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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
SOUTHERN REGION OF THE CENTRAL DIVISION

GARFIELD COUNTY, UTAH, *et al.*, Consolidated Plaintiffs, v. JOSEPH R. BIDEN, JR., *et al.*, Defendants, and SOUTHERN UTAH WILDERNESS ALLIANCE, *et al.*, Proposed Intervenor-Defendants.	**SUWA Intervenors' Reply to Garfield County Plaintiffs' and Federal Defendants' Briefs in Opposition to Intervention** Lead Case No. 4:22-cv-00059-DN-PK Member Case No. 4:22-cv-00060-DN-PK District Judge David Nuffer Magistrate Judge Paul Kohler

I. INTRODUCTION

The issues for the Court to decide are narrow. The Dalton Plaintiffs do not oppose SUWA Intervenors' motion to intervene at all. Federal Defendants do not oppose permissive intervention, and their response in "partial opposition" effectively concedes that SUWA Intervenors' motion was timely, that SUWA Intervenors do have an interest that may be impaired by the outcome of this litigation, and that the Federal Government does not adequately represent SUWA Intervenors' interests.[1] Federal Defendants contend only (and incorrectly) that *other* movant-intervenors can adequately represent SUWA Intervenors, opposing intervention as-of-right on that rationale alone. Only Garfield County Plaintiffs go further: whistling past the Tenth Circuit's dispositive decision in *Utah Ass'n of Counties v. Clinton* (*"UAC"*),[2] they oppose both intervention as of right *and* permissive intervention, based on mischaracterizations of caselaw and unmerited ad hominem attacks on a handful of the SUWA Intervenor groups.[3]

These objections are easily resolved. SUWA Intervenors have met Federal Rule 24(a)'s requirements and are entitled to intervene as of right. In the alternative, they should be permitted to intervene permissively under Federal Rule 24(b). In either case, SUWA Intervenors are committed to working with the other parties to minimize any burden on the Court, including abiding by the condition that Federal Defendants suggest—that Proposed Intervenors file "coordinated, non-duplicative briefs"[4]—if the Court deems it appropriate.

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[1] Fed. Defs.' Consol. Resp. in Partial Opp. to Intervention Mots. 2 (ECF No. 57) (hereinafter "Fed. Defs.' Opp.").
[2] 255 F.3d. 1246, 1252 (10th Cir. 2001).
[3] Garfield Cty. Pls.' Resp. in Opp. to Mot. to Intervene by SUWA *et al*. (ECF No. 55) (hereinafter "Garfield Opp.").
[4] Fed. Defs.' Opp. 2 n.3.

II. ARGUMENT

A. Proposed Intervenors need not show standing

Garfield County's argument that Proposed Intervenors must establish Article III standing is flat wrong. The Supreme Court has made clear that a proposed intervenor must "demonstrate Article III standing" only "when it seeks *additional relief* beyond that which the [original party] requests."[5] But here, Federal Defendants and SUWA Intervenors seek the same relief: dismissal of the complaints.[6] SUWA Intervenors therefore need only demonstrate an "interest" under Rule 24(a)—not standing. "[I]nquiring into [Intervenors'] independent Article III standing" here would be error, just as the Supreme Court held it was in *Little Sisters*.[7]

Garfield County supports its mistaken argument by erroneously conflating the *relief* sought with the *positions and arguments* the parties may advance in support of that relief.[8] But having different litigation positions is not the same thing as seeking different relief, as the Tenth Circuit has recognized.[9] Because Garfield County's argument is foreclosed by Supreme Court and Tenth Circuit precedent, the Court should reject it.

B. Intervenors have demonstrated that this litigation may impair their interests

Garfield County Plaintiffs next assert that Intervenors' interests "will not be 'impair[ed]' by this litigation."[10] Again, they are alone: Federal Defendants do not dispute that Intervenors

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[5] *Town of Chester v. Laroe Ests., Inc.*, 137 S. Ct. 1645, 1651 (2017) (emphasis added); *see also Little Sisters of the Poor v. Pennsylvania*, 140 S. Ct. 2367, 2379 n.6 (2020).
[6] *See* SUWA Intervenors' Mot. to Intervene (ECF No. 27) (hereinafter "SUWA Mot. to Intervene"), Proposed Answer 43-44 (ECF No. 27-13).
[7] 140 S. Ct. at 2379 n.6.
[8] Garfield Opp. 3.
[9] *See Kane County v. United States*, 928 F.3d 877, 887 & n.13 (10th Cir. 2019) (holding, under *Town of Chester*, that intervenors seeking "same relief" as federal defendants need not show standing, even though their "interests" differed for purposes of Rule 24(a)).
[10] Garfield Opp. 6 (quoting Fed. R. Civ. P. 24(a)(2)).

satisfy Rule 24(a)'s "impairment of interest" requirement. And again, Garfield County Plaintiffs are wrong.

