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Wilderness Recommendation: Zion National Park, Utah

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wilderness recommendation

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ZION



NATIONAL PARK / UTAH

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WILDERNESS RECOMMENDATION



Zion
National Park
Utah
March 1974

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RECOMMENDATION

1

IT IS RECOMMENDED THAT WILDERNESS TOTALING 120,620 ACRES WITHIN ZION NATIONAL PARK, UTAH, AS SHOWN IN EXHIBIT A, BE DESIGNATED BY AN ACT OF CONGRESS.

THIS RECOMMENDATION IS BASED UPON CAREFUL STUDY OF THE PARK, THE VIEWS PRESENTED AT THE PUBLIC HEARING, AND THE WRITTEN RESPONSES CONCERNING THE PRELIMINARY WILDERNESS PROPOSAL DESCRIBED IN THE APPENDED HEARING OFFICER'S REPORT.

RECOMMENDATION

CORRECTION TO WILDERNESS REPORT
for
ZION NATIONAL PARK, UTAH

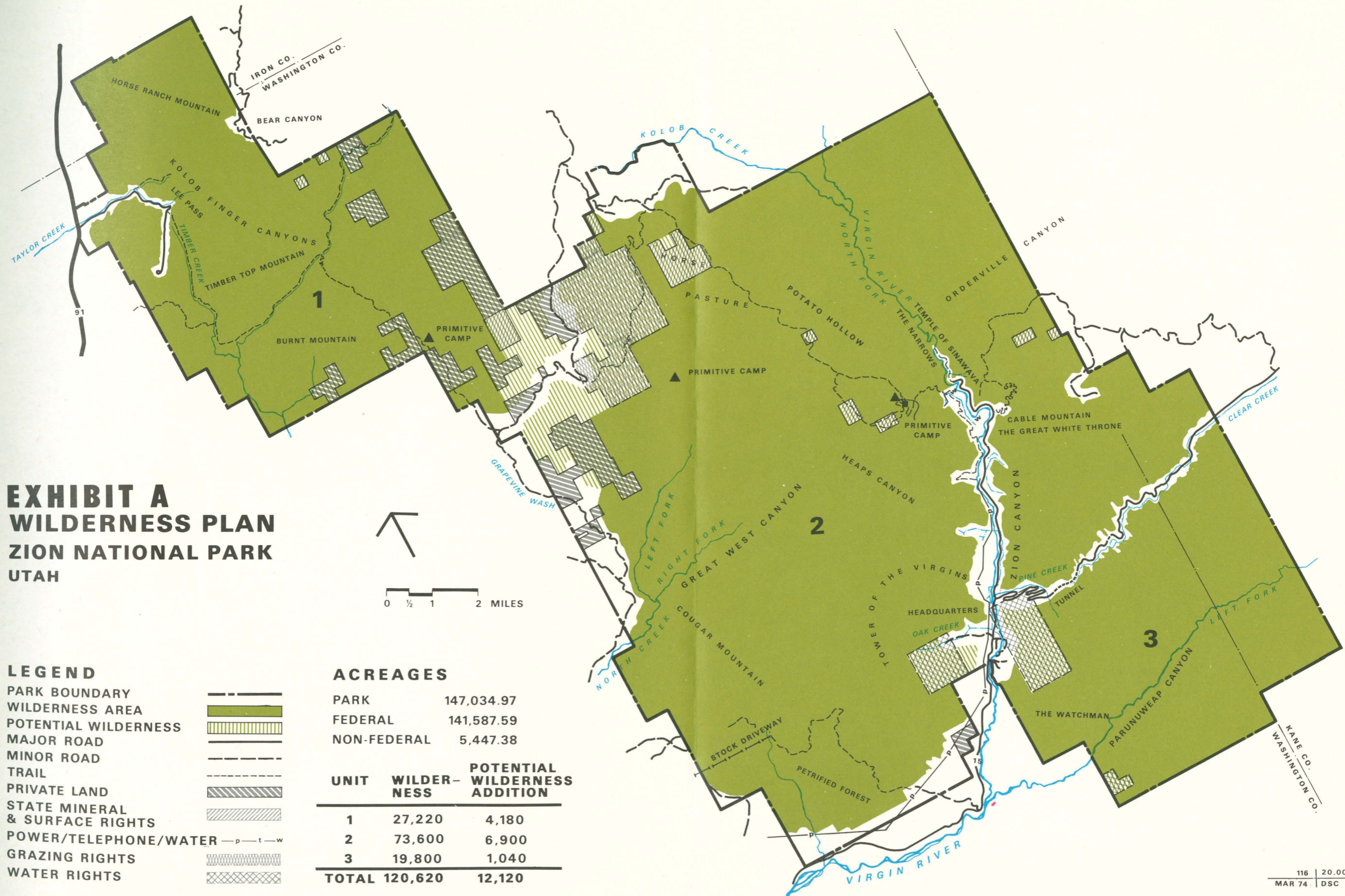
June 1974

The areas recommended as potential wilderness additions include 3,100 acres of privately owned lands; 4,000 acres of Federal land subject to life tenure grazing use; and 1,940 acres of Federal land through which access is gained to the private lands and the life tenure use area. Recommended potential wilderness additions do not include Federal lands subject to water rights, or State owned mineral and surface rights. The corrected area of recommended potential wilderness additions totals 9,040 acres.

IT IS RECOMMENDED THAT WILDERNESS TOTALING 120,832 ACRES WITHIN ZION NATIONAL PARK, UTAH, AS SHOWN IN EXHIBIT A, BE DESIGNATED BY AN ACT OF CONGRESS.

THIS RECOMMENDATION IS BASED UPON CAREFUL STUDY OF THE PARK, THE VIEWS PRESENTED AT THE PUBLIC HEARINGS, AND THE WRITTEN RESPONSES CONCERNING THE PRELIMINARY WILDERNESS PROPOSAL DESCRIBED IN THE APPENDED HEARING OFFICER'S REPORT.

EXHIBIT A WILDERNESS PLAN ZION NATIONAL PARK UTAH



LEGEND

- PARK BOUNDARY
- WILDERNESS AREA
- POTENTIAL WILDERNESS
- MAJOR ROAD
- MINOR ROAD
- TRAIL
- PRIVATE LAND
- STATE MINERAL & SURFACE RIGHTS
- POWER/TELEPHONE/WATER
- GRAZING RIGHTS
- WATER RIGHTS

ACREAGES

PARK	147,034.97	
FEDERAL	141,587.59	
NON-FEDERAL	5,447.38	
UNIT	WILDERNESS	POTENTIAL WILDERNESS ADDITION
1	27,220	4,180
2	73,600	6,900
3	19,800	1,040
TOTAL	120,620	12,120

A NATIONAL WILDERNESS PRESERVATION SYSTEM

Public Law 88-577, of September 3, 1964, establishing a National Wilderness Preservation System, provides, in part, as follows:

POLICY

"It is . . . the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

AREAS FOR STUDY

"Within ten years after the effective date of this Act the Secretary of the Interior shall review every roadless area of five thousand contiguous acres or more in the national parks, monuments and other units of the national park system . . . , under his jurisdiction of the effective date of this Act and shall report to the President his recommendation as to the suitability or nonsuitability of each such area . . . for preservation as wilderness."

4

SYSTEM

" . . . there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as 'wilderness areas'"

DEFINITION

"A wilderness, . . . is . . . an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean . . . an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which: (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

MANAGEMENT

"The inclusion of an area in the National Wilderness Preservation System notwithstanding, the area shall continue to be managed by the Department and agency having jurisdiction thereover immediately before its inclusion in the National Wilderness Preservation System unless otherwise provided by Act of Congress."

USE

5

"Nothing in this Act shall modify the statutory authority under which units of the national park system are created. Further, the designation of any area of any park, monument, or other unit of the national park system as a wilderness area pursuant to this Act shall in no manner lower the standards evolved for the use and preservation of such park, monument, or other unit of the national park system in accordance with the Act of August 25, 1916, the statutory authority under which the area was created, or any other Act of Congress which might pertain to or affect such area, including but not limited to, the Act of June 8, 1906, (34 Stat. 255; 16 U.S.C. 432 et seq.); section 3(2) of the Federal Power Act (16 U.S.C. 796 (2)); and the Act of August 21, 1935, (49 Stat. 666; 16 U.S.C. 461 et seq.)."

DEPARTMENTAL GUIDELINES FOR WILDERNESS PROPOSALS

United States Department of the Interior

Office of the Secretary
Washington, D.C. 20240

June 24, 1972

Memorandum

To: Director, Bureau of Sport Fisheries
and Wildlife

Director, National Park Service

From: Assistant Secretary for Fish and Wildlife
and Parks

Subject: Guidelines for Wilderness Proposals — Reference
Secretarial Order No. 2920

In the course of developing wilderness proposals we should strive to give the areas under study wilderness designation but not at the expense of losing the essential management prerogatives that are necessary to fulfill the purposes for which the areas were originally intended. Although each area under study must be considered separately, with special attention given to its unique characters, the following criteria should be adhered to when determining the suitability of an area for wilderness designation.

6

Management

An area should not be excluded from wilderness designation solely because established or proposed management practices require the use of tools, equipment or structures, if these practices are necessary for the health and safety of wilderness travelers, or the protection of the wilderness area. The manager should use the *minimum* tool, equipment or structure necessary to successfully, safely and economically accomplish the objective. When establishing the minimum tool

and equipment necessary for a management need within wilderness areas economic factors should be considered the least important of the three criteria. The chosen tool or equipment should be the one that least degrades wilderness values temporarily or permanently.

For the purpose of this paragraph, accepted tools, equipment, structures and practices may include but are not limited to: fire towers, patrol cabins, pit toilets, temporary roads, spraying equipment, hand tools, fire-fighting equipment caches, fencing and controlled burning. In special or emergency cases involving the health and safety of wilderness users or the protection of wilderness values aircraft, motorboats and motorized vehicles may be used. Enclaves, buffer zones, etc., should not be established if the desired management practices are permitted under these guidelines.

Visitor Use Structures and Facilities

An area that contains man-made facilities for visitor use can be designated as wilderness if these facilities are the minimum necessary for the health and safety of the wilderness traveler or the protection of wilderness resources. An example of a wilderness campsite that could be included is one having a pit toilet and fire rings made of natural materials and tent sites. A hand-operated water pump may be allowed. This kind of campsite would not be considered a permanent installation and could be removed or relocated as management needs dictate. Facilities that exceed the "minimum necessary" criteria will be removed and the area restored to its natural state. (See section on Exceptions.)

7 Areas containing campsites that require, for the protection of the adjacent wilderness values, facilities more elaborate than those allowed in a wilderness campsite should be excluded from wilderness designation.

Prior Rights and Privileges and Limited Commercial Services

Lands need not be excluded from wilderness designation solely because of prior rights or privileges such as grazing and stock driveways or certain limited commercial services that are proper for realizing the recreational or other wilderness purposes of the areas.

Road and Utilities – Structures and Installations

Areas that otherwise qualify for wilderness will not be excluded because they contain unimproved roads, created by vehicles repeatedly

traveling over the same course, structures, installations or utility lines, which can and would be removed upon designation as wilderness.

Research

Areas that otherwise qualify need not be excluded from wilderness designation because the area is being used as a site for research unless that use necessitates permanent structures or facilities in addition to those needed for management purposes.

Future Development

Those areas which presently qualify for wilderness designation but will be needed at some future date for specific purposes consistent with the purpose for which the National Park or National Wildlife Refuge was originally created, and fully described in an approved conceptual plan, should not be proposed for wilderness designation if they are not consistent with the above guidelines.

Exceptions

Certain areas being studied may contain structures such as small boat docks, water guzzlers and primitive shelters that ought to be retained but may not qualify as minimum structures necessary for the health and safety of wilderness users or the protection of the wilderness values of the area. When an area under study for wilderness designation would otherwise qualify as wilderness a specific provision may be included in the proposed legislation for this area, giving the wilderness manager the option of retaining and maintaining these structures. Necessary management practices such as controlled burning shall also be mentioned specifically in the proposed legislation.

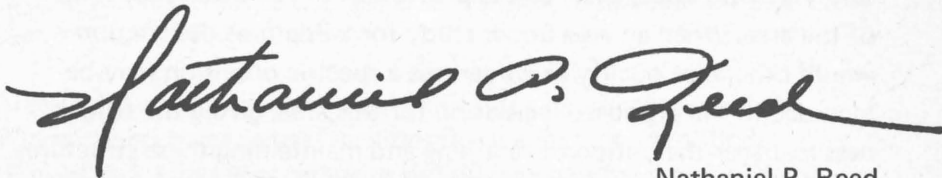
8

Areas being considered for wilderness designation will not be excluded solely because they contain hydrologic devices that are necessary for the monitoring of water resources outside of the wilderness area. When these devices, either mechanical or electronic, are found to be necessary, a specific provision allowing their use will be included in the legislation proposing the wilderness area being considered. For the installation, servicing and monitoring of these devices the minimum tools and equipment necessary to safely and successfully accomplish the job will be used.

Areas being studied for wilderness designation will not be excluded solely because they contain lakes created by water development projects if these lakes are maintained at a relatively stable level and the shoreline has a natural appearance. Where this occurs and there is no other reason for excluding the area, a specific provision describing the water development project and its operation will be included in the proposed legislation along with the recommendation for including it in the wilderness area. Other minimal development of water resources may be suggested for inclusion in wilderness if specific reference is made to them in the proposed legislation. These provisions will allow present maintenance practices to continue.

