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ECONOMIC IMPACTS OF SOUTHERN UTAH WILDERNESS ALLIANCE LITIGATION ON LOCAL COMMUNITIES

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INTRODUCTION TO THE SOUTHERN UTAH WILDERNESS ALLIANCE

The Southern Utah Wilderness Alliance (SUWA), a 501(c)(3) non-profit founded in 1983, has established its reputation as an uncompromising advocate for the preservation of wilderness. At its founding SUWA's stated goal was "to defend America's red rock wilderness from oil and gas development, unnecessary road construction, rampant off-road vehicle use, and other threats to Utah's wilderness-quality lands" (SUWA, 2012(a)). Today SUWA works toward achieving "the preservation of the outstanding wilderness at the heart of the Colorado Plateau, and the management of these lands in their natural state for the benefit of all Americans" (SUWA, 2012(b)). SUWA's efforts focus on both the local and national level to preserve wilderness through the National Park and National Wilderness Preservation Systems or by other means if available (Better Business Bureau, 2012). SUWA has adopted the strategy of "litigate-first" in achieving its goals. In our analysis, we find the organization's litigious actions often have negative economic impacts on local communities.

SUWA is a locally focused group that centers its efforts on the preservation of red rock wilderness areas found in Southern Utah, as well as smaller areas in Northern Arizona, Western Colorado, and Eastern Nevada. Due to the relatively small size of the organization, SUWA usually accompanies larger environmental groups such as the Sierra Club in lawsuits. One example of this is their recent cooperation with other environmental groups as part of the Greater Canyonlands Coalition—which also includes the Natural Resources Defense Council and the National Parks Conservation Association—in a formal request to the Secretary of the Interior Ken Salazar to restrict ORV routes and usage in the areas surrounding Canyonlands National Park (SUWA, 2012(e)).

The administrative body of SUWA is highly connected with larger environmental groups. Darrell Knuffke, who serves as chair of SUWA's Board of Directors, is also a leading member of the Wilderness Society. Knuffke served as a regional director of the Wilderness Society from 1985 to 1995, and vice president for regional conservation from 1995 to 2000 (Friends of the Boundary Waters Wilderness, n.d.). Additionally, Knuffke was the interim policy director at Friends of Boundary Waters Wilderness (FBWW) from 2006-2007 and has been a member



of the board of FBWW since 2000 (Friends of the Boundary Waters Wilderness, n.d.).

SUWA is listed as a 501(c)(3) under the current tax code, which requires the organization to post their financial records and be operated for specific purposes including charitable, religious, educational, or other causes. As such SUWA has charged itself with “maintaining public buildings, monuments, or works” (IRS, 2012). In 2010, SUWA had a total income of \$2,845,792 and expenses totaling \$1,977,589, leaving a surplus of \$868,203 (Better Business Bureau, 2012). The Better Business Bureau’s examination of SUWA shows that it does not meet the BBB’s Standard for Charity Accountability, as the chair of the board is directly compensated. In addition, another board member is “... indirectly compensated as the spouse of a paid staff member” (Better Business Bureau, 2012).

Content Analysis

To better understand how SUWA conducts their campaign against oil and gas drilling, OHV use, and roads we performed a content analysis of news reports from the environmental news clearinghouse Greenwire from December 2010 to October of 2012. We classified their actions as Threats to Sue, Lawsuits, Voice (lobbying, news conferences, organized demonstrations), and Petition (a formal petition to a government agency). During this time SUWA was involved in three states: Utah, Colorado, and Wyoming. We found that SUWA engages in two types of activities, Lawsuits, or Voice, or speaking for or against a certain policy. The Action Tables we compiled during our content analysis are available in the Appendix. Table 1 below has the summary statistics from the 116 observations of SUWA’s campaign found in Greenwire during our time period.

Table 1
Summary Statistics for SUWA's Actions


Variable	Observations	Mean	Standard Deviations
Threat to Sue	1,228	2.2%	.1467
Lawsuit	1,228	7.65%	.266
Voice	1,228	5.7%	.2319
Petition	1,228	2.04%	.1413
CBD Involved	1,228	14.33%	.3505
Endangered	1,228	9.45%	.2926
Energy	1,228	7.08%	.2567
Water	1,228	2.69%	.1618

Unlike other similar groups (see our paper on the Center for Biological Diversity) SUWA did not engage in any Threats to Sue during this time or Petitions to government agencies. We find that SUWA was active in almost 19% of counties across the eleven states mentioned above. On average 20% of their activities are related to voicing their opinions on different issues, while 10% of their activities on average are lawsuits.

Overview of SUWA's Activities

SUWA's advocacy for preserving wilderness has been focused largely on preventing creation or expansion of resource extraction in wilderness areas. In 2009, for example, Secretary of the Interior Ken Salazar decided to cancel seventy-seven oil and gas leases sold at auction during the final month of the Bush Administration (Loomis, 2012). In response to this, Uintah and Duchesne Counties joined with Impact Energy Resources, Peak Royalty Holdings, and Questar Exploration and Production in a lawsuit designed to block the decision by the Secretary. SUWA, while not an official party in the case, intervened through an attorney in favor of rejecting the leases (Loomis, 2012).


In general, SUWA's lawsuits are directed at government agencies, particularly the BLM. One example is the case of *SUWA v. Norton*, which directly challenged the management of wilderness areas by the Bureau of Land Management (BLM). In this suit, SUWA alleged that the BLM "violated the Federal Land Policy and Management Act . . . and the National Environmental Policy Act . . . by not



properly managing off-road vehicle and/or off-highway vehicle (collectively, ORV) use on federal lands that had been classified by the BLM as Wilderness Study Areas (WSAs) or as having ‘wilderness qualities’ ” (SUWA v. Norton, 2002). SUWA is involved in many such cases, suing government agencies including the National Park Service, the Department of the Interior, the Environmental Protection agency, the BLM, local, state, and national governments for their alleged failure to protect natural landscapes.