Garfield County's argument ignores the Tenth Circuit's squarely on-point decision in *UAC*, which held that environmental groups and other monument proponents were entitled to intervene as of right to defend the original designation of Grand Staircase-Escalante National Monument—one of the very monuments at issue here. Recognizing that Rule 24(a)'s "impairment of interest" requirement is a "practical" one, and that the "'burden [on movants] is minimal,'"[11] the Tenth Circuit concluded that national monument protections "provide[] greater protection for the intervenors' interests" than would otherwise be available, and that the loss of those protections would allow activities that could harm those interests, including mining and off-road vehicle use.[12]

Garfield County's contrary assertion—that monument status offers no more protection than other federal land management laws or the "pre-reservation status quo"[13]—is fanciful. When President Trump stripped monument status from parts of Bears Ears and Grand Staircase in 2017, the harms anticipated in *UAC* materialized: mining, off-road vehicle use, and other disruptive activities commenced, impairing SUWA Intervenor members' use and enjoyment of the impacted lands.[14] Moreover, Garfield County itself acknowledges that monument protections preclude it from accessing a coal deposit and other "energy resources" within monument boundaries.[15] This too is just like *UAC*, where the court held that impairment was "not

[11] *UAC*, 255 F.3d at 1253 (citation omitted); *accord Kane County*, 928 F.3d at 891.
[12] *UAC*, 255 F.3d. at 1253-54.
[13] Garfield Opp. 6.
[14] *E.g.*, SUWA Mot. to Intervene, Decl. of Tim Peterson ¶¶ 21-25, photos 8-13 (ECF No. 27-9) (documenting harm caused by Easy Peasy Mine).
[15] *See* Garfield Cty. Compl. ¶¶ 182-85 (ECF No. 2).

speculative" because, among other things, plaintiffs alleged that monument protections "thwarted the operation of an underground coal mine."[16] Thus, just as in *UAC*, monument status affords protective safeguards for SUWA Intervenors' interests; at minimum, it is inappropriate to presume the opposite for purposes of evaluating impairment.[17] SUWA Intervenors have met Rule 24(a)(2)'s impairment-of-interest requirement.

C. No other parties adequately represent SUWA Intervenors' interests

1. Federal Defendants do not adequately represent SUWA Intervenors

Federal Defendants do not adequately represent SUWA Intervenors, as their partial opposition brief tacitly concedes.[18] Federal Defendants' "silence on any intent to defend [Intervenors'] special interests is deafening"[19] and should be dispositive here.

Garfield County *does* argue that Federal Defendants will adequately represent SUWA Intervenors' interests,[20] but again, it is wrong: *UAC* is directly on point and disposes of their argument. *UAC* recognized that the federal government, when defending the validity of a national monument, must "consider a broad spectrum of views, many of which may conflict with the particular interest of the would-be intervenor."[21] Just so here. Garfield County fails to square its position with *UAC*, or with later Tenth Circuit decisions reaffirming *UAC*'s holding on adequate representation.[22] And, while Garfield County relies on *Tri-State Generation and*

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[16] 255 F.3d at 1253-54.
[17] *See, e.g.*, *San Juan County v. United States*, 503 F.3d 1163, 1200 (10th Cir. 2007) (en banc) ("disagree[ing]" with argument "that SUWA is not entitled to intervene because its interests may not be injured even if" plaintiffs prevailed).
[18] *See* Fed. Defs. Opp. 2-4.
[19] *UAC*, 255 F.3d at 1256 (citation omitted).
[20] Garfield Opp. 6-7.
[21] UAC, 255 F.3d at 1256.
[22] *See* Garfield Opp. 6-7; *see also, e.g., Kane County*, 928 F.3d at 894-95 (reaffirming *UAC*); *San Juan County*, 503 F.3d at 1204 (same).