Areas that contain underground utilities such as gas pipelines and transmission lines will not be excluded from wilderness designation solely for this reason. Where this occurs the areas may be included by making specific mention of them in the proposed legislation indicating that this use would continue and previously established maintenance practices would be allowed to continue.

When non-qualifying lands are surrounded by or adjacent to an area proposed for wilderness designation and such lands will within a determinable time qualify and be available Federal land, a special provision should be included in the legislative proposal giving the Secretary of the Interior the authority to designate such lands as wilderness at such time he determines it qualifies.

A handwritten signature in black ink, reading "Nathaniel P. Reed". The signature is written in a cursive style with a long, sweeping underline.

Nathaniel P. Reed

CONCLUSIONS

INTRODUCTION

As required by the Wilderness Act, a public hearing was held on the preliminary wilderness proposal (see Appendix: Hearing Officer's Report, p. 14) at Zion National Park, Springdale, Utah, on 12 December 1973. Notice of the public hearing appeared in the *Federal Register* on 3 October 1973. One hundred and fifty people attended the hearing and 37 oral statements were presented. Oral statements, plus responses in letters received, accounted for a total of 1,962 responses.

Of the agencies, private organizations, and individuals testifying or submitting written views, 5 out of 24 agencies, 2 of the 65 organizations, and 131 of the 1,873 individuals supported the preliminary wilderness proposal. Fifty-three organizations and 535 of the individuals commenting favored a larger wilderness; 1 individual favored wilderness with no specific recommendations. Eleven agencies, 10 organizations, and 1,206 individuals opposed the establishment of wilderness. Eight agencies acknowledged receipt of copies of the wilderness proposal.

Recommendations by others are described in the appended Hearing Officer's Report, and are indicated on Exhibit D.

Careful study of the statements presented at the hearing, the letters received, and management consideration have resulted in the following changes:

10

On the preliminary wilderness plan four tracts of land were shown as having State surface and mineral rights. These lands are entirely in Federal ownership. All or a portion of these tracts, as well as some Federal land immediately adjacent to these tracts, were shown on the preliminary plan as potential wilderness additions. Since these lands are Federal they are now recommended as wilderness. This will add 420 acres of wilderness to Unit 1 and 1,000 acres to Unit 2, increasing the total recommended wilderness for Zion National Park to 120,620 acres, and reducing the recommended potential wilderness additions by the same amount. This change is shown on Exhibit B.

AREAS RECONSIDERED

Most of the private organizations and some of the individuals recommended that non-wilderness road-corridors be narrowed by moving the wilderness line closer to the roads. The wilderness lines shown along roadways in the preliminary proposal were drawn along topographic features. These lines were drawn to exclude not only the roads but adjacent parking areas, pulloffs, utility lines, public-use structures, management structures, and areas of high visitor concentrations. These corridors are considered the minimum necessary for non-wilderness facilities and non-wilderness uses.

The same organizations and individuals also recommended that lands proposed as potential wilderness additions be designated as wilderness. The Wilderness Act specifically states that only undeveloped Federal land may be designated as wilderness. The lands proposed as potential wilderness additions contain non-Federal rights. These rights and conflicting uses will, within a short period of time, be eliminated. A provision is recommended in the legislation designating wilderness in Zion National Park that would provide the authority to the Secretary of the Interior to designate these lands as wilderness at such time as he determines they qualify.

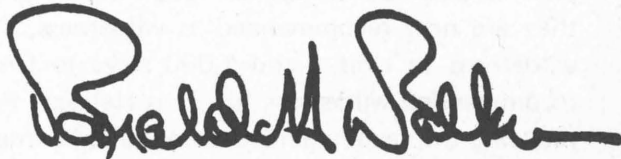
Many individuals recommended no wilderness. They stated that wilderness would prohibit the development of the natural resources in the park such as grasslands, minerals, timber, and water. They felt the park should be managed under a multiple-use concept. More developments for public-use and more roads were desired by this same group of people.

11

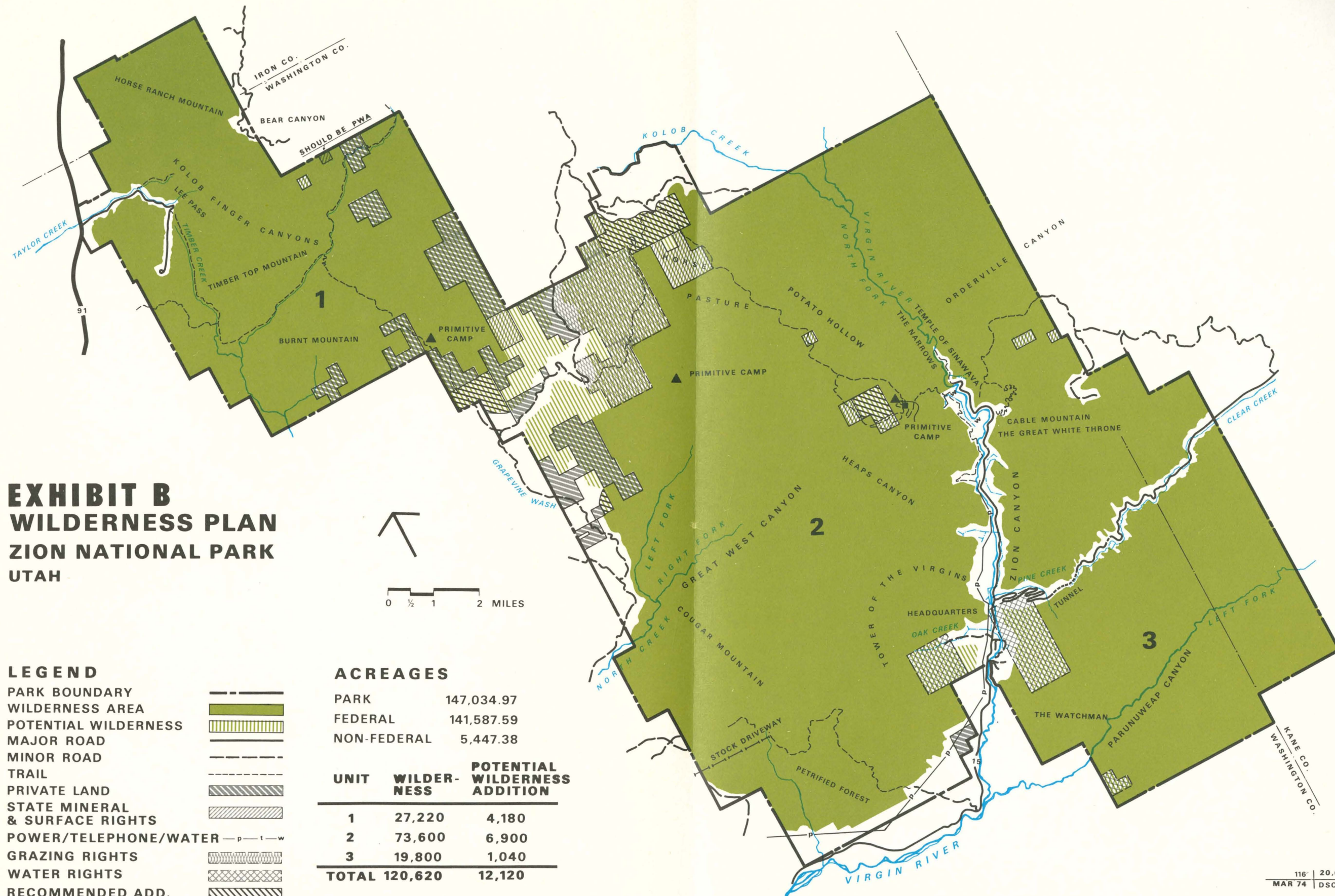
The act establishing Zion National Park provides for the preservation of the natural resources; therefore, with or without the establishment of wilderness the resources within the park cannot be used in the way suggested by those who opposed wilderness within Zion National Park.

SUMMATION

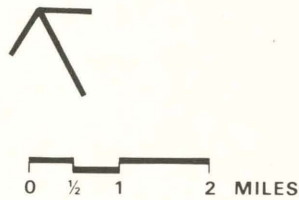
A total of 1,420 acres is recommended for addition to the preliminary proposal. The total recommended wilderness is therefore 120,620 acres; 12,120 acres are recommended as potential wilderness additions.



Director, National Park Service



**EXHIBIT B
WILDERNESS PLAN
ZION NATIONAL PARK
UTAH**



LEGEND

- PARK BOUNDARY
- WILDERNESS AREA
- POTENTIAL WILDERNESS
- MAJOR ROAD
- MINOR ROAD
- TRAIL
- PRIVATE LAND
- STATE MINERAL & SURFACE RIGHTS
- POWER/TELEPHONE/WATER
- GRAZING RIGHTS
- WATER RIGHTS
- RECOMMENDED ADD.

ACREAGES

PARK	147,034.97
FEDERAL	141,587.59
NON-FEDERAL	5,447.38

UNIT	WILDERNESS	POTENTIAL WILDERNESS ADDITION
1	27,220	4,180
2	73,600	6,900
3	19,800	1,040
TOTAL	120,620	12,120

APPENDIX: HEARING OFFICER'S REPORT

INTRODUCTION

A public hearing on the proposal to establish wilderness within Zion National Park was held in the Zion Visitor Center, Zion National Park, Springdale, Utah on 12 December 1972.

The hearing was opened at 10:00 a.m. by the Hearing Officer, Mr. John M. Davis, 7272 East Camino Valle Verde, Tucson, Arizona.

Approximately 150 people were present at the hearing and 37 oral statements were made. The proceedings of the hearings were reported by Clair Johnson, Salt Lake City, Utah.

The hearing was closed at 3:15 p.m. of the same day after everyone wishing to make a statement was heard.

14

THE PRELIMINARY WILDERNESS STUDY

Zion National Park and Its Environs

Zion National Park is located in the heart of the desert and canyon country of southwestern Utah, well removed from any large cities. Salt Lake City, Utah, 320 miles distant, and Las Vegas, Nevada, 175 miles distant, are the closest urban areas. Several small towns are located close to the park.

The lands adjoining the park are predominantly privately owned, although there are some scattered parcels of public domain lands that are contiguous to the park. The use of these lands, whether under private or public ownership, is almost exclusively livestock grazing. However, recreational use in the form of hunting and mountain homesites is assuming greater importance.

Zion National Park had its beginnings in 1909 as Mukuntuweap National Monument. A presidential proclamation set aside 15,200 acres. In 1918 another presidential proclamation added 61,600 acres and changed the name to Zion National Monument. This addition was for the purpose of including the Great West Canyon and the Parunuweap Canyon. By a Congressional act of November 19, 1919, Zion National Monument became a park. Boundary changes in 1930 and 1960 added additional lands to the park. In 1937 a presidential proclamation created Zion National Monument of 48,413 acres west and north of Zion National Park, setting aside the colorful Kolob Canyons and parts of the famous Hurricane Cliffs. This section was then added to Zion National Park in 1956 making a total of 147,034.97 acres.

Zion National Park is a superlative example of the effect of the erosional forces of water, wind, and temperature on the uplift of the Markagunt Plateau, resulting in the tremendous canyons, towering peaks, arches, and natural bridges. Angular terraces and vertical walls are common; curved outlines and gentle slopes are rare.

15 The south and west exposure of the Navajo sandstone presents an escarpment ranging from 1,000 feet to 4,000 feet high. The most spectacular of these isolated buttes is the West Temple, elevation 7,795 feet, which towers over the nearby Virgin River. The highest point in the park is Horse Ranch Mountain, elevation 8,740 feet. All of this great phenomenon lies between the alpine forest of the north and east, and to the Sonoran deserts to the south and west.

There are a number of areas within a radius of 125 miles of Zion National Park. They are: Grand Canyon National Park (North Rim), Grand Canyon National Monument, Rainbow Bridge National Monument, Bryce Canyon National Park, Cedar Breaks National Monument, Marble Canyon National Monument, Pipe Spring National Monument, Lake Mead National Recreation Area, and Glen Canyon National Recreation Area. While no wilderness areas have yet been designated in Utah, wilderness areas have been proposed for Cedar

Breaks National Monument and Bryce Canyon National Park. Areas within Arches, Capital Reef and Canyonlands National Parks, and Glen Canyon National Recreation Area are to be studied to determine their suitability for wilderness designation.

Roadless Study Areas

There are three large roadless areas of 5,000 acres or more within Zion National Park subject to study under provision of the Wilderness Act.

Within the roadless areas there are 3,963 acres of State mineral rights; 5,447.83 acres of privately owned land; 2,080 acres of water rights; and 4,117 acres on which grazing is permitted for the life of the current permittee.

Roadless Area 1 – about 33,000 acres – in the Kolob section of the park displays deep cut gorges and canyons of spectacular coloration. Forests of the rich green mesa tops break abruptly at salmon-pink precipices. Extinct volcano cones and lava outcrops remain as evidence of the tremendous volcanic forces which once were active in southern Utah. There are also ancient sand dunes and, in the Finger Canyons of the Kolob, lateral erosion has created hanging gardens of mature trees, brush, and flowers.

Roadless Area 2 – about 88,300 acres – contains outstanding examples of tectonic activities, crossbedding, folds, sheer walls, and block faulting – exposed by water, wind, and weather erosion. The Kayenta formation, created by ancient swamps, preserved tracks of ancient animal life which roamed here and long since have been covered by blowing sand of the “Navajo” period and, in turn, sealed by a lid of sea-laid Carmel limestone. Within this roadless area are plant and animal communities associated with the Sonoran desert zone, the juniper-pinyon zone, and the ponderosa pine-covered mesas and highlands.

