



UTAH PUBLIC LANDS ALLIANCE

*Together We Will Win,
But We Can't Do It Without You*

Opposition to the Proposed Dolores River National Conservation Area

As the President of the Utah Public Lands Alliance, I am compelled to voice our strong opposition to the establishment of a National Conservation Area (NCA) along the Dolores River in Colorado and Utah. While conservation efforts should always consider the balance between preservation and access, we believe that designating this area as an NCA would significantly harm public access, traditional uses, and local economies. Additionally, historical patterns demonstrate that NCAs often pave the way for even more restrictive designations, such as Areas of Critical Environmental Concern (ACECs), Wilderness Areas, and National Monuments, further curtailing multiple-use opportunities on public lands.

Erosion of Access and Use: Lessons from Other NCAs

Our concerns stem from the direct and indirect consequences observed in other NCAs across the western United States. These examples highlight how NCA designations often lead to increased restrictions and reduced opportunities for responsible land use.

Red Cliffs NCA (Utah)

The Red Cliffs NCA was established to protect the Mojave Desert tortoise and its critical habitat. While the intent was laudable, the implementation severely restricted access for recreational users, particularly Off-Highway Vehicle (OHV) enthusiasts. Motorized travel is prohibited within much of the NCA, despite the area's historic use for responsible recreation. Additionally, traditional grazing rights have been curtailed, and the potential for further land use restrictions, such as Wilderness designation, looms large.

McInnis Canyons NCA (Colorado)

The McInnis Canyons NCA provides another example of how NCA status can prioritize conservation to the detriment of multiple-use access. Within its boundaries, the Black Ridge Canyons Wilderness imposes severe restrictions on motorized and mechanized travel, effectively barring OHV users and mountain bikers from large swaths of the area. While some designated routes remain, the NCA's management plan continues to limit traditional activities, such as grazing and dispersed camping. These restrictions have had a tangible economic impact on local communities that previously benefited from broader recreational use.

Dominguez-Escalante NCA (Colorado)

The Dominguez-Escalante NCA exemplifies how NCAs can serve as stepping stones to even stricter protections. The area's Dominguez Canyon Wilderness is a prime example of how parts of an NCA can quickly transition to Wilderness status, further restricting access. Grazing allotments have faced tighter regulations, and the management focus has shifted overwhelmingly toward preservation rather than balanced multiple use. For recreationists and local industries alike, the NCA has diminished opportunities for traditional land uses.

Pathway to Stricter Designations

One of our primary concerns is that NCAs often become precursors to even more restrictive designations. The Dolores River proposal would undoubtedly increase the likelihood of additional designations such as ACECs, Wilderness Areas, and even National Monuments, as seen elsewhere:

- **ACECs:** These designations impose stringent management requirements, often banning OHV use, mining, and other traditional activities. Within NCAs, ACECs can proliferate, fragmenting access and curtailing opportunities for recreation and responsible resource development.
- **Wilderness Areas:** Many NCAs include designated Wilderness or areas that later transition to Wilderness status, as in the Dominguez-Escalante NCA. Wilderness designations effectively lock up lands, prohibiting motorized travel, mechanized equipment, and other multiple-use activities.
- **National Monuments:** The Grand Staircase-Escalante National Monument—initially an NCA in concept—demonstrates how areas can escalate to monument status, bringing sweeping restrictions that further alienate local stakeholders and users.

Economic and Cultural Impacts

The designation of the Dolores River as an NCA would harm local economies that rely on responsible recreation and resource use. Areas like Rabbit Valley and sections of the Dolores River currently support a diverse range of activities, from OHV riding and rafting to grazing and resource extraction. These uses are vital to rural economies, providing jobs and sustaining communities. Restricting these activities in favor of a conservation-focused framework would disproportionately impact these local industries.

Dispersed camping, a cherished activity for many visitors to the Dolores River region, would likely face significant restrictions under an NCA designation. Other NCAs, such as McInnis Canyons, have imposed limitations on where and how dispersed camping can occur to minimize perceived environmental impacts. These restrictions often reduce access for recreational users, diminishing their ability to enjoy remote and natural settings. This not only affects campers but also impacts local businesses that rely on visitation, such as outfitters, grocery stores, and gas stations.

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Additionally, NCA designations often shift local economies from higher-paying jobs in traditional industries, such as resource extraction and ranching, to lower-wage, seasonal tourism jobs. While tourism can provide economic benefits, these jobs are often less stable and do not offer the same level of financial security for local families and communities.

Moreover, the Dolores River corridor holds cultural significance and a long history of traditional use by ranchers, recreationalists, and local families. An NCA designation threatens to upend this legacy, imposing federal oversight that prioritizes preservation over the multiple-use framework long championed by public lands advocates.

Refuting the Commissioners' Claims

The assertion by Commissioners Cody Davis and Sue Hansen that an NCA represents a "proactive solution" is unrealistic and ignores the precedent set by other NCAs. While they argue that an NCA would prevent a National Monument designation and ensure local input, the reality is quite different:

1. **Loss of Local Control:** Once an NCA is established, management decisions are primarily guided by federal mandates and the influence of extreme conservation groups. Local voices often become secondary to broader conservation agendas, as seen with the Red Cliffs NCA and other examples in Utah and Colorado. Claims of preserving local input are therefore misleading.
2. **Precedent of Restrictive Designations:** NCAs frequently lead to more restrictive designations, such as ACECs and Wilderness Areas, which diminish local control and multiple-use access. For instance, in the Dominguez-Escalante NCA, parts of the area quickly transitioned to Wilderness, significantly curtailing traditional uses.
3. **No Guarantee Against a National Monument:** Establishing an NCA does not eliminate the threat of a future National Monument designation. Political shifts can still result in additional restrictions, regardless of local agreements or the presence of an NCA.
4. **Economic Harm from Restrictions:** Assertions that NCAs protect existing uses are contradicted by the economic realities in areas like McInnis Canyons and Red Cliffs. Restrictions on grazing, OHV use, and resource development often lead to job losses and economic decline, particularly in rural communities.

Undermining the BLM's Multiple-Use Mandate

The Bureau of Land Management (BLM) is mandated under the Federal Land Policy and Management Act (FLPMA) to manage public lands for multiple use and sustained yield. This means balancing recreation, grazing, resource extraction, and conservation. However, NCA designations tend to elevate conservation above all other uses, relegating traditional activities to secondary importance or outright prohibiting them. This undermines the BLM's core mission and creates an imbalance that disproportionately affects local stakeholders who depend on public lands for their livelihoods and recreation.

Conclusion: A Better Path Forward

The Utah Public Lands Alliance strongly opposes the establishment of an NCA along the Dolores River. While conservation is an important goal, it must be achieved without sacrificing access, traditional uses, and local economic stability. Instead of designating an NCA, we advocate for collaborative management solutions that protect the river's natural values while preserving public access and multiple-use opportunities. By working together, we can ensure the Dolores River remains a place for everyone to enjoy responsibly without the heavy hand of restrictive federal designations.

We urge policymakers to reject this proposal and seek alternatives that uphold the principles of balanced, multiple-use management for the benefit of all stakeholders.

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