

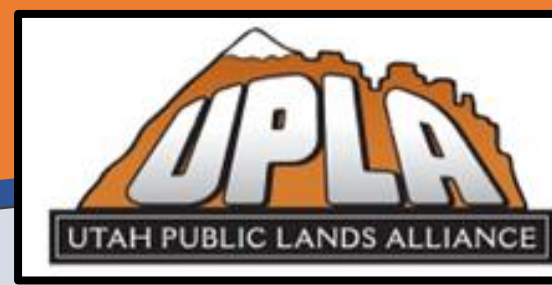


# **BEARS EARS NATIONAL MONUMENT**

## **Draft Resource Management Plan**

Rose Winn, UPLA & Simone Griffin, BRC

# Agenda



- Overview of the Bears Ears National Monument Draft Resource Management Plan
- The role of the Bears Ears Commission
- Comparison of the 5 proposed Alternatives
- Key issues for outdoor recreation and public access
- How to write a substantive comment
- Comment deadline, where to submit
- Q&A

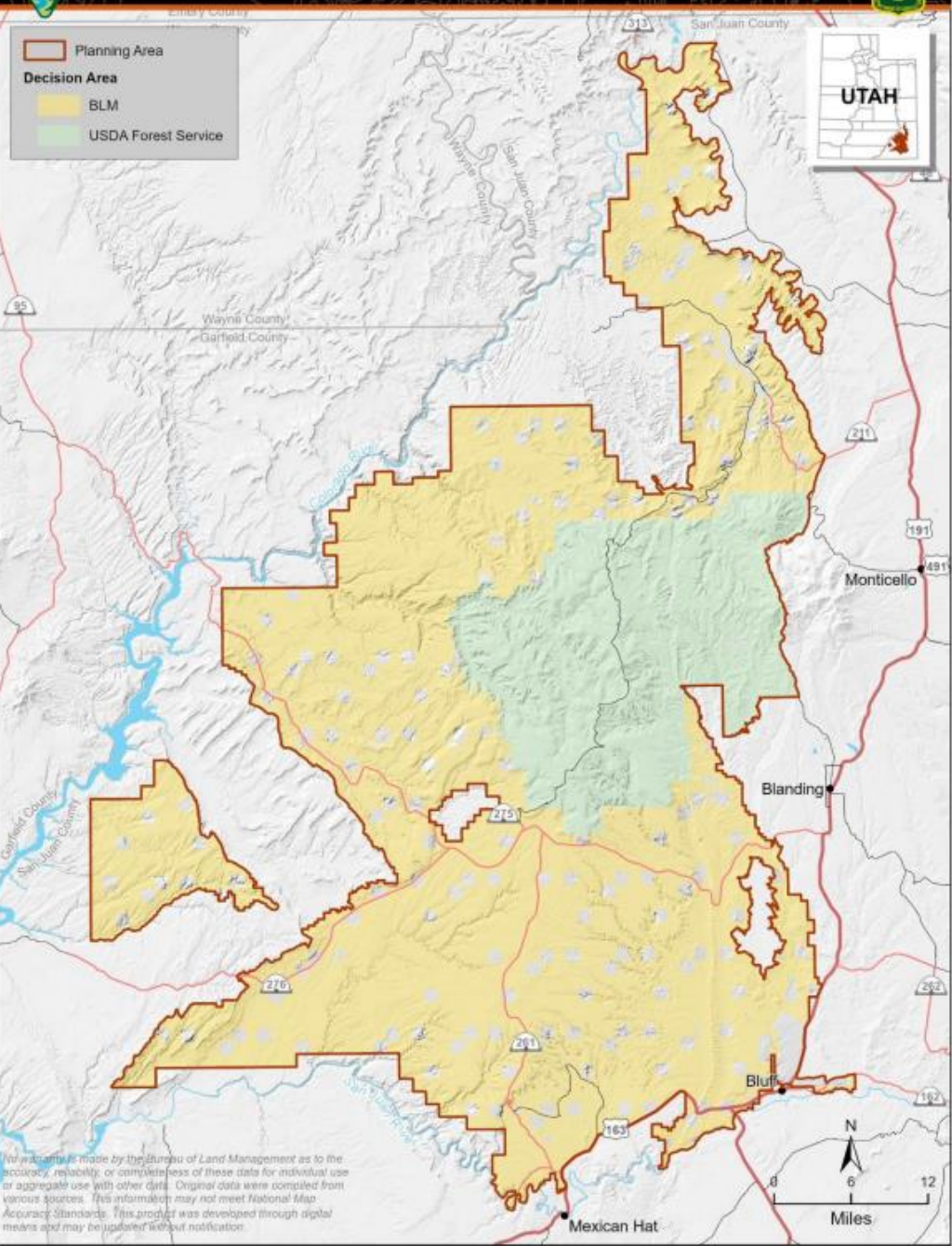




# Overview of BENM & RMP

- First designated by Obama in 2016
- Scaled back in size by Trump
- Expanded by Biden in 2021
- 2021 expansion prompted new RMP
- Current status: 1.36 million acres
- RMP is not a:
  - Travel management plan
  - Trail- or site-specific plan





# Overview of BENM

- 1.36 million acres
- Southeast Utah (San Juan County)
- BLM managed: 1.06 million acres
- BLM & Forest Service managed: 289k acres
- High-value destination for a broad variety of stakeholders and user groups
- Rich in archeological and cultural values for Native American tribes and local citizens dating back for 100's of years



Figure 1-1. Planning Area and Decision Area.

# The Bears Ears Commission

- Comprised of representatives from 6 Native American tribes
- Designated as “co-managers” of BENM
- The BEC was not authorized by Proclamation or Congress
- Played an integral role in shaping the 5 Alternatives
- Directly involved in crafting Alternative E