SUWA’s voice is heard not only through participation in the litigation process, but also through participation in organized efforts in support of or opposition to policies that deal directly with wilderness. SUWA’s opposition to one of the more controversial aspects of environmental law in Utah, the proposed plan of Utah’s Governor Gary Herbert that would shift federally owned lands in Utah to state control and management, is just one example. In March 2012, Governor Gary Herbert signed the Transfer of Public Lands Act demanding the transfer of over thirty million acres of federal land to state control (SUWA, 2012(c)). SUWA opposed this measure from the beginning, arguing that such action would place these areas at greater risk of damage and degradation. SUWA’s concerns surrounding this measure stem from what they see as the inability of the state government to properly manage these lands. SUWA asserts that “the federal government currently spends between \$200 and \$300 million per year managing public lands in Utah” (emphasis from SUWA; SUWA, 2012(c)). SUWA maintains that if these federal lands were to be transferred to state ownership “Utah taxpayers would be stuck with the cost of managing them” (SUWA, 2012(c)). While this is patently true, it is unclear whether state administration of lands would be less effective than federal administration. In reality, taxpayers are already stuck with the cost of managing lands, as federal income tax supports the administration of public lands.

SUWA also engages in federal lobbying activities. Currently, the organization is campaigning to secure the protection of the area collectively referred to as Greater Canyonlands. SUWA has been lobbying for President Obama and his administration to bar ORV use on 1,050 miles on trails through roughly “1.4 million acres of Bureau of Land Management (“BLM”) land surrounding Canyonlands National Park” (SUWA, 2012(e)). This attempt at a grassroots movement in favor of the protection of Greater Canyonlands area is largely



being conducted through social media, including Twitter and Facebook (SUWA, 2012(g)). Despite these efforts to pressure the President into the protection of Greater Canyonlands, the Administration has not deemed it prudent to further protect this area. Instead the Administration has opted to maintain management plans written by the Bush Administration, claiming these plans already provide adequate protection for the areas in question (SUWA, 2012(e)). Plans currently being enforced specifically allow for “... proposed uranium and tar sand mining, and oil and gas development” (SUWA, 2012(e)). The Administration refused, in August of 2011, “... to host a public discussion on protecting the Greater Canyonlands region” (SUWA, 2012(e)).

SUWA continues to protest any such attempts to allow for multiple use of public lands in Southern Utah, arguing that areas like Greater Canyonlands are of immeasurable value. Although SUWA’s actions may negatively impact local economies by discouraging or even permanently preventing development, the organization disregards such costs preferring to focus instead on emotionally charged arguments that often value the preservation of wilderness above human prosperity and wellbeing.

In what follows, we present set of case studies highlighting the types of development projects opposed by SUWA and illustrating how the organization uses obstructionist legal tactics used to discourage multiple use management of public lands. We show that SUWA’s actions come at a cost, be it discouraging companies from developing in certain areas, or simply delaying projects that citizens and elected officials favor. When development is discouraged, jobs and revenues that might otherwise be infused into local economies are sent elsewhere. SUWA tends to either marginalize or completely ignore such costs, instead focusing solely on their own emotional, ecological, or ideological goals of preserving wilderness, no matter the cost.

CASE STUDIES

Alton Coal Development

Alton Coal Development (ACD) is the only surface mining project in Utah. The mine is a strip mine, and operates on 635 acres of privately owned land under a state permit. Projected to produce up to 2 million tons of coal a year for three years, ACD is in the permitting process to expand the mine on 3,500 acres of federally managed land near Bryce Canyon National Park (Whitehurst, 2012).

SUWA has used state and federal permitting processes to obstruct development and increase the cost of projects like the Alton mine. State permitting processes are required for mining on privately owned lands, whereas federal permits are required for public land. In Utah, the Division of Oil, Gas, and Mining runs the approval process for all mining permits. ACD applied for a state permit to mine coal in June 2007, and the Division finally approved ACD's permit in October 2009 after an administrative and technical review (Utah Chapter of the Sierra Club V. Board of Oil, Gas & Mining, 2012). One month later, SUWA and other environmental groups demanded a state board review the decision, arguing that the Division had "failed to follow the necessary regulatory and statutory procedures" (Utah Chapter of the Sierra Club V. Board of Oil, Gas & Mining, 2012). After several months of testimony and site inspection, the Utah Board of Oil, Gas, and Mining upheld ACD's permit in November 2010. Dissatisfied with the ruling, SUWA "promised to take the case to state courts, if necessary, [to keep] the project tied up" (Associated Press, 2010).

SUWA and other environmental groups then followed through on their promise and appealed the board's decision to the Utah Supreme Court. SUWA argued that the Utah Board of Oil, Gas, and Mining failed to protect archaeological sites, "noting the possibility of coal-hauling trucks going through the town of Panguitch's historic district" (Whitehurst, 2012). Additionally, they argued the Division had not conducted an adequate water impact statement under federal regulations despite it being a state permit. SUWA's opposition notwithstanding, the court unanimously upheld the permit in October

2012. The court found no impact to archaeological sites and further that the Division had properly followed applicable state laws (Utah Chapter of the Sierra Club V. Board of Oil, Gas & Mining, 2012).

ACD began the federal permitting process in November 2004—before the state permitting process—but has yet to start mining. The federally mandated Environmental Impact Statement (EIS) has delayed the project for several years. The BLM started the EIS in November 2006 and published a draft in November 2011 (Bureau of Land Management, 2011). SUWA petitioned the BLM to reject the proposal, complaining that the draft EIS had not addressed possible air quality, groundwater pollution, and dark sky issues in nearby national and state parks. The BLM responded to SUWA's concerns and ordered supplemental studies to the draft EIS. The BLM was expected to issue a decision in the fall of 2013, but the supplemental studies delayed the EIS until 2014 at the earliest (Bammes, 2012). Additional public comment periods, litigation, and revisions may continue to delay the permit beyond that date.

Delays to the Alton coal project have significant costs for Utah's local and state economies, and come despite local support for its development. The mine has “a pretty significant impact for Kane County” said County Commissioner Doug Heaton. During the Utah Supreme Court case, Heaton said he “called every household in Alton. Only one family opposed [the mine]” (Heaton, 2013, Personal Communication). According to ACD representative Bennett Bayer, “This application was years long in review and cost millions of dollars,” (Foy, 2010). This time and money could have been spent developing the local economy, creating jobs, and generating revenue, but instead was wasted meeting SUWA's costly, litigious demands. ACD's proposed lease on BLM lands would create 160 jobs and “[generate] \$6.5 million in wages ... and up to \$197 million in total royalty revenue, of which Utah will get half” (O'Donoghue, 2011). As long as the project remains locked in litigation, however, local economies are missing out.

