



January 29, 2016

The Honorable Rob Bishop
US House of Representatives
1017 Federal Building
324 25th Street
Ogden, UT 84401

The Honorable Jason Chaffetz
US House of Representatives
51 S University Ave., Suite 318
Provo, UT 84601

RE: Public Land Solutions Comments to Public Land Initiative Discussion Draft

Dear Congressmen Bishop and Chaffetz,

Thank you for the opportunity to review the discussion draft of the Public Lands Initiative (PLI). Our organization, Public Land Solutions works to provide economic development opportunities to gateway communities via the outdoor economy—this includes both attracting visitor dollars and businesses who value the quality of life that public lands afford.

Outdoor recreation assets on public lands continue to grow as key economic drivers in Utah. In many Utah counties payrolls and tax revenues from businesses that have located for quality of life reasons are trending up—eclipsing jobs and tax revenues from energy development. While current depressed oil prices will probably rebound at some point, few analysts believe resource extraction in the 21st century will generate the type of wealth it has in the past.

Healthy economies in the 21st century will depend on attracting and keeping talented people by providing quality places to live with access to natural places. Utah is uniquely blessed with world-class landscapes that attract multinational corporations as well as entrepreneurs. Wealth generation in the 21st century will not be tied to commodity resources whose volatile prices leave communities with sudden deficits and long-term environmental damage.

While the Draft PLI includes some important recreation provisions, the general deference to resource extraction throughout the draft makes it impossible for us to support it as written. We have supplied a redlined version, which we believe would provide more balance and garner support from a wide range of stakeholders.

We understand that certainty with regard to energy development is one of the goals. Our suggested edits allow for oil and gas development where it is likely to be most profitable—near existing leases. Under this scenario oil and gas revenues will continue to flow to Utah's counties, but our suggested edits will ensure that clean air and water along with access to natural landscapes will allow these counties to prosper from a thriving recreation and quality-of life economy as time moves us away from non-renewable extraction.

We agree with you that Utahns should get the most out of their public lands and we urge you to consider the value and power of public lands beyond the production of commodities. Tying our future to commodity producers who evaporate when prices drop and leave us with damaged landscapes is not the right way to prepare Utah for the future. We have all worked hard to build the Utah brand and attract valuable businesses that provide jobs for our citizens. We are positioned to keep Utah at the economic forefront and how we treat our public lands is critical to our future.

Suggested Edits

Please consider our enclosed redlined version with our edits. The following are key parts of the proposed legislation that we believe require adjustment.

1. Boundaries in the following designated Wilderness Areas should be moved to the top of the cliffs to accommodate fixed anchors for rock climbing and avoid conflicts with wilderness management and regulations: Bridger Jack Mesa, Mexican Mountain, and Sids Mountain. Sec. 101.
2. In general, data used to make decisions about historic grazing levels should be based on science without regard to whether the data is provided by the state or the federal agency. Sec. 103 (D)(1)(4), etc.
3. Wilderness and NCA airsheds should be managed as Class II areas consistent with FLPMA and the Clean Air Act requirements for Class II areas, unless an area is re-designated as "Class I" by the State through procedures under the Clean Air Act. Sec. 110, etc.
4. Recreation stakeholders should be included in management planning development, in particular the proposed Bears Ears NCA. Title II, Sec. 204.
5. Federal acquisition of Wilderness, NCA, SMA, and Recreation Zone inholdings should be allowed by willing sellers. Sec. 108(a), etc.
6. Resolving road claims as of January 1, 2016 will greatly endanger the bill's chances of passing because of the massive amount of ongoing RS 2477 litigation. Sec. 204. (p)(2)(i), etc.
7. The Bears Ears NCA Advisory Council should be established mirroring the advisory council established for the Book Cliffs Sportsmen NCA. Sec. 206 (e).
8. Oversnow vehicles should be managed by the existing US Forest Service Oversnow Vehicle Rule. Title III, Sec. 303(d).
11. Grand County School Trust Land Consolidations should be reduced to minimize the impact of potential industrial development on the outdoor recreation economy and conservation. Division B, Sec. 102.

13. Sand Flats should not be conveyed from the BLM to Grand County. The proposal would create an additional financial burden to Grand County and the area is being well-managed under the existing regime and would create no benefits. Title VI (a)(1).

14. The Moab Tailings Project should be conveyed to Grand County only for the creation of a park and/or pathway and with no provision for private sale or development. Title VI (a)(3).

15. The Dugout Ranch conveyance to Utah State University includes North and South Six Shooter Peaks, which are highly valued recreation assets. This conveyance includes historic and very popular iconic climbing objectives that are very important to the recreation community. The bill needs to more clearly state whether this area would be managed for recreation in addition to research and education. Title VI (a)(18).

16. Seep Ridge Utility Corridor should not be included in the bill. This road corridor has been rejected by Grand County residents and local elected officials numerous times over the last 35 years. Please see the attached letter from recreation related businesses who are concerned that industrial development facilitated by this road will not benefit Grand County residents and will harm existing businesses. Title VI (a)(20).

17. As to energy development in Dee Pass, Utah Rims and Yellow Circle we suggest replacing “promote” energy development with “allow” energy development subject to the Moab Master Leasing Plan or other existing management plans for these areas. While some energy development can coexist with motorized recreation, at some point it will interfere with the purpose of the designation. Title VIII, Sec. 801(a)(6) and (7).

18. Red Rock Country Off Highway Vehicle Trail should be designed so as not to significantly impact existing bicycle traffic on the Kokopelli Trail. Title IX, Sec. 902 (2)(E).

19. Long Term Energy Certainty, Title XI, cannot be attained by undermining the recreation economy or reducing the quality of life in the adjacent communities, or jeopardizing the viability of the proposed bill. Much of the area which the proposed bill deems for energy production as the “highest management priority standard” is already leased, yet only a fraction of it is in production. Even with the new proposed Wilderness, NCA, SMA and recreation zone protections, the new “highest management priority” standard will encourage irresponsible industrial development on adjacent lands where there are few if any resources to be extracted at the cost of future dispersed recreation. Certainty can be better provided for both energy producers and local communities through a locally driven detailed planning processes such as the Master Leasing Plan.

20. Master Leasing Plans are a critical tool for local recreation interests, and their elimination via this legislation will be unacceptable for recreation advocacy groups and trade associations. Title XI, Sec 1101(a)(h).

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We offer these edits in the sincere attempt to bring other public land groups back to the table to

make progress on this bill. We look forward to your response to these suggestions and your earliest convenience and remain hopeful that a compromise can be found to move this bill forward.

Best regards,

Ashley Korenblat and Jason Keith

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