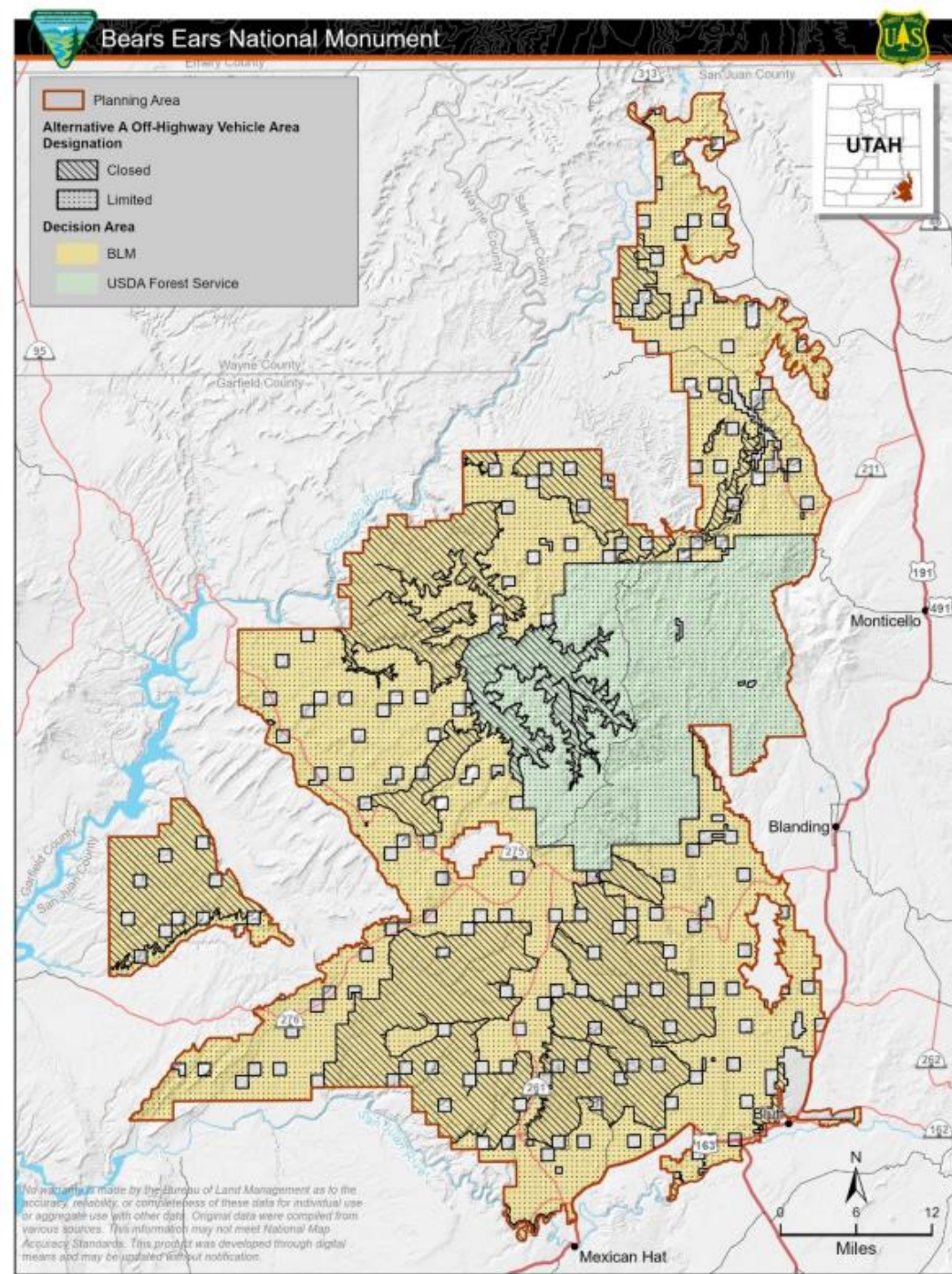




# The Five Alternatives

- Alternatives A – E present different variations of “balancing public access” with “protection of monument objects”
- All alternatives prioritize conservation of:
  - Landscape
  - Soundscape
  - Viewscape
- Zero alternatives are pro-recreation





