



*\*\*Submitted online at <https://eplanning.blm.gov/epl-front-office/eplanning/comments/commentSubmission.do?commentPeriodId=58098> on April 6, 2018\*\**

April 6, 2018

Bureau of Land Management  
US Forest Service  
365 North Main, P.O. Box 7,  
Monticello, UT 84535

Dear BLM and USFS planning personnel,

The Mountaineers appreciates the opportunity to comment on the public scoping process for the management plans for the Indian Creek and Shash Jaa Units of the Bears Ears National Monument.

Founded in 1906, The Mountaineers is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,800 skilled volunteers lead 3,200 outdoor education courses and activities annually for 15,500 members and guests. Our youth programs provide over 6,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors and values public lands which provide important opportunities for human-powered recreation.

The landscapes covered by both the original and reduced Monument designations contain world-renowned recreational resources that are highly important to our community, and must be incorporated as foundational to any management planning for the area.

We believe that the actions of President Trump to change the boundaries of Bears Ears National Monument (BENM) were illegal and we wholly oppose these changes. The establishment of the original Monument was undertaken after significant transparent and rigorous public processes (which we supported through the work and involvement of partner organizations like the Access Fund) and that the boundaries reflect the minimum area necessary to protect significant cultural artifacts and recreation resources of the landscape. We believe that only Congress has the authority to reduce or revoke a National Monument, and that current court challenges to the boundary reductions will confirm that the President’s actions were illegal. Based on this, we believe that the Bureau of Land Management (BLM) and the Forest Service (USFS) are acting prematurely in initiating planning processes for the reduced national monument.

If the agencies must move forward with planning processes for a reduced BENM, we ask you to incorporate outdoor recreation, and climbing specifically, as an important use in these landscapes and that you develop a plan that protects outdoor recreation opportunities, archaeological sites, and areas of scientific interest within the original monument. We also want to highlight that any Monument



Management Plan needs to incorporate significant public involvement, as established by the Federal Advisory Committee Act (FACA), and that any FACA charter for BENM planning needs to reflect a balanced representation of interested stakeholders, including the human-powered recreation community.

The original Proclamation 9558 specifically valued “rock climbing” as an appropriate and valued activity of the monument’s landscape, but it is not acknowledged in Proclamation 9681. Any planning process for BENM needs to acknowledge rock climbing as an appropriate and valued activity to these lands. Indian Creek is a climbing area of national and international prominence, and based on this we recommend the Access Fund to represent the recreational user community on any Bears Ears advisory committee. The Access Fund has significant experience and involvement in Indian Creek planning, management, and stewardship. We also urge any planning committees and processes to include significant Native American and Tribal representation and involvement. The original BENM was the first national monument designated at the request of Native American tribes. We must continue to honor the tribal connections to this landscape.

The original proclamation for Bears Ears National Monument also highlights the breadth of the area’s world class outdoor recreation opportunities, which also include hiking, backpacking, canyoneering, whitewater rafting, mountain biking, hunting, and horseback riding. Because visitors travel from near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the region. Any planning process must cover these recreation opportunities within the original boundaries of the BENM, and not simply within the Indian Creek and Shash Jaa units.

The Indian Creek area of BENM has long experienced a chronic lack of management resources. As recreation in this landscape only continues to grow, any management plan needs to include support for human resources like field rangers or an agency presence of any kind. Agency resources to assist with capital improvements to address growing demand and the need for more toilets, hardened campsites, trails, and other stewardship needs are also insufficient and need to be addressed. Any management plan must be appropriately funded so it can address the current and future needs of the area in partnership with nonprofit and industry partners who already provide resources for stewardship of the area. Currently, the outdoor community actively supports the maintenance of campgrounds, toilets and trailheads; the stewardship of climbing area trails; and cultural resource protection and education of the area.

Thank you for considering our perspectives and the importance of human-powered recreation to the Bears Ears landscape.

Sincerely,

Katherine Hollis,  
Conservation and Advocacy Director



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