



March 15, 2013

Congressman Rob Bishop
Attn: Fred Ferguson
123 Cannon House Office Bldg.
Washington, DC 20515

Dear Congressman Bishop,

Thank you for the opportunity to share our priorities for potential public land legislation in Eastern Utah. We are very supportive of your efforts to find ways to initiate a process to still the polarization and conflict surrounding the management of our public lands. We look forward to working with you and other stakeholders to find the balance you suggest. The National Parks Conservation Association (NPCA) is America's leading advocate for the national parks. Founded in 1919, our mission is to protect and enhance America's National Park System for present and future generations. As an independent, nonpartisan voice working to address major threats facing the National Park System, NPCA has over 750,000 members and supporters nationwide.

In Utah, we have 13 national park units, with seven of them located generally within the eastern portion of the state: Dinosaur National Monument, Arches and Canyonlands National Parks, Natural Bridges, Hovenweep, and Rainbow Bridges National Monuments, and Glen Canyon National Recreation Area. NPCA's priorities and concerns for any public lands process in eastern Utah relate to our mission to protect and enhance our national park units for present and future generations. Those concerns and priorities include expanding protections around several park units through specific land designations as well as ensuring that activities on lands adjacent to park units do not impair the air, water, sounds, night skies, views and other values that the National Park Service is charged with protecting. Our list of current priorities follows.

Priority 1 - Canyonlands Expansion

As you are well aware, many conservation organizations and community leaders have long advocated for greater public land protections around Canyonlands National Park. NPCA supports an open, transparent process to evaluate the larger Canyonlands landscape to determine what type of land designations make sense for maintaining the remote, adventuresome nature of the area while allowing for a variety of recreational opportunities, appropriate development, and a vibrant local and state economy. With that in mind, NPCA has been advocating since 1988 that the current boundaries of Canyonlands National Park are not consistent with the natural hydrology and topography of the basin. A substantial geographical feature, the Wingate sandstone

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cliffs, forms a natural erosional basin and topographical boundary for the expansion of the park. Our top priority in any public lands legislation will be the expansion of Canyonlands National Park to a boundary that expands to the east and south to the natural boundary of the Wingate cliffs.

Expanding the park boundary to the rim of the Wingate cliffs will not only create a more easily identifiable management area, but it will allow the National Park Service to more effectively manage for potentially incompatible uses taking place below the rim. This includes irresponsible off-road vehicle use, particularly in Lockhart Basin and Indian Creek where some off-road users illegally cross into the national park in sensitive areas off-limits to ORVs. This destroys vegetation, enhances wind and water erosion, and negatively impacts wildlife. In addition, the dust and sounds associated with off-road vehicle use below the rim can have a negative impact on some of Canyonlands most endearing features – its clear vistas and incredible natural quiet.

Our Canyonlands Expansion proposal also includes extending the southern boundary of the park to include areas near Newspaper Rock to the Manti-LaSal National Forest boundary and west along the USFS boundary to include Beef Basin and linking up with the natural boundary near Fable Valley. There are substantial, inventoried and protected archeological/cultural sites within the existing park lands adjacent to this area. We believe that expanding the park boundary as identified will allow further resource protection and minimize the complexity of BLM managed small islands between USFS and NPS managed lands.

To the northwest and west of the existing Canyonlands boundary, we also propose expanding into parts of Glen Canyon National Recreation Area in order to allow for more efficient and effective management of the area from both the recreational and natural resource protection perspective.

Along with the expansion proposal encompassing additional Federally managed land, we are cognizant of other land ownership included. Specifically, The Nature Conservancy owned Dugout Ranch in the Indian Creek area and State Institutional Trust Land Administration (SITLA) lands. We have had conversations with The Nature Conservancy (TNC) about the long term objectives for the Dugout Ranch and see the Canyonlands Research Center as important and integral to Canyonlands expansion. It is not our intention to limit or restrict existing grazing in the area and we believe that the National Park Service can enhance TNC's effort.

In terms of the SITLA lands within the Canyonlands Expansion area, we propose an exchange of SITLA properties within the expansion area as well as other areas throughout southeastern Utah for other federal lands identified through a broader SITLA land exchange outlined below as our second priority. Specifically within the proposed expansion area, we are concerned with oil and gas development on SITLA property in Lockhart Basin. This type of incompatible use would not only be an aesthetic issue for park visitors, but could create serious impacts on park resources including air and water.