Transmission Ass'n v. New Mexico Public Regulation Commission, it fails to acknowledge that the court there cited *UAC* as an instance where the federal government's objectives were *not* "identical" to intervenors' because—as here—it "must account for a 'broad spectrum' of interests" on national monuments.[23] Nor does Garfield County ever grapple with the Federal Government and SUWA Intervenors' ongoing adversity in litigation regarding these very same monuments in the District of D.C., where they have taken different positions on some of the same legal issues at stake here.[24] Adequate representation in such circumstances is impossible.

2. The Tribal Nations do not adequately represent SUWA Intervenors

Federal Defendants fault SUWA Intervenors for not explaining in their opening brief "why the Tribes would not adequately represent their interests."[25] But the Tribal Nations' motion to intervene was not granted until December 8, 2022,[26] *after* SUWA Intervenors moved to intervene, so they were not yet "existing parties" for purposes of Rule 24(a).[27]

That question is easily resolved now: the Tribal Nations do not adequately represent SUWA Intervenors. They are "sovereign political entities possessed of sovereign authority."[28] As such, they must balance potentially competing economic, political, and environmental considerations on behalf of their members regarding this litigation, just as any other similar governmental body must do.[29] In their own words, "[t]he Tribes … have multiple compelling and protectable interests in defending the Biden [Bears Ears] Proclamation that include and stretch

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[23] 787 F.3d 1068, 1073 (10th Cir. 2015) (in parenthetical, quoting *UAC*, 255 F.3d at 1256).
[24] *See* SUWA Mot. to Intervene 9-10.
[25] Fed. Defs. Opp. 3.
[26] Order Granting Tribes' Am. Mot. to Intervene (ECF No. 52).
[27] Fed. R. Civ. P. 24(a)(2).
[28] *Nanomantube v. Kickapoo Tribe in Kansas*, 631 F.3d 1150, 1151-52 (10th Cir. 2011) (citation omitted).
[29] *Cf. UAC*, 255 F.3d at 1255-56 (analyzing public interest balancing by federal government); *Utahns for Better Transp. v. U.S. Dep't of Transp.*, 295 F.3d 1111, 1117 (10th Cir. 2002) (same).

beyond environmental concerns"—including interests "grounded in their historical relationship with the region … and their prerogatives in managing the monument through the [Bears Ears] Commission."[30] They are not obliged to represent the distinct interests of environmental advocacy groups. Because they "will, and should, act only in the best interests of" Tribal members,[31] the Tribal Nations do not represent SUWA Intervenors' interests.

3. Other Proposed Intervenors are not "existing parties" under Rule 24(a) and, in any case, do not adequately represent one another's interests

The other Proposed Intervenors are, by definition, not "existing parties" who could adequately represent SUWA Intervenors.[32] Garfield County cites *no* caselaw supporting its novel argument that the presence of multiple movant-intervenors can scuttle an otherwise meritorious intervention motion.[33] Meanwhile, Federal Defendants muster only three out-of-circuit cases—each of which evaluated adequate representation by groups that *already* had intervenor status, not by movant-intervenors.[34] That is consistent with Rule 24(a)'s text, which allows the denial of intervention as of right only if "existing parties" will provide adequate representation.[35]

Finding no support in caselaw, Federal Defendants resort to a policy straw man: that movants "should not be allowed to circumvent" an adequacy analysis comparing them to other movant-intervenors "through coordinating timing."[36] But Federal Defendants *also* argue that

[30] Tribes Br. in Supp. of Mot. to Intervene 5, 7 (ECF No. 41).
[31] *Barnes v. Sec. Life of Denver Ins. Co*., 945 F.3d 1112, 1125 (10th Cir. 2019).
[32] Fed. R. Civ. P. 24(a)(2).
[33] *See* Garfield Opp. 7 (arguing the Court "should admit only one additional intervenor").
[34] *Coal. to Defend Affirmative Action v. Granholm*, 240 F.R.D. 368, 376 (E.D. Mich. 2006); *NRDC v. Costle*, 561 F.2d 904, 913 (D.C. Cir. 1977); *Sierra Club v. Froehlke*, 359 F. Supp. 1289, 1308, 1136-37 (S.D. Tex. 1973).
[35] Fed. R. Civ. P. 24(a)(2); *see, e.g., NRDC v. U.S. Nuclear Regulatory Comm.*, 578 F.2d 1341, 1345-46 (10th Cir. 1978) (considering multiple motions to intervene and evaluating adequate representation by existing parties only).
[36] Fed. Defs. Opp. 2-3.

