



*\*\*Submitted online at <https://eplanning.blm.gov/epl-front-office/eplanning/comments/commentSubmission.do?commentPeriodId=58097> on April 6, 2017\*\**

April 6, 2018

Bureau of Land Management  
669 S Highway 89A  
Kanab, UT 84741

Dear BLM planning personnel,

The Mountaineers appreciates the opportunity to comment on the public scoping process for the management plan for the Grand Staircase-Escalante 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 the public lands that provide important opportunities for human-powered recreation. We value our national public lands, which provide important outdoor recreation opportunities, including the protected public lands that comprise Grand Staircase-Escalante National Monument.

We believe that the actions of President Trump to change the boundaries of Grand Staircase-Escalante National Monument (GSENM) were illegal and we wholly oppose these changes. GSENM’s boundaries have been in place for more than 21 years and have been codified by Congress. We believe only Congress has the authority to reduce or revoke a National Monument, and that current court challenges to the boundary reductions will show 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 BLM must move forward with planning processes for a reduced GSENM, we ask you to develop a plan that protects the recreational opportunities, archaeological sites, and areas of scientific interest within the original boundaries of GSENM as set forth in Presidential Proclamation 6920 (September 18, 1996). Americans experience GSENM’s protected objects - the monument’s geology, paleontology, archaeology, human history, and unique plant and wildlife species - through human-powered outdoor recreation. These values make the originally-designated GSENM a rich destination for outdoor recreation and adventure. Any management plan must protect these experiences and resources throughout the areas both of the original proclamation as well as the reduced areas proposed by President Trump.



We also want to express our grave concern around how the proposed timeline for the public comment period makes it difficult for Americans to participate in their public lands planning. Please extend the comment period to at least ninety days following the last public hearing, and we ask that you schedule public hearings in Salt Lake City, UT; Flagstaff, AZ; Denver, CO; Albuquerque, NM; and Washington, D.C. so that the process creates true opportunity for public engagement. The GSENM is a national treasure, and citizens around the West and the nation should have a greater opportunity to participate in any public meetings related to its management.

GSENM is an integral piece of our invaluable public lands system, and an important economic driver for communities dependent on outdoor recreation. According to a study by the Outdoor Industry Association, outdoor recreation brings \$12.3 billion into the state of Utah, and creates 110,000 sustainable and long-lasting jobs. This economic engine is four times greater than the jobs supported by oil and gas development, mining, and logging combined. Protecting the lands within the original boundaries of the GSENM is an investment in our economic future.

Thank you for considering our perspectives and the importance of human-powered recreation to Grand Staircase Escalante landscape.

Sincerely,

Katherine Hollis,  
Conservation and Advocacy Director,