Several parcels of private land, lands with mineral rights, and lands with grazing rights, are within this roadless area. There is one tract subject to a water right in the southeast corner of the area.

Roadless Area 3 – about 22,100 acres – in the Parunuweap Canyon area, also contains highly scenic lands of a rugged nature. Relatively few species of plants are adapted to this arid and harsh landscape. There is one large tract and one small tract of land subject to water rights within this roadless area.

Preliminary Wilderness Proposal

A total of 119,200 acres, in three units, is recommended for designation as wilderness as shown on the accompanying map.

Wilderness lines are drawn on topographic features and section lines.

SUMMARY

UNIT	ROADLESS AREA	WILDERNESS
1	33,000	26,800
2	88,300	72,600
3	22,100	19,800
TOTALS	143,400	119,200

Unit 1 An area of 26,800 acres is proposed as wilderness in the Kolob section of the park. Beginning at the northwest corner of the park, the wilderness line proceeds generally south and west on the park boundary to Taylor Creek. At Taylor Creek the wilderness line forms a corridor generally following the south fork to Lee Pass and then ¼ mile south along the west side of Timber Creek. This corridor contains a road which provides public access to the Kolob section of the park. The wilderness line then returns generally along the south side of Taylor Creek to the park boundary and continues south and east along the park boundary, around private land. The wilderness line then proceeds north and west on the park boundary around private inholdings and returns to the point of beginning. On the east boundary the wilderness line runs around Bear Canyon, excluding this private access road.

17

A short segment of road, less than ½ mile in length on the east boundary, is to be closed and included in wilderness.

Unit 2 A total of 72,600 acres of wilderness is proposed for the Great West Canyon area. Beginning at the northeast corner of the park, the wilderness line runs west on the park boundary for about 6 miles. The line then turns south and west around mineral, water, and grazing rights, and private lands to Grapevine Wash where it follows the wash south to the west rim of the Left Fork of North Creek Canyon

EXHIBIT C

PRELIMINARY - SUBJECT TO CHANGE

WILDERNESS PLAN ZION NATIONAL PARK UTAH

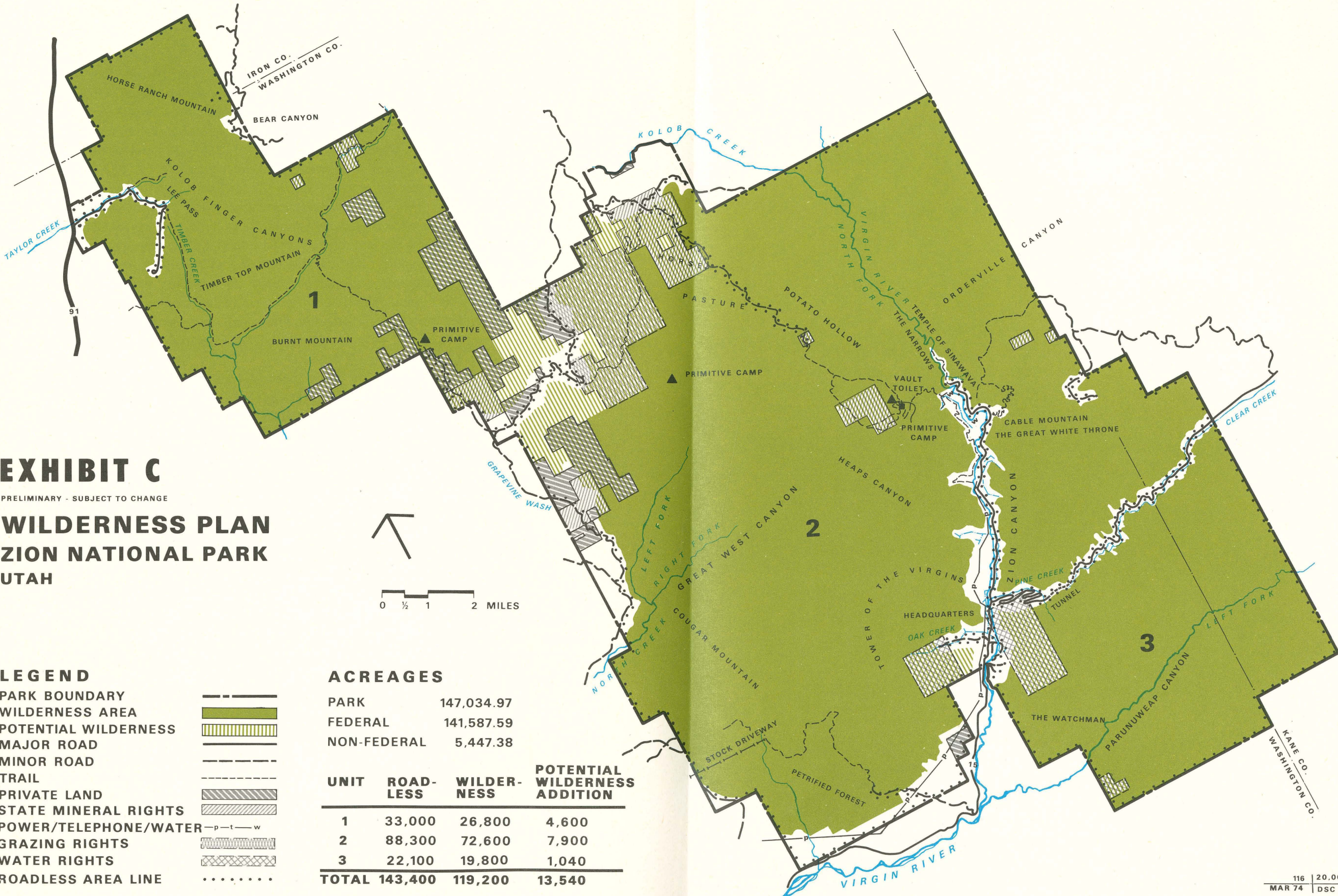
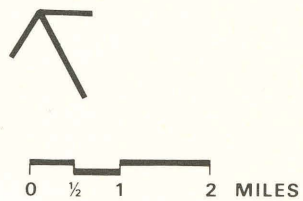
LEGEND

- PARK BOUNDARY
- WILDERNESS AREA
- POTENTIAL WILDERNESS
- MAJOR ROAD
- MINOR ROAD
- TRAIL
- PRIVATE LAND
- STATE MINERAL RIGHTS
- POWER/TELEPHONE/WATER
- GRAZING RIGHTS
- WATER RIGHTS
- ROADLESS AREA LINE

ACREAGES

PARK	147,034.97
FEDERAL	141,587.59
NON-FEDERAL	5,447.38

UNIT	ROAD- LESS	WILDER- NESS	POTENTIAL WILDERNESS ADDITION
1	33,000	26,800	4,600
2	88,300	72,600	7,900
3	22,100	19,800	1,040
TOTAL	143,400	119,200	13,540



excluding the north-south access road. It then follows the rim south back to the park boundary. The line continues south and then east on the park boundary to a point approximately one mile north of the southwest corner of the park. The wilderness line then runs in an easterly direction excluding the powerline within the southwest portion of Section 34, T41S, R11W, and the southwest portion of Section 31, T41S, R10W. It then continues north around a parcel of land subject to a water right, and runs northeast along the western edge of Zion Canyon to a point approximately one mile north of the Temple of Sinawava, and then south along the eastern edge of Zion Canyon to Pine Creek excluding all of the heavy public-use areas. It then proceeds east along Clear Creek to the park boundary. The wilderness line then continues north on the park boundary, excluding an area on the east boundary for a short public-use road and excluding two small sections of land where the State holds mineral rights, before returning to the point of beginning.

Three miles of management road are to be closed in Horse Pasture – the lands involved are to be included within this proposed wilderness unit. A $\frac{3}{4}$ -mile section of management road in the Petrified Forest area is being closed and these lands are included in the proposed wilderness. There is one vault toilet within this unit approximately one mile west of Temple of Sinawava.

Unit 3 An area of 19,800 acres in the Parunuweap Canyon area comprises the proposed Wilderness Unit 3. Beginning at the southeast corner of the park, the wilderness line runs west and north on the park boundary to the vicinity of the Watchman. The line continues east and north to a point approximately $\frac{1}{2}$ mile south of Pine Creek, excluding lands with water rights. The wilderness line then continues east along Clear Creek to the park boundary. It then proceeds south on the park boundary for about $5\frac{1}{2}$ miles to the point of beginning, excluding a tract of land subject to a water right.

20

Wilderness Management Facilities and Practices Within the proposed wilderness there are three primitive campsites and one vault toilet. A special provision is recommended in the legislation designating wilderness to permit the continued use and maintenance of vault-type toilets within the wilderness.

Helicopters are occasionally used in ecological research to permit the study of plateau areas at the top of pinnacle formations which are otherwise inaccessible.

Potential Wilderness Additions Lands which do not now qualify for wilderness designation because of conflicting uses or interests, but which are classified in the master plan for future management in a primitive condition, can be proposed as potential wilderness additions. A total of 13,540 acres within Zion National Park are so proposed. These areas include privately owned land; lands with mineral or water rights; grazing lands; and small, isolated parcels of the park which would not provide manageable wilderness areas until the adjacent alien lands or rights are acquired. The lands being grazed under a life-tenure permit are not deemed suitable for inclusion in wilderness at this time. Here man's presence is obvious in both works and activities which include the routine use of motorized vehicles in grazing operations. It is proposed that the legislation designating wilderness at Zion National Park provide authority for the Secretary of the Interior to designate these lands as wilderness at such time he determines they qualify. When qualified, a total of 13,540 acres would be added to the designated wilderness: 4,600 acres to Wilderness Unit 1, 7,900 acres to Unit 2, and 1,040 acres to Unit 3.

ANALYSIS OF THE RECORD OF PUBLIC HEARING AND WRITTEN RESPONSES

Conservation Group Proposal

The conservation organizations testifying at the hearing and submitting written statements recommended that approximately 13,000 additional acres be added to the preliminary wilderness proposal. These additions would be made by narrowing non-wilderness road-corridors and by designating as wilderness, areas proposed in the preliminary report as potential wilderness additions. These additions are generally shown by the letter "X" on Exhibit D.

21

Those Opposed To Wilderness

A large number of individuals expressed the view that no wilderness should be designated within Zion National Park, because they felt that the natural resources in the park — such as the grasslands, minerals, timber, and water — should be developed. They expressed a desire for multiple-use management. They also wanted more roads and more developments for public use.

The act establishing Zion National Park provides for the preservation of the natural resources of the park; therefore, with or without wilderness designation, the desire by this group of people for development of the natural resources is prohibited by law.

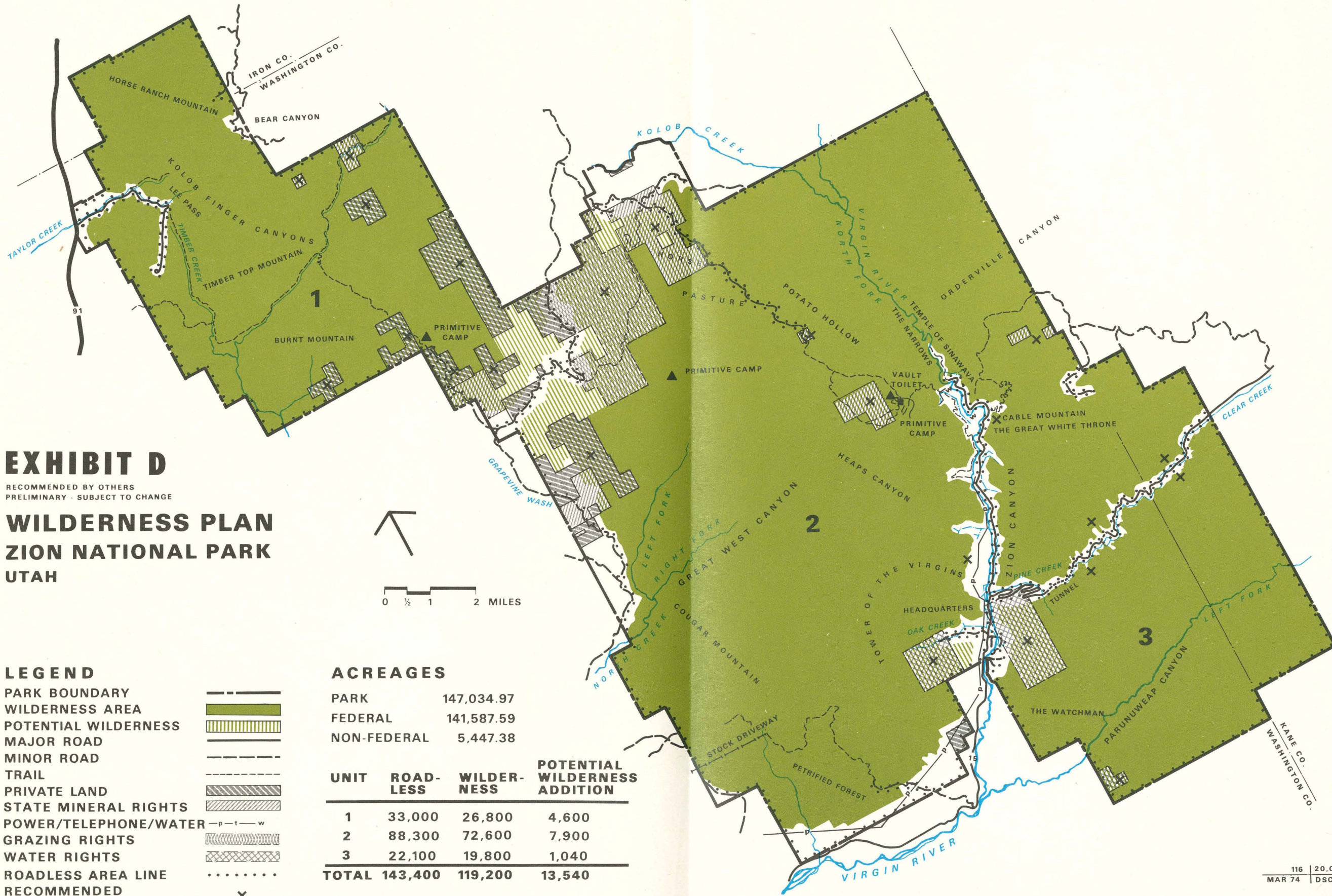


EXHIBIT D

RECOMMENDED BY OTHERS
PRELIMINARY - SUBJECT TO CHANGE

WILDERNESS PLAN ZION NATIONAL PARK UTAH

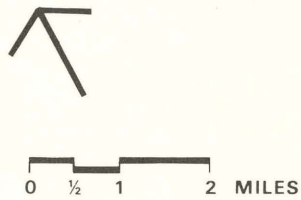
LEGEND

- PARK BOUNDARY
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- GRAZING RIGHTS
- WATER RIGHTS
- ROADLESS AREA LINE
- RECOMMENDED BY OTHERS

