

CHAPTER 16 – WILDERNESS

16.1 INTRODUCTION AND RESOURCE OVERVIEW

Wilderness is a controversial and polarized issue for many people. The following provides a brief history of this issue particularly as it relates to Utah and the Monticello Field Office (FO) Resource Management Plan (RMP) revision.

16.1.1 Background and History

In 1964, Congress passed the Wilderness Act, establishing a national system of lands for the purpose of preserving a representative sample of ecosystems in a natural condition for benefit of future generations. Until 1976, lands considered for and designated as wilderness were managed by the U.S. Forest Service, the Fish and Wildlife Service, or the National Park Service. With the passage of the Federal Land Policy and Management Act (FLPMA) in 1976, Congress directed the Bureau of Land Management (BLM) to inventory; study, and recommend which public lands under its administration should be designated as wilderness.

In 1979, the BLM began an inventory of 22 million acres of public land in Utah and determined that 95 areas (totaling over 3.2 million acres) possessed wilderness character. In the 20 years since the BLM completed its inventory, Utah wilderness has become a national issue initiating debate about which lands have wilderness character and should be considered for wilderness designation. Because of the debate and the significant amount of time since the original inventory, the Secretary of the Interior, in 1996, directed the BLM to reassess the areas in question.

Specifically, the Secretary directed the BLM to review certain lands in Utah to determine if they had wilderness characteristics. These lands had been proposed for wilderness designation and were in legislation before Congress (H.R. 1500). The Secretary wished to determine if, in the 20 years since the BLM completed its first inventory, conditions had changed on the ground and whether other lands possessed wilderness characteristics.

Following resolution of an injunction in a lawsuit filed in 1996 challenging the BLM's authority to conduct the inventory, the BLM completed the inventory in 1998. In 1999, the BLM released the 1999 Utah Wilderness Inventory, with a finding that another 2.6 million acres of public land in Utah had wilderness characteristics. Following the release of the Inventory, the BLM solicited public comments and held scoping meetings throughout Utah. In response to the comments received, and after conducting numerous field checks to ground truth information received, the BLM issued a revised inventory document for the Moab and Monticello Field Offices in 2003.

Lands found to have wilderness characteristics in the 1999 inventory within the Monticello FO area are managed under the existing 1991 San Juan Resource Area RMP. In the Monticello FO area, 20 areas totaling 488,744 acres, identified during the 1999 Utah Wilderness Inventory (as revised in 2003), possessed wilderness characteristics. In the years since completion of the 1999 inventory, the Utah Wilderness Coalition (UWC) has submitted information to the BLM suggesting that other areas have wilderness characteristics.

Over the past several years, legislation has been introduced into both Houses of Congress to designate wilderness areas on public lands in Utah. In the 108th Congress (2003), this bill is known as America's Red Rock Wilderness Act of 2003 (H.R. 1796, S. 639). Each year, the UWC has helped to formulate the America's Red Rock Wilderness Act into the bill known today. Though there are slight differences in names and acreages of some of the units in the America's Red Rock Wilderness Act and the UWC proposal, (also

the Utah Citizens Proposal), both generally consider the same information. The legislation currently has 158 co-sponsors in the House and 15 in the Senate. If passed in its entirety, this bill would affect approximately 1,219,400 acres of public land within the boundaries of the Monticello FO area. This acreage includes previously established wilderness study areas (WSAs), areas inventoried by the BLM in its 1996-99 inventory found to have wilderness characteristics, and additional lands proposed by the UWC in H.R. 1796, S. 639 for wilderness designation.

In April 2003, the U.S. District Court of Utah, Central District, approved an agreement negotiated to settle the 1996 lawsuit brought by the State of Utah, Utah School and Institutional Trust Lands Administration (SITLA), and the Utah Association of Counties. The 1996 lawsuit challenged the BLM's authority to conduct new wilderness inventories. As a result of the 2003 settlement, the BLM has no authority to designate new WSAs. "The settlement did not, however, diminish the BLM's authority under Section 201 of the FLPMA to inventory public land resources and other values, including characteristics associated with the concept of wilderness, and to consider such information during land use planning" (BLM 2003b).

