

CONSERVATION HIGHLIGHTS OF THE SAN RAFAEL SWELL AND LABYRINTH CANYON

Essential Improvements to the Emery County
Public Land Management Act of 2018

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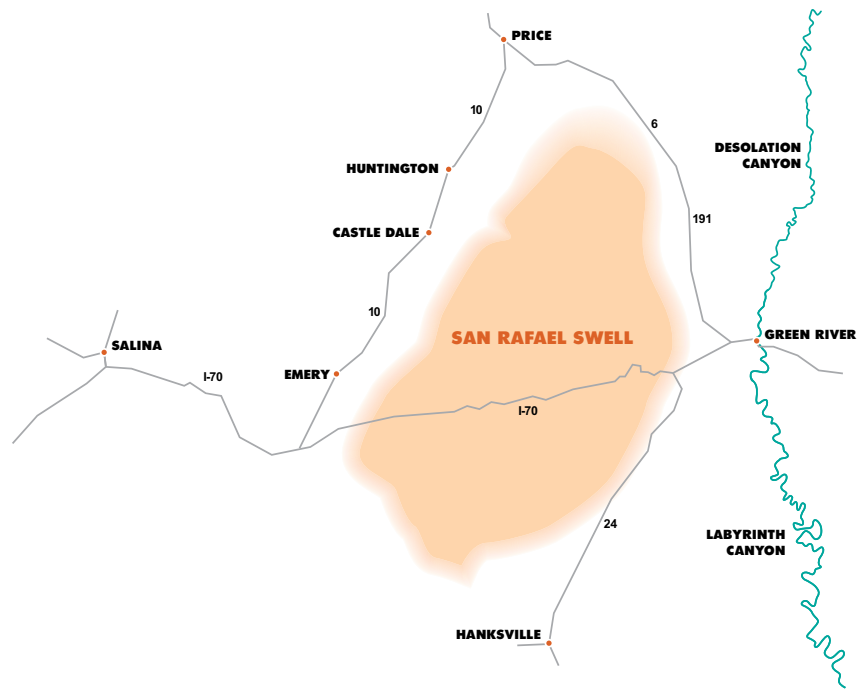
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Introduction

Between the Utah towns of Salina and Green River, Interstate 70 cuts through a great dome of uplifted sedimentary rock called the San Rafael Swell. Fifty miles long and thirty miles wide, the Swell rises 1,500 feet above the surrounding desert, forming one of the scenic and geological wonders of the world.

To the east, the Green River sinks gently into the land, winding for 50 miles through a series of “bowknot” curves before entering Canyonlands National Park. This is Labyrinth Canyon, one of the last great stretches of wild river in the West.

While this landscape has been the subject of proposed legislation for the past 50 years, legislation has never risen to a level worthy of places like Labyrinth Canyon, Muddy Creek and the San Rafael Badlands. Now, Utah Senator Orrin Hatch and Representative John Curtis have once again introduced legislation for these areas. And once again, that legislation fails to protect the world-class wilderness of the San Rafael Swell and Labyrinth Canyon. So far, the Utah delegation has refused to compromise on a one-sided wilderness proposal drummed up by local politicians—a proposal that omits Wilderness designation for more than 900,000 acres that deserve protection.

The boundaries of what would be designated as Wilderness by the legislation are absurd. For example:

- Only one side of Labyrinth Canyon would be protected, and the portion that would be designated is pitifully small.
- The largest intact wilderness in the Swell—Muddy Creek—would be chopped down in size by cutting it up with off-road vehicle routes.
- None of the western Swell Badlands—Molen Reef, Upper Muddy Creek, Cedar Mountain and similar places—would be given any protection at all.
- Wilderness Study Areas (WSAs) would be released in the Sids Mountain region to ensure that off-road vehicle use in those canyons would be perpetuated.

While the main failure of this bill would be the lack of protection for the Swell’s iconic wilderness landscapes, the bill also includes other poison pills:

- Undermines a settlement reached by conservationists, the Trump administration, and off-road vehicle advocates that resolved nearly ten years of federal court litigation by requiring new travel plans for the San Rafael area, based on conservation values. The bill takes the unprecedented approach of excluding all motorized routes from the NCA and Wilderness areas, effectively ensuring that they will remain open in perpetuity. This includes the illegal travel plan routes and additional motorized routes and trails sought by Emery County.

- Hands over control of the southern San Rafael Reef—including areas such as Chute and Crack Canyons—to the State of Utah, which will charge the public for visiting their public lands, with proceeds given to the state or Emery County.

- Allows Utah politicians to continue their litigation against the United States to force off-road vehicles trails into the same lands designated as Wilderness by the bill.

- Removes WSA protection to allow for coal mining.

Simply stated, there is little or no conservation gain in this bill. In fact, this bill wouldn’t close a single off-road vehicle route. No lands that are threatened by leasing would be closed to leasing. We understand that part of the intention of the bill is, in fact, to prevent future conservation gains.