ACREAGES

PARK 147,034.97
FEDERAL 141,587.59
NON-FEDERAL 5,447.38

UNIT	ROAD-LESS	WILDERNESS	POTENTIAL WILDERNESS ADDITION
1	33,000	26,800	4,600
2	88,300	72,600	7,900
3	22,100	19,800	1,040
TOTAL	143,400	119,200	13,540



SUMMARY OF RESPONSES RECEIVED

Recommendation	Public Agencies	Private Organizations	Individuals	Totals
National Park Service Proposal	5	2	131	138
Enlarge NPS Proposal	0	53	535*	588
Wilderness; No Specific Recommendations	0	0	1	1
No Wilderness	11	10	1,206**	1,227
Acknowledgements Received with No Specific Comments on Wilderness Proposal	8	0	0	8
TOTALS	<u>24</u>	<u>65</u>	<u>1,873</u>	<u>1,962</u>

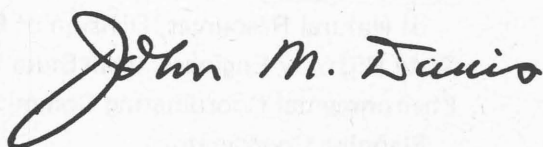
* 21 signatures contained in two petitions

** 461 signatures contained in 44 petitions

DISPOSITION OF HEARING RECORD AND WRITTEN RESPONSES

24

The official record, including letters received by the Hearing Officer, the park, the Rocky Mountain Regional Office, and the Washington Office of the National Park Service, has been assembled and is available for review in the Washington Office.



Hearing Officer

VIEWS OF OTHER GOVERNMENT AGENCIES ON THE PRELIMINARY WILDERNESS PROPOSAL

The following letters, statements, and resolutions are from the agencies listed below:

U.S. DEPARTMENT OF AGRICULTURE

Acting Chief, Forest Service

U.S. DEPARTMENT OF THE ARMY

District Engineer, Los Angeles District, Corps of
Engineers

U.S. DEPARTMENT OF COMMERCE

Deputy Assistant Secretary, Office of the Assistant
Secretary for Environmental Affairs

U.S. DEPARTMENT OF THE INTERIOR

Acting Director, Geological Survey
Assistant Director, Bureau of Mines
Director, Bureau of Outdoor Recreation
Commissioner of Reclamation, Bureau of Reclamation

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Deputy Assistant Secretary, Office of Community Planning
and Development

STATE OF UTAH

25

Governor, Office of the Governor
State Senator, Senate Chamber
State Representative, House of Representatives
State Representative, House of Representatives
State Archeologist, Department of Development Services,
Division of State History
Board of Commissioners, Department of Development
Services, Division of Travel Development
Special Projects and Environmental Specialist, Department
of Natural Resources, Division of Parks & Recreation
State Highway Engineer, Utah State Department of Highways
Environmental Coordinating Committee, Office of the State
Planning Coordinator

IRON COUNTY

Chairman, Iron County Planning Commission

Board of Iron County Commissioners (letter and oral statement)

FIVE COUNTIES ASSOCIATION OF GOVERNMENT (oral statement)

SPRINGDALE TOWN BOARD OF TRUSTEES (oral statement)

ST. GEORGE

City Council

Director of Utilities

CITY OF VIRGIN (oral statement)

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE

Washington, D.C. 20250

2320

NOV 2 1973



Mr. J. Leonard Volz
Regional Director, Midwest Region
National Park Service
U.S. Department of the Interior
1709 Jackson Street
Omaha, Nebraska 68102

Dear Mr. Volz:

Secretary Butz has asked that we review and comment upon your Wilderness Study for Zion National Park and Draft Environmental Statement DES 73-60. We appreciate the opportunity presented by your letters of October 15.

We agree with the general conclusions of your Wilderness study. The following questions were raised by your study report and perhaps could be clarified. On page 3, the last paragraph treats Wilderness in Utah but fails to mention proposed units of the National Wilderness Preservation System which are not within National Parks. The High Uintas Wilderness in the Ashley and Wasatch National Forests was recommended by the President to the Congress in 1969, but has not been enacted. This comment is also applicable to page 8 of the Draft Environmental Statement.

Another question pertains to the lands which are proposed for Wilderness status after acquisition of outstanding rights. Neither the study nor the draft Statement reflect what kind of structures or improvements which do not conform to Wilderness standards may be present. Such information would be useful in evaluating whether these lands could become Wilderness.

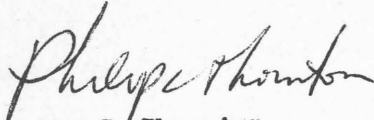
In the Draft Environmental Statement, item C (1) on page 19 indicates that the sounds of motorized equipment would be excluded by a Wilderness Act for the area. Elsewhere, the study notes that aircraft noise will not be eliminated. These statements conflict.

On page 20, the Draft Environmental Statement states that, "Wilderness use requires stringent controls over kinds and amount of human use allowed, thus assuring a high quality of individual

experience to those who will use the area." This statement seems misplaced under "Favorable Environmental Effects." In addition, the statement would seem more understandable if reworded to reflect that high quality of Wilderness experience may require controls on the kinds and intensity of human use.

We appreciate this opportunity to comment upon your proposal.

Sincerely,

A handwritten signature in cursive script that reads "Philip L. Thornton". The signature is written in dark ink and is positioned above the typed name.

Philip L. Thornton
Acting Chief



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2711
LOS ANGELES, CALIFORNIA 90053

SPLED-WB

16 November 1973

Hearings Officer
c/o The Superintendent
Zion National Park
Springdale, Utah 84767

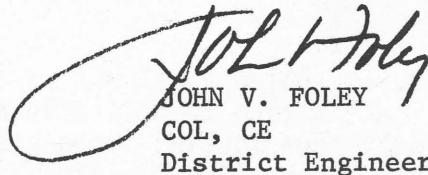
Dear Sir:

This is in answer to a letter of 15 October 1973 from the Regional Director of your Midwest region regarding the wilderness proposal for Zion National Park.

No existing or contemplated Corps project would have any effect on the area covered by the proposed action. The Corps will not be represented at the 12 December 1973 public hearing.

We appreciate the opportunity to review the proposal.

Sincerely yours,


JOHN V. FOLEY
COL, CE
District Engineer



OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE
Washington, D.C. 20230

November 30, 1973

Mr. J. Leonard Volz
Regional Director, Midwest Region
National Park Service
U.S. Department of the Interior
Omaha, Nebraska 68102

Dear Mr. Volz:

The draft environmental impact statement "Wilderness Proposal for Zion National Park, Utah," which accompanied your letter of October 15, 1973, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

This proposed wilderness area is an excellent suggestion. There would remain, for those who are unable to enter the wilderness area, free access to a large and interesting part of the park. Those who are physically able to enter the wilderness area on foot or by horse are assured of an area free of the evidences of civilization (mining, grazing, motor vehicles, roads). The negative aspects cited (difficulty in archeological research, restrictions of resource management practice, rationed use, restrictions on back country facility development and increased costs of trail maintenance), are relatively minor and in some cases are actually positive reasons for creating the wilderness area.

We suggest, however, that consideration be given to the following:

Possible increased park visitation, as indicated on page 22, may result in an increase of economic, social, and environmental demands on the Park Service as well as the surrounding area. This seems likely, as the proposed wilderness area will reduce the available facilities now existing in and around the park (such as lodging, access roads, etc.), as well as preclude development of future facilities.

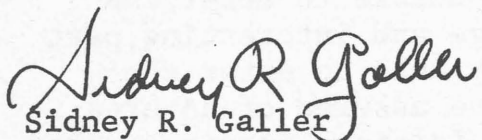
The Park Service's and the adjacent area's ability to meet future demands for lodging, dining, parking, as well as needs for water, sewage, etc., would appear to warrant further consideration.

For example, what measures will be taken to mitigate the adverse effects of increased water and sewage treatment demands and solid waste disposal? Do adequate facilities already exist? What zoning regulations govern land adjacent to the park entrances, the local town and the surrounding areas?

It would appear that the Park Service is limiting the uses of the lands but expect to have greater visitations. Thus, the reactions of the local citizens are important. Are they in favor of the proposal, or do they view it as a catalyst for unwarranted growth?

Thank you for giving us an opportunity to provide these comments which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,


Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs



United States Department of the Interior

GEOLOGICAL SURVEY

~~WASHINGTON, D.C. 20242~~

Reston, Virginia 22092

Mr. J. Leonard Volz
Regional Director, Midwest Region
National Park Service
1709 Jackson Street
Omaha, Nebraska 68102

Dear Mr. Volz:

Thank you for your brochure on the wilderness proposal for three areas in the Zion National Park, Utah, and for the invitation to attend the public hearing at Springdale, Utah, on December 12, 1973.

The Geological Survey has not made a mineral survey of the areas. We will not have a representative attend the hearing.

Sincerely yours,

Acting Director



United States Department of the Interior

BUREAU OF MINES
WASHINGTON, D.C. 20240

November 14, 1973

DI8 MWR CW

Memorandum

To: Regional Director, Midwest Region, National Park Service,
Omaha, Nebraska

Through: ^{Deputy} Assistant Secretary--Energy and Minerals *Quin*

From: Director, Bureau of Mines

Subject: Wilderness study proposal and draft environmental statement,
Zion National Park, Utah

Thank you for the invitation to present our views on your wilderness proposal at the December 12 public hearing to be held at park headquarters. We will be unable to attend the hearing.

In our review of the wilderness study brochure and draft environmental statement we find we have no major comments. Although much has been written on the geology of the park, there has not been an indepth study of its mineral potential. Questions of mineral potential might arise relative to the enclaves of 3,963 acres of State-owned mineral rights excluded from the proposal.

Thank you for the opportunity to review your brochure and draft environmental statement.

James R. ...
Assistant Director



United States Department of the Interior

BUREAU OF OUTDOOR RECREATION
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

A98 MWR CE
DES-73/60

NOV 26 1972

MEMORANDUM

To: Regional Director, National Park Service
Omaha, Nebraska

From: Director, Bureau of Outdoor Recreation

Subject: Draft Environmental Statement--Wilderness
Proposal, Zion National Park

The subject draft adequately covers the environmental concerns
of this Bureau. We have no comments.

Russell A. Soulen

for James G. Watt
Director



United States Department of the Interior

BUREAU OF RECLAMATION
WASHINGTON, D.C. 20240

NOV 20 1973

IN REPLY
REFER TO: 739

125.

Memorandum

To: Regional Director, Midwest Region,
National Park Service, Omaha, Nebraska

From: Commissioner of Reclamation

Subject: Draft Environmental Statement - Wilderness Proposal,
Zion National Park

As requested by your October 15 memorandum, we have reviewed the subject draft environmental statement. The Bureau of Reclamation has no presently proposed water resource development plans for the area involved.

The following comments are offered for your consideration.

Page 5, paragraph 3, last sentence: change to read "Wilderness boundary lines follow topographic features and section lines."

Page 5, paragraph 4, second sentence: Begin "At the present time, none"

Page 5, paragraph 4: Add a last sentence: An additional 8,593 acres of the roadless area do not qualify for wilderness status."

Page 14, first paragraph under Economy: Population figures quoted (except Springdale) are from the 1960 census. We suggest updating to the 1970 census. The 299 population for Springdale should be explained, since it does not match either the 1960 or 1970 census figures which are as follows:

	<u>1960</u>	<u>1970</u>
Springdale	248	172
Hurricane	1,251	1,408
St. George	5,130	7,097
Cedar City	7,543	8,946



Page 21, item C, second sentence: Use of word "monument" in lieu of "park" is inconsistent.

Page 24, first paragraph, first sentence: Begin "With the exception of foregone opportunities, no irreversible"

Page 28, first paragraph following table: First sentence should be clarified. Are the 2,500 acres in addition to the 13,540 listed in the table? If so, this should be so stated.