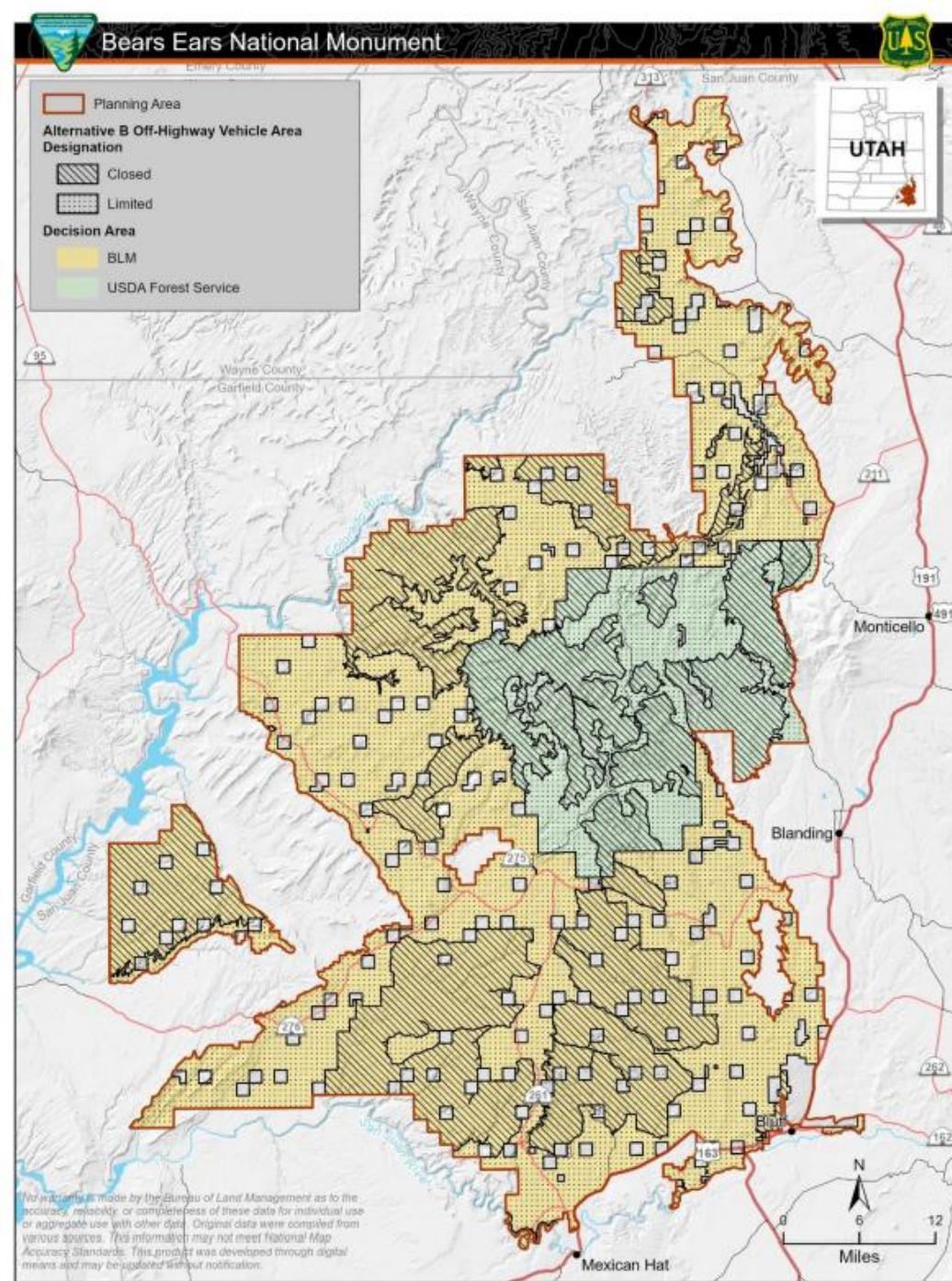
# Alternative A

- Continuation of current management (where consistent with Proclamation 10285)
- **BLM lands:** 8 special recreation management areas (SRMAs), 2 extensive recreation management areas (ERMAs) remain intact
- **Forest Service lands:** based on Recreation Opportunity Spectrum (ROS) categories: primitive, semi-primitive non-motorized, semi-primitive motorized, and roaded natural
- **Travel management:**
  - 928,080 open to limited OHV access
  - 436,075 acres closed to OHV access



Figure 2-33. Alternative A, off-highway vehicle area designation.





