January 13, 1984

The Honorable Morris K. Udall
U.S. House of Representatives
1419 North Third Street
Phoenix, Arizona 85004

Dear Mr. Udall:

This letter represents the position adopted by the Arizona Cattle Growers' Association, Arizona Mining Association, Salt River Project, Southwest Forest Industries, Arizona Department of Mineral Resources, Southwestern Minerals Exploration Association, Arizona Mining and Prospecting Association, Kaibab Industries and Valley National Bank on the subject of Roadless Area Review and Evaluation ("RARE II") legislation for Arizona. During the past six months, these user groups have given careful consideration to the RARE II study areas in the national forests of Arizona. We support the efforts of the Arizona congressional delegation to achieve bipartisan legislation to conclude the Arizona RARE II program which the Forest Service began over a decade ago. We fully realize that the enactment of a constructive wilderness solution will require the cooperation of ranchers, miners, timbermen, business people, recreationists, wilderness proponents and others who use national forests in Arizona, all working in conjunction with the Arizona congressional delegation.

From the 1,955,032 acres of national forest in Arizona studied under RARE II, the Forest Service recommended that 14 areas containing 400,312 acres be designated by Congress as wilderness; 545,828 acres be subject to further planning; and 1,008,892 acres be released from the limbo of interim wilderness management and returned to multiple use.

Currently, Arizona contains 997,049 acres of legislatively designated wilderness in national forests, parks and monuments. Two separate bills now before Congress -- the Arizona Strip Wilderness bill with 394,600 acres of new wilderness and the Aravaipa Canyon Wilderness bill with approximately 6,000 acres -- would bring Arizona's total wilderness to 1,398,000 acres.

In addition, 1,588,712 acres are being managed as wilderness due to endorsement by previous administrations. Although portions of this de facto wilderness should be reevaluated and returned to multiple use, its current status in limbo increases the total land tied up in existing and administration-endorsed wilderness to nearly 3,000,000

acres. Adding the 14 units recommended for wilderness through RARE II swells the state's acreage of existing and proposed wilderness to approximately 3,400,000 acres. When the 3,000,000 acres of Arizona lands set aside in national parks, monuments and wildlife refuges where preservation is the underlying management theme are added to the total, the acreage of actual and proposed wilderness jumps to 6,400,000 acres. This enormous acreage where preservation is now the dominant philosophy is nearly nine percent of the total land area of Arizona, and is over 20 percent of the federal land area in the state, after excluding Indian Reservations.

Moreover, in excess of 2,000,000 acres are now under review by the Bureau of Land Management (BLM) for their wilderness suitability. Based on past experience, we anticipate BLM lands will be recommended for wilderness designation, pushing the already sizeable total of actual or de facto wilderness higher still.

The users economically dependent upon Arizona's national forest lands, represented herein, have labored with the RARE II process for more than a decade in an effort to remove those areas unsuited for wilderness from their limbo status and return them to productive uses serving the best interests of the people of the State of Arizona and the nation. With this goal in mind, we have conducted intensive negotiations among national forest resource users over the past six months to reach a compromise on language and areas that would be mutually acceptable for inclusion in wilderness legislation.

The user groups represented in these discussions generate conservatively more than $10 billion in direct and indirect economic and social benefits to the state annually, a major portion of which is derived from present or former national forest lands in Arizona. In some instances the forest lands under consideration are the economic lifeblood of these users. We must stress that this proposal was most difficult to develop and is a very fragile package that is tied together not only by the selected acreage but also by the language which we consider necessary to meet the objectives of the respective groups.

The enclosed Table 1 shows that the RARE II areas we propose for wilderness exceeds 500,000 acres in 30 separate units. A number of areas shown on Table 1 have significant present and potential productive capabilities to the economically dependent users who have made substantial compromises to reach a unified position. We are concerned by the statement frequently heard that standard management provisions have been and must be incorporated in any state

RARE II legislation. However, management provisions have varied in other legislation to meet the needs and desires of individual states. Arizona RARE II legislation is an Arizona issue as well as a national concern. The Arizona delegation has a primary responsibility to the resource concerns of its own constituency and should not bypass those concerns simply to conform to other state RARE II bills. Our agreements to this proposal are conditioned upon the inclusion in the legislation of language substantially in the form presented herein.