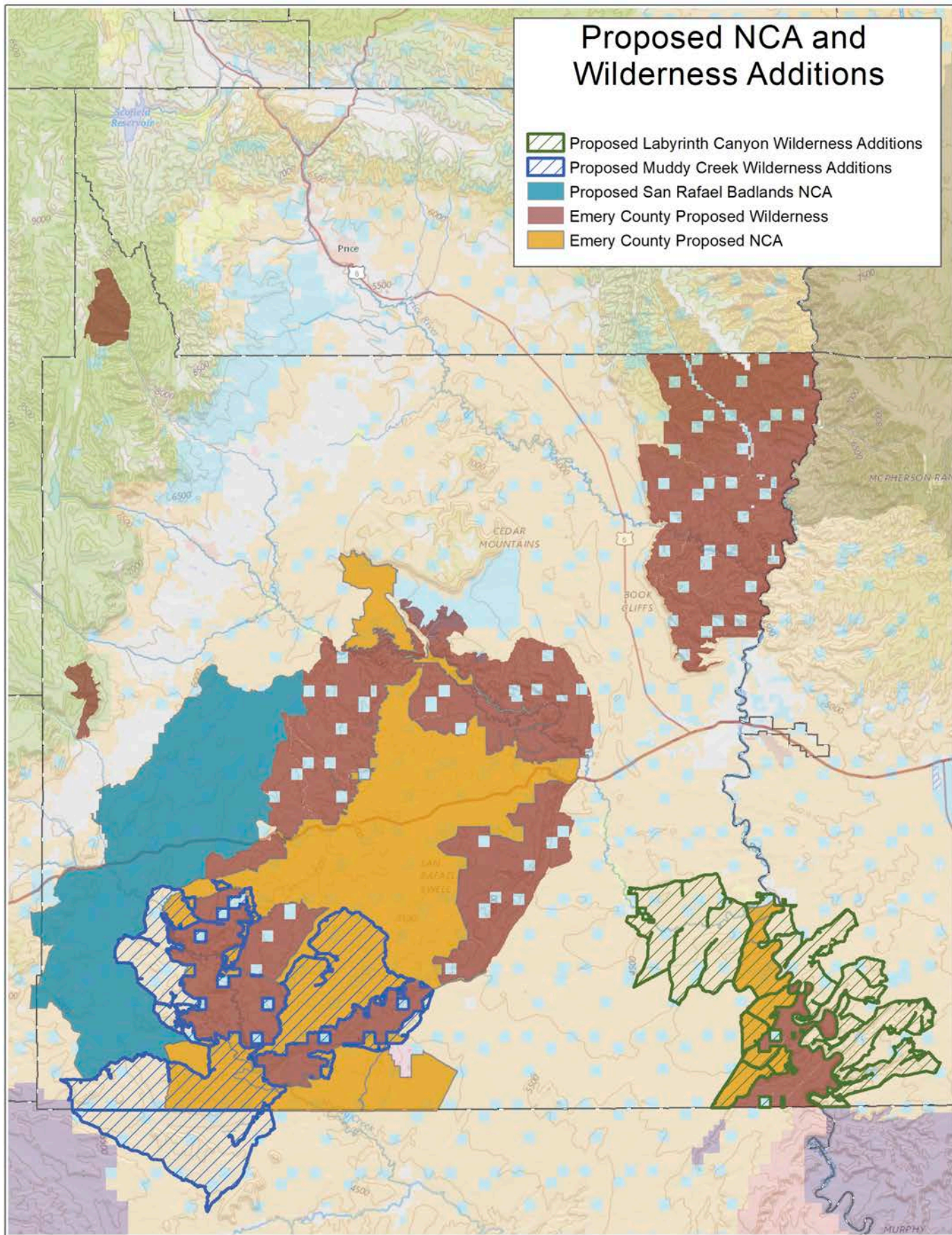
With your help, we can work to improve this legislation to a point that ensures that these remarkable, remote, and world-renowned landscapes receive the protection they’ve long deserved.