Despite these facts, SUWA followed its policy of litigate first, ask questions about negative impacts on local economies later. In the case of the Alton mine and projects like it, SUWA will likely never ask questions about its impact on local citizens' well-being, preferring to focus solely on the wilderness that they value above all else.




Oil Extraction in the Green River Formation

The Southern Utah Wilderness Alliance is among a number of environmental groups threatening to sue the Bureau of Land Management (BLM) for its March 2013 decision to allow oil and gas extraction throughout the Green River Formation in Utah, Colorado, and Wyoming (Grand Canyon Trust, 2013). The lawsuit accuses the BLM of violating the Endangered Species Act by failing to consult with the U.S. Fish and Wildlife Service (USFWS) when it altered several Resource Management Plans. The threat comes after an earlier challenge to BLM policy permitting oil extraction on two million acres of public land. In response to the earlier challenge, the BLM reduced the scope of exploration from two million acres to just over 800,000 (Grand Canyon Trust, 2013 p. 5; Southern Utah Wilderness Alliance, 2013).

According to Steve Bloch, SUWA's Litigation Director "Leasing for oil shale and tar sands is just a bad idea" (Southern Utah Wilderness Alliance, 2013). Bloch also expressed SUWA's opinion that the leases would harm wild areas in the Colorado Plateau region saying, "Development would also further degrade the region's air quality, harm native ecosystems, and exacerbate the harmful impacts that we're already seeing from climate change" (Southern Utah Wilderness Alliance, 2013). According to the BLM, they have not consulted with the USFWS because the specifics of the policy have yet to be developed (Associated Press, 2013).

Utah, Colorado, and Wyoming contain the world's largest oil shale deposits (United States Government Accountability Office, 2012). According to reports by the Government Accountability Office and other estimates, the Green River Formation holds upwards of three trillion barrels of oil—more than all OPEC countries combined (Farnham, 2013; Rocky Mountain Forum, n.d.; United States Government Accountability Office, 2012). The International Energy Agency predicts that the U.S. will become the world's largest oil producer by 2020 (Farnham, 2013). The reserves have the potential to fill the global growing oil demand. "The technology for assessing oil reserves is pretty good," according to the GAO's director for energy and science, Frank Rusco, "there is a very, very large amount of oil trapped down there that could be recovered. It's just that, so far, it can't be recovered at a profit" (Farnham, 2013).



Although geological realities have made extraction of oil shale difficult in the past, today there is reason for oil producers to be optimistic. The United State's oil shale and tar sands reserves are uniquely accessible, giving the country a distinct advantage over other future oil shale producers. Additionally, the cost of drilling, which once posed a considerable obstacle to extraction, is decreasing (Saravalle, 2013(b)). Companies are developing new and innovative techniques to bring it to the surface. Several companies with stakes in the disputed area, such as the Estonian oil company, Enefit, have a proven track record of extracting oil from shale and have successfully done so in Europe for over thirty years (Farnham, 2013). According to Rikki Hrenko, the CEO of Enefit's Utah subsidiary, "It's more labor intensive to have to mine the shale, ... [b]ut the economics are still quite feasible" (Farnham, 2013). The company hopes to secure permits before the end of 2016, and to be producing up to 25,000 barrels a day by 2020 (Farnham, 2013). This development will bring welcome economic benefits to the state of Utah in the form of job creation and increased tax revenues.

As previously inaccessible oil becomes available the potential economic windfalls for both the nation and local communities are extensive. Such is the case with North Dakota, which is experiencing an economic boom thanks to oil exploration. The state recently demonstrated the highest economic growth in the country—13.4%—more than five times the national average (Saravalle, 2013(a)). In addition, Bismarck-Mandan's unemployment rate in 2011 was just 3.4%, the lowest of any metropolitan area in the U.S. (Allenspach, 2012).

Texas is experiencing similar increased economic activity thanks largely to their oil industry. The city of Midland, for example, recently issued \$107 million in building permits in one week (McEwen, 2013). At a time when the national unemployment rate hovers around 7.5% such projects will create badly needed jobs and spur economic growth (Bureau of Labor Statistics, 2013).


SUWA's attempts to prevent any extraction of oil shale resources in the Green River Formation limits the area's potential for beneficial economic growth. Jobs and revenues that might be infused into local economies by development of valuable natural resources are being foregone because of one environmental organization's emotional attachment to the region's wilderness. Further, SUWA's attempts limit the

BLM's ability to fulfill its multiple-use mission, which includes balancing recreation with natural resource use. SUWA's efforts in the Green River Formation are just one example of the organization's emphasis on litigation rather than cooperation.

Gasco's Uintah Basin Natural Gas Project

In June 2012, former Interior Secretary Ken Salazar released a record of decision approving Gasco Energy Inc.'s Uintah Basin Natural Gas Project (BLM, 2012). After an eight-year approval process, local officials welcomed the announcement as overdue, describing the benefits the project would bring to the local economy. Uintah County Commissioner Mike McKee, for instance, estimated that the project would infuse five billion dollars into the economy over a fifteen-year period (O'Donoghue, 2012). Kathleen M. Sgamma of the Western Energy Alliance described how the project "balance[d] natural gas development with environmental protection," and estimated that the plan would help create "over 2,700 jobs in the near-term and 4,300 in the long-term" (Boman, 2012).


