



southern  
utah  
wilderness  
alliance

September 8, 2008

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, DC 20426

Re: FERC Project No. 13146 Comments on the application for a preliminary permit known as Bull Canyon Pumped Storage Water Power Project by Utah Independent Power.

Dear Ms. Bose,

Southern Utah Wilderness Alliance (SUWA) writes to express our grave concerns regarding the proposal for a pumped storage reservoir scheme in the Bull Canyon and Day Canyon areas. SUWA has had a long-standing interest in the management of public lands in Utah, and often participates in the decision-making process for project proposals and actions that could potentially affect lands included in the Utah Wilderness Coalition's statewide wilderness proposal – America's Red Rock Wilderness Act ("ARRWA"). *See* Attachment A – map of ARRWA wilderness proposal. ARRWA has been introduced in Congress since 1989 – currently introduced as H.R. 1919 and S. 1170 in the U.S. Senate – and enjoys bipartisan support with 158 co-sponsors in the House and 20 in the Senate. SUWA is comprised of 15,000 members nationally, many of whom have recreated or hope to recreate in the Goldbar Canyon proposed wilderness area – the proposed wilderness area in which the Bull Canyon project would be located. SUWA members enjoy hiking, climbing and sightseeing in Long Canyon, valuing the scenery, opportunities for solitude and reflection, and the riparian habitat.

The proposed project would substantially disturb the wilderness character of this unit within ARRWA – the Goldbar Canyon proposed wilderness. *See* Attachment B – map detailing wilderness characteristics in the proposed project. The Bureau of Land Management (BLM) – the primary land manager for the proposed project – has identified much of the proposed project area as possessing wilderness characteristics.<sup>1</sup> The large scale surface disturbance caused by the proposed project would result in a permanent loss of this wilderness characteristic.

The proposed project is inconsistent with both the BLM's current Grand Resource Management Plan and the Proposed Moab Resource Management Plan (PRMP). The

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<sup>1</sup> i.e. possession of the characteristics defining wilderness quality lands as defined by the 1964 Wilderness Act: naturalness, opportunities for solitude and a primitive unconfined type of recreation.

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Moab PRMP would designate this area a hiking focus area within the Labyrinth Rims/Gemini Bridges Special Recreation Management Area. The proposed project would greatly diminish the hiking and other recreational opportunities envisioned by the BLM land use plan. The BLM manages this area with a Visual Resources Management (VRM) II rating – the objective of Class II is to retain the existing character of the landscape, the level of change to the landscape should be low, and management activities may be seen, but should not attract the attention of the causal observer. The proposed dam and reservoir project would not comply with this rating. Additionally, Long Canyon is proposed for designation as an Area of Critical Environmental Concern (ACEC) by the BLM to protect wildlife and scenic values.

The proposed project would harm habitat important to several sensitive species. Long and Bull Canyons are potential nesting and breeding habitat for the Mexican Spotted Owl (ESA – threatened), burrowing owl habitat (Utah sensitive species), desert bighorn sheep migration corridor and Long Canyon is a lambing and rutting areas.

FERC’s environmental review must include an analysis of the impacts of the project on wilderness quality lands, wildlife, vegetation, soils, watersheds, cultural resources, and other uses of the area, as well as an assessment of the how the effects of climate change could potentially affect the project.

Grand County has submitted a letter detailing several concerns with the project from the perspective of local government and the Utah State Institutional Trust Lands Administration (SITLA), the other land owner of the proposed project area, has sent a letter of protest in opposition to this project.

In summary, this project is inconsistent with the existing land management framework, aesthetic and scenic values, and recreational and wildlife values of lands that would be impacted by this ill-conceived project. There may be other sites where such a pumped storage scheme would be beneficial and suitable, but it would be difficult to find a less suitable site than this one.

Regards,

/signed/

Scott Braden  
Field Advocate