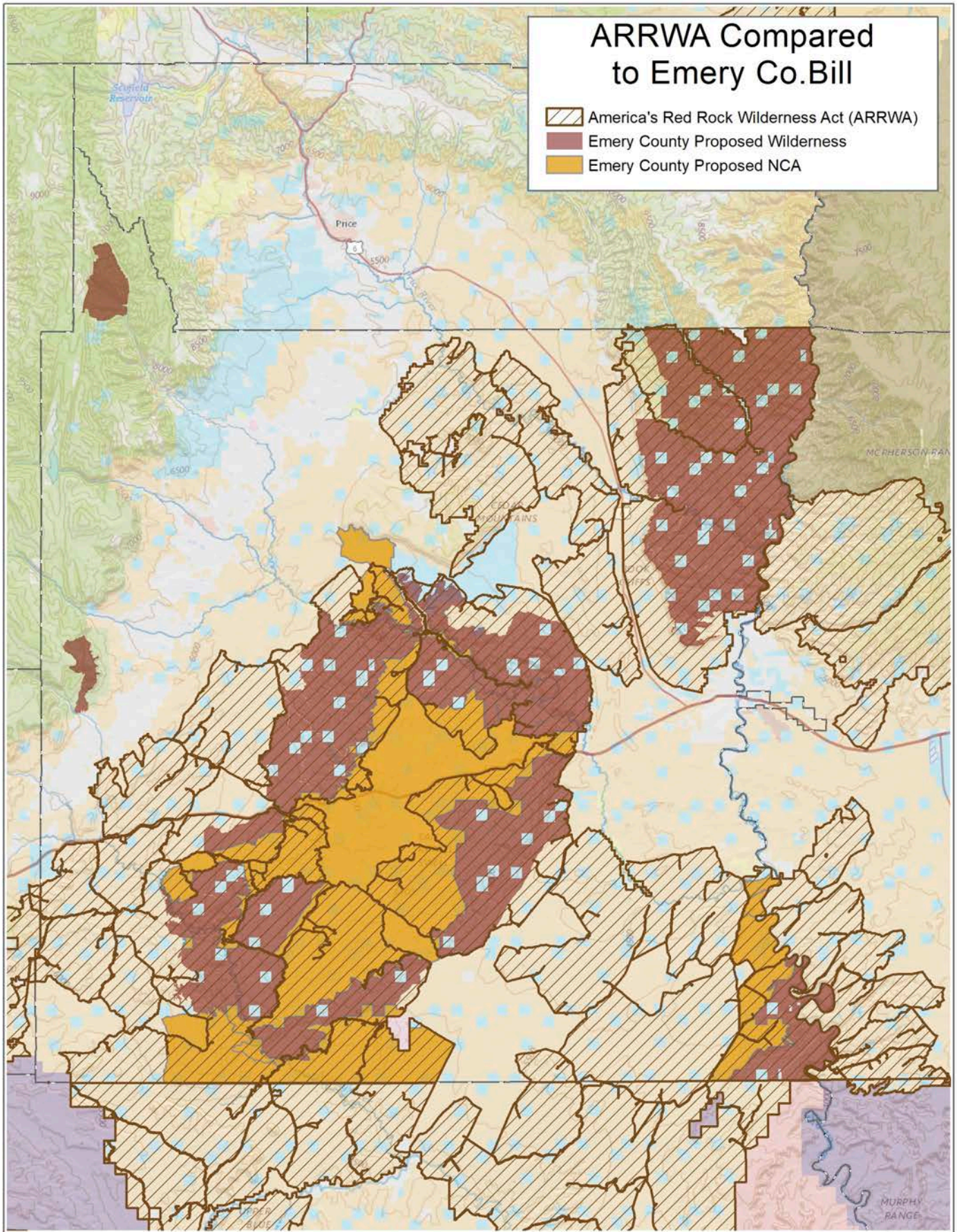
Sincerely,

Scott Groene

Executive Director

Southern Utah Wilderness Alliance





MUDDY CREEK WILDERNESS ADDITION

“THE UTAH DESERTS AND PLATEAUS AND CANYONS ARE NOT A COUNTRY OF BIG RETURNS, BUT A COUNTRY OF SPIRITUAL HEALING, INCOMPARABLE FOR CONTEMPLATION, MEDITATION, SOLITUDE, QUIET, AWE, PEACE OF MIND AND BODY. WE WERE BORN OF WILDERNESS, AND WE RESPOND TO IT MORE THAN WE SOMETIMES REALIZE. WE DEPEND ON IT INCREASINGLY FOR RELIEF FROM THE TERMITE LIFE WE HAVE CREATED. FACTORIES, POWER PLANTS, RESORTS, WE CAN MAKE ANYWHERE. WILDERNESS, ONCE WE HAVE GIVEN IT UP, IS BEYOND OUR RECONSTRUCTION.”

– WALLACE STEGNER, 1990

Highlights

Constituting the southern portion of the San Rafael Swell—and reaching from the interior of the Swell to the northeast corner of Capitol Reef National Park—Muddy Creek is the second largest block of undeveloped BLM land in Utah. With nearly a quarter of a million acres that deserve Wilderness protection, the Muddy Creek landscape represents every landform found in the San Rafael region: 200 million years of geologic history from the Permian Coconino Sandstone to Tertiary igneous intrusions folded and carved into towering mesas; sweeping badlands; impassable reefs; slickrock domes and canyons; and black walls of desert varnish. This remote region provides for extraordinary kayaking, canyoneering, backpacking, day hiking, and car camping trips

Biological Community

Sparse desert shrubs and grasses occur throughout the landscape, with scattered pinyon and juniper trees found in the higher elevation ecotypes. Cottonwood groves occur along many canyon and wash bottoms. Five candidate, one proposed, and two listed threatened or endangered plant species are known within or near the area. Desert bighorn sheep, mule deer, wild horses, gray fox, kit fox, and smaller mammals inhabit the region. Raptors include bald and golden eagles, ferruginous hawks, and rough-legged hawks.

Cultural Resources

Several archaeological sites including rock art and structures are known, but the full extent of cultural resources is unknown. Historic mining and ranching infrastructure exists throughout the area.

Recreation

The rugged and remote terrain offers endless and unforgettable opportunities for solitude and primitive recreation, including hiking, backpacking, canyoneering, kayaking, photography, geologic study, and horseback riding. The Muddy Creek area is internationally renowned for its canyoneering and hiking opportunities, in-

cluding technical and non-technical canyons such as Seger’s Hole, Chimney Canyon, Baptist Draw, Upper Chute Canyon, Lower Squeeze, Seger’s Window Canyon, and The Gorge of Muddy Creek.

Emery County Public Lands Management Act of 2018

The Emery County Public Lands Act of 2018 fails to account for the whole of this wild and contiguous wilderness landscape, and instead proposes to protect only a portion of the larger Muddy Creek area. Of the 239,000-acre Muddy Creek wilderness unit—all of which BLM agrees qualifies as wilderness—the legislation only designates the 30,500-acre Muddy Creek Wilderness Study Area and 8,700 acres of the Muddy Creek Natural Area as Wilderness. Even the proposed NCA for this area stops at the arbitrary southern boundary of Emery County, and fails to account for the contiguous wilderness landscape that continues into Wayne County. In order to give the Muddy Creek region the lasting preservation that it deserves, the legislation must:

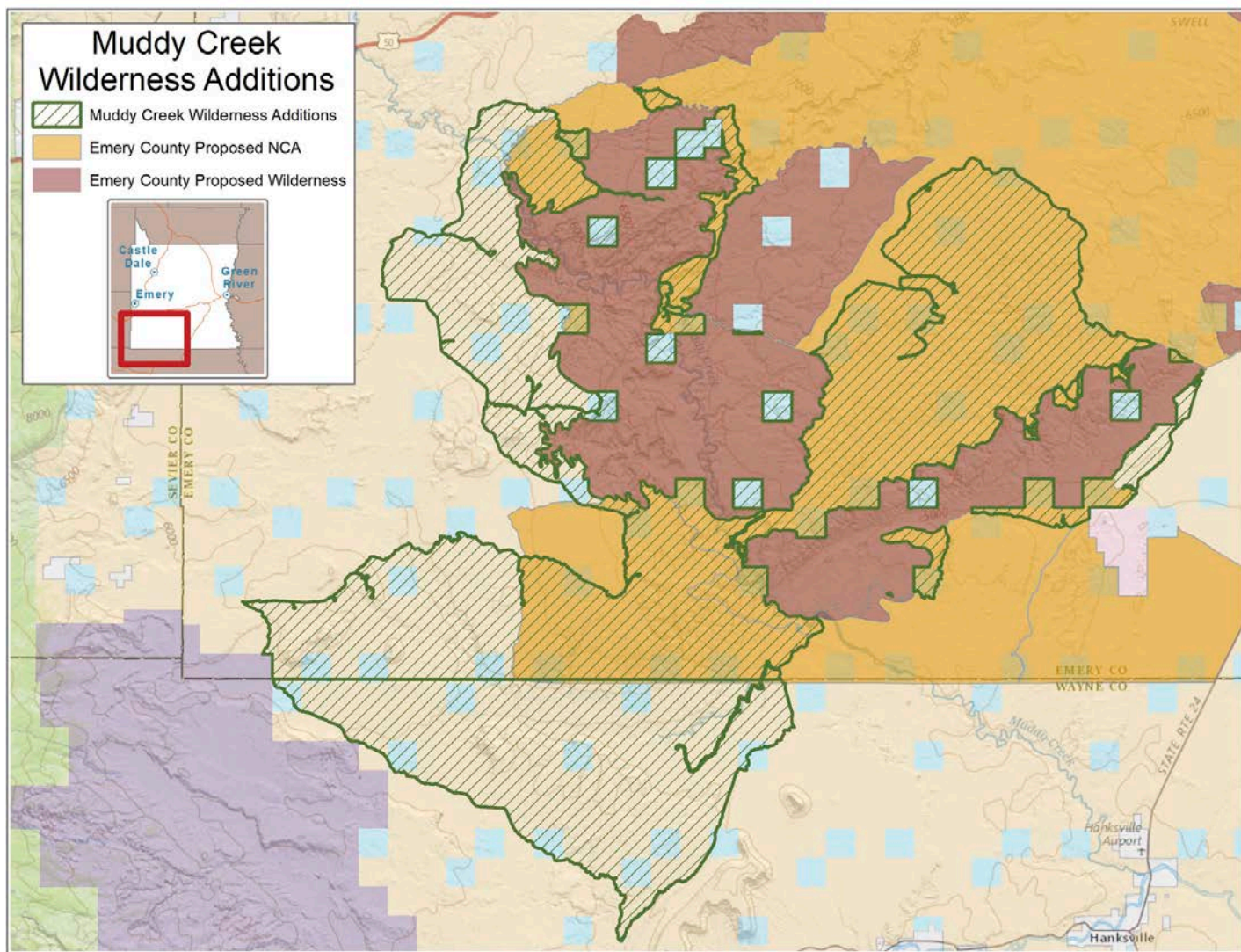
- Designate the entire 239,000-acre Muddy Creek proposed wilderness unit as Wilderness, ensuring that this wilderness treasure is preserved in its entirety and without the presence of habitat fragmenting off-road vehicle routes. This area includes contiguous public lands in both Emery and Wayne Counties (196,000 acres in Emery County and 43,000 acres in Wayne County). The 239,000-acre landscape is a BLM-identified land with wilderness characteristics (LWC), meaning that the agency has determined that it qualifies for wilderness designation under the requirements of the Wilderness Act of 1964. Cutting off protections at an arbitrary political boundary is irrational, creates a difficult management situation, and fails to protect the entirety of this deserving landscape. Compared to the Emery County proposal, protecting the entire Muddy Creek region would add approx. 165,000 acres of designated Wilderness to the legislation (121,625 acres in Emery County and 43,310 acres in Wayne County).

- In protecting the entire Muddy Creek unit as Wilderness, the portion of Muddy Creek that is currently proposed as an NCA by Emery County must also be designated as Wilderness. Failure to do so rolls back existing wilderness protections for the area.

- Permanently close the Behind the Reef motorized route and its spur routes, which bisect and would adversely impact the integrity of the Muddy Creek Wilderness. Wilderness designation would also prevent any future attempt to allow motorized use within the portion of Muddy Creek that cuts through the San Rafael Swell.

Muddy Creek Wilderness Addition / Photo by Ray Bloxham





Muddy Creek Wilderness Addition / Photo by Ray Bloxham



LABYRINTH CANYON WILDERNESS ADDITION

**“THERE IS AN EXQUISITE CHARM
IN OUR RIDE TO-DAY DOWN THIS
BEAUTIFUL CANYON. IT GRADUALLY
GROWS DEEPER WITH EVERY MILE
OF TRAVEL; THE WALLS ARE SYM-
METRICALLY CURVED AND GRANDLY
ARCHED, OF A BEAUTIFUL COLOR,
AND REFLECTED IN THE QUIET
WATERS IN MANY PLACES SO AS
ALMOST TO DECEIVE THE EYE AND
SUGGEST TO THE BEHOLDER THE
THOUGHT THAT HE IS LOOKING
INTO PROFOUND DEPTHS...WE
NAME THIS LABYRINTH CANYON.”**