A handwritten signature in cursive script, appearing to read "G. G. Stamm". The signature is written in dark ink and is positioned to the right of the typed text.

cc: Director, National Park Service



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

November 29, 1973

Mr. J. Leonard Volz
Regional Director
U.S. Department of the Interior
National Park Service - Midwest Region
1709 Jackson Street
Omaha, Nebraska 68102

Dear Mr. Volz:

Secretary Lynn has asked this office to acknowledge receipt of your letter on the Wilderness Proposal for Zion National Park.

I have referred your letter to our Denver Regional Office for further reply since I believe they will have more detailed knowledge of the area concerned. Mr. Robert C. Rosenheim is the Regional Administrator. His address is: Federal Building, 1961 Stout Street, Denver, Colorado 80202.

Sincerely,

A handwritten signature in cursive script that reads "Warren H. Butler".

Warren H. Butler
Deputy Assistant Secretary



STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY

CALVIN L. RAMPTON
GOVERNOR

January 15, 1974

Mr. Phillip R. Iversen
Utah State Director
National Park Service, USDI
125 South State Street
Salt Lake City, Utah 84111

Dear Mr. Iversen:

I would like to state my present opposition to the formal establishment of a 119,200 acre proposed wilderness area in Zion National Park, Utah. As I pointed out in our meeting on January 11, 1973, I would prefer to have a moratorium on such major classifications until after enactment of a National, and State of Utah land-use policy, expected within the next few months.

A land use planning and policy act should enable state and local interests to play a more active role in the decision-making regarding land use classification in areas within the State of Utah that are administered by Federal agencies.

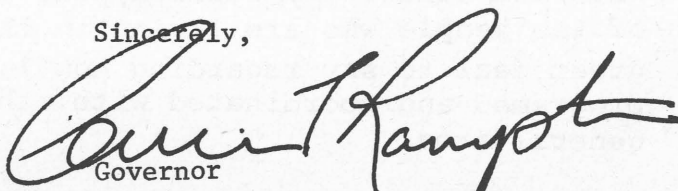
The Utah Environmental Coordinating Committee concludes that the secondary (external) effects of wilderness designation in relation to the small communities near Zion National Park are not fully known, nor adequately discussed in the draft environmental statement.

Wilderness designation as proposed could preclude the plans and proposals for needed development and use of some water resources originating within park boundaries. Considering the aridity of Southern Utah in general and the scarcity of suitable water supplies it is imperative that no water supplies be tied up in a wilderness.

I am aware that the wilderness proposal is in response to Public Law 88-577 (The Wilderness Act of 1964). However, it is inappropriate that the area within Zion National Park needs to be formally placed under the National Wilderness Preservation System when it, for all intents and purposes, is presently being managed as de facto wilderness.

Perhaps adverse uses are impairing wilderness values in Zion National Park. If this is the case, there is no specific documentation regarding such in the draft environmental impact statement or the wilderness study. I, therefore, restate my opposition to the proposed wilderness designation and ask postponement until after we have a National and State land use planning and policy act.

Sincerely,



Governor



SENATOR DIXIE LEAVITT
MAJORITY LEADER
393 SOUTH 700 WEST
CEDAR CITY, UTAH 84720

SENATE CHAMBER
STATE OF UTAH
SALT LAKE CITY

December 20, 1973

MEMBER

APPROPRIATIONS
HIGHER EDUCATION
HIGHER EDUCATION
RULES
STATE AFFAIRS
TRANSPORTATION AND
PUBLIC SAFETY

Mr. John M. Davis
Department of Interior
c/o Robert C. Heyder, Superintendent
Zion National Park
Springdale, Utah

Dear Mr. Davis:

I am writing to you because I was unable to be at the public hearing December 12th relative to the designation of the Zion National Park area as a wilderness area.

In order to identify myself to you, let me indicate that I am the majority leader in the Utah State Senate and I represent the five counties of Beaver, Garfield, Iron, Kane and Washington in the Utah State Senate. I have sponsored bills in the last two general sessions of the legislature to do with land use planning, so I might point out to you that I am not one who feels we should not have land use planning.

I am, however, concerned that the federal government is encouraging in every way land use planning but in no way do I find where they are coordinating their planning into an overall area program, as far as the whole picture is concerned.

It appears to me that the Forest Service has their own land use plan, the National Park Service has their land use plan, BLM has their land use plan, the county and the state is developing their land use plan; and yet nowhere do I see a plan being tied together to be sure that one doesn't conflict with the other. It would appear to me that the will and wishes of the people who are living in the given area should have a great deal to say regarding how land is used and how it is programed and coordinated with other lands in and around that general area.

Mr. John M. Davis
Page 2
December 20, 1973

I am opposed, in addition, for the following reasons. You will be disturbing grazing rights that are involved in the specified area. Mineral rights are held on lands within the park boundaries and the wilderness area would lock these up which might very well prove to be an unfortunate situation as far as the economic conditions of this given area.

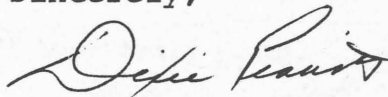
The same holds true with water rights. We can ill afford to lock up water rights when we are in such dire need of water in this arid country.

Also I am somewhat concerned that we will be designating such a large tract of ground as a wilderness area to make it possible for only such a very few people to take time to get into these areas, when, in fact, with a little access to them you can litterly find thousands and thousands of people enjoying the beautiful countryside and natural resource which we have here.

I would solemnly request that you do hold up any further designation of wilderness area in the Southern Utah area until such time as a complete and comprehensive study of our land use planning and development might take place. Let's make sure that we are talking about a total concept plan to take care of the needs in the area and not just the plan that goes in one direction for the National Park Service, another direction for the Bureau of Land Management and still another for some other federal agency.

I thank you for your consideration and hope that you will give this your affirmative action in withholding designation as a wilderness area to Zion National Park.

Sincerely,



Dixie Leavitt
State Senator

HOUSE OF REPRESENTATIVES
STATE OF UTAH

REP. SIDNEY J. ATKIN, 75TH DISTRICT

46 NORTH 200 EAST, ST. GEORGE, UTAH 84770

MAJORITY WHIP

COMMITTEES: APPROPRIATIONS (EDUCATION) -
REVENUE AND TAXATION - EDUCATION



January 4, 1974

Hearing Officer
c/o Superintendent of Zions National Park
Springdale, Utah 84767

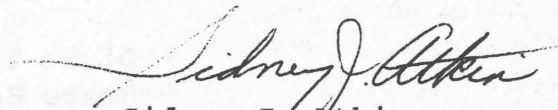
Dear Sir:

I would like to express opposition to the proposal which would make 92% of the land of Zions National Park declared a wilderness area at the present time for the following reasons:

1. I am aware of no justification for including Zions National Park as part of the wilderness area.
2. There seems to be a lot of confusion in the minds of the general public as to what the effects of a wilderness status would be. I would like to encourage more public information before any proposal is adopted.
3. The Utah Legislature is presently involved with legislation dealing with land use planning. This legislation would not have its ultimate impact until 1977, but until that time it would appear to be premature to go ahead and change the classification of Zions National Park.

In conclusion, I would appreciate any information that you could provide me to explain the advantages and disadvantages to Zions National Park by changing its status to include that of a wilderness area.

Very truly yours,


Sidney J. Atkin

SJA:jh

HOUSE OF REPRESENTATIVES
STATE OF UTAH

REP. CALVIN BLACK, 73RD DISTRICT

159 WEST FIFTH SOUTH, BLANDING, UTAH 84511

COMMITTEES: INDUSTRIAL DEVELOPMENT (CHAIRMAN) -
APPROPRIATIONS (TRANSPORTATION AND PUBLIC SAFETY) -
POLITICAL SUBDIVISIONS - TRANSPORTATION



December 26, 1973

Hearing Officer
c/o Superintendent
Zions National Park
Springdale, Utah

Dear Sir:

As an individual, and as a State Representative representing Garfield, Wayne, and San Juan Counties in the Utah House of Representatives, I strongly oppose designation of wilderness areas in Zions and other National Parks as is proposed.

I do so for the reasons that probably 99% of the people living near the areas proposed as wilderness are opposed to such designation.

I see no need or purpose for such designation. Being a Park, there is no beneficial use allowed now except for scenic value. Some of the area could conceivably be made available for the enjoyment of those not able to hike great distances, but locking it into wilderness status will make that impossible. Our National Parks are presently only about 2% available to the average, old, and young or disabled, comprising about 98% of the people. There is about 98% only available to those with the physical stamina, time, and money to hike or rent horses.

In the event the energy and other resource crisis deepens, there may likely be need to utilize resources now locked up in single use areas such as Parks and Monuments. Designating wilderness areas will make it more difficult and would be unwise.

We are now suffering a shortage of energy resources and will yet suffer a shortage of electricity, minerals, and food---all caused by environmental extremists and Government politicians and bureaucrats who thought this insane screaming minority was the will of the people. Let us not continue this fiasco. We do not need more areas set aside by fiat as wilderness.

Very truly yours,

Calvin Black



STATE OF UTAH
Calvin L. Rampton, Governor
DEPARTMENT OF
DEVELOPMENT SERVICES

Division of State History

Melvin T. Smith, Director
603 East South Temple
Salt Lake City, Utah 84102
Telephone: (801) 328-5755

October 23, 1973

Phillip Iversen
National Park Service
125 So. State
Salt Lake City, Utah 84111

Dear Phil:

I have been asked to review and comment on the draft Environmental Statement for the proposed Zion Wilderness area.

I read the statement with interest since that area is one of the more archeologically unique regions in the state. My initial concern was that designation as a wilderness area would preclude any archeological research. However, the subject was addressed in the statement and appears to have been adequately resolved.

The archeology of the proposed wilderness area appears to have been given considerable attention in the draft statement. The coverage and plans appear to be more than adequate. In view of some of the environmental impact statements I have seen, I would like to compliment your efforts in this area.

I have only one question. Are all 33 of the known archeological sites in Parunuweap Canyon significant enough to be placed on the National Register of Historic Places?

Sincerely,

David B. Madsen
State Archeologist

DBM:hc

TRAVEL DEVELOPMENT BOARD:

Kenneth Sowards, Chairman, Vernal
Murray Moler, Vice Chairman, Ogden
Gordon James Black, Monticello
Homer Bandle, Richfield
Jack Croft, Logan
Harold F. Chesler, Bloomington
Robert Temple, Salt Lake City



STATE OF UTAH
Calvin L. Rampton, Governor
DEPARTMENT OF
DEVELOPMENT SERVICES

Division of Travel Development
James G. Berry, Director
Council Hall
Salt Lake City, Utah 84114
Telephone: (801) 328-5681

POSITION STATEMENT JANUARY 8, 1974

The Utah Travel Council Board of Commissioners expresses unanimous opposition to the proposal which designates more than 90 per cent of Zion National Park as a wilderness area. The Travel Council supports the consensus of other concerned persons who oppose such designation. There now exists the mechanism to maintain harmony between environmental protection and multiple use.

The Utah Travel Council Board of Commissioners bases its opinion on the following observations:

1) Zion National Park was so declared and "dedicated as such for the benefit and enjoyment of the people." The administering agency of the park, the National Park Service, commands the regulatory control which will preserve the park's beauty. Therefore, the arbitrary wilderness designation is unnecessary since Congress has already delegated such responsibilities to the National Park Service.

2) Declaring most of Zion National Park a wilderness is inconsistent with the majority of public interest. Regional input to the Travel Council indicates spokesmen from the travel industry oppose the wilderness proposal. Representative S. Garth Jones has said the vast majority of state legislators is also opposed to the wilderness designation. Both houses of the first special session of Utah's 40th State Legislature have also overwhelmingly

POSITION STATEMENT/2

opposed the phase-out of overnight facilities within the park, as have the Utah Travel Council Board of Commissioners and staff.

3) Tourism is a vital segment of Utah's economy -- particularly in the economically depressed areas of southwestern Utah. The wilderness proposal would seriously hinder accessibility within Zion National Park and therefore adversely affect the region's travel industry.

4) A wilderness designation negates the multiple use concept which is an inherent part of public lands philosophy. The development of water resources, grazing, timber and mineral rights, recreational potential and right-of-way access to private lands would be "locked up" under the wilderness concept.

The Utah Travel Council Board of Commissioners considers these objections sufficient to justify its opposition to the establishment of a Zion wilderness area.

KENNETH SOWARDS, CHAIRMAN
BOARD OF COMMISSIONERS

cc: Governor Calvin L. Rampton
Senator Wallace Bennett
Senator Frank E. Moss
Congressman Gunn McKay
Congressman Wayne Owens



STATE OF UTAH
DIVISION OF PARKS & RECREATION



CALVIN L. RAMPTON, Governor

1596 WEST NORTH TEMPLE
SALT LAKE CITY, UTAH 84116

328-5881

BOARD MEMBERS

JAMES D. MOYLE, Chairman
HAROLD B. LAMB, M.D.

DEPARTMENT OF NATURAL RESOURCES
GORDON E. HARMSTON
Executive Director

HAROLD J. TIPPETTS
DIRECTOR

E.J. CLAUS
J. MIKE MONSON
LEROY JOHNSON

January 15, 1974

Mr. James Isenogle
National Park Service
Federal Building
125 South State
Salt Lake City, Utah

Re: Environmental Coordinating Committee
Comments On Zion Wilderness Proposal
Environmental Statement

Dear Jim:

The Division of Parks and Recreation would like to compliment the National Park Service for adequately describing most impacts related to the Zion Wilderness. We are concerned, however, about two impacts which were not adequately covered.