Not everyone was excited with the approval of Gasco's project, which could serve as a blueprint for future developments aimed at extracting some three trillion cubic feet of gas from the Uintah Basin (O'Donoghue, 2012). SUWA, alongside the Wilderness Society and the Natural Resources Defense Council, filed a lawsuit in January 2013 against the BLM for approving the project. SUWA pointed to 215 wells the BLM approved that SUWA had one of the following issues with as justifications for legal action; first some of the wells were within proposed wilderness, second SUWA felt the project was too close to Desolation Canyon, third SUWA raised concerns over the amount of ozone pollutants, as regulated by the Clean Air Act that the project could produce, and cited previous failures of the BLM to abide by restrictions within NEPA. Claiming the Interior Department failed to "reduce the project's footprint and protect the Desolation Canyon Wilderness" Stephen Bloch, an attorney for SUWA said, "By bowing to [Gasco's] proposal, Secretary Salazar put one company's profits above the protection of this world-class landscape. Americans are worse off because of this short-sighted decision" (O'Donoghue, 2013).



Gasco first obtained leases in the Uintah Basin near Desolation Canyon during the Clinton Administration in the 1990s, prior to any proposed wilderness lands in the area. W. King Grant, former CEO and President of Gasco, noted that at the time of the lease, SUWA “filed no protests or legal challenges” (Grant, 2012). In 2004, Gasco submitted a plan for a natural gas development project seeking about 1,500 gas wells, an equal number of well pads, with a total impacted area of 7,533 acres (O’Donoghue, 2013). Between 2004 and 2008, Gasco’s proposal underwent “exhaustive review” by BLM, FWS, and the EPA (Grant, 2012). During the process, the BLM conducted six separate public meetings seeking input from concerned citizens and stakeholders (Grant, 2012). Gasco also sat down with environmental groups, including SUWA, more than six times in 2011 to discuss the Uintah Basin Natural Gas Project (Grant, 2012).

Throughout the approval process, the BLM adhered to regulations regarding environmental impact statements and coordination with relevant agencies and concerned stakeholders. According to a release regarding the Gasco project, the BLM worked closely with the Bureau of Indian Affairs, Uintah and Duchesne Counties, the U.S. Fish and Wildlife Service (USFWS), and the Environmental Protection Agency (EPA) to address any potential environmental concerns (Bureau of Land Management, 2012). An email in an article published by Bloomberg on March 16, 2012 records the EPA’s coordination with the BLM as well as the opinion of the agency regarding the project, “We [the EPA] worked closely together [with the BLM] to address environmental and public health impacts and believe the final environmental impact statement addresses them well...The Gasco project is a good example of a domestic energy development project that will go forward with vital safeguards to control pollution” (Klimasinska, 2012).

After a lengthy, eight-year approval process, Gasco made significant concessions in their 2004 proposal, and consented to a variety of mitigation measures to get approval for the Uintah Basin project. The final plan, approved by the BLM, consisted of a maximum of 1,298 wells, no more than 575 well pads, and a surface disturbance of 3,600 acres, which amounted to half of the initial proposal, and only two percent of the total development area of 206,826 acres (O’Donoghue, 2013). Drilling would take place over a fifteen-year period, and would incorporate directional drilling to reduce surface impacts (O’Donoghue, 2013). Ninety-four percent of the water used for the project would be treated and recycled production




water (BLM, 2012). Visual and noise mitigation requirements were written into the plan to preserve the experience of recreationists in the area. Historic and cultural resources were afforded protection in the plan through a programmatic agreement in accordance with the National Historic Preservation Act. The plan also prohibited any drilling “below the rim of Nine Mile Canyon, in the 100 year flood plain, or in critical habitat for endangered fish” (BLM, 2012).

The BLM summarized the environmental protections within the final plan describing how it reduced “surface disturbance, eliminate[d] floodplain impacts, protect[ed] the viewshed for Green River, Desolation Canyon, and Nine-Mile Canyon, and reduce[d] impacts to water, soil and air quality” (BLM, 2012). Commenting on the success of the plan, former Interior Secretary Ken Salazar said, “This plan reflects our commitment to responsibly address public concerns regarding resource and land use issues in the Uinta Basin area” (BLM, 2012). Salazar continued, “Working together with Gasco Energy, Inc., we have made substantial improvements to protect land and water resources, safeguarding iconic areas such as Desolation and Nine Mile Canyons, while supporting Utah’s economy and reducing our dependence on foreign oil” (BLM, 2012).

Despite Gasco’s eight year efforts to develop a plan in the Uintah Basin that accounted for stakeholders’ and citizens’ interests, SUWA’s lawyer Bloch opined, “If you put lipstick on a pig, it’s still a pig, and this project is a pig” (Streater, 2012). SUWA, alongside the National Resources Defense Council, the Wilderness Society, and the Sierra Club, filed an official complaint in a Utah District Court on January 18, 2013, alleging the BLM had failed to abide by NEPA, adequately assess environmental impacts, and wrongly approved a project that violated standards for ozone and fine particulates regulated under the Clean Air Act (SUWA, 2013).

The proximity of the Uintah Basin Project to Desolation Canyon was of particular concern to SUWA. In addition to the noise, viewshed, and environmental mitigation measures mentioned above, Gasco Energy and the BLM assured SUWA that no drilling would take place in Desolation Canyon or nearby wilderness study areas. Plans approved by the BLM state that the closest proposed drilling site would be four miles from Desolation Canyon National Historic Landmark and five miles from Desolation Canyon Wilderness Study Area (BLM,




2012). SUWA contends that five miles is not far enough away. “The fact the activity is five miles away from the canyon is irrelevant,” said Gloch, “The issue has always been the proximity to the Desolation Canyon portion of the Green River and the Desolation Canyon proposed wilderness area, which is going to be significantly damaged as a result of the project” (Streater, 2012).

In expressing frustration over the Gasco Project, SUWA often references an earlier development project approved for the Uintah Basin in which the organization had more of a voice. Prior to the BLM’s approval for Gasco’s Uintah Basin Project, a subsidiary of Anadarko Petroleum had actively worked with the BLM and SUWA to get approval for the Greater Natural Buttes Area Gas Development Project. Beyond implementing strategies and technology to address air quality problems, Kerr-McGee Oil & Gas Onshore LP agreed to limit the number of wells around “wilderness-quality lands along the White River and to purchase and preserve private lands along the river corridor” (Streater, 2012). Because the outcome benefited them, SUWA openly praised the project for the collaboration that took place between developers, agencies, and environmental groups.

