



September 9, 2013

The Honorable Rob Bishop  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman Bishop:

This letter is in response to your request for additional feedback on public land management in eastern Utah. On behalf of The Pew Charitable Trusts (Pew), I appreciate the opportunity to provide you more details on our vision for the federal lands in the region.

Pew has a proven history of working collaboratively to protect our nation's wild landscapes and cultural resources, as well as the economic and public health of local communities. We were pleased to be involved in the successful Cedar Mountain and Washington County efforts and are eager to continue the dialogue regarding future public land management in eastern Utah.

As we work together on this important initiative, we understand that issues other than land designation may be discussed and that additional legislative provisions may be proposed. Pew cautions against using the eastern Utah initiative as a vehicle to advance broad public land issues that will be polarizing. Taking up controversial subjects such as hard release, the Antiquities Act, no net loss motorized language, and air quality exemptions will only serve to nationalize this proposal in an adverse fashion and undermine its collaborative nature.

Attached are maps showing Pew's proposal for land protection in the eastern Utah counties of Carbon, Emery, Grand, San Juan, Uintah, and Wayne. While our proposal currently addresses only Bureau of Land Management (BLM) areas, we are certainly open to other organizations' proposals for the protection of Forest Service lands and state lands.

Pew proposes wilderness designation for most of the wilderness study areas (WSAs) in this region. Additionally, Pew believes a number of the 1999 inventory areas warrant protection as wilderness, except where noted on our map. The 1999 inventory presented a well-documented and compelling case for safeguarding areas with wilderness characteristics including naturalness, solitude, and primitive recreation opportunities, as well as geological, ecological, scenic, and historical values. Pew recognizes that some official BLM data may be outdated and that this may influence current decisions. For example, certain lands inventoried during the BLM 1999 inventory process may have lost some of their wilderness values; likewise, lands which once didn't meet certain wilderness criteria may now qualify for consideration.

In areas with significant competing uses, we propose designating them as national conservation areas (NCA). For those places not recommended for wilderness, but included in our proposal for enhanced protection, we provide justification below.

## **Emery County**

Emery County is endowed with spectacular landscapes, including Desolation and Turtle Canyons in the north and the San Rafael Swell. Located only three hours from Salt Lake City, the Swell is highly valued by motorized and non-motorized recreationists.

The interior of the Swell is a large basin surrounded by dramatic domes, cliffs, gorges and slot canyons. It abuts San Rafael Reef, a geologic up-thrust that extends for fifty miles.

Pew supports Emery County's approach for a large NCA with wilderness areas included within it. A successful, long-term management solution for the area requires a balance between conflicting motorized and non-motorized uses.

We propose wilderness designation and NCA designation, as differentiated on our attached map, for the following areas in the San Rafael Swell: Upper Muddy Creek, Cedar Mountain, Muddy Creek, Wild Horse Mesa (northern portion), Hondu Country, and San Rafael Reef.

*The Muddy Creek Units.* These units are an extension of Crack Canyon and Muddy Creek WSAs. They contain Seger's Hole and the Muddy Creek ACEC currently managed to protect a historic mine and Hondu Arch. Muddy Creek also includes Moroni Slopes, an area of remote canyons and the volcanic Black Mountain.

*Upper Muddy.* The Upper Muddy includes long mesas, buttes, and colorful badlands as well as lengthy volcanic fins. This area provides exemplary opportunities for solitude. Ten miles of Muddy Creek pass through this unit.

*Cedar Mountain.* Cedar Mountain, towering 1,000 feet over the Muddy Creek badlands, boasts a spectacular 360-degree view of San Rafael Swell. The unit is considered the geographical centerpiece of the San Rafael Swell. The eastern portion is year-round habitat for desert bighorn sheep.

*Hondu Country.* This area is remote, roadless, and not yet widely visited. It provides habitat to bighorn sheep year-round and is home to the San Rafael Desert cactus.

*Wild Horse Mesa.* Wild Horse Mesa provides habitat for bighorn sheep and is known for its extremely colorful badlands and deep canyons. The Red Canyon area is spectacular, with formations similar to those found in Goblin Valley State Park, located to the north. During spring, river runners pass through this unit, as Muddy Creek cuts through Wild Horse Mesa for approximately 30 miles. The Wild Horse Mesa has high paleontological value for its petrified wood, agates, shark teeth, and occasional dinosaur bones. Universities conduct field studies in the area.

The northern portion of Wild Horse Mesa has seen a dramatic increase of visitors due to the popularity of Goblin Valley State Park and the Little Wild Horse and Bell Canyons trails. The entrance for these two hikes is within Wild Horse Mesa Unit. The Wild Horse Mesa off-highway vehicle (OHV) trail begins in Wayne County, passes through the area, and ends at Goblin Valley State Park. This region should be managed as an NCA to preserve these attractions for generations to come.