Although the fact is mentioned that BLM is considering the Canaan Mountain area south of the park for primitive area management, the Park Service did not adequately describe the wilderness area considerations at Cedar Breaks National Monument or Bryce Canyon National Park. The roadless area studies of the Forest Service and their potential wilderness designations on the Pine Valley Mountain, on Forest Service lands near Cedar Breaks and on the Aquarius Plateau, all within the Dixie National Forest, were not mentioned. It is the cumulative effect of these management designations that is beginning to concern this agency.

From a recreation standpoint, these designations could result in all of the high quality recreation resources available only to the back-packer or at a distance to the sightseer. The concept of offering a variety of recreation opportunities through a balanced recreation system with adequate management should be encouraged.

In order to offer a wider variety of recreation experiences in Zion National Park, without hampering the valuable wilderness experiences available in most of the rest of the park, we recommend allowing mechanized access into the Potato Hollow-Horse Pasture area. The roads and trails in that area should be made available for such uses as trailbike riding and snowmobiling. The environmental statement does not adequately describe the loss of these choice recreation experiences under the proposed plan.

BOATING ADVISORY COUNCIL

WILLIAM A. CARVER, Chairman

C. VICTOR DOVER

JOHN M. GARR

PETER WILSON

JACK CURREY

January 15, 1974

We appreciate the opportunity to comment on this statement. We wish to add that some of the Park Service comments for considering alternatives A or B sound much better than the proposal. These alternatives could more adequately meet the dual responsibility which we understand the National Park Service has: (1) Provide for recreation needs of the public and (2) protect the beautiful resources under their jurisdiction. It seems the Park Service is placing much more emphasis on the latter rather than intensifying management in selected areas and helping to meet the former.

Sincerely,



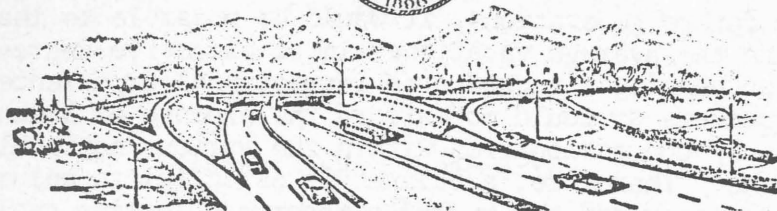
Stan Elmer, Special Projects
& Environmental Specialist

SE/des

cc: Grover Thompson

DIRECTOR
WINE J. KAY

STATE HIGHWAY E
C. V. ANDER



Utah State Department of Highways

State Office Building

Salt Lake City, Utah 84114

United States National Park Service
125 South State Street
Salt Lake City, Utah, 84138

Gentlemen:

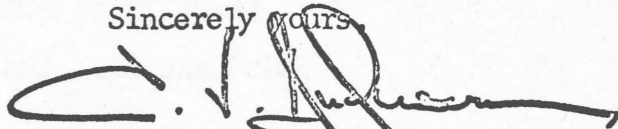
We have reviewed the Wilderness Area Study for Zion National Park and concur in general with the proposed Wilderness Area designations. However, there are two points we believe should be considered further.

Reference the Potential Wilderness Area between units 1 and 2. We believe the text should state the intent to retain the minor road traversing this area. This section of National Park Road is a segment of a loop road between I-15 just south of Hamilton Fort and I-15 at Harrisburg Junction. Because of the terrain through which this road passes, it is a possible candidate for Utah's Scenic and Recreational Highway System - currently in the study stage. Even if the loop is not included in this system, it can provide the average motorist with a magnificent view of this rugged countryside in and around Zion Park.

Also, we note that all of the nearby (125 mile radius) recreation areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce. From this type of study, an area master plan could be developed to provide for foreseeable recreation needs.

While the Wilderness Area concept is essential to ensure retention of such areas for our future generations, it would be possible to inadvertently limit access to the average vacationer in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who were not backpackers or could not afford the expense of licensed, guided pack trips run by concessionaires within the various national parks and recreation areas. Therefore, a balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated within the available public lands in Utah.

Sincerely yours

A handwritten signature in black ink, appearing to read 'C. V. Anderson', with a long horizontal flourish extending to the right.

C. V. Anderson, P.E.
State Highway Engineer

Calvin L. Rampton
Governor



Burton L. Carlson
State Planning
Coordinator

STATE OF UTAH
Office of the
STATE PLANNING COORDINATOR

118 State Capitol
Salt Lake City, Utah 84114
(801) 328-5246

January 14, 1974

Mr. Phillip Iversen
Utah State Director
National Park Service
U.S. Department of
the Interior
125 South State Street
Salt Lake City, UT 84111

Dear Mr. Iversen:

Subject: Proposed Zion Wilderness, Zion National Park

Thank you for the opportunity to review the draft Environmental Impact Statement for the Proposed Zion Wilderness designation. The following comments shall represent the State Clearinghouse and Environmental Coordinating Committee (E.C.C.) response to the above EIS.

We think the draft EIS is generally a well prepared document. It rather clearly indicates the Park Services' Plans for Zion National Park.

There are some concerns voiced by members of the ECC that perhaps could be addressed in the final EIS, these include: the advisability of granting the Secretary of the Interior the authority to designate 13, 540 acres as wilderness when he determines that the lands quality is questionable. We hope that before such a designation is made, appropriate private persons, state and local officials will be a part of this decision-making process. Since much of the area in question is privately owned or involves private rights, an order by the Secretary to clarify those areas as wilderness might be done without proper hearing. While the Wilderness Area concept is essential to ensure retention of such areas for future generations, it would be possible to inadvertently

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limit access to some users, especially the handicapped, in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who werenot backpackers or could not afford the expense of licensed, guided pack trips run by concessionaires within the various national parks and recreation areas. A balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated wthin the available public lands in Utah. For example, we should like to see some facilities and opportunities for recreation provided for non-backpackers near or along the minor road bisecting the park at the narrowest area between units 1 and 2. Also, we note that all of the nearby (125 mile radius) recreational areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce.

Another unclear point in the draft EIS is whether the wilderness designation will preclude the future operation of the cabins and other visitor facilities within the park. For many park visitors the opportunity to stay within the park and take advantage of the cabins, restaurants and other facilities is an important part of the total park experience. We urge that the Park Service maintain its present facilities within the park and support private enterprise opportunities necessary to park visitors in towns and other areas on the perimeter of the park.

The State Comprehensive Outdoor Recreation Plan (SCORP) delineates the following high priority activity needs within the Southwest Planning District of which Zion Park is a part. Bike trails, general winter activity areas, wildland hiking trails, bicycle paths, camping sites, and picnicking sites. According to the SCORP, the primary responsibility for meeting these activity and facility needs lies with federal, private and state interests. This fits in with the general objective of Park Management which we hope will provide a multi-recreational park experience.

We are cognizant of the National Park Services' position concerning the Town of Grafton; we wish to voice disagreement with the Park Service justification for excluding the historic Town of Grafton from within the Zion Boundaries. It seems there

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should be further investigation to determine the advisability of such action.

A major concern of the Division of State Lands relayed through ECC relates to the reserved mineral acreage within the proposed wilderness area. The state has 3,963.00 acres of reserved mineral interest. In addition to this, and not included in the report, the state has 200.00 acres where they own both surface and mineral interest; described as follows:

Southeast Quarter of the Northwest Quarter,
Northeast Quarter of the Southwest Quarter
of Section Twenty-seven; North Half of the South-
west Quarter of Section Twenty-eight, Township
Thirty-nine South, Range Eleven West, and the
Northeast Quarter of the Northeast Quarter of
Section Thirty-one, Township Thirty-eight
South, Range Eleven West

The State would be interested in exchanging their interest out of the Park. Under present management, and more so under the wilderness concept, effective use of the State's reserved mineral and surface interests are impossible. However, we might add that in other cases where the Federal Government has locked up State land through similar actions, the State has had a difficult time getting land values in return.

On Page Twelve, grazing, logging, mining, hunting, and power development are all called consumptive uses. Maybe in strict sense that the Park Service views these uses, they might be classified as consumptive; in general we think that term consumptive can be misleading. Consumptive use implies destructive or wasteful use, and the use of a nonrenewable resource. Grazing and logging, for example, involve the use of renewable resources, and the harvesting of that resource does not destroy it if the base is maintained and use does not exceed a critical zone.

Under Part V, Unavoidable Adverse Environmental Effects, no mention is made of the impact that the proposal might have on State and private holdings within the proposed wilderness areas. We would suggest that there will be some impact on alien rights, particularly when private and state land is considered as potential wilderness.

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In Part VI, it is stated that wilderness designation will not adversely affect the long-term productivity of the area as a natural ecosystem. In some cases, wilderness designation may introduce unnatural conditions that may change the natural ecosystem.

We recognize that fire is an integral portion of many of the unique ecosystems within the proposed Zion Wilderness. However, if the maintenance of fire as a primitive value becomes a threat to adjoining ownerhsips, additional steps should be taken.

In the "Draft Environmental Impact Statement for Zion Wilderness", Section III - Environmental Impacts, Subsection B - Impacts Upon the Wilderness Proposal, fire entering the wilderness is mentioned in Paragraph I as a minimal impact, "because of the terrain configuration and small amount of forest cover". The possibility of fire leaving the wilderness is not considered. Fire originating within the park and spreading to adjacent private and public lands is a distinct possibility especially during adverse weather conditions. Fire is of particular consequence since wildfire presumably cannot be fought using mechanical equipment within the concept of wilderness.

Land use records in the State Forester's Office indicate that use patterns are changing on private ownerships along the north and east park boundaries. The use of these private wildlands is becoming more and more that of recreational subdivisions. Should the present trend continue, increased values will be at risk to wildfire and more humans will be present in the area. Those private wildlands of concern to State Forestry from a fire danger standpoint are portions of Sections 3, 10, 14, 15, 22, and 23 of Township 29 South, Range 11 West and Sections 28, 29, 30 of Township 38 South, Range 11 West, both S.L.B.M.

Since the statutory responsibilities of the Section of Forestry and Fire Control include preventing the origin and spread of fire on non-federal forest, range, and watershed areas, the following suggestions are submitted to the National Park Service for its considerations.

Suggestions to Reduce Fire Hazard to Lands Surrounding the Proposed Zion Wilderness

- A. Designate and train the Ranger Patrol to act as fire control officer in his area of jurisdiction.

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- B. Provide the Ranger Patrol with several fire tool caches along the north and east park boundaries and provide him (them) with radio communications for suppression assistance if necessary.
- C. Allow the use of mechanized equipment and aircraft for fire emergency use within certain corridors along park boundaries.
- D. Fly fire detection flights on the north and east park boundaries within 12-14 hours after local lightning storms during the fire season.

We forward the following comments regarding statements concerning Wildlife:

Page Ten - Third Paragraph - The statement regarding deer populations - "One of their natural checks, the cougar, occurs in sub-normal numbers, attributed to heavy killing outside the park. This factor contributes to a complex deer management problem." How was this conclusion derived? It is not uncommon for the National Park System to have problems associated with over-populations of ungulates.

Division of Wildlife Resources records indicate the cougar populations are stable. The harvest is not "heavy." Wildlife has a turnover whether hunted or not. Our information indicates that, at the present, transient animals make up the major portion of animals being harvested and that the population is stable. If there is a lack of predators, particularly the cougar, it is probably due to the 975,976 visitors to the park. The cougar, like some other predatory species is truly a sedintary species, thus avoiding people. We feel that this whole conclusion is open to question.

Page 18 - Third Paragraph - As we understand the Wilderness Act concept, the activities of wandering hunters does not necessarily intrude on wilderness values. It would as far as Park Service objectives are concerned, but not wilderness. We know of other proposed wilderness areas in Utah by the United States Department of the Interior, and hunting or grazing have not been mentioned as "intrusions upon wilderness values."

Page 19 - Third Paragraph - If the National Park Service is expecting the same nonintrusive activities such as hunting on Canaan Mountain this would not be true as we understand the

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Wilderness Act. We would naturally oppose non-hunting moves towards Canaan Mountain.

Some representatives to the Environmental Coordinating Committee registered their agencies' opposition to the proposed wilderness designation in Zion Park. For example, the Division of Water Resources regards the proposal for the most part as undesirable for the following reasons:

The restrictions imposed by a wilderness designation could be very detrimental to the people in the drainage area of streams originating within Zion National Park.

The Division of Water Resources suggests that the natural beauty of the park area should be protected. It should be remembered though, in any land classification discussions, that the region around Zion National Park, Southern Utah in general, is very arid and water supplies are scarce. It is, therefore, imperative that no water supply be tied up in a wilderness area. The State of Utah, the towns in Washington County, and Cedar City, have definite plans and proposals for developing waters of the Virgin River and its tributaries for municipal and agricultural supplies. Some of these developments will be rendered impossible by the wilderness proposal. A particular case in point is Grapevine Springs on the Left Fork of North Creek which is the only good source of untreated culinary water for the Town of Virgin, Utah. This, of course, would call for the construction of a diversion structure and a pipeline, but with proper planning the impacts can be minimal. As the wilderness area is proposed, Grapevine Springs is within the wilderness boundary and the possibility of tapping the source would become very remote. Whereas if the Park remains under National Park Service jurisdiction, the possibility of using Grapevine Springs as a water source is feasible. We would be interested in seeing the wilderness boundary moved to the east, such that Grapevine Springs is not included in the wilderness proposal.