Unlike the Anadarko project, SUWA failed to get everything they wanted from Gasco’s development in the Uintah Basin. Immediately following Gasco’s approval, SUWA denounced the Gasco process claiming it was nothing like the collaborative process through which Anadarko Petroleum had gained approval for the Greater National Buttes agreement (Streater, 2012). Expressing his disdain for the Gasco project’s approval, Bloch said, “With this decision, the secretary’s rhetoric of a collaborative approach to tackling difficult problems has fallen flat” (Streater, 2012). Juan Palma, the BLM state director for Utah, disagrees with Bloch describing how the process was “a prime example of the successful collaboration among the BLM, Environmental Protection Agency, the U.S. Fish and Wildlife Service and Uinta and Duchesne Counties” (BLM, 2012). The main distinction between the two development projects is that SUWA got what they wanted with Anadarko, and failed to get what they wanted with Gasco.

SUWA’s cries against the Uintah Basin project reflect less a failure of a collaborative process, and more the stubbornness of an environmental group




regarding an emotionally charged land use issue. Gasco's Uintah Basin project shows significant promise for creating jobs and contributing to local economies, a benefit rarely mentioned by SUWA. A 2012 press release from the BLM reports that the development could support up to two hundred jobs and could lead to the development of over three trillion cubic feet of gas in the area in coming decades (BLM, 2012). The mitigation measures adopted by Gasco to reduce the environmental impacts are significant and took years to investigate and plan, but SUWA tends to frame the project as a reckless endeavor that failed to look at long-term impacts, marginalizing the level of detail included in the plan to protect the environment and preserve recreationists' experience in Desolation Canyon. The case of Gasco developing natural gas in the Uintah Basin was a collaborative process that addressed economic, environmental, social, and administrative concerns, it just happened to be in an area SUWA deemed of immeasurable value.

Revised Section 2477: Rights-of-Way Disputes in Southern Utah

Revised Section 2477 (RS 2477) was a section of the Mining Act of 1866 that stated, in full, "and be it further enacted, that the right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted" (BLM, 2001). The statute allowed for roads to be built through public lands without any approval from the federal government. This law greatly facilitated the economic development of the West, allowing states to build roads that reached previously inaccessible places where businesses and towns could now flourish. In Utah alone, over 25,000 roads segments running for a combined 45,000 miles were created under the act (Liesik, 2012).


As the national attitude toward the environment shifted, RS 2477 was repealed when the Federal Land Policy and Management Act of 1976 (FLPMA) was passed by Congress. However, the act granted an exemption for existing rights-of-way: "Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of this Act." (BLM, 2001). In other words, all rights-of-way that existed before the repeal of RS 2477 would still be considered valid.



Because no records of rights-of-way were required—the only requirement to establish a right of way was to start using it—much of the controversy over RS 2477 claims has been focused on whether or not the road claims actually existed before 1976 (Feriancek, 2004, p. 68). Because RS 2477 did not establish a federal standard for what constituted a right-of-way, when disputes over roads have been raised, courts have consistently used the state’s definition of a right-of-way (Feriancek, 2004).

The Southern Utah Wilderness Alliance (SUWA) is a member of the Highway Robbery coalition, a group that includes large environmentalist organizations like the Sierra Club and Earthjustice. The coalition is “united in its opposition to the use of RS 2477 to bulldoze roughshod over our nation’s special lands” (Highway Robbery, 2007). SUWA has not only voiced opposition to thousands of RS 2477 claims (SUWA, 2013), but has also been involved in litigating RS 2477 cases (Southern Utah Wilderness Alliance v. Bureau of Land Management, 2006).

One Utah case in particular stands out in illustrating SUWA’s costly, litigate-first approach. In 1996, Garfield, Kane, and San Juan counties began grading sixteen roads located on BLM land. When SUWA complained to the BLM, the BLM took no initial action against the three counties. SUWA promptly sued the three counties, claiming that they had illegally graded the roads. The suit, joined by the Sierra Club, contended that six of the roads were located in wilderness study areas, nine were located in the Grand Staircase-Escalante National Monument, and “six others traversed a mesa overlooking the entrance corridor to the Needles District of Canyonlands National Park” (SUWA v. Bureau of Land Management, 2005). These groups also sued the BLM for not stopping the construction, citing FLMPA, the Antiquities Act, and the National Environmental Policy Act. The BLM responded with a cross claim against the three counties, arguing that they were guilty of trespassing on federal land and had violated FLPMA (Southern Utah Wilderness Alliance v. Bureau of Land Management, 2006). The three counties argued that the roads qualified under RS 2477 under Utah’s definition of a road. Ultimately, the court used Utah’s definition of a road: continuous use for at least ten years. If a road met that definition, then it also qualified under RS 2477 (Peloso, n.d.).



The lawsuit lasted nine years and SUWA remains unsatisfied with its outcome. SUWA's constant harassment over RS 2477 issues has included several other cases in southern Utah, including a lawsuit over eleven miles of road in Canyonlands National Park, a dispute over another road on BLM land, and a handful of roads used by Kane County (Blue Ribbon Magazine, 2006; Zukoski, 2007; SUWA, 2013, March 21). The State of Utah has filed thirty lawsuits seeking to reclaim its historic rights-of-way through federal land, and SUWA has expressed its intention to "participate in a majority of these lawsuits" (SUWA, 2013, March 21).

SUWA's legal intervention with regards to RS 2477 is always costly and often unreasonable. The organization makes it difficult for counties like Garfield, Kane, and San Juan to maintain their roadways, limiting economic activity in those counties by making transportation more difficult. This case study is yet another example of SUWA's attempts to limit the BLM's ability to fulfill its multiple-use mission, by limiting activities that can occur on public lands. SUWA places such a high value on wilderness areas where contested roads are located that they consider only the pricelessness of the natural landscape, with no regard for the well being of the area's residents. Once again, SUWA prefers to litigate first rather than work with citizens and organization on the ground to find mutually beneficial solutions.

