

DEPARTMENT OF THE INTERIOR

ENVIRONMENTAL STATEMENT

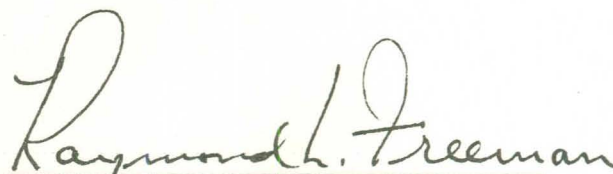
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Proposed
Bryce Canyon Wilderness Area
Bryce Canyon National Park,
Utah

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Prepared by
Bryce Canyon National Park
Midwest Region
National Park Service
Department of the Interior


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Acting Director, National Park Service

JAN 10 1974

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FINAL ENVIRONMENTAL STATEMENT
PROPOSED
BRYCE CANYON WILDERNESS AREA
BRYCE CANYON NATIONAL PARK, UTAH

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Summary

() Draft (X) Final Environmental Statement

Department of the Interior, National Park Service, Midwest Region,
Bryce Canyon National Park, Utah

1. Type of action: () Administrative (X) Legislative

2. Brief description of action: This legislative action proposes to establish a wilderness area, in three units, in accordance with the Wilderness Act of 1964, of 16,303 acres within Bryce Canyon National Park. This proposed wilderness lies approximately 2/3 within Garfield and 1/3 within Kane Counties of the State of Utah.

3. Summary of environmental impact and adverse environmental effects: Environmental impacts are generally found to be more beneficial than detrimental. Some adverse effects will be restrictions on road and recreational development, restrictions on backcountry facilities, increased costs of trail maintenance, restrictions on resource management use, and curtailment of certain research projects. In general these impacts are offset by the favorable environmental effects of the proposed wilderness or they can be minimized.

4. Alternatives considered:

- a. No wilderness classification.
- b. A greater amount as wilderness.

5. Comments have been requested and received* from the following:

Department of Agriculture

*Forest Service

Soil Conservation Service

Department of Commerce

Economic Development Administration

Department of Housing and Urban Development

Land and Facilities Development Administration

Department of the Interior

*Bureau of Mines

Bureau of Land Management

*Bureau of Outdoor Recreation

*Bureau of Reclamation

*Bureau of Sport Fisheries and Wildlife

*Geological Survey

Department of Transportation

*Office of the Secretary of Transportation

*Federal Highway Administration

Federal Power Commission

Water Resources Council

State of Utah

State Clearinghouse

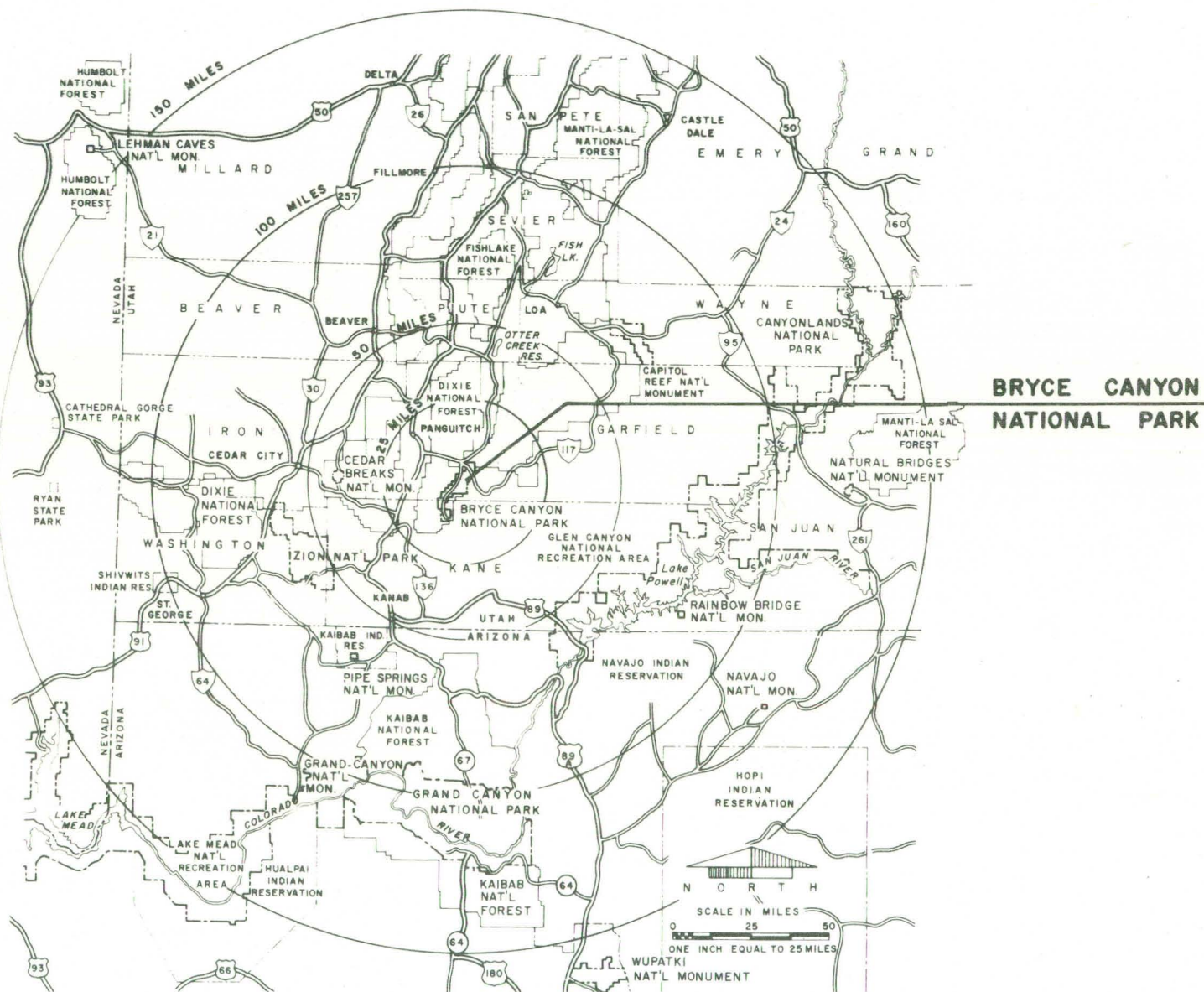
*State Liaison Officer for Historic Preservation

Town of Tropic, Utah

6. Date statement made available to CEQ and the public:

Draft statement: January 27, 1972

Final statement: JAN 10 1974



I. DESCRIPTION OF PROPOSED ACTION

The Department of the Interior proposal for designation of certain lands within Bryce Canyon National Park delineated and described in detail in a document entitled Wilderness Recommendation - Bryce Canyon National Park, Utah, published October 1971 by the National Park Service, United States Department of the Interior. A revision of the original proposal, based on comments of other agencies, organizations, and individuals was approved by the Director of the National Park Service in April 1971. This study and the recommendations contained therein is in response to Public Law 88-577 of September 3, 1964, establishing a National Preservation System. In accordance with "...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 recommendations as to the suitability or nonsuitability of each such area...for preservation as wilderness."

A total of 24,275 acres of roadless lands in Bryce Canyon were studied for wilderness suitability.

