Wilderness Inventory Comment Form

This form can be submitted via email to mlnfplanrevision@fs.fed.us, fax (435) -637-4940, or hand delivered/sent by postal mail to the Manti-La Sal Supervisor’s Office at 599 West Price River Drive, Price, Utah 84501 by Thursday, April 27th. There will be additional comment periods for the Evaluation, Analysis and Recommendation phases.

Comment:

Grand Canyon Trust appreciates the opportunity to provide comments on the Manti-La Sal’s Draft Wilderness Inventory in the Assessment Phase. This is our third set of comments pertaining to Wilderness Inventory and Evaluation for the Manti-La Sal’s Forest Plan Revision process. Please enter these official comments in the official project record on behalf of Grand Canyon Trust, a 501(c)3 organization whose mission is to protect and restore the Colorado Plateau — its spectacular landscapes, flowing rivers, clean air, diversity of plants and animals, and areas of beauty and solitude. We maintain offices and staff in Flagstaff, Arizona; Moab, Utah; and Durango and Denver, Colorado, and have an interest in public lands planning.

Please find our responses to the survey questions for the April 17-27 10 day comment period on Wilderness Inventory below.

1. Are there areas smaller than 5,000 acres that you think should be considered for recommendation as Wilderness?

   Such areas must be of sufficient size as to make practicable their preservation and use in an unimpaired condition, including but not limited to areas contiguous to existing wilderness and areas adjacent to wilderness inventory areas administered by other Federal Agencies. Please provide as much detail as possible to support your recommendation(s).

Comment:

Several areas containing fewer than 5,000 acres of Forest Service lands, but adjacent to BLM roadless areas, are still missing from the Draft Wilderness Inventory maps. This round of maps has improved since the September 2016 maps, with the addition of Forest Service Wilderness Inventory units that are adjacent to BLM Wilderness Study Areas (mapped areas 801 and 814) – thank you.

The measure of roadless areas on BLM lands is not limited to Wilderness Study Areas, however. The full scope of roadless areas on adjacent federal lands must be analyzed at this stage, including BLM-managed lands with wilderness characteristics (LWCs), BLM “natural areas,” and inventoried, wilderness-quality lands that are currently proposed for wilderness designation in legislation before the United States Congress. See America's Red Rock Wilderness Act
(ARRWA), H.R. 2044, S. 948 (115th Congress). Based on review of the existing Forest Service Wilderness Inventory maps provided as part of this 10-day review period, the Forest Service has omitted the following National Forest Wilderness Inventory units that are adjacent to BLM-managed LWCs, natural areas, or proposed wilderness units:

- Beaver Creek (Grand Co)- 154 acres
- Beaver Creek (Grand Co)- 563 acres
- Butler Wash (Grand Co)- 2,212 acres
- Mary Jane Canyon (Grand Co)- 3,475 acres
- Mill Creek (Grand Co)- 1,485 acres
- Mill Creek (Grand Co)- 921 acres
- Mill Creek (Grand Co)- 408 acres
- Mill Creek (Grand Co)- 56 acres
- Porcupine Rim (Grand Co)- 65 acres
- Seven Sisters Buttes (San Juan Co)- 952 acres

These additional areas must be included in this coarse-level Forest Wilderness Inventory at this stage. Please refer to GIS shapefiles provided by the Southern Utah Wilderness Alliance via email, including a layer showing the above-listed National Forest Wilderness Inventory units as well as BLM-managed LWCs, natural areas, and proposed wilderness units (ARRWA) that must form the basis for this analysis.

2. Are there any corrections that need to be made to the initial draft potential Wilderness Inventory maps (additions, adjustments, or deletions), including the location(s) of vegetation treatments, roads, trails, timber harvest areas, mines, recreational improvements, etc.? If so, please provide as much detail as possible to support your recommendation(s).

For reference, the initial draft potential Wilderness Inventory maps can be viewed at the following links (these maps are also located on the Forest's Planning webpage)
https://www.fs.usda.gov/detail/mantilasal/landmanagement/planning/?cid=fseprd534059

Comment:

Two areas greater than 5,000 acres are missing from the Initial Inventory, and should be added prior to the Evaluation Phase.

From north to south:

**Trough Springs Ridge, Price Ranger District, 9,652 Acres**

Immediately north of the East Mountain and Nuck Woodward Wilderness Inventory units, east of the Fairview Huntington Road and north and west of the Nuck Woodward Road lies Trough
Springs Ridge Roadless Area. Encompassing 9,652 acres, the area meets the qualifications for inventory. Please see figure 1 at the end of this document, and include this area on revised Wilderness Inventory maps.

**Muddy Creek – Nelson Mountain Addition, Ferron Ranger District - 29,775 acres**

On the southern end of the Ferron Ranger District, a substantial portion (nearly 30,000 acres) of the Muddy Creek – Nelson Mountain Roadless Area has been omitted by the Forest Service from the draft Wilderness Inventory maps. In this coarse filter analysis, the inventory should include all qualifying areas, and the use of straight lines to excise an area is not acceptable, except at administrative boundaries. Please see figure 2 at the end of this document, and include this area on revised maps.

3. Which potential Wilderness areas identified on the Initial Draft Potential Wilderness Inventory maps should be carried over to the next phase (Evaluation Phase) of the Wilderness Evaluation Process? Please provide as much detail as possible, including data if available, to support your recommendation.