Prior to the settlement, the BLM made formal determinations regarding wilderness character consistent with the definition of wilderness as described in Section 2 (c) of the Wilderness Act of 1964, and provisions of BLM Handbook, H-6310-1, Wilderness Inventory and Study Procedures. Consistent with the 2003 settlement, the handbook has been rescinded (BLM 2003b). It is no longer BLM policy to make formal determinations regarding wilderness character as defined in the 1964 Wilderness Act. Likewise, the BLM can no longer designate new WSAs through the land use planning process, or manage any lands, except WSAs established under Section 603 of the FLPMA and other existing WSAs, in accordance with the non-impairment standard prescribed in the Interim Management Policy and Guidelines for Lands under Wilderness Review (BLM 1995).

16.1.2 Planning Area Profile

There are four categories of lands with wilderness characteristics or likely to have wilderness characteristics in the Monticello Field Office.

16.1.2.1 Wilderness Study Areas

With completion of the inventory in November 1980, the BLM designated thirteen WSAs located completely or partly in the Monticello FO area (see Table 16.1):

1. Mancos Mesa
2. Grand Gulch ISA Complex
3. Road Canyon
4. Fish Creek Canyon
5. Mule Canyon
6. Cheesebox Canyon
7. Dark Canyon ISA Complex
8. Butler Wash
9. Bridger Jack Mesa
10. Indian Creek
11. South Needles
12. Squaw and Papoose Canyons

13. Cross Canyon

The WSAs, established under the authority of Section 603(c) of FLPMA, are managed to preserve their wilderness values according to the Interim Management Policy for Lands under Wilderness Review (BLM 1995), and will continue to be managed in that manner until Congress either designates them as wilderness or releases them for other uses. Since only Congress can designate or release Section 603 WSAs, their status will not change as a result of the Monticello RMP process. Therefore, the WSAs will be addressed generally in this Analysis of the Management Situation (AMS), except for the issue of managing lands should Congress release all or portions from WSA status.

The 1990 and 1991 documents describe the resource values and uses of each WSA and those values and uses have not changed significantly since that time. A reference of those current resource values and uses for each WSA, as established in 1980 under the authority of Section 603(c) of FLPMA, can be found in the Utah BLM Statewide Wilderness Final Environmental Impact Statement (BLM 1990a), in the Utah Statewide Wilderness Study Report (BLM 1991a), and in the San Juan/San Miguel Planning Area Wilderness EIS (BLM [Colorado] 1990b). The following table provides variations in the reported acreage of the WSAs that were found between the San Juan Resource Area RMP (BLM 1991b), Utah BLM State Wilderness Final EIS (BLM 1990a), and the Utah Statewide Wilderness Study Report (BLM 1991a). These variations in acreage are due to recomputations using more accurate measurement methods in the Utah BLM State Wilderness Final EIS. Detailed information is included in the footnotes of Table 16.1. Figure 16-1 shows the location of the 13 WSAs located in the Monticello FO area.

Table 16.1. BLM Wilderness Study Areas in the Monticello FO Area - Acreages

Name	San Juan Resource Area ¹ RMP (BLM 1991b)	Utah BLM State Wide Wilderness Final EIS ^{2,3} (BLM 1990a)	Utah Statewide Wilderness Study Report ⁴ (BLM 1991a)
Dark Canyon ISA ⁵	62,040	68,030	68,030
Grand Gulch ISA ⁶	37,810 ⁷	105,520	105,520
Indian Creek WSA	6,870	6,870	6,870
Bridger Jack Mesa WSA	5,290	5,290	5,290
Butler Wash WSA	22,030	22,030	22,030
South Needles WSA	160	160	160
Middle Point WSA ⁵	5,990		
Mancos Mesa WSA	51,440	51,440	51,440
Pine Canyon WSA ⁶	10,890		
Cheesebox Canyon WSA	15,410	15,410	15,410
Bullet Canyon WSA ⁶	8,520		
Slickhorn Canyon WSA ⁶	45,390		
Road Canyon WSA	52,420	52,420	52,420
Fish Creek WSA	46,440	46,440	46,440
Mule Canyon WSA	5,990	5,990	5,990
Sheiks Flat WSA ⁵	3,140		

Table 16.1. BLM Wilderness Study Areas in the Monticello FO Area - Acreages

Name	San Juan Resource Area¹ RMP (BLM 1991b)	Utah BLM State Wide Wilderness Final EIS^{2,3} (BLM 1990a)	Utah Statewide Wilderness Study Report⁴ (BLM 1991a)
Squaw Canyon WSA	6,580		6,676 ⁸
Cross Canyon WSA	1,000		1,008 ⁹
Totals	387,410	379,600	387,284

¹ In this column, except as noted, all acreage figures are from San Juan Resource Area RMP (BLM 1991).