The proposal for Bryce Canyon National Park recommends establishment of 45% of the park's acreage as wilderness, for a total of 16,303.38 acres so designated. Total acreage of the park is 36,010.38. For the most part, the wilderness is located below and to the east of the plateau rim. Elevations range from 6,850 feet on Yellow Creek near the east boundary to over 9,100 feet near Rainbow Point. All of the great amphitheaters, Boat Mesa, and most of the Promontory are included as wilderness. The proposed wilderness is divided into three separate units comprised as follows:

Unit 1	2,632
Unit 2	6,280
Unit 3	7,391

Units 1 and 2 are separated by the Campbell Canyon Stock driveway and Units 2 and 3 are separated by the Sheep Creek Stock driveway. These two driveways reflect the commitments made by the National Park Service to the Forest Service prior to the enlargement of the park by Presidential Proclamation (46 Stat. 3043) as authorized by the Act of Congress of June 13, 1930 (46 Stat. 582) and other related management relationships between the two agencies concerning Bryce Canyon National Park. These commitments are to be found in the Memorandum of Understanding of December 4, 1930. On June 24, 1972, the Department of the Interior promulgated new administrative policy guidelines which provide that stock driveways may be included in wilderness areas as long as motor vehicles are not used. Thus, such stock driveways are included within wilderness proposals prepared since that date.

The wilderness recommendation for Bryce Canyon also excluded a 1/8 mile wide management zone along the east and south boundaries of the park. The new administrative policy guidelines which provide that ... "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." Thus, the management zone has been deleted from all wilderness proposals prepared since the above date.

Alternatives B, C and E, described on pages 28-31 of this statement, specifically consider the addition of the management zone area to the recommended wilderness. Alternatives E and F consider specific additions to the recommended wilderness which extend to the park boundary with no management zone provided.

An area along the park boundary south of Bryce Point was not recommended for wilderness designation because of a National Park Service soil and moisture control program involving earth and log checkdams and reseeding projects. Maintenance of these projects requires the use of heavy mechanical equipment. Equipment must also be used to repair damage to the project works caused by flash floods. While some of the damage caused by sheep grazing in past years has been repaired, the project is to continue until natural conditions are restored and the time period which will be required is presently not known. All grazing within the park was terminated in 1962.

Another area at the eastern or lower end of Campbell Canyon was excluded because it contains a water supply system serving the town of Tropic, Utah located about two miles east of the park. This development consists of wells, pumps, and water lines. In the southeastern corner of the park the area around Riggs Springs was excluded because of another water supply system. Here, the water is collected and carried by pipeline outside of the park for domestic livestock watering as provided for in the above mentioned Memorandum of Understanding.

Accepted tools, equipment, structures and practices may include 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 for protection of wilderness values aircraft motorboats, or motorized vehicles may be used.

An example of a wilderness campsite that could be included is one having a pit toilet and fire rings made of natural material and tent

sites. A hand operated pump may be allowed. This kind of campsite is not considered a permanent installation and could be removed or relocated as management needs dictate.

Present use of the backcountry is minor; in 1972, only 594 visitors registered for backpacking and camping. Most of the visitation was during the summer months of peak visitation to the park. Some 43 miles of trail exist in the park, most of which is in the proposed wilderness. No additional trails are proposed.

Dixie National Forest and Bureau of Land Management lands surround the park, except for a few small tracts of private land. Neither agency has plans at present to place any of their lands adjacent to the park into wilderness classification.

A public hearing on the proposal to establish a wilderness area within Bryce Canyon National Park was held in Panguitch, Utah on December 11, 1967. The majority of responses received recommended enlargement of the National Park Service proposal by adding portions of the park which were excluded for water system developments and those portions bisected by telephone and electric power lines, a state highway, and stock driveways.

II. DESCRIPTION OF THE ENVIRONMENT

General

The park is located in Southern Utah and is the salient geological feature of the Paunsaugunt Plateau as expressed by the dynamic forces of natural erosion. This erosion has exposed an area of highly colored and sculptured sandstone and limestone. The outstanding feature of this national park is a system of multi-colored natural limestone amphitheaters. There are more than ten amphitheaters (the count varies with individuals making it) which have been cut into the Paunsaugunt Plateau. Their color ranges from white through red in a variety of hues. Each of the amphitheaters has a wide variety of sculptured rock forms resembling miniature cities, cathedrals, spires, bridges in an almost endless number of architectural themes. Iron, manganese and other minerals provide the coloring matter. This process of erosion, still an active dynamic natural force, is considered by many to be one of the greatest examples of river piracy active in the world today.

Elevations of 8000 to 9000 feet are common along the rim of the Paunsaugunt Plateau. However, the plateau breaks off abruptly to the east and south in a series of steep walls and slopes. There is great contrast between the precipitous and colorful lowlands along the eastern flank of the park and the timbered hillsides and tablelands to the west. The lowest point in the park is where Yellow Creek crosses the park boundary at an elevation of 6580 feet. Other than along short sections of Yellow Creek, there are no perennial streams in the park.

Neither the Geological Survey nor the Bureau of Mines have made a mineral survey of the area, but based on the geological information on the area mineral resource potential is minimal in Bryce Canyon. Coal deposits are found in the general area of the park, however.

Climate

The park climate varies between a record high of 90 degrees F. and -26 degrees F. below in the winter. Frequent thunderstorms occur during the summer months; snow depths in the winter occasionally reach a depth of eight to ten feet. Annual precipitation is about 16.5 inches.

Flora

The park ecosystem consists of plant and animal communities which range from the Upper Sonoran at 6600 feet elevation into the Canadian life zone at 9100 feet. Three major forest types are represented.

At low elevations pinyon pine and sagebrush predominate, on the plateau are open stands of ponderosa pine, and at the higher regions are the spruce-fir aspen forests. Considerable overlapping exists. Due to sheep grazing damage in past years, the National Park Service is conducting a soil and moisture control program involving earth and log checkdams, reseeding projects, and fencing south of Yellow Creek. All grazing within the park has been terminated since 1962.

The lowest forest type, the pinyon-juniper forest, is most readily seen adjacent to Highway 89 on the drive into Bryce Canyon. Since trees are usually not as tall as those found on the higher and wetter plateaus, the name "pygmy forest" is sometimes applied to those wooded areas. They are characterized by low rainfall and an elevation range between 5000 and 7000 feet. Common species include the Utah juniper, pinyon pine, and sagebrush. Gambel oak is abundant on the lower, shaded slopes of the hills.

Between 7000 and 8500 feet, just below and above the rim in the Bryce Amphitheater area, the ponderosa pine is abundant in open stands. Limber pine, bristlecone pine, Douglas-fir, and Rocky Mountain juniper are also present. Manzanita and antelope bitterbrush cover the forest floor. The open valleys between the forested slopes are covered with black sagebrush, rabbitbrush, and grasses.

In the southern part of the park, above 8500 feet, are dense forests of white fir, blue spruce, and quaking aspen. Toward Rainbow Point, however, the common tree is Douglas-fir. On windswept slopes of these high elevations are scattered individuals of bristlecone pines.