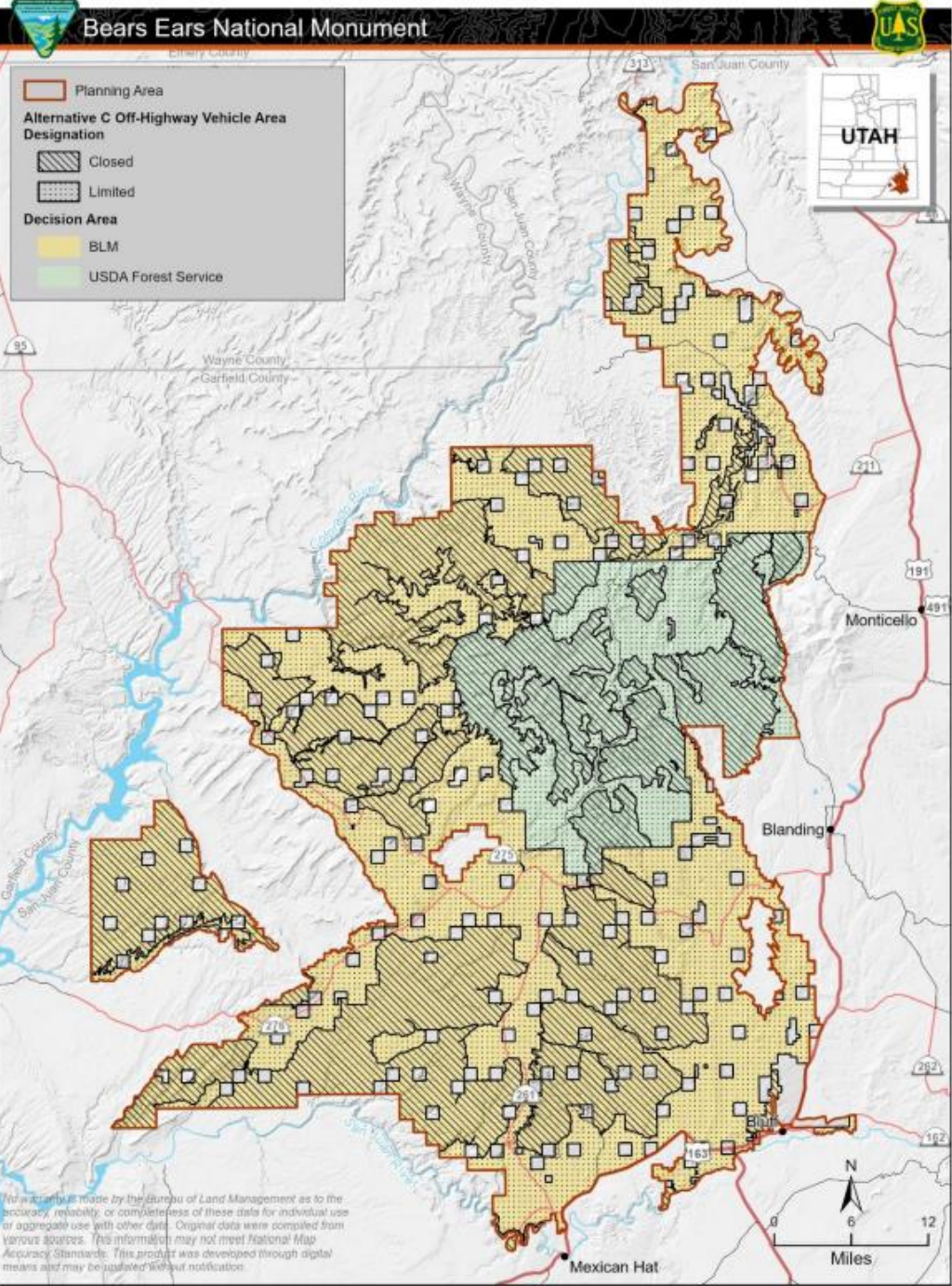
# Alternative B

- Most permissive management for recreation access, however, conservation is heavily prioritized over recreation and public access
- **BLM lands:** managed through four SRMAs and four ERMAs
- **Forest Service lands:** based on ROS categories: primitive, semi-primitive non-motorized, semi-primitive motorized, and roaded natural
- **Travel Management:**
  - 797,525 acres open to limited OHV access
  - 566,627 acres closed to OHV access



Figure 2-34. Alternative B, off-highway vehicle area designation.