² In this column, except as noted, all acreage figures are from Utah BLM State Wide Wilderness Final EIS (BLM 1990).

³ Squaw/Papoose Canyon and Cross Canyon WSAs were not studied in the Utah BLM State Wide Wilderness Final EIS (BLM 1990) as they were studied in the San Juan / San Miguel Planning Area Wilderness EIS (BLM [Colorado] 1990).

⁴ In this column, except as noted, all acreage figures are from Utah Statewide Wilderness Study Report (BLM 1991).

⁵ The Dark Canyon ISA combines with the Middle Point WSA to form the Dark Canyon Complex, with a total of 68,030 acres.

⁶ The Grand Gulch ISA combines with the Pine Canyon, Bullet Canyon, Slickhorn, and Sheiks Flat WSAs to form the Grand Gulch Complex, with a total of 105,520 acres.

⁷ The statewide wilderness EIS uses 37,580 acres for the Grand Gulch ISA. Acreage calculations for the San Juan RMP from the master title plats revealed the actual total to be 37,807, which is rounded to 37,810. The difference between the two figures amounts to 0.6 percent.

⁸ Total acres of this study area are 11,287 of which 4,611 acres are in Colorado.

⁹ Total acres of this study area are 12,588 of which 11,580 acres are in Colorado.

16.1.2.2. Non-WSA Lands with Wilderness Characteristics

In the 1999 Utah Wilderness Inventory (as revised in 2003), the BLM identified and inventoried 21 areas lying all or partly in the Monticello FO area that were thought to possess resource values described as wilderness characteristics (BLM 2003c). The BLM found 20 of these areas to possess wilderness characteristics. The information obtained from this inventory will be used in the Monticello RMP revision. Currently, these lands are managed under the existing San Juan Resource Area RMP.

Table 16.2 summarizes the acreages of each of these areas. Figure 16-2 indicates their locations in the Monticello FO area.

Table 16.2 Acreage Summary

Name (areas marked with an asterisk [*] are contiguous with a WSA of the same name)	Acreage
*Bridger Jack Mesa	23,254
*Butler Wash	1,661
*Cheesebox Canyon	13,244
Comb Ridge	13,763
*Cross Canyon	1,355
*Dark Canyon	66,325

Table 16.2 Acreage Summary

Name (areas marked with an asterisk [*] are contiguous with a WSA of the same name)	Acreage
*Fish and Owl Creeks	24,649
Fort Knocker Canyon	12,409
Gooseneck	3,571
*Grand Gulch	47,109
Gravel and Long Canyons	36,933
Harmony Flat	9,660
Harts Point	26,214
*Indian Creek	18,937
*Mancos Mesa	62,190
Nokai Dome	94,189
*Road Canyon	11,377
San Juan River	14,338
Sheep Canyon	3,998
*Squaw and Papoose Canyon	3,568
Total	488,744

16.1.2.3 BLM Land Administratively Endorsed for Wilderness

The Monticello FO also manages 1520 acres of public land adjacent to and east of Butler Wash WSA as land Administratively Endorsed for Wilderness, and which is currently not part of the Butler Wash WSA. Currently, these lands are managed under the existing San Juan Resource Area RMP.

16.1.2.4 Non-WSA Lands Likely to have Wilderness Characteristics

Additional lands in the Monticello FO area have been proposed for wilderness as part of H.R. 1796, S. 639, America’s Red Rock Wilderness Act of 2003. To date, the UWC has submitted only maps to the BLM on the wilderness characteristics of lands located completely in, or in partly within, the Monticello FO area (and also contained in H.R. 1796, S. 639). The BLM has not evaluated this proposal, which, by itself, does not contribute new information.

Additionally, Southern Utah Wilderness Alliance (SUWA) has submitted “new information” on two areas, Harts Point and Lockhart Basin. The BLM has determined that at least part of Lockhart Basin is likely to have resource values described as wilderness characteristics. Currently, these lands are managed under the existing San Juan Resource Area RMP.