Greater Canyonlands and OHVs

Located in southeastern Utah, the Greater Canyonlands area consists of 1.5 million acres and makes up "the largest remaining block of undeveloped land in the lower 48" (Maffly, 2013). According to SUWA, Greater Canyonlands includes Canyonlands National Park, Natural Bridges National Monument, and the Glen Canyon National Recreation Area (Fidel, 2011). With such a diverse composition, this land is valuable for multiple uses, especially for recreational activities such as off-highway vehicles (OHVs). Further, the federal and state agencies are charged with a multiple-use mission, and recreation including OHV use falls under that mission.


Throughout the Mountain West, OHV use is popular, with a higher than average OHV participation rate of 28% of the population (Jakus et al., 2013). There is no doubt that off-highway vehicle use is a major part of local economies;

however, there are doubts as to where OHVs should be permitted. According to SUWA, “Ecosystems of the West . . . are especially vulnerable to OHV-related activities on unpaved (gravel or dirt) roads and trails due to the effects they impose on soils and vegetation, which may take centuries to recover” (Southern Utah Wilderness Alliance, 2011).

Beginning in 1999, SUWA and other anti-access groups sued the BLM for allegedly not regulating OHV recreation according to the National Environmental Policy Act (NEPA) in Canyonlands National Park. SUWA’s justification came from the Administrative Procedure Act (APA) “which allows federal courts to compel government action when an agency has failed to meet its legal duties” (Norton v. Southern Utah Wilderness Alliance. 2004. 542 U.S. 55). SUWA requested nine popular OHV areas be closed, but the Utah District Court rejected the claim. The 10th Circuit Court of Appeals reversed the decision on the grounds that “the bureau’s discretion was limited to deciding how to implement the act, not if to implement it, and that SUWA could therefore bring suit to force it” (Norton v. Southern Utah Wilderness Alliance. 2004. 542 U.S. 55). The BLM then appealed the appellate court’s decision to the Supreme Court. It was there that “The OHV groups convinced the District Court that SUWA’s claims went far beyond the standard and were really attempting to dictate the everyday activity of BLM” (Blue Ribbon Coalition, 2004).

SUWA’s “management through litigation” approach was the driving force behind efforts to ban OHV use in the Greater Canyonlands (Blue Ribbon Coalition, 2004). The Supreme Court decided in Norton v. Southern Utah Wilderness Alliance (2004), that “A general complaint based on policy differences...could not be heard under the APA,” with a 9–0 vote in favor of Norton (Norton v. Southern Utah Wilderness Alliance. 2004. 542 U.S. 55).

In 2009, SUWA filed another lawsuit against the BLM over the designation of 20,000 miles of OHV routes in the Greater Canyonlands (Fidel, 2011). SUWA believed these “travel plans developed in the Moab, Price and Vernal Field Offices violate[d] the law by failing to adequately analyze environmental effects of vehicle use” (Blue Ribbon Coalition, 2009). They claimed that “the BLM failed to include ‘quantitative air quality modeling for ozone and other criteria pollutants regulated



under the Clean Air Act” (Blue Ribbon Coalition, 2009), and that “the BLM failed to analyze the impacts of oil and gas development and vehicle use on climate change.” (Blue Ribbon Coalition, 2009). These cases are still in litigation.

In 2012, SUWA and other environmental groups brought an additional lawsuit against the BLM for their South-Central Utah Management Plan, also known as the Richfield Plan. The approximate two million acres of land in the Richfield area would be used for energy development and OHV recreation. More specifically, “80 percent of the land ... to energy development, while some 90 percent of the area would be open to motorized off-highway vehicle recreation” (Salt Lake Tribune, 2012, December 27). SUWA argued that the BLM failed to manage the land effectively and follow the federal laws, rules and executive orders to instead aid development. The “spider web” of OHV routes was one main component to push the SUWA to create a lawsuit against the BLM (Salt Lake Tribune, 2012, December 27). SUWA hopes to turn this area into protected wilderness. Doing so would eliminate any OHV recreation or energy development within the Richfield area.

SUWA’s litigation practices, and attempts to limit the BLM’s ability to manage the Greater Canyonlands will inevitably limit the economic viability of the area. If OHV use is limited, those who might travel to the area may be deterred from doing so and, as a result, tourism may decline. Prohibiting any OHV access to the Greater Canyonlands will not only have an adverse economic effect on local economies, it will likely affect the entire state of Utah. SUWA’s emotionally charged dream of a pristine wilderness will only come at the cost of rural economic development in the Greater Canyonlands.



CONCLUSIONS

The litigation and lobbying events illustrated here provide examples that highlight the priorities of activist groups, like SUWA, who place preservation of wilderness areas as paramount. Often working at odds with the wishes of local citizens, who would prefer to enjoy the economic benefits of development, SUWA acts to block development based on emotional values about natural landscapes they find to be of priceless value.

State and federal organizations are tasked with multiple use mandates—which include preservation, energy and mineral extraction, and ORV and other recreation activities. SUWA and similar organizations frequently act to block any use of public lands for anything other than preservation. This single-minded approach places such organizations, at times, in direct opposition to the desires and economic welfare of the impacted local populace. Although the law mandates a multiple-use approach for most public lands, areas designated as wilderness are set aside for the sole purpose of preservation. SUWA and other groups often pursue wilderness designation to prevent any development of any kind.

Wilderness designation generally eliminates the possibility of extracting energy or developing recreation facilities, and therefore can negatively affect local economies. In fact, a Utah State University study found that, “federally designated Wilderness negatively impacts local economic conditions,” and that those counties with wilderness have lower household income, total payroll, and county tax receipts than counties without wilderness (Steed, Yonk & Simmons, 2011). SUWA’s efforts to pursue designating more wilderness ignore these potential costs faced by local economies, placing the value of pristine landscapes above that of human prosperity.