Between the shrubs and trees are the fragile wildflowers. Some of the species found on the slopes below the red-rock formations are the blue columbine, twinpod, and goldenweed. The yellow evening-primrose, blue flax, painted cup, skyrocket gilia, western yarrow, blue penstemon, and segolily mariposa are more abundant on the plateau.

Fauna

Many varieties of wildlife exist within the park, but none are significant. Principal species include mule deer, gray fox, bobcat, squirrels, chipmunks and other small rodents. Seen occasionally is the cougar. Due to the long, narrow boundaries of the park, resident populations of large mammals are not found inside. The Rocky Mountain mule deer is the largest animal found at Bryce Canyon. They are often seen in early morning or dusk as they browse the meadows. No special problems of wildlife populations exist within the proposed wilderness; no endangered species are involved.

Among the common birds found in the park are the Steller's jay, Clark's nutcracker, pigmy nuthatch, white-breasted nuthatch, mountain chickadee, gray-headed junco, hairy woodpecker, and the red cross-bill. In summertime, the western tanager is among the more colorful visitors. At the cliff face are the white-throated swifts and violet-green swallows.

History

Probably the first people to visit Bryce Canyon were the Basketmakers, a group of Indians who hunted in this country until about A.D. 700. In the Paria River valley below the Pink Cliffs, burials of these people indicate that man was familiar with this area. The Pueblo Indians lived along the tributaries of the Paria, undoubtedly hunting in the area that is now the park. Still later came the Paiutes, a hunting and gathering people. Most of them spent their summers on the plateaus, hunting and trapping animals and gathering herbs, seeds and berries. Since no archeological surveys have been conducted in the park, the story of the Indian in Bryce Canyon is unknown. No surface sites have been discovered.

Trappers visited the locality from 1800 to 1850, and Mormon scouts from 1850-1870. It was Major J. W. Powell that first described Bryce Canyon in the early 1870's. The first Mormon settlers laid out their farms in Paria Valley in 1874; Ebenezer Bryce, for whom the park was named, arrived in 1875 to raise cattle and settled near the end of the amphitheater now known as Bryce Canyon. He became discouraged and in 1880 moved to Arizona.

The small town of Tropic, established in 1891, is one of the early settlements that survived later development in the valley.

Since there are no known historic sites in the park, there are no properties listed on the National Register of Historic Places. An archeological survey of the park, however, will be programmed to determine whether any significant Indian sites exist. As discussed, no surface sites have been discovered inside the park.

Legislative History

In 1905, government surveys resulted in having the Paunsaugunt Plateau set aside as a National Forest. In 1919 the Utah Legislature proposed to the Congress of the United States that the canyon be set aside as a national monument.

Bryce Canyon was established as a national monument by Presidential Proclamation (43 Stat. 1914) on June 8, 1923. Its status was changed to that of a National Park by an Act of Congress (43 Stat. 593) on

June 7, 1924. This act also changed the name of the area to that of Utah National Park. The area of the park was enlarged and its name changed to Bryce Canyon National Park by an Act of Congress (45 Stat. 147) on February 25, 1928, and was officially established on September 15, 1928. An Act of Congress (45 Stat. 520) on May 12, 1928 established the legal description of the boundaries. On June 13, 1930, the park was enlarged to include the rim south to Rainbow Point by Act of Congress (45 Stat. 582) and on January 5, 1931, a Presidential Proclamation (46 Stat. 3042) was issued which made changes to the park boundary as authorized by the Act of June 13, 1930. An Act of Congress (46 Stat. 1166) of February 17, 1931, both added and deleted lands from the authorized park boundaries. This was put into effect by a Presidential Proclamation issued (47 Stat. 2455) on May 5, 1931 and on March 7, 1942. Congress established the present boundary descriptions as found in the Act of February 17, 1931, and in the Presidential Proclamation dated May 4, 1931 with an Act (56 Stat. 141).

The organic act of 1928 dedicated and set apart as a public park for the benefit and enjoyment of the people of the nation, and with the expressed purpose of preserving in their natural state the outstanding scenic features held therein. This park, one of the world's most outstanding examples of geologic erosion, is a continuing gift of the natural heritage of this nation for future generations. The geologic formations of Bryce Canyon are directly related to those of Zion and Grand Canyon National Parks in providing the complete story of the geology of this region.

Visitor Use

Visitation in 1972 reached 426,151. The average length of stay, except for overnight visitors in campgrounds and concessioner facilities is from 2-4 hours. Access to the park features is provided by a system of roads to the plateau rim and a series of trails which lead downward through the various amphitheaters. Facilities include a lodge near the rim of Bryce amphitheater. Accommodations at the Lodge are in cabins. An inn and store are located near the North Campground which is just east of the visitor center. Sunset campground is one mile south of the visitor center.

Visitor use for 1972 was as follows:

Concessioner cabins	25,487
Camping - tents	35,347
vehicles	53,439
group	3,980
backcountry	594

Campground capacity is 225 units; the cabin pillow count is 350. The Management Objectives for the park specify that all concessioner overnight accommodations will be phased out in a five year period, beginning in 1973.

Some 43 miles of trail exist in the park, mostly in the proposed wilderness. Backcountry camping totaled 594 visitors in 1972.

Regional Setting

Lands adjacent to the park boundary are about 90% in federal ownership. Of 62 total miles of park boundary, 44 miles are shared with the Dixie National Forest, about 13 miles with the Bureau of Land Management, while five miles border on private land of two ranches. Surrounding land uses include agriculture, grazing, logging and hunting.

On a regional basis, the general economy of the two counties in which the park is located are considered economically depressed. On January 1, 1972 Garfield County had 18.5% of its employable individuals on unemployment and Kane County had 15% in the same situation. During the last ten years Garfield County has had a 16.5% decrease in population, which is a trend which started in 1940. Population in this area, except for that at Cedar City have remained very much the same or have decreased slightly in the past ten years. In 1970, Cedar City, 80 miles west, had a population of 8,946. The nearest towns to the east, Panguitch and Tropic, had populations of 1,318 and 329, respectively. Other neighboring towns, such as Hatch (139) and Orderville (399) have declined in population by as much as 30% in the same period. There are now no economic reasons evident which would cause a reversal.

The present economy of the region is built on lumbering, stock raising, mining and tourist industries. The major problem that the tourist industry presents to the county is that it is highly seasonal and therefore does not present a good economic basis to the region for greater employment of local residents.

Southwestern Utah contains three national parks, a national recreation area, a national monument, two national forests, three State parks, and numerous areas which could possibly be included in the State Park System, along with hundreds of square miles of public domain. All these areas provide a potential for public recreation use. Bryce Canyon is located among these fine areas and its primary access from the north, west, and south is by road from Highway U.S. 89. Travel from the east via Escalante, Utah is now limited, but once all-weather roads are constructed beyond Escalante to Capitol Reef National Park via Boulder Mountain and through the Waterpocket Fold, travel should increase from this direction.

Present overnight facilities outside of the park are found to the north of the park entrance and in the areas of Panguitch, Hatch and Escalante, Utah. These facilities, for the most part, have a capability to expand as demand would warrant.