Table 16.3 depicts all Monticello FO lands included in H.R. 1796, S. 639. The land identified in H.R. 1796, S. 639 includes (but does not distinguish) existing WSAs, lands inventoried by the BLM both with and without resource values described as wilderness characteristics, and new acreage proposals.

Table 16.3 America's Red Rock Wilderness Act of 2003 Proposal

Name	Acres¹
The Tabernacle	7,000
San Juan River	15,000
Nokia Dome	93,000
Red Rock Plateau	213,000
Road Canyon	63,000
Grand Gulch	159,000
Fish and Owl Canyons	73,000
Comb Ridge	15,000
Arch Canyon	30,000
Hammond Canyon	4,400
Allen Canyon	5,900
White Canyon	98,000
Dark Canyon	134,000
Butler Wash	27,000
East Montezuma	45,000
Shay Mountain	14,000
Bridger Jack Mesa	33,000
Indian Creek	28,000
Dead Horse Cliffs	4,100
Goosenecks	9,000
Hatch Point Canyons/Lockhart Basin	149,000
Total	1,219,400

¹All figures are approximate acres. Some of the units may share acreage with adjoining field office.

16.2 SPECIFIC MANDATES AND AUTHORITY

16.2.1 Authorities

- Wilderness Act of 1964, 16 USC 1131.
- National Environmental Policy Act of 1969 (NEPA), 42 USC 4321.
- Council on Environmental Quality (CEQ) regulations at 40 CFR 1500-1508.
- Federal Land Policy and Management Act of 1976 (FLPMA), 43 USC 1701, et seq., Sections 201 and 202.

16.2.2 BLM Guidance

- Manual Handbook H-1601-1, Land Use Planning Handbook.
- Manual Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review (IMP).
- Washington Office Instruction Memorandum No. 2003-275 Change 1, Consideration of Wilderness Characteristics in Land Use Plans (Excluding Alaska)

16.3 CURRENT MANAGEMENT PRACTICES

Existing management direction is currently provided in the San Juan Resource Area RMP and as specified for WSAs under the Interim Management Policy and Guidelines for Lands under Wilderness Review.

16.3.1 Wilderness Study Areas

Section 603 (c) of FLPMA tells the BLM how to manage WSAs:

During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this Act and other applicable law in a manner so as not to impair the suitability of such areas for preservation as wilderness

This language is referred to as the “non-impairment” mandate or standard, and will remain in effect until Congress acts on the Secretary’s wilderness recommendation for WSAs. Should Congress release a WSA, those lands included in the (former) WSA will be managed according to the current land use plan at the time of release.

“Interim management” of WSAs under the “non-impairment” standard has several practical effects, which include the following:

- WSAs must be managed so as not to impair their suitability for preservation as wilderness. This standard applies to all uses and activities except those specifically exempted (grandfathered uses and valid existing rights) from this standard by FLPMA.
- Activities that are permitted in WSAs must be temporary, create no new surface disturbance, and not involve the permanent placement of structures. There are exceptions to this standard.
 - Emergencies such as suppression activities associated with wildfire or search and rescue operation
 - Reclamation activities designed to minimize impacts to wilderness values created by IMP violations and emergencies
 - Uses and facilities which are considered grandfathered or valid existing rights under the IMP
 - Uses and facilities that clearly protect or enhance the land’s wilderness values or that are the minimum necessary for public health and safety in the use and enjoyment of the wilderness values
 - Reclamation of pre-FLPMA impacts
- Grazing, mining, and mineral leasing uses that existed as of the passage of FLPMA (October 21, 1976) may continue in the same manner and degree.

- WSAs may not be closed to location under the mining laws in order to preserve their wilderness character, although the wilderness character of the area cannot be impaired through actions to perfect the claim.
- Valid existing rights will be recognized.
- WSAs will be managed to prevent unnecessary and undue degradation.

16.3.2 Non-WSA Lands with Wilderness Characteristics

These lands are managed under the existing San Juan Resource Area RMP.

16.3.3 BLM Land Administratively Endorsed for Wilderness

These lands are managed under the existing San Juan Resource Area RMP.

16.3.4 Non-WSA Lands Likely to Have Wilderness Characteristics

These lands are managed under the existing San Juan Resource Area RMP.

