worthy of protection. As recently after settlement as 1910, local efforts like those of Torrey residents Ephraim P. Pectol and Dr. A. L. Inglesby to protect the “Wayne Wonderland” were well underway. In 1935, the Utah State Land Board briefly lobbied the federal government to create a Wayne Wonderland National Park. Back even further, legend holds that cartographers transposed the names of the southerly Boulder Mountain (over 900 lakes) and northerly Thousand Lake Mountain (fewer than 30 lakes); others say settlers propagated the confusion to protect their best trout fishing on Boulder. Either way, the extraordinary volcanic high plateaus of Thousand Lake and Boulder tumbling to redrock cliffs inspire awe in locals, visitors and amenities migrants to Torrey and the Fremont River Valley. Here, the power of the high plateaus to catch, hold and release life-giving water to the desert below is on vivid display. Boulder Mountain is the highest forested plateau in the world, and the alpine tundra at over 11,000 feet on Boulder Top falls dramatically from the cliff edges to the Spruce/Fir zone before gently transitioning to Aspen, Ponderosa Pine, Piñon/Juniper and Colorado Plateau grass and shrub communities. Home to standout native cutthroat trout and plentiful big game, Boulder and Thousand Lake’s roadless areas deserve protection as some of the best habitat in the state. The impressive scarp of Miners Mountain and the BLM stretch of the Fremont River Gorge from Highway 12 to the Capitol Reef National Park deserve protection as well.

For the Fremont River Headwaters/Wayne Wonderland Region, we recommend a mix of designations including:

- BLM Wilderness as outlined in the Utah Wilderness Coalition’s BLM wilderness proposal and Forest Service Wilderness in the Thousand Lake Mountain region of the Fishlake National Forest and for Boulder Mountain on the Dixie National Forest, administered by the Fishlake National Forest.
- Wild, Scenic and/or Recreational River status for the Fremont River and important tributaries
- Land Exchange, trading SITLA out of protected lands and into developable lands
- Enhanced protection of historical and cultural resources, including additions to the National Register of Historic Places



- Protection of municipal watersheds

7. Uinta Mountains/ Dinosaur Region

The only major east-west running mountain range in the continental United States and the highest range in Utah, the Precambrian Uinta quartzite and shale uplift serves as a vital source of water to the Green and Bear river basins. Home to spectacularly diverse wildlife habitat, cold, clear, sparkling spring-fed lakes and streams, dazzling peaks and deep gorges, the Uintas host Utah's first designated wilderness. Opportunities abound to expand that original wilderness area to protect the stellar habitat and water resources found there. The region is also home to the truly remarkable landforms in and around Dinosaur National Monument. Two of the West's great rivers, the Yampa and Green, meet here at Echo Park. Though the confluence is protected within the Monument, the viewsheds and uplands critical to the experience of river runners and Monument visitors are not. A veritable treasure trove of cultural and paleontological resources, the visually arresting landforms of the region like Cliff Ridge, Diamond Mountain, Daniels Canyon and Moonshine Draw astound visitors. The region's remoteness and frontier character is palpable; in Browns Park and Diamond Gulch, it's easy to imagine you can still see 19th century outlaws on the lam from the law, or swindlers salting a patch of ground with imported Diamonds to dupe potential investors fresh off the Chicago train.

For the Uinta Mountains/ Dinosaur Region, we recommend a mix of designations including:

- BLM Wilderness, as outlined in the Utah Wilderness Coalition's BLM wilderness proposal near and adjacent to Browns Park and Dinosaur National Monument and Forest Service Wilderness in the Lakes area, significant expansion to the east of the existing High Uintas Wilderness, and standalone areas to the north, east and south of the High Uintas Wilderness.
- Wild, Scenic and Recreational River status for the Green River below Flaming Gorge Dam, in Brown's Park and the Gates of Lodore as well as for important river and stream segments such as Ashley Creek
- National Conservation Area status for deserving areas either overlapping or not protected by other designations such as Browns Park, Fantasy Canyon and the Red Mountain area north of Vernal
- Enhanced protection of historical and cultural Resources, including additions to the National Register of Historic Places
- Creative management for enhancement of the outstanding wildlife habitat in the Tabby Mountain block of SITLA lands
- Protection of municipal watersheds

Representative Bishop, thank you for the opportunity to participate in this important effort to resolve land tenure issues in eastern Utah. We enter this dialogue in good faith and with

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anticipation of success. We look forward to working actively with you and others to help develop administrative and/or legislative solutions that substantively resolve conflicts and address conservation needs in eastern Utah.

Sincerely,



Bill Hedden
Executive Director
Grand Canyon Trust

Cc:
Representative Jason Chaffetz
Representative Jim Matheson
Chairman Ron Wyden
Ranking Member Edward Markey
Ranking Member Raul Grijalva