III. THE ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION

The impacts of establishment of the Bryce Canyon Wilderness would in no way be ecologically detrimental to the environment. As part of the National Park System, the park is dedicated to the preservation of scenic beauty, wilderness, native wildlife, indigenous plant life, geologic features, and areas of scientific significance, thus it is already assured preservation from the consumptive uses, such as grazing, logging and mining. Classification of wilderness would give added legal protection to the area under consideration and the wilderness management concept would prevent the intrusion of roads, structures, or consumptive uses through some possible future administrative action.

No manmade facilities except simple trails (some of which are old roads no longer maintained or passable for vehicles) exist or are proposed to be constructed in the areas recommended for wilderness. This would preclude any commercial or interpretive developments.

Designation as wilderness would give added assurances of the retention of the areas character as developed by the dynamic forces of natural erosion. These are expressed in the geologic processes interwoven with the ecological interaction found within the park. Moreover, wilderness designation would provide an enduring wilderness resource, by protection from the probability of future adverse administrative decisions. The intrusion of roads, buildings, and power and telephone lines would forever be excluded.

1. A primary benefit of the proposal is the greater assurance for perpetuation of 1) a living outdoor laboratory for the study of natural forces, uninfluenced by man, 2) ecological benchmarks or reserves of plant life, animal life, geologic land forms, and 3) invaluable scientific and educational benefits as man continually related himself to his environs.
2. The wilderness visitor will be able to enjoy a natural environment, an unspoiled primeval area in which to escape from stress-inducing urban conditions. The mental and physical challenges which the wilderness offers its visitors, will encourage the preservation and development of pioneer attitudes which are believed to have contributed greatly to the nation's success.
3. 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 will require a program of monitoring use to determine any adjustment in policy that may be required to preserve the integrity of the area.

4. Wilderness designation precludes development of a road system. The current road system is on the Paunsaugunt Plateau overlooking the significant geological feature of a colorful eroding landscape. Development below the rim would extend construction scars for several miles through some of the most scenic portions of the park. Such construction would be visible from many overlooks along the rim.

A. Impacts as a result of the proposal.

1. Wilderness precludes use of motorized equipment except for emergency situations involving serious threat to lives, property or irreplaceable resources. As a result, trail maintenance would be done by hand tools. Cost factors involved in maintaining trails within the wilderness area will increase with such designation. The present cost to reconstruct existing trails by manual labor is \$500 per mile, whereas if motorized equipment is used the cost would be \$150 per mile. Increased costs would be approximately \$10,000 annually.

2. Wilderness designation curtails certain forms of research because of limitations on permanent structures and installations. This is not a major impact as all recent research proposed investigations which would not require permanent structures. At this time there are no management related research projects proposed on the ecosystems. It is not expected that the archaeological survey which is proposed will require any permanent facilities.

3. Wilderness designation precludes development of visitor use facilities, such as shelters, in the backcountry. Impact on Bryce Canyon is minimal here since the master plan does not propose any such facilities, nor does the current level of backcountry use require them. Since there are only occasional summer thunder showers, construction of backcountry shelters is not required. Departmental wilderness guidelines permit pit toilets and fire rings made of natural materials and tent sites. Such facilities can be removed or relocated as deemed necessary by management.

4. Wilderness designation precludes development of recreational facilities and roads. The impact here again is minimal since visitor use patterns do not dictate their development; sufficient recreational opportunities exist within the region. An additional road system is not needed since all of the rim is already traversed by a road and made accessible by a trail network.

During the wilderness proposal hearings it was recommended that visitor facilities be developed below the rim and within the scenic amphitheaters to attract and accommodate a greater number of visitors. The impact here is to deny a certain segment of the public access to the outstanding geological features. Wilderness designation limits access by foot and stock only. Since the existing concessioner overnight lodging facilities will be phased out, development of additional lodging facilities below the rim is not reasonable.

One impact would be to shift visitor use pressures to other areas within the region. Within a 100 mile radius of the park are numerous recreation sites located within National Forest, Bureau of Land Management, and Utah State Park lands. National Park System units include Canyonlands, Grand Canyon, and Zion National Parks; Arches, Capitol Reef and Cedar Breaks National Monuments; and Glen Canyon and Lake Mead National Recreation Areas.

The shifting of visitor pressures elsewhere will also shift the attendant impacts of congestion, resource deterioration, littering, vandalism and similar effects. Shifting these pressures elsewhere will also require other agencies and communities to provide additional utilities, sewage facilities, parking areas, and police and fire protection services. In turn, it would provide some economic benefits for the business communities around the park. The management objectives for the park recommend phasing out concessioner overnight accommodations inside the park and developing these facilities outside.

B. Other considerations which effect the wilderness proposal

1. The impact upon the environment of the proposed wilderness from outside the boundaries of the park must also be considered. These would include fire entering from lands administered by other agencies. Major fire frequency in the park and surrounding is on a 25 to 50 year cycle.

2. Another consideration is the impact from a proposed development of a coal fired steam generating plant to be located near the town of Tropic. If constructed, it will cause a visual and air pollution impact upon the park and the proposed wilderness. The development of coal reserves in the general region around Bryce Canyon could have a lasting adverse impact that could effect the "wilderness" and "park" experience of the park visitor for a long period of time.

3. A variety of noncompatible land uses preclude inclusion of certain lands within the proposed wilderness area.

The northernmost boundary of the proposed wilderness is located south of Water Canyon. The Tropic and East Fork Irrigation Company utilizes a ditch located in Water Canyon for transportation of water from the East Fork of Sevier River in the vicinity and town of Tropic, Utah. An overhead powerline is also located in Water Canyon. Utah State Route 54 crosses the park north of Water Canyon via its route through Tropic Canyon. An overhead telephone line is also located in this canyon.

In the vicinity of Bryce Springs the proposed boundary is located 1/4 mile inside and parallel to the park boundary due to the existence of a small water collection system. Under the terms of a special-use permit, the Tropic and East Fork Irrigation Company may gather water for domestic and other purposes. Water is transported to the town of Tropic, Utah, via a pipeline.

The south halves of sections 19 and 20, T. 37 S., R. 3 W. (south of Yellow Creek), contain a National Park Service soil and moisture-control program involving earth and log checkdams, reseeding projects, and fencing. These projects have repaired a good deal of the damage caused by sheep grazing in past years. (All grazing within the park has been terminated since 1962). At times, maintenance of these projects requires the use of heavy mechanical equipment. Equipment must also be used to repair damage to the project works caused by flash floods. These half-sections are not included in the proposed wilderness.

As shown on page 25 (Preliminary Wilderness Proposal) the northward course of the proposal boundary is defined for the most part by the plateau rim. It does not include the upper reaches of Podunk Creek (the area north of Yovimpa Pass and west of the primary park road). The park maintains a water system a short distance south of Yovimpa Pass at Riggs Spring. Water is gathered from springs and pumped uphill across the part of this area lying between two management roads and on to visitor facilities at Rainbow Point.

The portion of the plateau surrounding Paria View as well as lands west and south of this area are not included within the proposed wilderness. An important well installation is located west of Paria View. This unit is served by an overhead powerline. A waterline traverses parts of the area between the well and the park road. Access to these utilities must be continued.

Two stock driveways, one in Campbell Canyon and the other in Sheep Creek, were not included in the recommended wilderness. These driveways reflect commitments made by the National Park Service to the Forest Service prior to enlargement of the park by Presidential Proclamation.