The Division points out that water originating from within the Park is capable of carrying heavy loads of silt and sediment and has been known to damage land and property below. This may call for proper control measures such as catchment basins to be constructed within the Park at strategic locations. It may also be necessary to repair some man-made facilities already in the Park. It may be necessary to reseed an area that experiences serious

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erosion and is not an original trait of the area but was caused by man and should be corrected by man now, or in the near future. All of these controls and corrections would be impossible if land were reclassified as a wilderness area, but they would be possible if the land remained under National Park jurisdiction.

The secondary effects (spillover effects) of wilderness designation in relation to the small communities near Zion Park are not fully dealt with in the draft statement. For example, the discussion of alien water rights, and the importance of these rights to the local people, and economy is not adequate.

The provision of culinary water supply to communities surrounding Zion National Park is not a requirement to the National Park Service. However, we suggest that the National Park Service cooperate in all possible respects in assuring that local water needs are met.

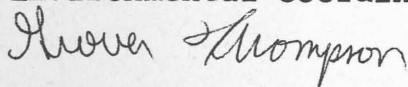
We would also suggest that there be greater cooperation in planning efforts among Washington County communities in this area for possible better solutions to their common problems, especially the provision of water.

Sincerely,

Dale Carpenter, Chairman
Environmental Coordinating Committee



Grover Thompson, Secretary
Environmental Coordinating Committee



DC:GT:ml

Members:
D. A. Stones
Arnold O. Gurr
Wesley Bauer
Richard F. Jones
LaRue Gardner
Keith Smith, Exofficio

IRON COUNTY PLANNING COMMISSION

JAMES C. SANDBERG, CHAIRMAN

99 North Main Street
Cedar City, Utah, 84720

Lorene Pratt
Secretary
H. Dee White
Building Permits
Ira Schoppmann
Zoning Administrator
Hans Q. Chamberlain
Attorney

December 20, 1973

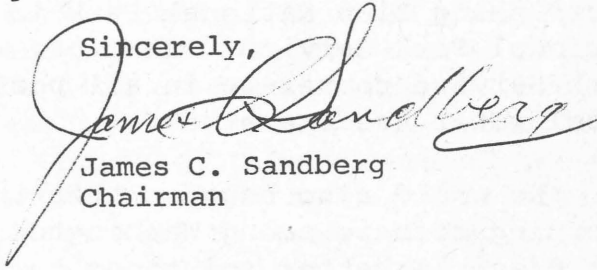
John M. Davis
Hearing Officer
c/o Superintendent
Zion National Park
Springdale, Utah 84767

Dear Mr. Davis:

Re: Wilderness Proposal
Zion National Park

Enclosed is a copy of my presentation at the hearing
December 12, 1973 regarding the Wilderness Proposal.

Sincerely,


James C. Sandberg
Chairman

em
Encl.

This a copy typed from the photo copy submitted by Mr. James C. Sandberg.

INTRODUCTION

As an interested citizen, as Chairman of the Iron County Planning Commission for the past ten years, as an Engineer affiliated with Coon, King & Knowlton, Consulting Engineers and Land Surveyors, who are presently working in water supply systems for many of the communities between Kanarraville on the North and Springdale on the South, and specifically representing the Community of Virgin, and as a leader of youth who was instrumental in taking one of the largest groups of young people (135) through this area, I appreciate the opportunity to be heard at this hearing so vital to us with a heritage here in Southern Utah.

Beginning with Mukuntuweap National Monument established on July 31, 1909, on 15,200 acres, the Federal Government Bureaucracy has steadily expanded and increased control until at present a total of 147,000 acres has Zion National Park status. Zion National Park extends into three counties and the economic impact of policies of administration of these lands is critical in every community located in the five Southern Utah Counties and has a significant effect on the economy of the entire state.

The Department of the Interior is now proposing to give essentially the entire Zion National Park Area a wilderness designation which would for all intents and purposes eliminate any further development of Southern Utah's most valuable economic asset from the state's economy.

It is necessary for local City and County Planning Commissions to become involved when large areas within the County or adjacent to the communities have such a drastic change in Land Use Designation as changing a large area within a County to a Wilderness Area would have. To date there has been no consultation between the local planning agencies and the Department of the Interior.

The 147,000 acres now within the bounds of Zion National Park vary in elevation from 8,700 feet to 3,700 feet and covers the Southwestern boundary of the Markagunt Plateau. The snow pack at the higher elevations give life to the mountain streams and feed the crystal clear springs that emit at the lower elevations. Pure water supply is our most limited natural resource. It is the economic life blood to the small communities of Southern Utah. A Wilderness Area Designation would preclude any possibility of ever enhancing or bettering the watershed along this vital stretch of mountain rim.

Great progress is being made in cloud seeding, underground research is making it possible to get more and more data about the water bearing strata beneath the surface. This area under consideration is especially valuable in each instance. With only limited controls as now provided with National Park Status this valuable watershed could be protected and yet be developed with no adverse effects to the esthetics of the area.

President Nixon's goals for a better life for more Americans encouraged growth of rural America. Setting aside such large tracts of land into Wilderness Areas would not only take the area designated as wilderness out of circulation but also stop development of adjacent rural communities dependent upon the watersheds of the Wilderness Area. We should all be concerned with the 74% of the citizens who now spend most of their time on 2% of the land. We are now proposing to limit to less than 2% of the people 74% of the recreational land in Southern Utah. We should also be concerned about the 50% of the Counties in Utah who lost population from 1960 to 1970 Census.

To make an area into a Wilderness Area does not make that area more valuable to more people but does exactly the opposite by isolating the area to the average American.

Three of the five Southern Utah Counties have economically depressed designations. These counties all have thousands of acres with less than two people per square mile. If public recreational lands and facilities are not provided and encouraged it then becomes the responsibility of local Planning Commissions to see that these types of facilities are allowed and encouraged.

*ROADS

Plans were made in the Kolob Sector prior to its receiving park status, for connecting a road through the sector and extending it to U-15, which would make a loop road through one of the most scenic areas in the world. Only part of the road has been built. The Public's investment in this road is being badly administered with the road being opened to tourists only about two months of the year. Plans should be continued to extend this road through the park for the enjoyment of more people, which would include that increasingly important and growing segment of our population, the Senior Citizens, who are not physically capable of a Wilderness Area hike.

In conclusion, the groups that I represent are opposing extending a Wilderness Area throughout the Zion National Park Area. Our reasons are as follows:

- (1) To curtail the growth and control of lands in Southern Utah by Government Agencies;
- (2) To allow local planning agencies to have a voice in the total planning of land within their counties;
- (3) To allow this extensive and important watershed to be developed unhampered by the restrictions imposed in a Wilderness Area;
- (4) To allow further road development within the Zion National Park Area so more people with limited time and resources could enjoy some of the hidden wonders of the park not now available where it would be economically and esthetically feasible to construct roads;
- (5) The water that sustains life and the economic structure within the small communities along the boundary of the park could not be developed.

Do we really need the additional controls designated by a Wilderness Area?

*See Exhibits 1 to 10 attached.

Note: The above exhibits are a part of the official record which are available for review in the Washington Office of the National Park Service.

MR. IVAN M. MATHESON, Commissioner of Iron County: The National Park officials, Ladies and Gentlemen:

In behalf of Iron County, I would like to make a few remarks with regard to the proposed wilderness area.

After consideration of this, Iron County has concluded to file a protest on this wilderness area, for the following reasons:

Because of flood control problems that exist in this area, we feel that adequate access to stream heads, to water problems that may exist in the area, we feel this would preclude the necessary functions that would have to go on in this capacity.

Being aware of the shortages of water in our area, and also being aware that many of the high reaches of all of these watersheds exist within the boundaries of Zion National Park, we feel that the economic impact on municipal and industrial water development as well as agriculture would be adverse to the interests of the area. We feel that because of future need for power generation, and so forth, in the area, and the impact upstream that it may have on sites outside the park area, that considerations need to be made of this. Locking this into a wilderness area at this time would preclude these considerations at a later date, without congressional action.

We recognize that the Park status now has some prohibition against the development that would necessarily need to take place to serve our area, and we feel these would be easier to overcome than the problem that would be created with wilderness designation.

We feel there are some areas within the reaches of Zion National Park that may need to be used as storage areas for water, which we feel would not impact adversely the aesthetic values and the environmental considerations of the area.

At the present time the proposal designates that it will not impact private grazing and so forth in the park boundary. We feel that this type of designation,

if it followed practices concluded in other areas, would eventually impact these areas. We have seen stock grazing permits, and so forth, affected by other areas of wilderness that had a direct impact against the economic interests of our area.

The proposal, as it is, to lock up approximately ninety percent of this park area, we feel would deprive access to many people to many scenic areas.

I think it has been some nine or ten years ago that the five counties area proposed an opening of area between Kolob Canyon and Springdale for tourist attraction, and we feel that by locking this up at this time it would prohibit much of that area from ever being seen by humans.

Tourism being one of our--probably our number two industry in the area, if not our number one, we're greatly concerned about the economic impact this would have.

I think we can't fail to recognize the potential energy sources in the area. We're all aware of the Virgin Oil Field that has been drilled on the perimeter of the park. We know some oil exists there. What quantities are not known at this time, and we feel that because of the crisis in the nation at this time, some consideration should be given, and we feel these areas should be left so that multiple use can be had and that those things can be used for the economic benefit of our people.

There are some areas within the park boundary where timber harvesting, I believe, is a consideration that should be looked at. If we lock it up in wilderness areas and we have a bug infested area in the timber, that could migrate or spread to other areas. This could have an adverse effect.

Knowing the mineralogical resources of our area, we don't know where minerals are at this time, many of them, that need to be developed from time to time to serve the needs of our people. This would prohibit exploration--and recognizing that exploration needs to be controlled and precautionary measures taken, we still feel like multiple use is the designation that any public land

should have, whether it be national park, national forest, or whether it be Bureau of Land Management jurisdiction.

Again, I would like to emphasize that the tourism aspect of this thing, if we have no areas for facilities, and so forth, to serve the travelling public, will be adverse on the area. Tourism is moving, I mentioned, to our number one spot in our area, as an economic base.

Multiple use, we feel in the Iron County Commission--I think this is the status also in our Five County group--serves the economic needs of our people much better. It can provide proper management for whatever things go on within the boundary of a designated area.

With proper management and multiple use, the aesthetics and the intrinsic values of the area can be protected and even enhanced.

It would be our recommendation that the wilderness--that this large of an area, at least, be looked pretty closely at, and there may be some smaller areas that would be feasible.

We have seen a move in our nation for some time now to lock up large areas of land to inaccessibility. This would be for the interests of minor groups, I think, and the adverse interests of the majority.

We feel like the public as a whole needs access to these lands, and with proper management, protection can be given without locking it up in a wilderness area where no development can take place, and where the economics cannot be considered.

I thank you for the opportunity of this presentation.

COMMISSIONERS

KEITH T. SMITH
CHAIRMAN

IVAN M. MATHESON

GLEN HALTERMAN

CLAIR HULET
CLERK & AUDITOR

Iron County

PAROWAN, UTAH 84761

LAMAR G. JENSEN
TREASURER

H. DEE WHITE
ASSESSOR

JOAN W. WARDEN
RECORDER

IRA SCHOPPMAN
SHERIFF

HANS Q. CHAMBERLAIN
ATTORNEY

January 10th, 1974

Mr. Robert C. Heyder, Superintendent
Zions National Park
Springdale, Utah 84767

Dear Mr. Heyder:

In submitting this communication relative to the Wilderness proposal for Zions National Park, we are willing to stipulate that it may appropriately be construed as a reiteration and/or confirmation of the position which we took verbally at the hearing of December 12th, 1973.

In the first instance, as a general observation, we would appreciate being understood as being opposed to the basic concept of Wilderness areas, since we sincerely believe that the objectives of this idea can much more fairly be achieved through the multiple use system of range and resource management. A system through which these areas, in addition to their many other uses, may still remain a productive force in making their contribution to the ever increasing basic material needs of man. Furthermore, and again as a general observation, it is our position that the creation of Wilderness areas, which in effect padlock the benefits of vast public areas to the vast majority of the people, and at the same time furnish a key to the favored few, is high rank discrimination, and not in keeping with the spirit of the times.

Now specifically with respect to the Zions National Park proposal, we oppose the reducing of this area to a Wilderness status, not only for the reasons covered in our general observations, which are material, but for the following reasons as well:

(1) To reduce this particular area to a Wilderness status would obviously result in serious consequences for private land holdings located in and adjacent to the area, and livestock grazing rights, both private and public. Furthermore, we believe that the success of these Enterprises should be of vital concern to every Citizen. Ours is a dual concern plus an obligation. The first and foremost being the effect such an action would have on the material production of the area, and secondly, our obligation to safeguard, in so far as possible, the County tax base.

(2) We believe that due to the nature of the climate, timber and vegetation cover, the increased fire hazard to be generated through the establishment of a Wilderness area should not be underestimated in weighing the merits and demerits of the proposal. Neither should the effect lack of access to the general area, would have on fire fighting and control.

(3) Such action would preclude the development of water and water impoundment projects, with their attendant benefits to all Citizens within the scope of the drainage area. Also the harvesting of timber, and the development of mineral deposits, all of which are vital in supplementing our ever increasing need, and more and more evident short supply.