Proposed Intervenors *should* coordinate their briefing to reduce burdens on the Court and parties[37]—as Proposed Intervenors have done already. To the extent Federal Defendants suggest there is something improper about Intervenors' voluntary efforts to coordinate, that is not so. Proposed Intervenors coordinated their intervention filings to allow for streamlined briefing and consideration. In contrast, Federal Defendants' rule, if adopted, would encourage would-be intervenors to race to the courthouse—filing motions seriatim and perhaps prematurely, resulting in multiple rounds of briefing on different timelines, which could cause delays and burden both courts and parties.

In any case, Proposed Intervenors do not adequately represent one another. SUWA Intervenors are nonprofit advocacy groups with missions focused on environmental conservation, with interests in both Bears Ears and Grand Staircase. UDB Intervenors are focused on environmental, paleontological, and recreational interests in Bears Ears specifically. Grand Staircase Partners are focused on environmental and paleontological interests in Grand Staircase specifically. Archaeological intervenors are focused narrowly on archaeological interests in both monuments. "[A] partial congruence of interests" among intervenors "does not guarantee the adequacy of representation."[38]

Nor is it unusual to have multiple intervenors involved in litigation over federal public lands that hold significance for many different stakeholders.[39] Indeed, one of Rule 24(a)'s purposes is to enable courts to "dispos[e] of lawsuits by involving as many apparently concerned

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[37] *Id*. at 2 n.3.
[38] *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 737 (D.C. Cir. 2003); *see also Costle*, 561 F.2d at 913.
[39] *See, e.g., SUWA v. Burke*, 981 F. Supp. 2d 1099, 1101-02 (D. Utah 2013) (fourteen defendant-intervenors represented by six sets of counsel); *SUWA v. U.S. Dep't of Interior*, No. 2:06-cv-342-DAK, 2007 WL 2220525, at *1 (D. Utah July 30, 2007) (seven industry intervenors represented by three sets of counsel); *see also infra* note 47 (describing D.C. monument litigation).

persons as is compatible with efficiency and due process."[40] And when cases raise issues of significant public interest, like here, the Tenth Circuit has instructed that "the requirements for intervention may be relaxed"—not heightened.[41] SUWA Intervenors have satisfied their "'minimal' burden" of establishing that their interests "may not" be adequately represented by other Proposed Intervenors.[42]

D. Judicial efficiency may justify conditions on participation, but it cannot justify denial of intervention where Rule 24(a)'s criteria are met

Garfield County and Federal Defendants protest that having more than one intervenor group involved[43] will make these cases "clutter[ed]"[44] or "unmanageable."[45] Their protests are misplaced. To be sure, some multi-party cases may present legitimate concerns about judicial efficiency. But the answer to those concerns is using reasonable docket-management measures to streamline proceedings. The Tenth Circuit has held that courts have the discretion to adopt such measures, even as to intervenors as of right.[46] The answer is *not*, however, to deny intervention to groups that meet the requirements of Rule 24(a).

The ongoing litigation over these same monuments in the District of D.C. provides an apt example. There, the court granted the intervention motions of *five* separately represented

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[40] *UAC*, 255 F.3d at 1251-52 (citation omitted).
[41] *San Juan County*, 503 F.3d at 1201.
[42] *Kane County*, 928 F.3d at 896 (quoting *U.S. Nuclear Regul. Comm'n*, 578 F.2d at 1345).
[43] *See* Garfield Opp. 7.
[44] Fed. Defs.' Opp. 4.
[45] Garfield Opp. 1.
[46] *San Juan County*, 503 F.3d at 1189 (noting "reasonable conditions may be imposed even upon one who intervenes as of right" (citation omitted)); Wright & Miller, 7C Fed. Prac. & Proc. Civ. § 1922 (3d ed.) (emphasizing that, for intervenors as of right, conditions must be "reasonable" and "of a housekeeping nature").

intervenor groups, including Garfield and Kane Counties and the State of Utah.[47] (Federal Defendants, Tribal Nation Intervenors, SUWA Intervenors, and most of the other Proposed Intervenors here are parties in the D.C. litigation as well.) To streamline proceedings, the court imposed certain conditions, including requiring that intervenors "confer with [Federal] Defendants and other intervenors before filing any new substantive motions or briefs and endeavor to eliminate unnecessary repetition by incorporating one another's filings by reference when possible."[48] Those conditions have worked: the D.C. litigation has not suffered from any of the dire consequences that Garfield County conjures.