Priority 2 - SITLA Land Exchange

Many groups within the conservation community have been working to create a proposal for trading out existing SITLA properties within southeastern Utah for other federal lands with development potential, into which SITLA could consolidate parcels. NPCA's priorities for an exchange include removing all SITLA parcels within the Canyonlands Expansion area (as described above) as well as all parcels located within

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the viewshed of the park along the rim and along the entrance road to the Needles Overlook. Near Arches National Park, NPCA would like to trade out a SITLA block of parcels to the west of the park in order to create a more consistent land ownership pattern and cohesive management strategy.

We would also like to see a SITLA parcel adjacent to the eastern boundary and near the entrance to Natural Bridges National Monument exchanged in order to ensure that no commercial development occurs that could seriously impact the dark night skies of the area. On March 6th, 2007, Natural Bridges National Monument became the first International Dark Sky Park certified by the [International Dark-Sky Association](#). The goal of a Dark Sky Park is to preserve the skies and educate the public about light pollution and how they can make a difference. This is an important tourist attraction for the area and should be preserved for the benefit of the park as well as local communities. Commercial development of this property could also have a negative impact on the monument's natural soundscape, viewshed and natural hydrology.

Finally, NPCA supports an expansion of Hovenweep National Monument (outlined below) which would include exchanging one SITLA parcel adjacent to the northern boundary of the monument.

Priority 3 - RS2477

NPCA views the issue of the State of Utah claiming thousands of rights of ways (ROWs) across public lands throughout the state as a major issue that needs to be resolved in a manner that does not jeopardize the health and sound management of Utah's national park units. We believe there are over 450 miles of challenged RS2477 rights of way within units of the National Park Service. Among on-going efforts to find a negotiated resolution of these issues, the rights of way claims within national park units should be withdrawn.

Priority 4 – Hovenweep National Monument Expansion

NPCA supports the expansion of protections around Hovenweep National Monument to incorporate greater protection of the landscape and cultural resources of the area. This could be accomplished through a monument expansion or a BLM National Conservation Area designation of the landscape around the monument similar to the BLM's Canyon of the Ancients National Monument in Colorado. This type of designation would more broadly protect the viewshed, watershed, soundscape, and cultural resources of the area and provide contiguous protection and potential management with Canyon of the Ancients.

Along with these four priorities for a conservation component of a public lands legislative process, we also want to stress the importance of ensuring that appropriate, well-planned energy development takes place in eastern Utah. NPCA understands the difficulty and importance of balancing the interests and needs of not only those of us lucky enough to live in Utah, but the entire American public who rely on public lands not only for the recreational opportunities they provide but also the energy resources available for development. One of NPCA's nationwide priorities is ensuring that energy development near our national park units is planned and executed in a way that does not impair them for the future. This type of responsible energy development includes ensuring that the air and water in and around our parks remains clean and clear, wildlife and plant populations critical to park ecosystems remain healthy, dark night skies remain unimpaired by air and light pollution, the views from the parks are not marred by extensive development, natural sounds remain, and visitors continue to be drawn to the national parks and the communities that benefit from them.

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A great example of planning for responsible energy development near a national park is in the Moab area where the BLM , NPS and others are collaborating on a Master Leasing Plan that seeks to “plan first, lease later.” Through careful assessment and review, before leases are offered, many of the confrontations, conflicts and delays associated with energy development can be minimized.

Build trust and work toward consensus

The challenges we have all faced in finding the balance you identify as a goal for this process are distorted by misperceptions, misrepresentations and certainly some honest differences. We strongly encourage that the envisioned long term success you and all stakeholders seek can be best accomplished through an honest, open consensus oriented process. Our experience has shown that a skilled, neutral facilitator – selected and supported by the stakeholders in the process – can establish a foundation of trust and guide a process that can lead to the resolution and certainty we all seek.

Thank you again, Congressman Bishop, for leading on this critically important mission. We look forward to working with you and stakeholders who have a similar commitment to finding some common ground.

Sincerely,

David Nimkin
Senior Regional Director
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