– JOHN WESLEY POWELL, 1869

Highlights

The Labyrinth Canyon of today differs little from the wilderness landscape described by John Wesley Powell during his famous 1869 expedition down the Green and Colorado Rivers. This world-class stretch of flat water—unbroken by rapids or falls on its 50-mile journey from Red Wash near Trin-Alcove Bend to Canyonlands National Park—offers spectacular opportunities for quiet recreation and sightseeing, provides critical wildlife and plant habitat, and contains a wealth of prehistoric cultural resources. Cutting its way through towering walls of Navajo Sandstone, Labyrinth Canyon’s endless series of “bowknot” curves contain unique riparian habitat and incomparable side canyons—Spring, Hell Roaring, Three, Keg Spring, Horseshoe, Hey Joe, Mineral, and Ten Mile. Recognized the world over for its geological and archaeological wonders and quiet recreation opportunities, Labyrinth Canyon is truly a unique wilderness landscape.

Biological Community

Like its geology, the biological resources of Labyrinth Canyon and its side canyons are rich and diverse. Many species of fish, waterfowl, reptiles, and mammals call this place home. Deer graze among willows along the river, beaver glide across lagoons at the mouth of side canyons, and a dozen species of fish—including the endangered Colorado pikeminnow, bonytail chub, and humpback chub—live in the river. Coyote, bobcat, fox, and desert bighorn sheep roam the side canyons and benchlands. Hawks, vultures, golden eagles, and peregrine falcons share the updrafts, and pronghorn antelope graze among the dunes and slickrock domes found along the canyon rims.

Cultural Resources

Deep in Horseshoe Canyon, a 35-mile-long side canyon of Labyrinth Canyon, lies the Great Gallery, one of the most significant prehistoric rock art sites in North America. Although a 2,500-acre National Park Service unit protects the site, the rest of the canyon—including less well-known pictograph panels—remains unprotected. Elsewhere in the Labyrinth Canyon system, archeologists have discovered human artifacts nearly 9,000 years old. Labyrinth

Canyon is also home to early pioneer sites, historic mines, and engravings from early explorers to the region.

Recreation

With nearly 50 miles of smooth water unbroken by rapids or falls, Labyrinth Canyon is a river runner’s paradise. Cutting a path through Navajo Sandstone on its way towards the confluence with the Green River in Canyonlands National Park, the canyon and its tributaries are riddled with alcoves and caves, natural bridges, and towering cliff faces. River runners enjoy the sight of Navajo Sandstone cliffs gradually rising out the flat-lying deserts as they float down the smooth waters of the Green River. By Trin-Alcove Bend, the cliffs become an imposing barrier to overland travel, although additional access points can be found at Ten Mile, Spring, Hell Roaring, and Horseshoe Canyons. Above the canyons, rolling benchlands culminate in dramatic overlooks of the river. By the time the river reaches Canyonlands National Park, the cliffs of Wingate Sandstone are exposed high above. The side canyons of Spring, Hell Roaring, Three, Keg Spring, Horseshoe, Hey Joe, Mineral, and Ten Mile also provide an array of quiet recreation opportunities. From technical canyoneering routes to daylong hikes in search of swimming holes and hanging gardens, Labyrinth Canyon provides an accessible multi-day wilderness river experience for families, beginners, and experts alike.

Emery County Public Lands Management Act of 2018

While the Emery County Public Lands Management Act of 2018 protects a portion of the western side of Labyrinth Canyon as designated Wilderness, the legislation fails to ensure lasting protection for this entirety of this quiet recreation Eden. Without the clear protection afforded by the Wilderness Act, the wilderness-quality of Labyrinth Canyon will be lost to off-road vehicle abuse and energy development. In order to protect the unparalleled solitude of Labyrinth Canyon for all future generations, the legislation must:

- **Protect the entirety of Labyrinth Canyon and its side canyons within both Emery and Grand Counties as designated Wilder-**