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APPENDIX

Land Action Table

Article Date	State	County	Area	Agency	Action	Article
11/5/12	Utah	Tooele	Cedar Mountain	Private Fuel Storage	Voice	States' Rights Stalwart Bishop May Lead Committee
10/31/12	Utah	San Juan	Canyonlands National Park	BLM	Lawsuit	Attorney for Utah Wilderness Group Moving to Earthjustice in Denver
10/31/12	Utah	Grand	Canyonlands National Park	BLM	Lawsuit	Attorney for Utah Wilderness Group Moving to Earthjustice in Denver
10/31/12	Utah	Wayne	Canyonlands National Park	BLM	Lawsuit	Attorney for Utah Wilderness Group Moving to Earthjustice in Denver
10/31/12	Utah	Garfield	Canyonlands National Park	BLM	Lawsuit	Attorney for Utah Wilderness Group Moving to Earthjustice in Denver
10/31/12	Utah	Kane	Bryce Canyon National Park	Utah State Board of Oil, Gas, and Mining	Lawsuit	Utah High Court Rules for Strip Mine Near Bryce Canyon
10/2/12	Utah	Box Elder	Coral Pink Sand Dunes State Park	BLM, FWS	Voice	Identified as Vulnerable 28 Years Ago, Utah Beetle Finally Gets Listing Proposal
10/2/12	Utah	Tooele	Coral Pink Sand Dunes State Park	BLM, FWS	Voice	Identified as Vulnerable 28 Years Ago, Utah Beetle Finally Gets Listing Proposal
10/2/12	Utah	Davis	Coral Pink Sand Dunes State Park	BLM, FWS	Voice	Identified as Vulnerable 28 Years Ago, Utah Beetle Finally Gets Listing Proposal
10/2/12	Utah	Weber	Coral Pink Sand Dunes State Park	BLM, FWS	Voice	Identified as Vulnerable 28 Years Ago, Utah Beetle Finally Gets Listing Proposal
9/27/12	Utah	Uintah	Book Cliffs	BLM	Lawsuit	Seep Ridge Paving Project Lawsuit: Road to Ruin or Opportunity
9/27/12	Utah	Grand	Book Cliffs	BLM	Lawsuit	Seep Ridge Paving Project Lawsuit: Road to Ruin or Opportunity
9/16/12	Utah	Uintah	Dinosaur National Monument	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	San Juan	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Grand	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Wayne	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Garfield	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Carbon	Desolation Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Emery	Labyrinth Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	Utah	Iron	Labyrinth Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
6/18/12	Utah	Carbon	Nine Mile Canyon, Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	Utah	Duchesne	Nine Mile Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	Utah	Uintah	Nine Mile Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	Utah	Emery	Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	Utah	Grand	Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
5/8/12	Colorado	Rio Blanco	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	Colorado	Moffat	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	Utah	Uintah	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	Utah	Duchesne	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	Utah	Carbon	West Tavaputs Plateau	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
4/24/12	Utah	San Juan	Canyonlands National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Grand	Canyonlands National Park, Arches National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Wayne	Canyonlands National Park, Capitol Reef National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Garfield	Canyonlands National Park, Capitol Reef National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Sewier	Capitol Reef National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Emery	Capitol Reef National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Summit	Arches National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Washington	Zion National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Iron	Zion National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
4/24/12	Utah	Kane	Zion National Park	BLM	Voice	Coalition Decries Utah Road Claims as 'Back-Door Attack' on Parks, Wilderness
3/16/12	Colorado	Rio Blanco	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	Colorado	Moffat	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	Utah	Uintah	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	Utah	Duchesne	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
11/17/11	Utah	Emery	Uintah Basin	BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
11/17/11	Utah	Grand	Uintah Basin	BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
11/17/11	Utah	Salt Lake	Uintah Basin	BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
10/27/11	Utah	Carbon	Uintah Basin	BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
10/27/11	Utah	Emery	Uintah Basin	BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
10/27/11	Utah	Grand	Uintah Basin	BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
7/14/11	Utah	San Juan	Canyonlands National Park	BLM, DOI	Voice	Enviros Press BLM to Reconsider OHV Use in Utah Canyonlands
7/14/11	Utah	Grand	Canyonlands National Park	BLM, DOI	Voice	Enviros Press BLM to Reconsider OHV Use in Utah Canyonlands
7/14/11	Utah	Wayne	Canyonlands National Park	BLM, DOI	Voice	Enviros Press BLM to Reconsider OHV Use in Utah Canyonlands
7/14/11	Utah	Garfield	Canyonlands National Park	BLM, DOI	Voice	Enviros Press BLM to Reconsider OHV Use in Utah Canyonlands
2/24/11	Utah	Millard	Canyonlands National Park	BLM, DOI	Voice	Utah Lakebed Could Become Massive Potash Producer
1/13/11	Utah	Kane		Kane County	Lawsuit	Court Rules Enviros Can't Challenge Utah County's Road Claims