We also propose an NCA designation for the Dry Lake and San Rafael River units on the eastern edge of Emery County.

*Dry Lake.* Dry Lake was nominated for ACEC protections for its archeological values and rare Paleo-Indian sites.

*San Rafael River.* Moonshine Wash is located in the middle of the San Rafael Desert and provides an outstanding non-technical slot canyon with extensive narrows for family hiking and recreation. The remote area is part of San Rafael River drainage. It also boasts historical sites, such as the Chaffin Ranch.

## **Grand County**

Grand County is known for its national parks, but it contains extensive other public lands and recreation resources that warrant protection. Pew recognizes the collective impact these resources have on the local economy, and we recommend a mix of wilderness and integrated recreational areas in this region.

On the western side of the county, Pew proposes an NCA that would balance the many recreational opportunities in the area: hiking, wildlife viewing, rock climbing, biking, paleontology and archeology, off-roading, and rafting. We suggest protecting the following places in an NCA: the small area to the west of Arches National Park (Moab Brand bike trails), the southern tip of Duma Point, White Wash, Ten Mile Canyon ACEC, and Gold Bar Rim.

*Moab Brand Trails.* The Moab “brand trails” (i.e. Bar M, Circle O, Rocking A, Bar B) are a network of trails located west of Arches National Park. These trails serve all ages and abilities and have become a draw for both residents and tourists in the Moab area. An NCA would help ensure this area is sustainably managed for its recreation and scenic values.

*Duma Point.* Duma Point is a popular destination for motorized recreation users. Including the area in an NCA, as delineated on our map, could help mitigate user conflicts in the region.

*White Wash.* White Wash was previously nominated for ACEC protections. The region drains into the Green River, lies within an active sand dune area, and supports a small herd of desert bighorn sheep. White Wash is popular with motorized recreationists, and an NCA designation would provide the opportunity to balance the protection of riparian and sand dune ecosystems with appropriate motorized access.

*Ten Mile Canyon (ACEC).* This region is a unique riparian oasis flanked by arid cliffs and side canyons. It houses cultural sites and artifacts. Despite sensitive riparian values, the canyon is a popular ATV route that goes all the way to the Green River. Pew recommends this route be better managed to protect riparian values.

*Gold Bar Rim.* The Gold Bar Rim area has high scenic and recreational value and is popular with both hikers and motorized users. It contains numerous arches, bighorn sheep and mule deer, and fragile soils. An NCA designation will help manage the sometimes conflicting uses within the Gold Bar area.

## **San Juan County**

Pew proposes wilderness designation for a number of cultural and natural resource areas in San Juan County. We also recognize the popularity of motorized recreation within the county and look forward to continued communications with county leaders and stakeholders as proposals are refined. Though Pew proposes wilderness in lieu of an NCA, we support efforts by the Navajo Nation to protect food-gathering rights and cultural and sacred sites within them.

In addition to the WSAs and 1999 inventoried lands indicated on our map, we propose wilderness protection for Lockhart Basin, White Canyon, and Upper Red Canyon.

*Lockhart Basin.* Visible from Needles Overlook, this area contains canyons, washes, and vast open spaces. Archeological sites including granaries and dwellings are located here. Canyonlands National Park supports wilderness designation of these units.

*White Canyon.* The White Canyon area is a rugged landscape with extensive cliff dwellings, slot canyons, and natural bridges.

*Upper Red Canyon.* This region is part of the vast, spectacular geological complex that comprises the southwestern portion of the county. Although the canyon area is remote, OHV use is nonetheless a threat to primitive recreational opportunities and solitude.

## **Uintah County**

Uintah County encompasses some of the most significant wildlife habitat in eastern Utah, providing unparalleled hunting and fishing, in addition to providing hiking, camping and wildlife viewing opportunities. The county also contains significant oil and gas reserves, as well as other resource potential.

In an effort to acknowledge the significance of this area to the local and statewide economy, Pew proposes designating key lands in the southern portion of Uintah County as an NCA. NCA legislative language should be written such that the mandate for the protection of wildlife habitat and water quality is clear, regardless of increasing development pressures such as construction of the Seep Ridge Road and the potential Green River oil refinery.

Our proposed NCA lands in southern Uintah County are: Winter Ridge WSA, Wolf Point, Seep Canyon, Cliff Dweller, Sweet Water, Cripple Cowboy, and Rat Hole. We suggest the Main Canyon route as the northern boundary for the proposed NCA.

*Rat Hole.* This unit is located on the Utah/Colorado border in the Eastern Book Cliffs, at the southern end of the Lower Bitter Creek unit. Rat Hole Canyon and Bitter Creek wind throughout this area, interrupted along the way by numerous side canyons. The area provides habitat to peregrine falcons and golden eagles.