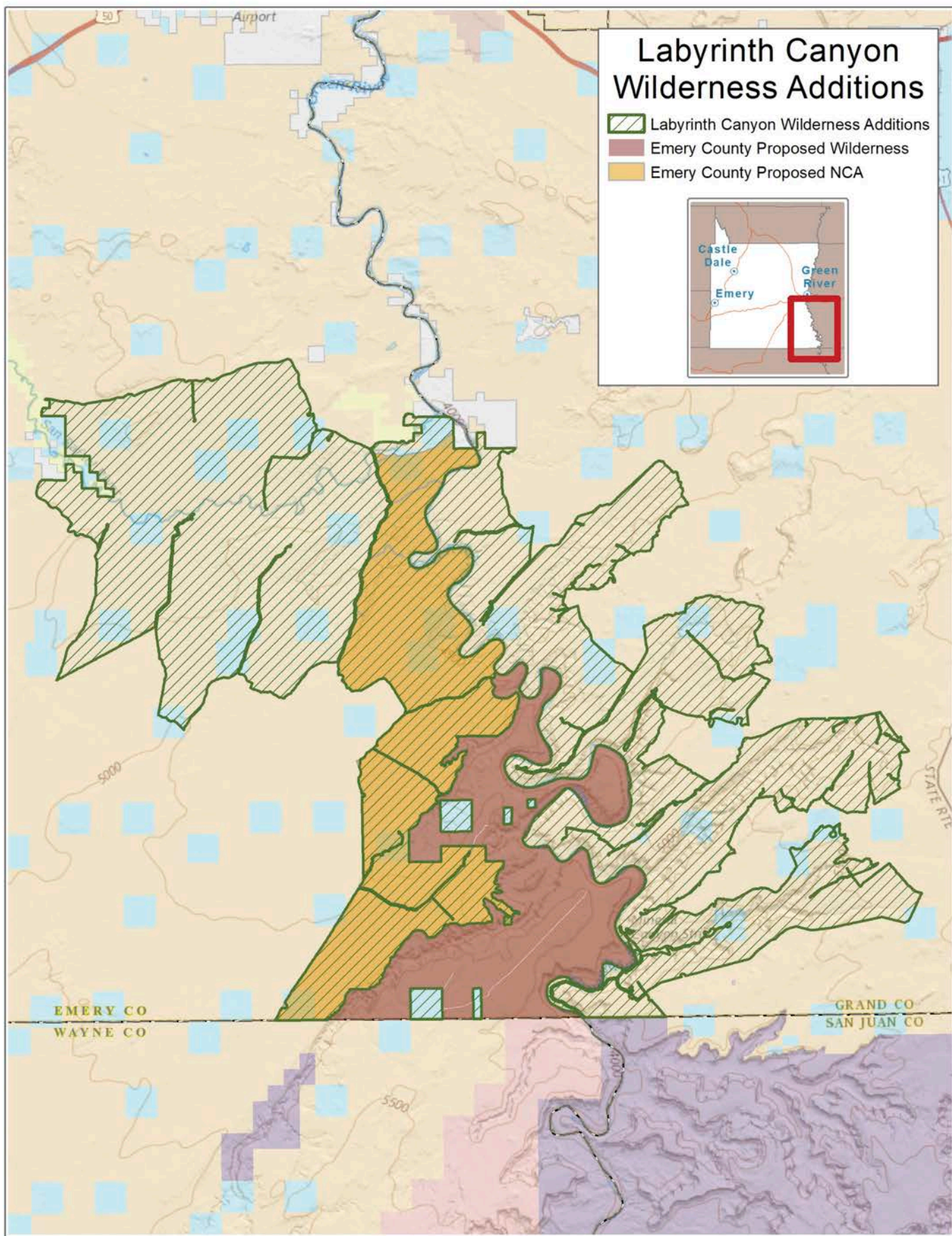
ness—from Red Wash down to Canyonlands National Park. The current proposal, drawn on arbitrary political boundaries, fails to recognize Labyrinth Canyon as one intact landscape—protecting only a fraction of Labyrinth Canyon as designated Wilderness and omitting the eastern side of the canyon system entirely. In order to ensure lasting solitude and wildness within the canyon system, the legislation must protect the eastern side of Labyrinth Canyon and its side canyons (Ten Mile, Spring, Hell Roaring, Hey Joe, and Mineral) as designated Wilderness. The legislation must also designate the western portion that is currently proposed as an NCA by Emery County as Wilderness. Protecting only portions of the western rim of Labyrinth Canyon in Emery County fails to give the canyon system the lasting protection it deserves; makes little sense for conserving the primitive, wilderness river experience; and creates a bizarre and difficult land management situation. Compared to the Emery County proposal, protecting all of Labyrinth Canyon would add approx. 138,000 acres of designated Wilderness to the legislation (92,740 acres in Emery County and 45,025 acres in Grand County).

- Not open currently—closed motorized routes. This includes June's Bottom, which runs from the western rim of Labyrinth Canyon to the river. If opened, the June's Bottom route would allow motorized vehicles into the river corridor, adversely impacting the river's solitude and primitive recreation experience.

- Permanently close all motorized routes along the Green River in Labyrinth Canyon. This includes the Hey Joe, Ten Mile Wash, and Hell Roaring Canyon motorized routes, and the motorcycle routes known as The Tubes and Dead Cow Wash. There are hundreds of motorized trails located elsewhere in this region available for such use; however, there is no alternative to Labyrinth Canyon for quiet river recreation. As designated Wilderness, these areas should be protected from the noise, dust, and pollution from motorized use along the Green River. There is simply no compelling reason to continue allowing motorized use to negatively impact this wilderness treasure.

Labyrinth Canyon Wilderness Addition / Photo © Tom Till





SAN RAFAEL

BADLANDS

NATIONAL

CONSERVATION

AREA

**“WILDERNESS IS NOT A LUXURY
BUT A NECESSITY OF THE HUMAN
SPIRIT, AND AS VITAL TO OUR
LIVES AS WATER AND GOOD
BREAD. A CIVILIZATION WHICH
DESTROYS WHAT LITTLE REMAINS
OF THE WILD, THE SPARE, THE
ORIGINAL, IS CUTTING ITSELF OFF
FROM ITS ORIGINS AND BETRAY-
ING THE PRINCIPLE OF CIVILIZA-
TION ITSELF.”**

— EDWARD ABBEY, 1968

Highlights

The western reach of the San Rafael Swell, known as the San Rafael Badlands, holds a diversity of landscapes rich in cultural resources, scenic vistas, and geologic wonders. Composed of Molen Reef, Eagle Canyon, Rock Canyon, Cedar Mountain, and the Mussentuchit Badlands (pronounced “mustn’t touch it”), this rugged landscape is studded with mesas, buttes, and igneous intrusions painted with a brilliant kaleidoscope of desert colors. Historically drawing hikers and sightseers for its stark and vast beauty, recent discoveries of rock art—in addition to well-known panels—have also increased interest in the area. The area’s abundance of known and yet-to-be-discovered cultural resources, along with recreational opportunities, have caused the Hopi Tribe, along with conservation, recreation, and archeological groups, to challenge oil and gas leasing here in recent years.

Biological Community

A classic badlands ecosystem, occasionally interrupted by the riparian vegetation of Muddy Creek and other springs, sparse desert shrubs and grasses typify the San Rafael Badlands. Two federally listed endangered species of cacti, the San Rafael cactus (*Pediocactus despainii*) and the Winkler’s pincushion cactus (*Pediocactus winkleri*), are found within the Morrison Formation of the San Rafael Badlands.