Appendix 1 contains release and sufficiency language providing that lands not designated as wilderness shall not be managed for the purpose of protecting their suitability for wilderness designation pending revision of the initial plans and in no event prior to January 1, 1998. Appendix 2 is an express disavowal of any federal claim or denial as to exemption from Arizona water laws and to Arizona jurisdiction over fish and game. Appendix 3 incorporates a provision prohibiting buffer zones. Appendix 4 contains language on transportation and utility corridors within federal lands. Appendix 5 provides language for grazing in wilderness areas. Appendix 6 provides for the management of concentrated use areas so as to avoid unreasonable interference with other authorized activities in such areas. Appendix 7 contains language relating to lands previously withdrawn by the U.S. Bureau of Reclamation and for hydrologic and communication facilities.

The user groups have developed maps of each proposed wilderness area at a scale of one-half inch equals one mile which will be forwarded to your office shortly. These maps are important because they define those boundaries which were given special consideration and compromise by the user groups to exclude some of the highly productive national forest lands in the state which fringe the areas proposed for wilderness.

The areas and acreages proposed in Table 1 as well as the attached language constitute what should be an acceptable and reasonable culmination of the RARE II process in Arizona. It proposes more than 100,000 acres for wilderness in excess of what was included in the final Forest Service recommendations made in 1979, and adds 16 more areas.

Further, the group is adverse to tying the previously developed Arizona strip bill, the Aravaipa Canyon wilderness bill, or Wild and Scenic River designations into this RARE II legislation. We believe these issues should be addressed separately, and the already existing Arizona wilderness bills should be moved along expeditiously.

We reiterate that this proposal is a fragile package, and this compromise can be maintained only by retaining the substance of the language presented herein. We respectively request that this proposal be accepted by the Arizona delegation.

Respectfully,

Arizona Cattle Growers' Association

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Executive Vice President

Arizona Department of Mineral Resources

John H. Jett

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y Dependent User Groups Arizona Wilderness Proposal

Forest Service Acreage	F.S. & Adm. Proposed Designation	Acreage Adjustment from F.S. Proposal	Reason for Adjustment	Compromise Net Acres Proposed
6,510	W	--	--	6,510
17,940	W	--	--	17,940
1,790	FP	--	--	1,790
8,050	FP	--	--	8,050
5,610	NW	--	--	5,610
9,040	NW	--	--	9,040
37,380	NW	--	--	37,380
5,540	NW	--	--	5,540
8,580	W	--	--	8,580
9,910	NW	--	--	9,910
8,280	NW	--	--	8,280
2,650	NW	--	--	2,650
47,480	W	- 4,480	timber & utilities	43,000
32,870	FP	--	--	32,870
20,770	NW	--	--	20,770
9,890	FP	--	--	9,890
31,850	FP	- 3,850	timber	28,000
870	FP	--	--	870
5,010	NW	--	--	5,010
1,290	NW	--	--	1,290
14,090	FP	--	--	14,090
83,700	FP	-48,700	mining, utilities, cattlemen	35,000
4,100	NW	+ 4,400	--	8,500
13,100	NW	--	--	13,100
9,590	NW	- 2,440	timber & utilities	7,150
27,160	W	--	--	27,160
55,090	NW	--	--	55,090
43,360	W	--	--	43,360
60,150	W	-30,000	mining	30,150
5,080	FP	--	--	5,080
			TOTAL	501,660

its to accomodate cattle movement.

