

November 7, 2003

Ms. Sally Wisely, State Director
Utah Bureau of Land Management
Attn.: Utah State Office Business Information Center
324 South State Street, 4th floor
Salt Lake City, UT 84111

Re.: Proposed November 24 lease sale of parcels in Desolation and Dirty Devil Canyons

Dear Ms. Wisely,

I am writing on behalf of the National Outdoor Leadership School (NOLS) to express deep concern about the Bureau of Land Management's (BLM) intent to offer for lease parcels of public land in and near both Desolation and Dirty Devil Canyons. Please accept this letter as a formal protest to the November 24, 2003 lease sale of the following parcels: UT 008, UT 009, UT 010, UT 011, UT 012, UT 013, UT 015, UT 016, UT 019, UT 20, UT 026, UT 027, UT 028.

NOLS is a non-profit organization that teaches outdoor skills, leadership and environmental ethics to 9,000 students each year. Founded in 1965 and headquartered in Lander, Wyoming, NOLS employs more than 700 instructors and staff at nine locations and two professional institutes worldwide. NOLS' mission is to be the leading source and teacher of wilderness skills and leadership that serve people and the environment. The core of our educational programs includes extended backcountry expeditions of 28 to 93 days in length.

Here are our concerns about this proposed lease sale:

1. Long-standing permitted operator

NOLS holds Special Use Permits (SUPs) with the Ritchfield (Henry Mountain), Price and Vernal Field Offices of the BLM. We have been a permitted operator in Desolation Canyon since 1989, in the Dirty Devil, since 1994, and with the Price Field Office since 1995. We have a long-standing history of teaching students low-impact, back country travel and camping skills, technical river-travel skills, natural history and environmental studies and ethics in these areas. Some of the proposed parcels straddle our operating areas. Without a doubt, if they are leased, our operations and our students' experiences will be adversely affected.

For the past two seasons we have been working with BLM staff in the Henry Mountain Field Office to help protect habitat for the Mexican Spotted Owl in the area of the Dirty Devil. The BLM requested that we modify the routes that we travel by foot in order to avoid critical nesting areas. We were happy to do so and to use the opportunity to teach students

about how land managers make decisions to balance visitor use with protection of the resource. These efforts seem incongruous with this proposed lease sale and its likely effects on natural habitat.

2. Loss of roadless values and opportunities for solitude and recreation

These operating areas are critical to our educational programs because of their relatively undisturbed natural characteristics and the opportunities they offer for solitude, hands-on teaching and extended wilderness experience. We are concerned that these qualities will be significantly affected by the likely ultimate results of the leases, including surface disturbance, noise, dust, disruption of wildlife, and other impacts related to oil and gas operations. These areas represent two of a small and ever-shrinking group of natural river corridors in the U.S. that can support programs like ours that provide true wilderness education. Students receive college credit for completion of a NOLS education. But we can't teach it in an indoor classroom.

3. Resource Management Plans in progress

The BLM is currently in the process of preparing Resource Management Plans for both the Vernal and Ritchfield planning areas. We understand that these plans are designed to evaluate overall use, resource characteristics and demands on an area and chart a course for long-term sustainable management. We are confused as to why the agency would move ahead with lease sales on the verge of determining a long-term management plan for the area. We encourage the BLM to complete the RMP process before taking action that could have long-term effects on the resource.

4. Notification of existing permit holders

NOLS is not the only organization that holds SUPs to operate in these areas. Other entities will be affected by this proposed sale should it go forward. We are disturbed that the BLM would complete a lease sale without notifying existing permit holders. NOLS submits that as permittees, we are lease-holders ourselves – we rely on BLM-managed land to run a sustainable, high-quality operation. And we rely on the BLM to manage these areas to protect their unique natural characteristics.

We appreciate the opportunity to comment on the proposed lease sale and we urge you not to offer for lease the parcels listed above. Thank you for your consideration.

Best regards,

Jennifer Lamb
Public Policy Director
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