The primary effect of developments and alien water rights is that they preclude consideration of the lands for wilderness designation. Wilderness is defined as an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation. Some visual intrusions occur since several of the developments can be seen from the wilderness due to the openness of the land. The size of the wilderness areas is not sufficient to buffer all of the sights and sounds of civilization. The nature of the resource, however, permits the continuity of a wilderness experience below the rim and within the rugged amphitheaters. Lands surrounding the southern end of the wilderness lie within Dixie National Forest providing a zone of reasonable separation from the agricultural activities and other influences of man.

SUMMARY - ENVIRONMENTAL IMPACTS

IMPACTS

MITIGATING MEASURES

UNAVOIDABLE IMPACTS

Due to preclusion of motorized equipment trail maintenance costs will increase; estimated at \$10,000 annually.

None.

Increased trail maintenance costs.

Curtailement of some forms of research due to preclusion of permanent structures and installations.

Research facilities will be allowed elsewhere in the park.

Research options will be limited.

Preclusion of mass visitor use facilities and roads in wilderness reduces future management options. Shifts pressures and visitor use impacts elsewhere in the region.

Information will be provided the visitors on recreational facilities and opportunities elsewhere in the region. Efforts will be coordinated with other agencies to assure that carrying capacities will not be exceeded.

Some pressures and impacts will be shifted to areas outside the park.

Preclusion of permanent backcountry facilities will result in some social impacts resulting from less comfort and convenience.

None.

Facilities for visitor comfort and convenience will be precluded.

IV. MITIGATING MEASURES INCLUDED TO THE PROPOSED ACTION

The adverse impacts resulting from the wilderness proposal are minimal as described under the impact section. Those measures which are proposed to protect, enhance, and mitigate even these minor influences are as follows:

A. Information will be provided to the visitor as to recreational facilities and opportunities which are denied in the park but are available elsewhere within the vicinity. Numerous recreation sites are located within National Forest, Bureau of Land Management, Utah State Park, and National Park System lands in the region. Information will be disseminated by exhibits, leaflets, and personal contacts. Efforts will be coordinated to assure that carrying capacities are not exceeded at specific locations.

B. Research activities, requiring permanent facilities, could possibly be allowed in the areas not designated as wilderness. Of the total 36,010 acres in the park, 45 percent or 16,303 acres are in wilderness.

V. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

Wilderness designation possibly will result in some unavoidable adverse environmental impacts, which once designation is made could not be changed without legislative action.

- A. Exclusion of future developments of additional visitor convenience facilities, such as roads, shelters, hostels, or others, may cause an inconvenience to certain members of the public. Visitor pressures will be shifted to areas outside the park resulting in increased visitor impacts and increased needs for visitor services and facilities.
- B. The installation of permanent facilities for scientific research would be prohibited; some forms of research will be curtailed.
- C. The barring of use of mechanized equipment will increase the cost factors of trail maintenance and rehabilitation, per unit of work accomplished. Increased costs of trail maintenance are estimated at \$10,000 annually.
- D. Preclusion of certain permanent backcountry facilities for the comfort and convenience of users will result in some adverse social effects. Other than pit toilets, fire rings and tent sites, wilderness users will be required to have a backcountry experience under primitive conditions.

VI. SHORT-TERM USES VERSUS LONG-TERM PRODUCTIVITY

In Bryce Canyon, wilderness does not involve short-term consumptive uses other than that of recreational grazing from visitor stock and firewood utilization for campfire use.

Because of the park's national and world significance as both a scenic and scientific resource, it is believed that the long-term sociological, scientific, educational and cultural benefits far exceed those benefits which could be obtained by short-term exploitation and use of these resources. The benefits are necessarily subjective, but none the less real, and their values increase steadily as their kind diminishes elsewhere. Wilderness designation would insure that the values and resources will continue to be available to people in the future. The flora, fauna and land mass will continue to evolve with minimal disturbance by man. This legislation, if enacted, will provide the proposed wilderness area the needed protection from the expanding usage of this park.

VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

National park status, in itself, normally precludes degradation by grazing, logging, mining, or other consumptive uses unless expressly identified by statutes in the establishment act. In addition, under the wilderness designation the resources would be given further protection. Since the wilderness proposal precludes any form of developments, there are no commitments which will effect rare and endangered species and archeological or historic resources. Nor will there be any consumptive use of the resources. However, the acts establishing the park and the wilderness classification do not constitute an irreversible or irretrievable commitment of resources. An Act of Congress disestablishing the park and declassifying the area as wilderness would enable utilization of the renewable and nonrenewable resources.

VIII. ALTERNATIVES

In the preparation of this wilderness proposal, the National Park Service reviewed several alternatives to the proposal, which include no wilderness and various boundary alternatives. During the public hearing in 1967 various conservation organizations, public agencies and individuals proposed alternatives to the National Park Service proposal. These alternatives are presented below.

A. No Wilderness - Opposition to Wilderness

An alternative to placing these lands in a wilderness classification is to not classify them so. At the public hearing three local individuals and five organizations opposed any wilderness designation, and suggested development of visitor facilities below the rim and within the scenic amphitheaters. It was further suggested that the park's water resources be developed for use by surrounding communities.

Present management policies are directed towards maintaining the recommended wilderness areas in their present natural state free of man-made influences. This effort might continue whether or not these areas are included in the National Wilderness Preservation System, but there would exist the possibility that some developments or vehicular access might be emplaced by administrative decision.

The impacts of this proposal are several. Nonwilderness designation would permit permanent research installations, mechanized trail maintenance, further development of backcountry facilities, and as well, further development of roads, campgrounds and other visitor use facilities. Trail maintenance costs would not increase \$10,000 annually and the potential for shifting visitor pressures outside the park would be diminished. It is doubtful that permanent backcountry facilities for the comfort and convenience of the visitors would be developed, however, since climatic conditions do not warrant them. Nonwilderness designation would not provide the additional protection of the ecosystem and its assurance of preservation as wilderness, due to the possibilities of administrative decisions.

B. Increased Wilderness Designation - Wilderness Society

The Wilderness Society proposed a 20,800 acre Bryce Canyon Wilderness area by adding 900 acres of proposed management zone, 2,000 acres to the east and west of Paria View Well, and an additional wilderness unit of 3,000 acres to include all of the park land north of Utah Route 54. The Sierra Club endorsed the plan at the public hearing. This proposal is identified by areas lettered X on Exhibit D.

1. To include the 1/8 mile management zone along the east and south boundaries of the park. This would add approximately 900 acres to the proposed wilderness area. Guidelines for wilderness proposals recently promulgated by the Department of the Interior provide for such actions within wilderness, utilizing the minimum tool, equipment or structure necessary to protect the health and safety of wilderness travelers, or for the protection of the wilderness area.

2. The inclusion of 2,000 acres on the Paria View Plateau into the park's proposed wilderness was considered, but an important water well installation is located west of Paria View which precludes the inclusion of all this land for wilderness designation.

This well, though not presently in use, will possibly be used in the future when more economical means are found to remove natural salts and make it potable for domestic use. Until a final decision is made for the development of a park-owned water system this area should be excluded to provide adequate access to the well for the road, powerline and future pipeline required for its operation. After restudy of the Paria View Plateau question, 480 acres of the plateau was added to the National Park Service wilderness proposal.