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APPENDIX 1

Administrative and Congressional Review and Release of Roadless Areas

The Congress hereby determines and directs that (1) Lands in the State of Arizona managed by the Forest Service not designated as wilderness by this Act have been adequately studied for wilderness in the RARE II Final Environmental Impact Statement (dated January, 1979) and such statement shall not be subject to judicial review with respect to national forest system lands in the State of Arizona;

(2) Such studies shall constitute an adequate consideration of the suitability of national forest system lands in the State of Arizona for inclusion in the National Wilderness Preservation System and the Department of Agriculture shall not review the wilderness option for such land prior to revision of the initial plans required for such lands by the Forest and Rangeland Renewable Resources Planning Act of 1974 as amended by the National Forest Management Act of 1976 and in no event prior to January 1, 1998;

(3) Such lands shall not be managed for the purpose of protecting their suitability for wilderness designation pending revision of the initial plans and in no event prior to January 1, 1998.

APPENDIX 2

State Water Allocation Authority

As provided in section 4(d)(7) of the Wilderness Act, nothing in this Act shall constitute an express or implied claim or denial on the part of the Federal Government as to exemption from Arizona water laws.

As provided in section 4(d)(8) of the Wilderness Act, nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the State of Arizona with respect to wildlife and fish in the national forests in Arizona.

APPENDIX 3

Prohibition on Buffer Zones

Congress does not intend that designation of wilderness areas in the State of Arizona lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.

APPENDIX 4

Transportation and Utility Corridors

Within 180 days after the date of enactment of this Act, the Secretaries of Agriculture and Interior shall designate transportation and utility corridors upon lands subject to their respective jurisdictions in the State of Arizona, in accordance with the provisions of Section 503 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1763). In so doing, the Secretaries shall consider existing and proposed transportation and utility rights of way and facilities in the State. Corridors designated by the Secretaries shall be of such width as the Secretaries shall deem appropriate; provided, however, that they shall be no more than one mile, nor less than one-quarter mile in width; and further, provided, that lands thus designated as transportation and utility corridors shall not be further studied for eligibility as wilderness nor shall they be managed for the purpose of protecting their suitability for wilderness designation. The designation of corridors pursuant to this subsection shall not preclude the designation of additional corridors at a later date under Section 503 of the Federal Land Policy and Management Act of 1976.

APPENDIX 5

Grazing in Wilderness Areas

The grazing of livestock including the use of motorized equipment for the maintenance of range improvements and for grazing management activities, where established prior to the date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture. The Secretary is directed to review all policies, practices, and regulations of the Department of Agriculture regarding livestock grazing in national forest wilderness areas in Arizona in order to ensure that such policies, practices, and regulations fully conform with and implement the intent of Congress regarding grazing in such areas, as such intent is expressed in this Act. The Secretary shall give particular attention to changes needed in such policies, practices and regulations to assure that maintenance of range improvements and grazing and range management activities in forest wilderness areas in Arizona are permitted on a timely basis.

APPENDIX 6

Management of Concentrated Use

The Secretary of Agriculture shall manage entry points and areas in national forest wilderness areas in Arizona receiving concentrated public use so as to avoid unreasonable interference with other authorized activities in such areas.

APPENDIX 7

Hydrologic/Communication Facilities
Bureau of Reclamation Withdrawn Lands

The following special provisions are hereby made:

(1) Within wilderness areas designated by this Act, the use of aircraft, motor vehicles, or motorboats where these uses have already become established, may be permitted to continue subject to such restrictions as the Secretary of Agriculture deems desirable. In addition, such measures may be taken as may be necessary in the control of fire, insects, and diseases, and for the installation and maintenance of hydrologic, meteorologic, and telecommunication facilities essential for flood warning, flood control and water reservoir operation purposes, subject to such conditions as the Secretary deems desirable.

(2) No portions of the lands along the Salt and Verde Rivers withdrawn by the Secretary of the Interior on March 12, 1903, December 14, 1904, and July 20, 1905, for reclamation purposes shall be designated for inclusion in the National Wilderness Preservation System or the Wild and Scenic Rivers System until such time as the Secretary reviews these lands as required by section 204(1)(2) of the Federal Land Policy and Management Act of 1976 and terminates withdrawals under section 204(1)(3) of the same Act.