Similarly here, if the Court has concerns about judicial efficiency, ordinary docket-management conditions can readily resolve them. Notwithstanding Garfield County and Federal Defendants' fixation on the total number of proposed intervenors and associated counsel,[49] there are only *four* separately represented groups of Proposed Intervenors here. Federal Defendants themselves suggest that Proposed Intervenors should "file coordinated, non-duplicative briefs,"[50] and Proposed Intervenors will abide by that condition if the Court deems it appropriate. (In contrast, Garfield County urges the Court to go further and require Proposed Intervenors to "seek leave of Court before filing any independent motions"—but that would have the opposite of the

[47] *See* Order, ECF No. 105, *Hopi Tribe v. Trump*, No. 17-cv-02590-TSC (D.D.C. Jan. 11, 2019) (granting intervention motions of three separately represented groups: sport-hunting and grazing proponents; San Juan County; and the State of Utah); Order, ECF No. 83, *The Wilderness Society v. Trump*, No. 17-cv-02587-TSC (D.D.C. Jan. 11, 2019) (granting intervention motions of three separately represented groups: agricultural trade groups; Kane and Garfield Counties; and the State of Utah).
[48] *See* Order at 8, ECF No. 105, *Hopi Tribe v. Trump* (*supra* note 47); Order at 7, ECF No. 83, *The Wilderness Soc'y v. Trump* (*supra* note 47).
[49] Garfield Opp. 8; Fed. Defs.' Opp. 2.
[50] Fed. Defs.' Opp. 2 n.3.

desired effect, inflating the number of filings connected to each motion, even unopposed procedural motions, as it did in the case Garfield County cites.[51])

In sum, judicial efficiency may justify "reasonable conditions" on intervenors where circumstances warrant,[52] but they do *not* justify *denying* intervention as of right where a movant meets Rule 24(a)'s criteria, as SUWA Intervenors do here.

Finally, Garfield County's ad hominem attacks on "some" of the SUWA Intervenor groups[53] are unmerited and irrelevant. To take one example: Garfield County misleadingly accuses SUWA of "hinder[ing]" another proceeding by advancing a legal theory the Utah Supreme Court deemed "'absurd.'"[54] Not so. Rather, after a panel of three federal judges certified the question,[55] the Utah Supreme Court agreed with SUWA's plain-text interpretation of the statute at issue. But under the "absurdity" doctrine—which concerns the *results* of a statute's plain-text meaning, not the quality of any party's argument—the court "reform[ed] the statute."[56]

SUWA Intervenors will not burden the Court with a point-by-point refutation of Garfield County's characterizations; they are irrelevant here. Unlike the trial proceedings in the case Garfield County cites, the present cases focus on primarily legal questions and may not involve any discovery at all.[57] If discovery does become relevant, the parties can coordinate to propose reasonable limitations on discovery requests. SUWA Intervenors have not stated any counter- or

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[51] Garfield Opp. 9.
[52] *San Juan County*, 503 F.3d at 1189.
[53] Garfield Opp. 8-9.
[54] Garfield Opp. 8.
[55] Order, *Garfield County v. United States*, No. 2:11-cv-1045, 2015 WL 1757194, at *1 (D. Utah Apr. 17, 2015).
[56] *Garfield County v. United States*, 424 P.3d 46, 52, 56 (Utah 2017).
[57] *Contra* Garfield Opp. 1 (speculating, without citation, that SUWA Intervenors "will make discovery demands and objections").

cross-claims, or injected any new legal issues, that might expand this litigation's scope.[58] And SUWA Intervenors have committed to "coordinate with other defendants to prioritize the just and efficient resolution of th[ese] action[s],"[59] and will work with the other parties in good faith and civility, as the Court expects of all litigants.

III. CONCLUSION

For the foregoing reasons and those set forth in their opening brief, SUWA Intervenors respectfully request that the Court grant their motion to intervene.

Respectfully submitted this 6th day of January, 2023,

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[58] *See* SUWA Mot. to Intervene, Proposed Answer 43 (ECF No. 27-13) (stating single affirmative defense); *contra* Garfield Opp. 1 (speculating, without citation, that SUWA Intervenors "will pile briefing before the Court on every imaginable issue").
[59] SUWA Mot. to Intervene 10.

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CERTIFICATE OF COMPLIANCE

This reply brief complies with the type-volume limitations of DUCivR 7-1(a)(4)(D) because it contains 3,097 words, exclusive of the parts of the reply brief exempted by that Rule.

January 6, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, I caused the foregoing document to be filed with the Clerk of the Court using the Court's CM/ECF system, and service was thereby effected electronically to all counsel of record.

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