16.4 RESOURCE DEMAND AND ANALYSIS FORECAST

16.4.1 Trends

Tourism within the Monticello FO area has been gradually rising due to increases in recreational use, increased vehicular use, and increased National Park Service (NPS) visitation, which spills over onto adjacent BLM lands (from Canyonlands National Park, Arches National Park, Glen Canyon National Recreation Area, Hovenweep National Monument, and Natural Bridges National Monument). However, visitation trends in the NPS areas have stabilized during the past few years with some indices showing a recent decline in visitation due to economy, fuel prices, and national security concerns.

Many of the field office's area with wilderness characteristics have become destinations themselves as interest in the region continues to grow. Recreationists continue to seek out areas with wilderness characteristics because of values such as primitive and unconfined recreation opportunities and outstanding opportunities for solitude. Wilderness advocacy groups continue to provide new data, readily available on the Internet, on lands that they believe have wilderness characteristics, thus increasing demand and use.

The significant increase in use of off highway vehicles (OHVs), recreation with dispersed camping, and increasing numbers of campers and hikers will have an impact on areas with wilderness characteristics. Oil and gas exploration and development are expected to continue within the Monticello FO area and will contribute additional impacts to areas with wilderness characteristics.

16.4.2 Demands

At present there is a high demand for concentrated use of areas with wilderness characteristics in Grand Gulch and Cedar Mesa, which are permitted areas. Areas outside of Cedar Mesa such as Dark Canyon are becoming more popular. The BLM, Forest Service, and the NPS are looking into whether group size limits should be imposed in Dark Canyon.

16.5 CONSISTENCY WITH NON BUREAU PLANS

The San Juan County Master Plan includes a stated policy objective on wilderness resources. San Juan County will accept those areas that meet the true criteria of wilderness as described in the 1964 Wilderness Act. However, at this time San Juan County does not support the designation of large wilderness areas, such as those known as H.R. 1500 (as contained in H.R. 1796, S. 639 today). The county feels that the designation of wilderness and their restrictions are not consistent with the County's best interests.

16.6 ISSUES OR CONCERNS

- No new WSAs will be designated through the current RMP planning process.
- Revision of current management prescriptions for WSAs will include the following policies, which were not included in the IMP: VRM Class I management objectives; an OHV management class consistent with the IMP for each WSA, these include "closed," "limited to designated roads and trails," and "limited to existing roads and trails;" and oil and gas leasing Category 4.
- Management of existing WSAs, should Congress release them from WSA status:
 - Should Congress release any of these areas from WSA status, they would be managed under the provisions of the RMP in effect at the time of release. The forthcoming Monticello RMP will need to develop a broad array of alternative management prescriptions based on objectives for these areas, should any or all be released from WSA status.
 - Congressional designation of a wilderness area would constitute a plan amendment. Designated wilderness would be managed under regulations in 43 CFR 8560. A wilderness management plan would be prepared to provide site-specific management guidance for any designated wilderness areas.
- Fire prescriptions in WSAs, including fuels treatments. (See AMS Chapter 5–Fire Management.)
- Commercial use in WSAs is increasing, which may create conflicts with wilderness advocates, especially Dark Canyon WSA and the areas off of Cedar Mesa. There are currently no limits on commercial use of WSAs with the exception of the Grand Gulch Area.
- Management of non–WSA lands with and likely to have wilderness characteristics:

The BLM's policy and guidance for consideration of the areas associated with resource values described as wilderness characteristics on public lands (non-WSA areas), and how to consider these values in land use planning, is included in IM No. 2003-275, Change 1. The land use management evaluation will consider:

- the area's values - naturalness, outstanding opportunity for solitude, and outstanding opportunity for primitive recreation.
- the ability to manage for those values – establishing goals and objectives describing the future desired condition of the land and resources, desired outcome of the recreation experience, and allowable uses. Also considered are land status, access to state or private in-holdings, and valid existing rights.
- other resource values and uses found on BLM lands – ones that might be foregone or adversely affected, and the benefits that could accrue to other resource values and uses as a result of placing priority on values associated with wilderness characteristics.