3. The area north of Utah Route 54, of about 3,000 acres, was considered for addition to the recommended wilderness but was not included because the area contains an irrigation ditch and is bisected by a Stock Driveway Withdrawal made by Departmental Order on November 19, 1919, as authorized by Act of Congress of December 19, 1916, 38 Stat. 862, as amended, 43 U.S.C. 292. Recent Departmental guidelines allow stock driveway use in wilderness if roads, permanent installations or motorized equipment are not utilized.

C. Increased Wilderness Designation - National Parks Association

The National Parks Association recommended two units of wilderness that would include the majority of land in Bryce Canyon National Park. One unit would comprise all of the park north of Utah Route 54. The second unit would include all of the park south of Water Canyon except for four areas:

1. Park headquarters and associated facilities.

2. Paria Well.
3. The portion of the roadless area near Bryce Creek used as a source of water for the town of Tropic.
4. The area in the vicinity of Yellow Creek containing the soil and moisture-control projects.

The plan provides a narrow access ribbon for the road, spur roads, and trailheads, between headquarters and Yovimpa Point. The proposal is identified on Exhibit D and includes the areas indicated by letters X and Y.

Benefits of the proposal would include a greater percentage of the park's ecosystems under wilderness designation and the greater assurance of protection from intrusive development. Whether the primeval character of wilderness would prevail in a strip averaging about 1,500 to 3,000 feet is doubtful, especially with the primary visitor use road adjacent to the east boundary. Inclusion of this additional wilderness acreage would also preclude any future management options for development of visitor use facilities. Since the Forest Service is not proposing a contiguous wilderness, the possibility of a larger wilderness, utilizing National Park Service and Forest Service lands, is not expected.

D. Increased Wilderness Designation - National Park Service

The National Park Service during preparation of this wilderness proposal considered several alternatives, including various boundary alternatives.

1. In the vicinity of Bryce Springs, the boundary of the wilderness is 1/4 mile within the external boundary of the park. This is to exclude Bryce Springs which are developed with a water collection system. The system was developed under the terms of a Special Use Permit granted to the Tropic and East Fork Irrigation Company to gather water for domestic and other purposes for the town of Tropic, Utah. Use of water from these springs predate the establishment of the park.

2. The south halves of Sections 19 and 20, T37S, R3W were considered for inclusion within the wilderness proposal, but were excluded because this area has been under an intensive soil and moisture control program to correct damage which occurred through heavy grazing in past years. (The last year grazing was allowed within the park was in 1962). The control devices require the use of motorized equipment to maintain their effectiveness, therefore, this area was not recommended

for wilderness. Furthermore, the control devices, if removed, or not maintained, would effect control measures that have been taken by the Bureau of Land Management outside of the park.

3. Riggs Springs was considered but excluded because of the development of the Springs and the pipeline which removed water from the park for stock watering. This was agreed to in a Memorandum of Understanding between the Forest Service and the National Park Service dated December 4, 1930. Water from this spring enables lands to be grazed that could not be if it were not available.

4. Campbell Canyon and Sheep Creek Driveways were originally included in the wilderness proposal, but on finding of the Memorandum of Understanding between the Forest Service and the National Park Service dated December 4, 1930, these stock driveways were excluded from the wilderness proposal so as not to violate the agreement. Campbell Canyon was last used for cattle drives in 1964, but prior to that it had not been in routine use since late 1930's or early 1940's. The Sheep Creek Driveway was used almost continuously before 1956, the last year it was used. While these driveways are no longer in routine use, the cattlemen have expressed the occasional need for their use in the event of need to move sick animals by the shortest and quickest route available to their ranch locations. Recent Departmental guidelines, however, permit inclusion of stock driveways in wilderness if permanent facilities, motorized equipment, is not involved.

E. Increased Wilderness Designation - National Park Service

As suggested in D. 4 above, a larger wilderness could be considered if certain wilderness criteria are redefined and additional area designated.

This proposal is illustrated by the diagonally lined tracts shown on Exhibit A., page 4. It reflects inclusion of the Campbell Canyon and Sheep Creek livestock driveways, the perimeter management zones, except as indicated, and the area below Inspiration Point.

This proposal would add 2,457 acres for a total of 18,760 acres of wilderness proposal.

These areas qualify as wilderness and such designation would give protection to a maximum amount of park lands. As long as the management zone exists, it is possible that those areas may actually concentrate visitor use rather than prevent it. Developed visitor access facilities could be built in this zone. At the public hearing all of the conservation groups recommended inclusion of the zone as wilderness.

Public opinion as expressed at the hearings was in favor of including these zones in wilderness. As long as management zones exist, the possibility remains open that facilities and road access could be developed. Long range, it is possible that rather than precluding development at the edge of wilderness, the zones may encourage it. As noted previously, under present administrative policies of the Department of the Interior management zones are no longer excluded from wilderness proposals.

CONSULTATION AND COORDINATION WITH OTHERS

A. Consultation and coordination in the development of the proposal and in the preparation of the draft environmental statement:

As required by the Wilderness Act, a public hearing was held on the preliminary wilderness proposal at Panguitch, Utah on December 11, 1967. Information packets containing copies of the preliminary wilderness proposal had been distributed to the agencies listed in the summary sheet and at the end of the section, and were provided to all agencies, organizations and individuals requesting them. These materials, together with copies of the master plan, were made available for public inspection at the park headquarters, Bryce Canyon National Park; the National Park Service Regional Office in Santa Fe, New Mexico, and in Washington, D.C. Of the responses, 296 favored an enlarged National Park Service proposal, 21 endorsed the National Park Service proposal, while eight recommended that no wilderness be established. The following table summarizes the responses received:

<u>Recommendation</u>	<u>Public Agencies</u>	<u>Private Organizations</u>	<u>Individuals</u>	<u>Totals</u>
NPS Proposal		1	20	21
Wilderness with Qualifications	1	1	1	3
Enlarge NPS Proposal		16	280	296
Wilderness, No Specific Recommendations			6	6
No Wilderness	2	3	3	8
Acknowledgement Received, No Special Comment	<u>10</u>	<u>—</u>	<u>1</u>	<u>11</u>
Totals	13	21	311	345

After consideration of the responses, the National Park Service then developed their wilderness recommendation on April 19, 1971. The response was carefully analyzed and taken into account in the preparation of this draft environmental impact statement.

B. Coordination in the review of the draft environmental statement:

The Draft Environmental Statement, DES 72-16 (January 27, 1972), was sent to the following agencies for review and comment. Those responding are identified by an asterisk and their letters attached as an appendix. Their comments were considered in the final statement.

Department of Agriculture

*Forest Service

Soil Conservation Service

Department of the Interior

*Bureau of Mines

*Bureau of Outdoor Recreation

*Bureau of Sport Fisheries and Wildlife

Bureau of Land Management

*Geological Survey

*Bureau of Reclamation

Department of Commerce

Federal Power Commission

Water Resources Council

Department of Housing and Urban Development

Department of Transportation

*Office of the Secretary of Transportation

*Federal Highway Administration

State of Utah

State Clearinghouse

*State Liaison Officer for Historic Preservation

A comment-response section, responding to specific comments, follows.