(4) Another factor which, in our judgement, should be weighted heavily against the proposal, is the real possibility of serious impairment to the Tourist Industry in Southern Utah, an Industry which is an essential factor in its economic structure and growth.

We will appreciate your giving due weight to our position in this matter, coupling our basic views as expressed in our general observations with our more specific argument as as expressed in (1), (2), (3), and (4), and the making of an appropriate finding that the Zions National Park area should NOT be reduced to a Wilderness status.

Very truly yours,
BOARD OF IRON COUNTY COMMISSIONERS

By *Clair Hooper*
Clerk

MR. NEIL CHRISTENSEN, Executive Director of the Five Counties of Government: My assignment this morning, as charged by the steering committee of the Five Counties Association of Governments, is to provide to the National Park Service the following resolution to be entered in the record of this hearing:

WHEREAS, formal consideration and planning are underway to establish approximately 92 percent of the land within the boundaries of Zion National Park as a wilderness area, and

WHEREAS, such consideration and planning, even though on existing National Park land and within established boundaries, may have great impact in the future on the land and communities which border the Park, and

WHEREAS, the local governments and communities, even though concerned with proper and adequate protection and conservation of the natural beauties and resources of the park, must evaluate the intended establishment of this wilderness area proposal most cautiously, because of the critical nature of energy and resource needs of the area, and

WHEREAS, wilderness area designation when approved restricts use of resources from and within the Park even more than under its status as a National Park,

NOW, THEREFORE, BE IT RESOLVED, by the Five County Association of Governments convened at St. George, Utah this 7th. day of December, 1973, consisting of elected officials of the cities, counties and school districts of Washington, Iron, Beaver, Garfield, and Kane Counties, that they hereby formally go on record to oppose the designation of Zion National Park as a Wilderness Area for the following reasons:

1. The National Park Service presently maintains direct control of the land and its use within the boundaries of the Park. Inasmuch as designation of the proposed land area within the Park as wilderness area will place it in a status requiring Congressional approval for use, present and future conditions relating to resource needs in this area indicate that this designation

should not be given further consideration at least until comprehensive land use planning is accomplished for the geographical areas which surround the Park, within the State of Utah.

2. According to the Environmental Impact study related to the wilderness area proposal, 4,117 acres of the Park are presently impacted by grazing rights. Three grazing rights involve, (one a life tenure, the other two term tenures) approximately 1,108 animal unit months. Even though these grazing rights are not presently on land area proposed for Wilderness Area designation, future expansion of the wilderness area in the Park could directly impact these grazing rights.

3. Mineral rights are held on lands within the Park boundaries, some of which are on land proposed for designation as wilderness areas, others on lands which could be designated in the future. Impact of the loss of use of these rights is not clearly known because, as suggested by the Impact Study, comprehensive mineral exploration of these areas has not been completed.

4. The Impact Study indicates approximately six water rights application areas exist within the boundaries of the Park. These areas do not exist on the lands which it is proposed be designated as wilderness area. Future expansion of the designation, however, could impact water rights and water use. Availability and use of water is and will continue to be vital to the communities and area surrounding the Park. Any action which will further restrict these communities and land owners from present or justified expanded use of this vital resource must necessarily be opposed.

5. Total restriction of further access and right-of-way routes development into and through the Park could have negative impact in the future on tourist use of the Park. Rather than preserving specific areas for future benefit, restricting road and path development could eliminate or restrict a large portion of the tourists who visit the Park, having full access to its scenic natural resources.

6. Designation of Wilderness Areas such as this tends to "lock up" large land areas to potential multiple use. The concept of multiple use of the land has been and remains basic to effective land use in the

This area is dependent on use of resources which exist on or come from Federal and State-owned land, which encompasses the great percentage of land mass in the Five County area. Future existence and progress of this area is greatly dependent on the objective planning and development of land use, and must necessarily include consideration of resources which are part of the Federal and State-owned lands.

The present emphasis on wilderness area designations by the Federal Government could negatively impact future best use of the land to meet the needs of people and communities in this area. Environmental and Energy related pressures, now, more than ever, demand cautions development of conservation and protection programs until such time as they may be accomplished as part of a comprehensive Land Use planning and development effort.

Thank you very much.

MR. WARREN HAMILTON, President of the Springdale Town Board: Thank you, Mr. Davis, Hearing Officer -- Ladies and Gentlemen:

I have a statement here from the town of Springdale which is--you know, is just outside the boundary of Zion National Park.

The statement says: The three areas being proposed for wilderness within Zion National Park have been reviewed in the wilderness study by the town board of Springdale.

The town board concurs with the recommendations of the National Park Service in the overall proposal to propose some 119,200 acres within the park as roadless area, without any development other than those permitted in a wilderness.

The Board is of the opinion that the increase in population and consequent increase in the use of Federal lands points up the need to preserve certain portions of National Parks and National Forests as wilderness areas.

Certainly there are very many spectacular areas of Zion National Park containing outstanding natural features that deserve to be retained in an undeveloped state.

The water rights of the town, dating back to 1925, as mentioned on Page 14 of the Environmental Statement, are of vital importance as the major source of domestic water for the community. Any alternate source would be prohibitive in cost for a small town of this size.

There are numerous facilities, such as motels, restaurants, service stations, stores, and so forth, which serve the public visiting the park. Some are open during the off-season when the concessioner in the park is closed. These facilities are of benefit to the public coming to visit the park, and this benefit will increase soon when overnight accommodations are anticipated to be phased out in the park.

The Board, therefore, strongly believes that the retention of these water rights are essential to the welfare of the town.

Signed, the Board of Trustees of Springdale.

MAXINE SMITH, RECORDER
CLARA C. COTTAM, TREASURER
JOHN W. PALMER, ATTORNEY
ANDREW R. PRICE, ENGINEER
JOE HUTCHINGS, CHIEF OF POLICE
RUDGER M. MCARTHUR, OFFICE MANAGER
MICHAEL R. EMBLEY, PUBLIC WORKS



MARION H. BOWLER, MAYOR
COUNCILMEN
BARNARD H. SEEGMILLER
ELDON MCARTHUR
WALTER S. BROOKS
NEAL M. LUNDBERG
JOHN F. WHITNEY

January 7, 1974

Mr. Rogers C. B. Morton, Director
Department of the Interior
% Mr. Robert C. Heyder, Superintendent
Zions National Park
Springdale, Utah 84767

Dear Sir:

Pursuant to the Wilderness Hearing held in the Visitor's Center, Zions National Park at 10:00 a.m. December 12, 1973, the City Council of the City of St. George want to categorically go on record as opposing the wilderness proposal for Zions National Park for the reasons as stated in brief in the attached resolution.

It is the City Council's belief that more will be gained and less lost if another public hearing is now scheduled to allow us greater opportunity to express our oppositions to your proposed plan, which if adopted as now indicated will be in direct conflict with what we believe to be the best interests of the citizens of Southern Utah.

We have caused a copy of this letter and the accompanying resolution to be sent to Utah Senators and Congressmen in Washington, D.C., and hope you give our request your first consideration.

Sincerely,

N. M. Lundberg
N. M. Lundberg, Mayor
City of St. George

DMD:ms

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ST. GEORGE, UTAH, STATING THEIR OPPOSITION TO THE PROPOSAL OF THE DEPARTMENT OF THE INTERIOR TO DESIGNATE ADDITIONAL AREAS IN ZIONS NATIONAL PARK AS WILDERNESS AREAS.

WHEREAS, tourism is one of Southern Utah's major industries and

WHEREAS, Zions National Park is adjacent to our City and has enjoyed visitors approximating 100,000 people this past year and,

WHEREAS, these people are of immense economic benefit to our entire area and,

WHEREAS, designating 90 percent of Zions Park as a wilderness area would be discriminatory in that only those persons who are able to "back pack" and hike into the excluded area would be able to enjoy its beauty and,

WHEREAS, communities in this area are dependent upon the Zions Park area for water supplies, grazing for animals and access to private properties.

NOW THEREFORE BE IT RESOLVED that the St. George, Utah City Council is officially opposed to any such change in the Zions Park planning as proposed by the Department of the Interior and shall cause a copy of this resolution to be sent to all Utah Senators and Congressmen in Washington, D.C. expressing these views.

Passed and adopted unanimously on motion by Councilman Walter Brooks seconded by Councilman Phil Squire, this 7th day of January, 1974.

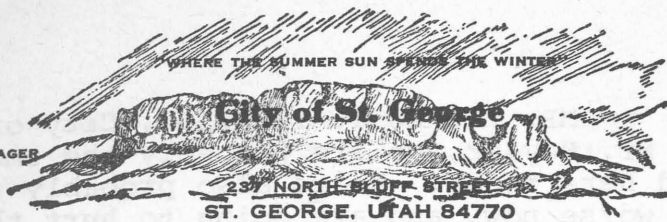
Signed:

W. M. Lundberg
W. M. Lundberg

Attest:

Maxine Smith
Maxine Smith, Recorder

MAXINE SMITH, RECORDER
CLARA C. COTTAM, TREASURER
JOHN W. PALMER, ATTORNEY
ANDREW R. PRICE, ENGINEER
JOE HUTCHINGS, CHIEF OF POLICE
RUDGER M. MCARTHUR, OFFICE MANAGER
MICHAEL R. EMBLEY, PUBLIC WORKS



MARION H. BOWLER, MAYOR
COUNCILMEN
BARNARD H. SEEGMILLER
ELDON MCARTHUR
WALTER S. BROOKS
NEAL M. LUNDBERG
JOHN F. WHITNEY

January 8, 1974

To: Hearing Officer
% Robert C. Heyder, Superintendent
Zion National Park
Springdale, Utah 84767

Dear Sir:

We have reviewed with great concern the information submitted by the United States Park Service concerning the proposed Wilderness Area in Zion National Park.

As you are fully aware a great majority of the high elevation drainage of the Virgin River is on public domain much of which is encompassed in the proposed Wilderness acreage. We participate with the Washington County Conservancy District, Washington County Commission, Santa Clara River Water Users and the Lower Gunlock Reservoir Corporation in sponsoring and developing water in the Washington County area. The City of St. George, through its municipal water collection and distribution system, furnishes water to the towns of St. George, Santa Clara, Ivins, Washington, Bloomington and Bloomington Hills and must rely on all available sources of supply to meet these various requirements.

The St. George City Utility Commission views as disastrous any setting apart of a Wilderness Area on this water shed.

The water potential of the Virgin River has not been utilized and is the only remaining source of water in Washington County to meet our projected population growth. By the year 1990 the domestic requirements from the Virgin River drainage will be an estimated 45 cfs. The total potable water utilized from this source at this time is 5 cfs and the supply to meet the projected requirements must come from the Virgin River drainage.

If you in fact create this proposed Wilderness area you will destroy our ability to develop much needed water and limit if not stop the growth of the Washington County area.

We are contacting our Congressional Delegates and will insist that they oppose this Wilderness Area as being detrimental to the best interests of a majority of the people of our County, State and Nation.

Respectfully,

UTILITY COMMISSION

By *Rudger M. McArthur*
Rudger M. McArthur
Director of Utilities

MR. THOMAS T. THOMPSON, City of Virgin:
Mr. Davis, Mr. Heyder, we are probably the smallest town represented here today. We're also probably the one that is hurting worse now, and are going to hurt the worst if this is followed through, this proposition, at the present time at least, because of the water situation.

The first gentleman to speak said practically everything that I had to say when he said that all of our water is locked up in the country that is to be covered by the wilderness area, and once that is made a wilderness area, we'll never get water out.

Now, you may know that we have at this time a problem, if you wish to put it that way, with the Park Service, attempting to get water out of a very deep narrow canyon, where we would have to run a pipe approximately two and a half miles, and we can't--so far it is "no; no; no", right up the line. If it ever gets into wilderness, we know we're never going to get a "yes".

They speak of all the tourists we're going to have, the people that are going to come and make use of these facilities, but there aren't going to be any facilities. These young people can put packs on their backs and take off for twenty miles, and there's an awful lot of people that come up here--and I have a small business in Virgin, I see them, I talk to them--and I repeat myself, there are an awful lot of people that come up here of my age who can't go up there and hike that ten or fifteen, twenty and thirty miles to get to a rest room.

I see no allowances made for camping areas. There will be no access to this country whatsoever, so far as I can see. I'll stand corrected, if I am wrong on that statement.

But, there were campgrounds back up in there--I believe we should save the country to what extent we can, but not close it off entirely.

We do have the oil situation. Of course, with--when I first came to Virgin, around thirty years ago, I think they were real excited about the oil fields at that time, and a good many years before. I'm not getting excited again, but they're drilling again.

But, suppose under this energy crisis they did cut oil there, if you were in a wilderness area you couldn't touch it.

So, I believe we're premature, basically. Something might be worked out, I don't know--but you have taken all our economy in a wilderness area by taking away our cattle, grazing. There will be no more sheep up there, no dry farming.

The way it's deteriorated over the years-- I think in 1930, if I remember correctly, Virgin was incorporated with 300 people. The last census they had 119, and I'm afraid you'd have to count cats and dogs to get that many today, because every time we have a marriage--and the kids are growing up and getting married--they have to leave town because we don't have the facilities--we have no industry and we have nothing to replace what's being taken away from us.

But, basically, as I say, the gentleman who spoke first here brought out all these points.

I'm merely repeating what he had to say.

I'll take no more of your time on this.

Thank you for listening.

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