16.7 MANAGEMENT OPPORTUNITIES AND LIMITATIONS

16.7.1 Wilderness Study Areas

1. Revision of current management prescriptions for WSAs – Additional management prescriptions, based on policies in place since the IMP was developed in 1995, have to be included in the RMP revision. These include: VRM Class I management objectives; an OHV management class consistent with the IMP for each WSA, i.e., “closed,” “limited to designated roads and trails,” and “limited to existing roads and trails;” and oil and gas leasing Category 4.
2. Management of existing WSAs should Congress release them from WSA status – The RMP will identify how the WSAs would be managed if released, and will present a broad array of alternative management prescriptions. For the most part, these prescriptions should be consistent with the management prescribed for adjacent lands.
3. No new WSAs will be designated in the current RMP revision process.

16.7.2 Non-WSA Lands with Wilderness Characteristics and BLM Land Administratively Endorsed for Wilderness

Other land management allocations and actions may be used to manage and preserve some or all of an area’s values associated with wilderness characteristics, consistent with plan objectives. These management allocations and actions include, but are not limited to, designation of OHV categories, mineral leasing categories, VRM classes, ROS classes, special recreation management, and areas of critical environmental concern (ACECs).

16.7.3 Non-WSA Lands Likely to Have Wilderness Characteristics

The BLM has determined that there is a reasonable probability of wilderness characteristics present in Lockhart Basin. The Field Office Interdisciplinary Team will evaluate and assess any new information received from the public, including information on wilderness characteristics, to determine if there are significant new circumstances or information relevant to environmental resource concerns. If the Interdisciplinary Team makes this determination, the information will be carried forward for consideration in the planning process.

Among the choices for potential management allocations and/or actions are the following:

Off Highway Vehicle Designations – Certain areas could be closed to OHV use to preserve their wilderness characteristics. Inventoried “ways” (in WSAs) could be closed to motorized and mechanized use to enhance opportunities for primitive recreation.

Oil and Gas Leasing – The impacts of oil and gas leasing, and the actions that may follow on the wilderness characteristics of these lands could be minimized by the following actions:

- For areas open to leasing, use special stipulations to minimize the impacts to wilderness characteristics (i.e., road access and construction, visual screening, seasonal closures, watershed impact measures, etc)
- Minimize the use of seismic exploration
- Review and changes of leasing categories

Recreation – Certain areas could be managed to preserve and enhance opportunities for solitude and/or primitive and unconfined recreation. Management options could include:

- Use ROS objectives as a tool to preserve and enhance opportunities for solitude and/or primitive recreation.
- Close pre-inventoried ways to motorized and mechanized travel to enhance primitive recreation opportunities under ROS
- Limit all such travel to designated routes
- Limit commercial use such as filming, competitive and organized events or activities, and commercial permits
- Close to travel non-essential routes near to or bordering these lands, to further enhance opportunities for primitive recreation under ROS
- Close routes to non-street legal vehicles, which would limit amount of traffic in these areas
- Designate Special Recreation Management Areas

Areas of Critical Environmental Concern (ACECs) – The RMP could designate portions of these areas, where appropriate, as ACECs especially to protect values such as wildlife, view shed, geology, riparian, etc.

Woodcutting – Placing restrictions on woodcutting could help preserve the naturalness of the area by reducing road proliferation, as well as scars to vegetation and loss of cover for wildlife.

Fire Management – Portions of these areas could be placed in limited or zero wildfire suppression zones to minimize impacts to naturalness from activities such as the construction of fire roads and vegetative clearing.

Wildlife – These areas could be managed to enhance wildlife habitat, especially in those areas where wildlife has been noted as a supplemental value for wilderness characteristics. Tools available include limits on motorized or mechanized travel, including construction of new roads; oil and gas stipulations to protect wildlife; and protection of watershed and riparian areas that are crucial to wildlife.

Lands and Realty – Identify right of way exclusion and avoidance areas as possible tools to preserve and enhance wilderness characteristics of non-WSA lands with and likely to have wilderness characteristics.

16.7.4 Summary

While the BLM will not consider designating additional WSAs in this planning process, it will consider whether other lands with values associated with wilderness characteristics will be managed to preserve some or all of those values with other management allocations and actions.

16.8 REFERENCES

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BLM 2003a. Instruction Memorandum No. 2003-274, BLM Implementation of the Settlement of Utah v. Norton Regarding Wilderness Study. Washington, D.C.

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