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State of Utah

GOVERNOR'S OFFICE OF PLANNING AND BUDGET
Resource Development Coordinating Committee



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June 21, 1999

Linda Colville
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ACT/002/013
#2

Re: 1999 Utah Wilderness Inventory
Scoping on Proposed Section 202 Plan Amendments

The State of Utah has begun its review of the 1999 Utah Wilderness Inventory and supporting data, pursuant to the Notice in the Federal Register dated March 18, 1999, page 13439. The state submits these comments to meet the deadline for submission of scoping comments, but would like to indicate that it will continue to submit more detailed statements as more review and field work is completed. We understand that these later comments will be given full consideration, as indicated in your June 8, 1999 Planning Notice.

Primarily, in addition to the attached comments, and the data given to you by the Division of Water Resources, the state is concerned that the scope and purpose of the review is too narrow. In addition to a review of the wilderness characteristics of an area, the BLM should carefully examine other uses of the area, and determine which is better for the good of all. The BLM must review all the possible mineral uses, recreational uses - motorized and nonmotorized - and historical use patterns. For example, many areas are now in very good shape, due to active management by the Division of Wildlife Resources, BLM and local ranchers. Water sources have been developed, which, in turn, has allowed many herds of animals and flocks of birds to thrive, where otherwise no wildlife would be present at all. None of this is apparent to the casual eye. The BLM must consider carefully the best management regime for an area, for, if the active management necessary to support wildlife is removed, and the animals and birds leave, what is the purpose of wilderness?

We must emphasize the comments attached about the school trust lands. Many of them have been reviewed by BLM, but, of course, BLM does not have the authority to make school lands into WSAs. The Trust Lands Administration may be willing to exchange lands in the event of Congressional wilderness legislation, but BLM should examine the manageability of proposed WSAs with the understanding that the trust lands will be managed for the benefit of the schoolchildren.

Linda Colville
1999 Utah Wilderness Inventory

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We also ask BLM to review these units in light of other BLM actions. For example, if BLM has leased lands for coal or other mineral production, subsequent WSA status should be precluded. This has apparently happened in the Turtle Canyon and Mussentuchit areas. Recent BLM plans have allowed for reasonable uses of the public lands. For example, the Dixie RMP allows for setbacks near powerline corridors, which should be honored in this study, and the Grand Staircase - Escalante Monument Plan provides for the management of that area. There appears to be no reason to amend the Monument plan, jointly worked upon by state and federal people, by this process.

We look forward to working with the BLM in order to focus the issues related to each and every proposed WSA. Thank you for your consideration. Please call myself (538-1558) or John Harja (538-1559) with any questions or concerns.

Sincerely,


Brad Barber
State Planning Coordinator

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