Cultural Resources

For millennia, humans have occupied and travelled through the San Rafael Badlands, contributing to one of the most significant archaeological and cultural records available to the public. As a whole, this region paints a vivid picture of the First Americans—from plants used for food, medicine, and religious purposes, to culturally-saturated topography marked by rivers, intermittent water sources, migratory routes, and overlooks. The significance of these features is abundantly written in the landscape in the form of rock art, habitation sites, stone working sites, burials, and places in which

grain was stored. As the San Rafael Badlands have never been subject to comprehensive archaeological study, the potential for undiscovered sites is simply stunning. Since 2013, upwards of 250 new and significant cultural sites have been discovered in the Molen Reef area alone. The Hopi Tribe claims cultural affiliation to prehistoric Paleoindian, Archaic, Basketmaker, Anasazi, and Fremont prehistoric cultural groups associated with the San Rafael Badlands, and has actively worked to challenge oil and gas leasing in this region. This area has also been the focus of gypsum mining development.

Recreation

The San Rafael Badlands provide an array of recreational opportunities for the intrepid explorer. Called a “photographer’s heaven” in guidebooks and other publications, the San Rafael Badlands is where the extraordinary 70-mile kayak trip to the Dirty Devil River begins on Muddy Creek, an outstanding desert river that in high water years provides rocky rapids in a setting of incredible scenery and isolation. Constantly changing in form and topography, with hundreds of draws, ravines, and gullies, the challenge becomes finding your way through the maze of such a complex landscape. Whether it’s photography, kayaking, scenic and geologic sightseeing, photography, extended hiking, or study of cultural resources, the San Rafael Badlands provides a stark, adventurous recreational experience unlike that found in many other regions of the desert Southwest.

Emery County Public Lands Management Act of 2018

The Emery County Public Lands Management Act of 2018 fails to protect any the sensitive landscapes of the San Rafael Badlands. In order to protect this remote and rugged cultural and natural treasure, the legislation must:

- Designate the San Rafael Badlands as the “San Rafael Badlands National Conservation Area.” The 200,100-acre National

Conservation Area (NCA) should be designated “to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the cultural, ecological, wildlife, natural, scenic, educational, and scientific resources” of the NCA. The NCA utilizes manageable boundaries—following human impacts or topographic features—and is drawn to ensure that the irreplaceable cultural and natural resources of this region are protected. The NCA should utilize precedential language from the 2009 Washington County legislation.

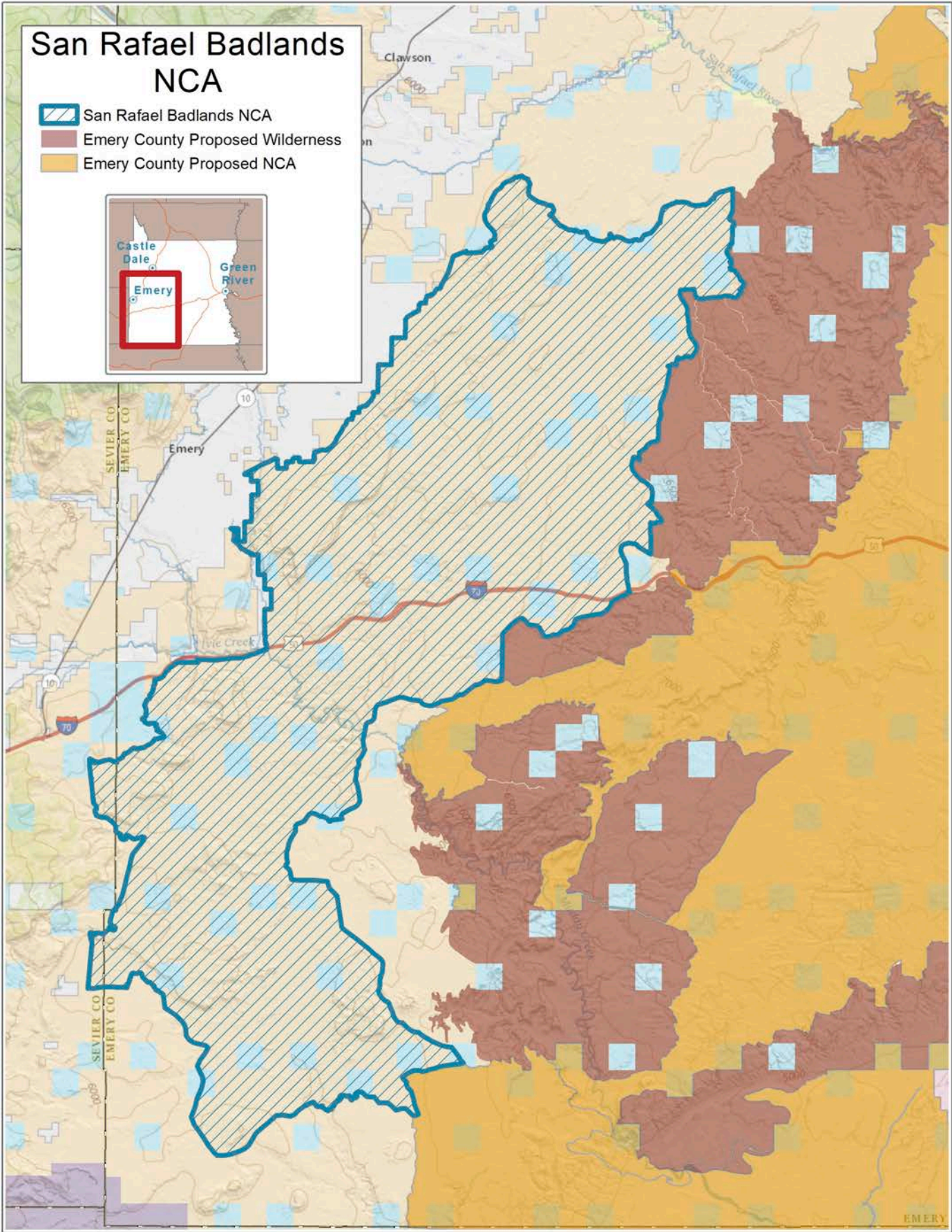
- Include a mineral withdrawal for the entire San Rafael Badlands NCA. A mineral withdrawal will ensure that this culturally-sensitive region is protected from oil, gas, and mining development.