Geological Survey

Comment: The Geological Survey has not made a mineral survey of the area, however, on the basis of the considerable geologic information on the area, there is no objection to the proposed legislation.

Response: None required.

Bureau of Reclamation

Comment: The summary should not be longer than one page.

Response: The summary is now one page.

Comment: A map showing the present and proposed development in the park, including trails that would be maintained within the proposed wilderness area should be included.

Response: A map is now included (page 24) identifying the trails and present development areas. No additional developments are proposed.

Comment: The future impacts that might be caused by the facility development restriction should be discussed.

Response: The discussion was revised. The statement now specifies that backcountry facility development is not required due to the only occasional summer thunder showers during the peak period of use. Use of pit toilets, fire rings, and tent sites are allowable.

Comment: A discussion of the anticipated economic impacts, if any, on the surrounding area that would result from wilderness designation.

Response: Wilderness designation would have little effect on the business community surrounding the park. Sufficient facilities exist inside the park to meet current demand; the management objectives recommend phasing out concessioner overnight facilities and encouraging facility developments by the surrounding business communities outside the park. The statement now discusses these points.

Comment: Mitigating measure "B" appears to be an operating procedure rather than a mitigation measure.

Response: This mitigating measure is now deleted.

Bureau of Outdoor Recreation

Comment: Statement comments under the alternative of a larger wilderness are aimed primarily at adverse cultural and economic impacts. These seem to be secondary issues in comparison to the obviously lesser environmental impacts of a larger wilderness.

Response: The alternatives section has been revised extensively. The statement considers the lesser environmental impacts of a larger wilderness.

Federal Highway Administration

Comment: No specific comments to offer.

Response: None required.

Bureau of Mines

Comment: The Bureau of Mines has made no mineral survey of the area, therefore can make no evaluation of the impact of the proposed action on mineral resources. Because the area is presently closed to mineral activity, the proposed changes would have no effect on any mineral resources that may be present.

Response: None required.

Bureau of Sport Fisheries and Wildlife

Comment: The statement is comprehensive and quite adequately meets the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969.

Response: None required.

Department of Transportation

Comment: Offers no comments on the proposal, but recommends that the National Park Service remain in contact with the relevant offices of the Federal Highway Administration and the Federal Aviation Administration during development of the proposals.

Response: As requested, the National Park Service will remain in contact with the Federal Highway Administration and the Federal Aviation Administration during development of the proposals. Copies of the final environmental statements will be sent to both agencies.

State Liaison Officer for Historic Preservation, Utah

Comment: Review of the proposal finds no conflict with any archeological or historic site in the area.

Response: None required.

Forest Service

Comment: The draft environmental statement specifies that wilderness designation will prohibit development of facilities such as shelters. However, the "Wilderness Use and Management Policy", contained in Appendix A provides that trail shelters may be permitted where they are needed for the protection of wilderness values.

Response: The policy on wilderness use and management has been revised. Departmental guidelines permit pit toilets and fire rings made of natural materials, and tent sites. Permanent structures, such as trail shelters, are excluded from wilderness.

Comment: The visitation figure might be clarified by identifying it as annual visitation.

Response: Visitor use statistics are now clarified.

Comment: Wilderness designation will not prevent the intrusion of the sounds of all motorized equipment.

Response: The grammar was corrected; the intent was that these sounds will not be generated inside wilderness except under emergency conditions.

Comment: If the proximity of the Dixie National Forest to the proposed wilderness is a real factor for concern relating to the intrusion of sound, consideration could be given to relocating the proposed wilderness boundary to a point where the sounds would be inconsequential. It is suggested that the statement be deleted.

Response: The statement has been deleted. Since the wilderness area proposed for Bryce Canyon National Park is not of sufficient size to buffer intrusive sounds from multiple use activities or aerial sources, relocation of wilderness boundaries is not a reasonable recommendation. Some conservationists, however, have suggested air reservation space over all wilderness to preclude nonemergency use of helicopters or airplanes.



United States Department of the Interior

GEOLOGICAL SURVEY
WASHINGTON, D.C. 20242

OFFICE OF THE DIRECTOR

May 8, 1972

Memorandum

To: Director, Midwest Region, National Park Service

From: Director, Geological Survey

Subject: Draft environmental statement -- Wilderness Proposal,
Bryce Canyon National Park, Utah

We have reviewed the subject draft environmental statement as requested in your memorandum of March 13 and have no comment on it.

In our comment to the Legislative Counsel on Wilderness Proposal No. 24 we noted that the Geological Survey has not made a mineral survey of the part of the Bryce Canyon National Park that is being proposed as a wilderness. However, on the basis of the considerable geologic information on the area, we have no objection to the proposed legislation.

Acting Director



United States Department of the Interior

BUREAU OF RECLAMATION
WASHINGTON, D.C. 20240

IN REPLY
REFER TO: 730
121.

JUN 19 1972

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

Dear Mr. Volz:

As requested in your recent letter this will provide our Bureau's comments on the draft environmental impact statements for the following wilderness area proposals:

Bryce Canyon Wilderness Area

1. The Summary should be no more than one page, as directed by the Council on Environmental Quality's Guidelines, published in the Federal Register (Vol. 36, No. 19, Jan. 28, 1971). This could easily be accomplished by a reference to the agencies listed under item 5.
2. A map showing the present and proposed development in the park, including trails that would be maintained within the proposed wilderness area, should be included.
3. Page 14, last sentence. The future impacts that might be caused by the facility development should be discussed.
4. A discussion of the anticipated economic impacts, if any, on the surrounding area that would result from granting wilderness status to this area should be included.
5. Page 19, paragraph B. This measure appears to be an operating procedure rather than a mitigation measure.

Colorado National Monument Wilderness

1. On page 4. More details on the planned expansion of the trail system should be incorporated. We believe the permanent research installations involved should be named and described and indication made as to where they could be relocated.
2. On page 9. The Powderhorn Ski Area on Grand Mesa was omitted. This facility is smaller than the centers mentioned but is very important to the area economically.

Great Sand Dunes National Monument Wilderness

1. Page 3, first and second paragraphs. These paragraphs allude to purchase of private tracts of land. The statement is not clear whether purchase of these lands is part of the wilderness proposal or if such purchase is a long-range plan of the Park Service. This should be clarified.
2. Page 10, second full sentence. This sentence indicates that the State of Colorado has considered developing San Luis Lake for recreation purposes. One of the proposals in our proposed Closed Basin Division, San Luis Valley Project, is the stabilization of the water level in San Luis Lake and construction of recreation facilities. This proposal should be mentioned in the statement.
3. Page 11, paragraph 2, Adverse Environmental Impacts, and paragraph 1, Beneficial Impacts. These two paragraphs seem to be in partial conflict concerning research in the dune area. Additional clarification is needed.

We thank you for this opportunity to review these statements.