Comment:

**All areas identified must be carried forward on to the evaluating phase.** The online survey and downloadable comment forms contain apparent violation of the letter of 2012 Planning Rule guidance. September 2016 and April 2017 Wilderness Inventory Survey comment forms published by the Manti-La Sal to solicit public input included the following (this) question:

"Which potential Wilderness areas identified on the Initial Draft Potential Wilderness Inventory maps should be carried over to the next phase (Evaluation Phase) of the Wilderness Evaluation Process? Please provide as much detail as possible, including data if available, to support your recommendation."

The advancement of inventory units to the evaluation phase is not an area open to public debate. According to agency policy, all areas that meet the criteria in the inventory phase must be carried over to the evaluation phase.

"FSH 1909.12, 72 – Evaluation

The primary function of the evaluation step is to evaluate, pursuant to criteria set forth in the Wilderness Act of 1964, the Wilderness characteristics of the lands included in the inventory. **All lands included in the inventory must be evaluated.**"

And:

"FSH 1909.12, 72.1: Evaluation of Wilderness Characteristics."
"The Interdisciplinary Team shall evaluate areas, which must include all lands identified in the inventory (sec. 71 of this Handbook), to determine potential suitability for inclusion in the National Wilderness Preservation System using criteria included in the Wilderness Act of 1964, section 2(c).” (Emphasis added)

The use of the words "shall" and "must" makes clear that all areas identified in the inventory must carry forward in to the evaluation phase.

4. Which potential Wilderness areas identified on the Initial Draft Potential Wilderness Inventory maps should not be carried over to the next phase (Evaluation Phase) of the Wilderness Evaluation Process?

   Please provide as much detail as possible, including data if available, to support your recommendation.

Comment:

**All areas identified must be carried forward on to the evaluating phase.** The online survey and downloadable comment forms contain apparent violation of the letter of 2012 Planning Rule guidance. September 2016 and April 2017 Wilderness Inventory Survey comment forms published by the Manti-La Sal to solicit public input included the following (this) question:

“Which potential Wilderness areas identified on the Initial Draft Potential Wilderness Inventory maps should not be carried over to the next phase (Evaluation Phase) of the Wilderness Evaluation Process? Please provide as much detail as possible, including data if available, to support your recommendation.”

The advancement of inventory units to the evaluation phase is not an area open to public debate. According to agency policy, all areas that meet the criteria in the inventory phase must be carried over to the evaluation phase.

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National Wilderness Preservation System using criteria included in the Wilderness Act of 1964, section 2(c).” (Emphasis added)

The use of the words "shall" and "must" makes clear that all areas identified in the inventory must carry forward in to the evaluation phase.

5. Any additional comments can be provided here

Comment:

On the Moab Ranger District, straight line omissions have been made in the center of Inventory Unit 820 in the Miners Basin and Bald Mesa areas. These omissions appear to be made to exclude a remote private inholding in the Bald Mesa area above Schuman Gulch. Much uncertainty as to the location of private lands exists in this area. The Forest Service’s Roadless Inventory includes some lands which are displayed as private lands in the Utah AGRC’s LandOwnership GIS layer, and excludes lands which are not private lands, for no apparent reason. As a part of this inventory, the Forest must obtain the most current and correct land ownership data, and correct the Wilderness Inventory maps to reflect correct ownership, excluding private lands where appropriate, and including all qualifying Forest Service Lands in the Wilderness Inventory where the Forest Service is the owner.

The entirety of the Forest Service holdings in the Miners Basin and Bald Mesa area should be included in the Wilderness Inventory. The private inholdings in Miners Basin are owned by William Petty and Christoph Henkel, both of whom are supportive of wilderness designation surrounding their private inholdings. Please see figure 3 below, a letter indicating their support for wilderness designation.

Thank you for your careful consideration of our comments. We look forward to continued involvement in the Forest Plan Revision Process.

Sincerely,

Tim Peterson
Utah Wildlands Program Director
Grand Canyon Trust

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1 Submitted for the record for the assessment phase and beyond in the Manti-La Sal National Forest Land and Resources Management Plan revision process in my official capacity as Utah Wildlands Program Director for Grand Canyon Trust.
Landowner Letter
Regarding Forest Service Wilderness in Grand County

29 January 2014

Dear Grand County Council Members,

I am writing this letter as a longtime Grand County business owner (the Jailhouse Cafe for over 20 years). I'm also writing as one of two partners in the largest inclusion of private lands within the Grand Canyon Trust's map of proposed Wilderness in the La Sal Mountains. This inclusion consists of a collection of patented mining claims in Miners, Bachelors, and Beaver basins, and in far Upper Mill Creek. Between my partner and me, we own all the private lands within these excluded areas, amounting to just under 270 acres.

I want to say that as the owner of the Jailhouse Cafe, I am favor this proposal, as I believe that ultimately it will be an economic benefit to me and other business owners in Grand County, and by extension, to all county residents.

As a landowner who would be very much surrounded by this proposal, I realize that Wilderness designation could cause certain headaches for me personally, but on the whole I am in favor of it, as long as rights of access and other important private property rights are maintained. Even as the owner of actively maintained mining properties, I would be dishonest if I did not admit that, from my own knowledge, the highest value of those mountains is not mineral extraction.

I have spoken to my partner in these properties, Christoph Henkel, regarding this proposal. He has stated that he agrees with the position I have outlined above, and has also given me permission to say so in this letter.

Sincerely yours,

[Signature]

Will Petty
The Jailhouse Cafe
101 North Main
Moab