Land Action Table

Article Date	State	County	Area	Agency	Action	Article
12/16/10	UT	Garfield	Bryce Canyon National Park	Utah Board of Oil, Gas and Mining		Enviros Challenge Coal Mine Proposal Near Bryce Canyon NP
12/16/10	UT	Kane	Bryce Canyon National Park	Utah Board of Oil, Gas and Mining		Enviros Challenge Coal Mine Proposal Near Bryce Canyon NP
1/27/11	CO	Rio Blanco	Uintah Basin	BLM	Voice	Utah Drilling Proposal Snared Over EPA Concerns About Ozone
1/27/11	CO	Moffat	Uintah Basin	BLM	Voice	Utah Drilling Proposal Snared Over EPA Concerns About Ozone
1/27/11	UT	Uintah	Uintah Basin	BLM	Voice	Utah Drilling Proposal Snared Over EPA Concerns About Ozone
1/27/11	CO	Duchesne	Uintah Basin	BLM	Voice	Utah Drilling Proposal Snared Over EPA Concerns About Ozone
2/17/11	CO	Rio Blanco	Uintah Basin	BLM	Voice	Monitors Record Winter Ozone Spikes in Utah Gas Field
2/17/11	CO	Moffat	Uintah Basin	BLM	Voice	Monitors Record Winter Ozone Spikes in Utah Gas Field
2/17/11	UT	Uintah	Uintah Basin	BLM	Voice	Monitors Record Winter Ozone Spikes in Utah Gas Field
2/17/11	UT	Duchesne	Uintah Basin	BLM	Voice	Monitors Record Winter Ozone Spikes in Utah Gas Field
2/24/11	UT	Millard		BLM, DOI	Voice	Utah Lakebed Could Become Massive Potash Producer
4/4/11	UT	Uintah		BLM	Lawsuit	Utah Conservation Groups Reach Deal with Drilling Company
4/7/11	UT	Uintah		BLM	Lawsuit	Agreement Reached on Drilling Project Near Utah's White River
4/7/11	UT	Duchesne		BLM	Lawsuit	Agreement Reached on Drilling Project Near Utah's White River
4/7/11	UT	Carbon		BLM	Lawsuit	Agreement Reached on Drilling Project Near Utah's White River
4/7/11	UT	Emery		BLM	Lawsuit	Agreement Reached on Drilling Project Near Utah's White River
4/7/11	UT	Grand		BLM	Lawsuit	Agreement Reached on Drilling Project Near Utah's White River
4/21/11	CO	Rio Blanco	Uintah Basin	BLM	Voice	Winter Ozone Problem Continues to Mystify Regulators, Industry
4/21/11	CO	Moffat	Uintah Basin	BLM	Voice	Winter Ozone Problem Continues to Mystify Regulators, Industry
4/21/11	UT	Uintah	Uintah Basin	BLM	Voice	Winter Ozone Problem Continues to Mystify Regulators, Industry
4/21/11	UT	Duchesne	Uintah Basin	BLM	Voice	Winter Ozone Problem Continues to Mystify Regulators, Industry
4/21/11	WY	Sweetwater	Green River Basin	BLM	Voice	Winter Ozone Problem Continues to Mystify Regulators, Industry
6/16/11	UT	Uintah	Uintah Basin	BLM	Voice	Uintah Drilling Agreement Could Worsen Basin's Ozone Problem
6/17/11	UT	Duchesne	Uintah Basin	BLM	Voice	Uintah Drilling Agreement Could Worsen Basin's Ozone Problem
6/18/11	CO	Rio Blanco	Uintah Basin	BLM	Voice	Uintah Drilling Agreement Could Worsen Basin's Ozone Problem
6/19/11	CO	Moffat	Uintah Basin	BLM	Voice	Uintah Drilling Agreement Could Worsen Basin's Ozone Problem
7/14/11	CO	Rio Blanco	Uintah Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Moffat	Uintah Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Rio Blanco	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Garfield	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production

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7/14/11	CO	Mesa	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Pitkin	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Delta	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Gunnison	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	CO	Montrose	Piceance Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	UT	Uintah	Uintah Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	UT	Duchesne	Uintah Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
7/14/11	WY	Sweetwater	Green River Basin	Mid-America Pipeline, Co., BLM	Voice	Proposed Line Could Expand West's Natural Gas Liquids Production
10/27/11	UT	Carbon		BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
10/27/11	UT	Emery		BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
10/27/11	UT	Grand		BLM	Voice- Agree not to Sue	Road Closures Erode Good Will Over Utah Drilling Project
11/10/11	UT	Garfield	Bryce Canyon National Park	BLM	Lawsuit	Coal Lease Plan Near Utah National Park Advances
11/10/11	UT	Kane	Bryce Canyon National Park	BLM	Lawsuit	Coal Lease Plan Near Utah National Park Advances
11/17/11	UT	Emery		BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
11/17/11	UT	Grand		BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
11/17/11	UT	Salt Lake		BLM	Voice	Bishop Offers Rare Kudos for Salazar's Plan
3/16/12	CO	Rio Blanco	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	CO	Moffat	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	UT	Uintah	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
3/16/12	UT	Duchesne	Uintah Basin	BLM	Voice	Revised Utah Drilling Project Moving Forward, Despite Concerns
4/9/12	CO	Rio Blanco	Uintah Basin	BLM	Voice	Utah Drilling Project Earns Praise from Enviros
4/9/12	CO	Moffat	Uintah Basin	BLM	Voice	Utah Drilling Project Earns Praise from Enviros
4/9/12	UT	Uintah	Uintah Basin	BLM	Voice	Utah Drilling Project Earns Praise from Enviros
4/9/12	UT	Duchesne	Uintah Basin	BLM	Voice	Utah Drilling Project Earns Praise from Enviros
5/8/12	CO	Rio Blanco	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	CO	Moffat	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	UT	Uintah	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	UT	Duchesne	Uintah Basin	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
5/8/12	UT	Carbon	West Tavaputs Plateau	DOI, BLM	Voice	Utah Project a 'Historic Milestone' -- Salazar
6/18/12	UT	Carbon	Nine Mile Canyon, Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	UT	Duchesne	Nine Mile Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar

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6/18/12	UT	Uintah	Nine Mile Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	UT	Emery	Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
6/18/12	UT	Grand	Desolation Canyon	DOI, BLM	Voice	Project Near Utah Canyon 'Environmentally Appropriate' -- Salazar
7/11/12	UT	Kane	Bryce Canyon National Park	BLM	Voice	BLM to Conduct Additional Review of Controversial Utah Lease
7/23/12	CO	Rio Blanco	Uintah Basin	US EPA	Lawsuit	Groups Sue EPA Over Smog in Heavily Drilled Utah Basin
7/23/12	CO	Moffat	Uintah Basin	US EPA	Lawsuit	Groups Sue EPA Over Smog in Heavily Drilled Utah Basin
7/23/12	UT	Duchesne	Uintah Basin	US EPA	Lawsuit	Groups Sue EPA Over Smog in Heavily Drilled Utah Basin
7/23/12	UT	Uintah	Uintah Basin	US EPA	Lawsuit	Groups Sue EPA Over Smog in Heavily Drilled Utah Basin
9/6/12	UT	Uintah	Dinosaur National Monument	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	San Juan	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Grand	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Wayne	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Garfield	Canyonlands National Park	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Carbon	Desolation Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Emery	Labyrinth Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
9/6/12	UT	Iron	Labyrinth Canyon	DOI, BLM	Lawsuit	Appeals Court Upholds Salazar's Decision to Cancel 77 Utah Leases
10/31/12	UT	Kane	Bryce Canyon National Park	Utah State Board of Oil, Gas, and Mining	Lawsuit	Utah High Court Rules for Strip Mine Near Bryce Canyon
11/5/12	UT	Tooele	Cedar Mountain	Private Fuel Storage	Voice	States' Rights Stalwart Bishop May Lead Committee

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