Sincerely,



For, Ellis L. Armstrong
Commissioner



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF MINES
WASHINGTON, D.C. 20240

March 16, 1972

Memorandum

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

Through: Assistant Secretary--Mineral Resources

From: Director, Bureau of Mines

Subject: Draft environmental statements for wilderness proposals
for Bryce Canyon National Park, Black Canyon of the
Gunnison National Monument, Colorado National Monument,
and Great Sand Dunes National Monument

The Bureau of Mines has reviewed the draft environmental statements for proposed wilderness designation for areas within one National Park and three National Monuments--Bryce Canyon National Park, Black Canyon of the Gunnison National Monument, Colorado National Monument, and Great Sand Dunes National Monument--all prepared by the National Park Service. The proposals recommend the placing of approximately 62,000 acres of national park and monument lands within the National Wilderness Preservation System. Of this acreage, 16,303 acres (3 units) would be in Bryce Canyon, 8,780 acres would be in the Black Canyon of the Gunnison, 7,700 acres would be in the Colorado National Monument, and 29,225 acres would be in the Great Sand Dunes.

The Bureau of Mines has made no mineral surveys of the four areas and, therefore, can make no evaluation of the impact of the proposed actions on mineral resources. Because the areas are presently closed to mineral activity, the proposed changes would have no effect on any mineral resources that may be present.

Elbert F. Cebor
Director



PACIFIC SOUTHWEST REGIONAL OFFICE

BOX 36062

450 GOLDEN GATE AVENUE

SAN FRANCISCO, CALIFORNIA 94102

March 23, 1972

[illegible]

To: Director, Mid-West Region, National Park Service

From: ~~Acting~~ Regional Director

Subject: Environmental Impact Statement on Bryce Canyon
National Park Wilderness Proposal

On instructions from our Washington Office, we are hereby submitting our comments on the above subject directly to you instead of through Washington channels.

We feel that the subject statement provides an adequate analysis of the impact of the wilderness as proposed. However, we are somewhat concerned about the comparative environmental impact analysis of "Alternative #2--a greater amount of wilderness."

Although we do not necessarily advocate a larger wilderness proposal for Bryce Canyon National Park, it seems that the statement comments under "Alternative #2" are aimed primarily at adverse cultural and economic impacts of a larger wilderness. These factors probably played a large role in the master planning and wilderness recommendations of the Park Service, but seem to be secondary issues in comparison to the obviously lesser environmental impacts of a larger wilderness.

by *Frank E. Sylvester*
Frank E. Sylvester



United States Department of the Interior
FISH AND WILDLIFE SERVICE
BUREAU OF SPORT FISHERIES AND WILDLIFE
WASHINGTON, D.C. 20240

INITIALS
ADDRESS ONLY THE DIRECTOR.
BUREAU OF SPORT, FISHERIES
AND WILDLIFE

MAR 17 1972

3/20

SEARCHED	INDEXED
SERIALIZED	FILED
MAR 20 1972	
FBI - WASHINGTON	

Memorandum

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

From : Chief, Office of Environmental Quality, Bureau of
Sport Fisheries and Wildlife, Washington, D.C.

Subject: Wilderness Proposal Environmental Statements for
Bryce Canyon National Park (DES 72-16)
Colorado National Monument (DES 72-13)
Great Sand Dunes National Monument (DES 72-15)
Black Canyon of Gunnison National Monument (DES 72-14)

On behalf of Acting Director Smith, thank you for the opportunity
of reviewing subject statements.

Bureau personnel, both at the field and central office levels, have
studied the statements and have no comment. The documents are
comprehensive and quite adequately meet the requirements of Section
102(2)(c) of the National Environmental Policy Act of 1969.

R. E. Johnson



OFFICE OF THE SECRETARY OF TRANSPORTATION

WASHINGTON, D.C. 20590

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3/13
MAR 10 1972

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

Dear Mr. Volz:

We have reviewed the package of draft environmental impact statements for the following wilderness area proposals:

1. Bryce Canyon National Park
2. Colorado National Monument
3. Black Canyon of the Gunnison National Monument
4. Great Sand Dunes National Monument

Although we have no comments to offer on these proposals, it is recommended that the National Park Service remain in contact with the relevant offices of the Federal Highway Administration and the Federal Aviation Administration during development of these proposals.

Sincerely,

John E. Hirten
Deputy Assistant Secretary for
Environment and Urban Systems



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

August 18, 1972

Bill W. Dean
Assistant Director
Cooperative Activities
Department of Interior
1709 Jackson Street
Omaha, Nebraska 68102

Re: Bryce Canyon National Park Wilderness Proposal

Dear Mr. Dean:

Dr. Jesse D. Jennings, Head of the Department of Anthropology at the University of Utah, has reviewed the proposal and finds no conflict with any archaeological or historic site in the area.

Thank you for your cooperation.

Best Regards,

Gary D. Forbush
Director of Preservation Planning

GDF:hc

UNITED STATES DEPARTMENT OF AGRICULTURE

FOREST SERVICE

Washington, D.C. 20250

APR 19 1972

1940



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

Dear Mr. Volz:

We have completed our review on the Bryce Canyon National Park, Colorado National Monument, Black Canyon of the Gunnison National Monument, and Great Sand Dunes National Monument Wilderness proposal environmental statements.

The draft environmental statements for the wilderness proposals for Bryce Canyon National Park, Colorado National Monument, and Black Canyon of the Gunnison National Monument all point out that wilderness designation will prohibit the development of facilities such as shelters. We believe this restriction conforms to the direction contained in Section 4(c) of the Wilderness Act which prohibits structures and installations in Wilderness. However, the "Wilderness Use and Management Policy," contained in Appendix A of each draft statement, provides that trailside shelters may be permitted where they are needed for the protection of wilderness values. We suggest reconsideration of the Policy statement in view of the prohibitions in the Wilderness Act.

Bryce Canyon Wilderness Proposal

On page 10, the visitation figure might be clarified by identifying it as annual visitation if that is what is represented.

On page 16, the exclusion of the sound of motorized equipment is represented to be a beneficial impact as a result of the wilderness proposal. We question whether wilderness designation of itself will prevent the intrusion of the sounds of all motorized equipment. Helicopters and airplanes may still fly over the protected areas. We note

on page 18 it is stated that certain activities on the adjacent Dixie National Forest would have an audio impact on the proposed wilderness. We suggest that the sentence on page 16 is overstated. If the proximity of the Dixie National Forest to the proposed wilderness is a real factor for concern relating to the intrusion of sound, consideration could be given to relocating the proposed wilderness boundary to a point where the sounds would be inconsequential. However, there would remain a problem with aerial sound intrusions. We suggest considering the elimination of the statements on pages 16 and 18. If the statement on page 18 is retained, mitigation of sound might be accomplished by setting back the proposed wilderness boundary and should be noted in Section IV.

Colorado National Monument Wilderness Proposal

On page 14, a favorable environmental effect is attributed to the exclusion, forever, of the intrusion of the sounds of vehicles, chainsaws, and other impacts of the modern world. On page 15, an adverse environmental impact is attributed to the sights and sounds of civilization which could intrude upon the small proposed wilderness surrounded by a network of roads and valley development. If, in fact, valley sounds or sounds from aircraft are audible within the proposed wilderness, the statement attributing such a favorable environmental impact to wilderness designation should be omitted.

Great Sand Dunes National Monument Wilderness Proposal

No comment.

We appreciate the opportunity to review these draft environmental statements.

Sincerely,

Thomas C. Nelson
THOMAS C. NELSON
Deputy Chief