San Rafael Badlands NCA / Photo by Ray Bloxham



San Rafael Badlands NCA / Photo by Ray Bloxham





Muddy Creek Wilderness Addition / Photo by Ray Bloxham



Muddy Creek Wilderness Addition / Photo by Ray Bloxham



Labyrinth Canyon Wilderness Addition / Photo by Ray Bloxham



Labyrinth Canyon Wilderness Addition / Photo © Tom Till



San Rafael Badlands NCA / Photo by Ray Bloxham

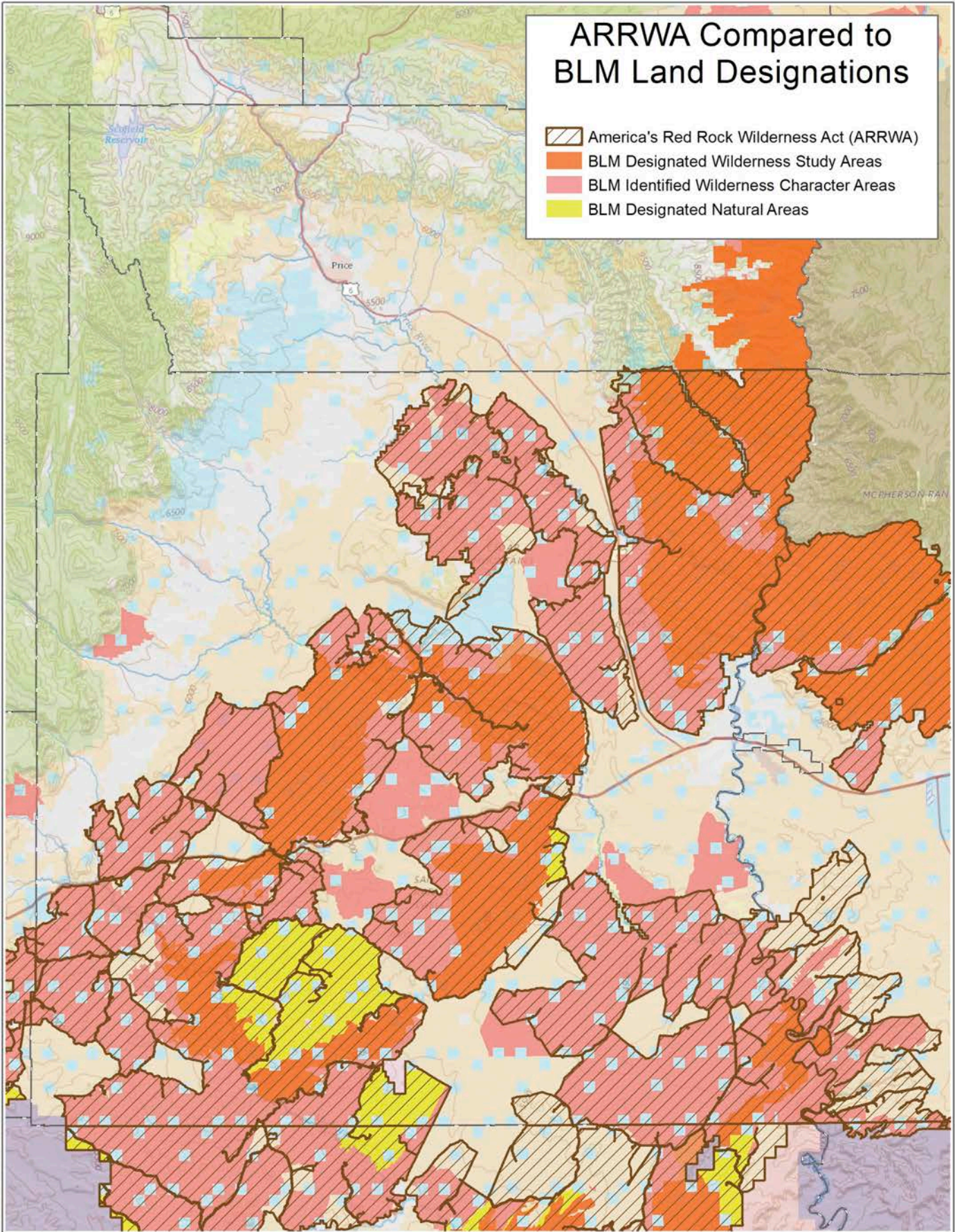


San Rafael Badlands NCA / Photo by Ray Bloxham



ARRWA Compared to BLM Land Designations

-  America's Red Rock Wilderness Act (ARRWA)
-  BLM Designated Wilderness Study Areas
-  BLM Identified Wilderness Character Areas
-  BLM Designated Natural Areas







San Rafael Reef / Cover Photo by Bill Church

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