*Sweetwater Canyon.* This area is extremely popular with the hunting community. Comprised of three deep canyons and important aspen stands, Sweetwater is home to a large population of black bear and contains crucial fawning habitat for mule deer.

*Seep Canyon and Cliff Dwellers.* This region is filled with canyons, diverse vegetation, and superb wildlife habitat for elk, black bear, deer, cougar, and birds of prey. The good wildlife habitat makes this area a prime hunting ground. Seep Canyon is home to threatened and endangered species such as Mexican Spotted Owl, Willow Flycatcher, and the Ferruginous Hawk.

*Wolf Point.* Wolf Point offers year-round habitat for elk and deer, including crucial winter range habitat. Mule deer migration occurs in the canyon bottoms. It also serves as a home to golden eagles, various hawk species, and black bear.

### **Wayne County**

In addition to wilderness recommendations for WSAs and some 1999 inventory lands in Wayne County, Pew proposes an NCA designation for certain 1999 inventory lands, including Wild Horse Mesa and Factory Butte. An NCA would provide an appropriate solution for managing the conflicting recreational uses of the area, as well as protecting the natural resource.

*Factory Butte (part of Muddy Creek).* The Factory Butte unit is primarily located in Wayne County, with its northern portion extending into the San Rafael Swell region of Emery County. The butte is one of the most photographed formations in southeastern Utah. In 2006, BLM announced that 222 square miles would be closed to OHVs because of the presence of the endangered Wright fishhook and the threatened Winkler cactus. A high-use playground that is four square miles remains open, as do 220 additional miles of established dirt roads and trails. Factory Butte would benefit from an integrated travel plan to preserve threatened plant species, scenic values, and provide recreation opportunities for ORV enthusiasts.

*Wild Horse Mesa (see Emery County reference).* In spring run-off season it is possible to float the entire stretch of Muddy Creek in this region. The river corridor is a Wildlife Reserve Management Area.

### **Wild and Scenic River Protections**

Rivers are critical to western ecosystems and economies. They provide habitat for wildlife and fish, recreation for local families and visitors, and support the economic wellbeing of ranchers and outfitters. In addition to wilderness and NCA protections, we propose Wild and Scenic River designation for the following sections of rivers:

Negro Bill	12.8 miles – from Manti La Sal National Forest boundary to Colorado River confluence
Colorado River	127 miles – from Utah/Colorado border to Green River confluence
Dark Canyon	14 miles – from Woodenshoe Canyon confluence to Colorado River confluence
Dirty Devil River	64 miles – from Muddy Creek confluence to Green River Confluence (Lake Powell)
Dolores River	21 miles – from Utah/Colorado border to Colorado River confluence
Fremont River	17.3 miles – within Capitol Reef National Park and Fremont Gorge
French Spring Fork	7 miles – from headwaters to Happy Canyon confluence
Granite Wash	7 miles – from headwaters to Dirty Devil River confluence
Happy Canyon	11 miles – from Happy Canyon confluence to Dirty Devil River confluence
Mill Creek	23.6 miles – from headwaters to Colorado River Confluence

Muddy Creek	84 miles – from headwaters to Dirty Devil River Confluence
North Fork Mill Creek	13.3 miles – from headwaters to confluence with Mill Creek
Price River	108.7 miles – from Scofield Reservoir to Green River Confluence
Professor Creek	8.3 miles – on BLM land
Rattlesnake Canyon	17.3 miles – from headwaters to Green River Confluence
Salt Wash	12.6 miles – from Arches NP boundary to Colorado River confluence
San Rafael River	84.9 miles – from headwaters to confluence with Green River
White River	41.3 miles – from Utah/Colorado border to confluence of Sand Wash
Green River	96.4 miles – from San Rafael River confluence to Colorado River confluence
Green River	104.6 miles – from Pariette Draw to Swasey's Beach river access
Green River	32.5 miles – from Utah/Colorado border to the confluence of Brush Creek
San Juan River	82.7 miles – from Sand Island river access to Lake Powell
San Juan River	13 miles – from confluence with Montezuma Creek to town of Bluff
Salt Creek	34.5 miles – from Canyonlands National Park boundary to Colorado River confluence

Pew appreciates your consideration of our proposal. We look forward to your feedback. Pew will continue to meet with and learn from other key stakeholders, and we look forward to working with you and other members of the Utah congressional delegation to make this initiative successful for all involved.

Sincerely,



Mike Matz  
Director, U.S. Public Lands Program

cc:

Rep. Jason Chaffetz  
Rep. Jim Matheson  
Rep. Chris Stewart  
Sen. Orrin Hatch  
Sen. Mike Lee