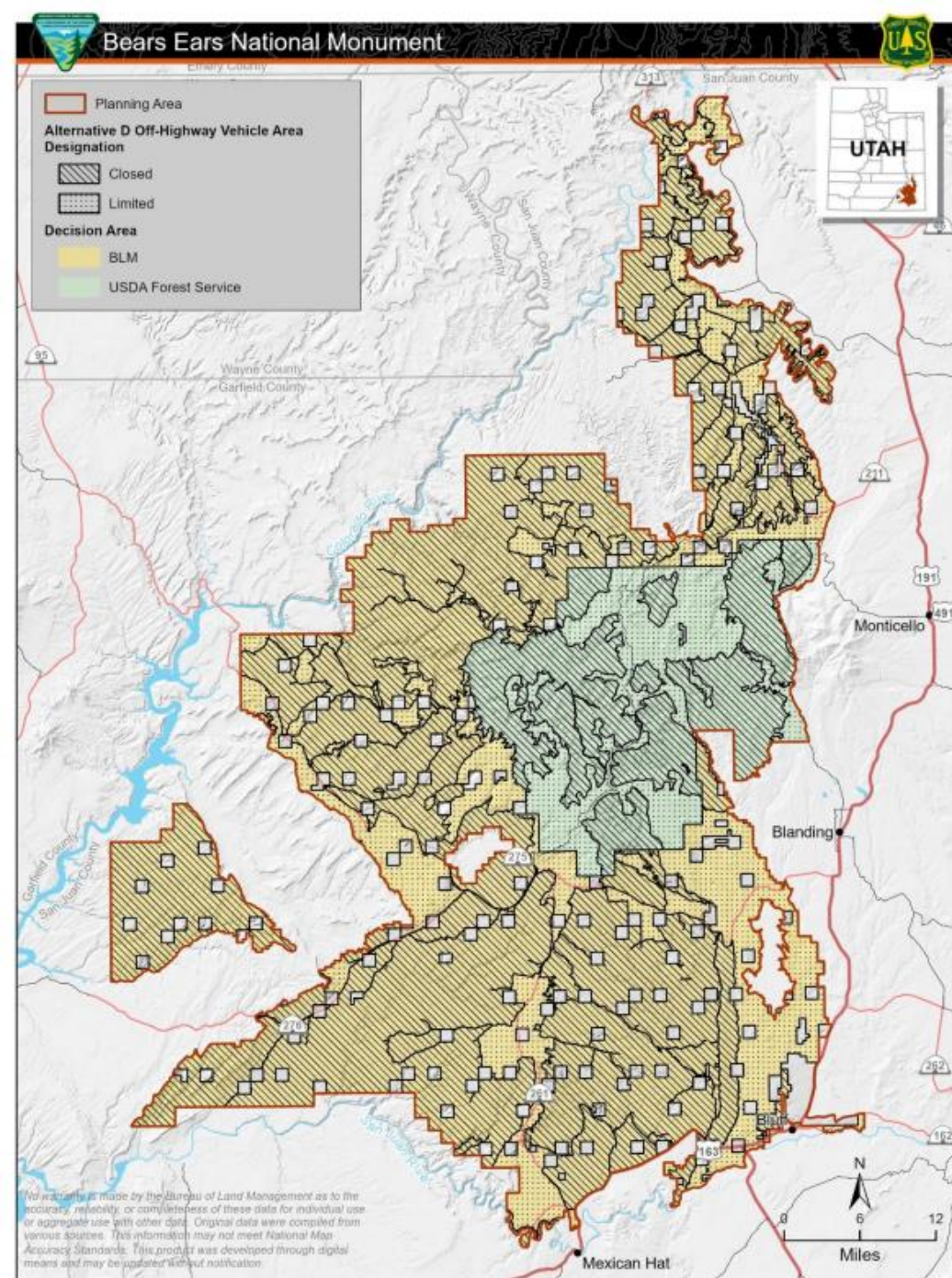
# Alternative C

- Similar to Alternative B, with additional restrictions to use of drones
- **BLM lands:** managed through four SRMAs and four ERMAs
- **Forest Service lands:** based on ROS categories: primitive, semi-primitive non-motorized, semi-primitive motorized, and roaded natural
- **Travel Management:**
  - 700,122 acres open to limited OHV access
  - 664,030 acres closed to OHV access



Figure 2-35. Alternative C, off-highway vehicle area designation.





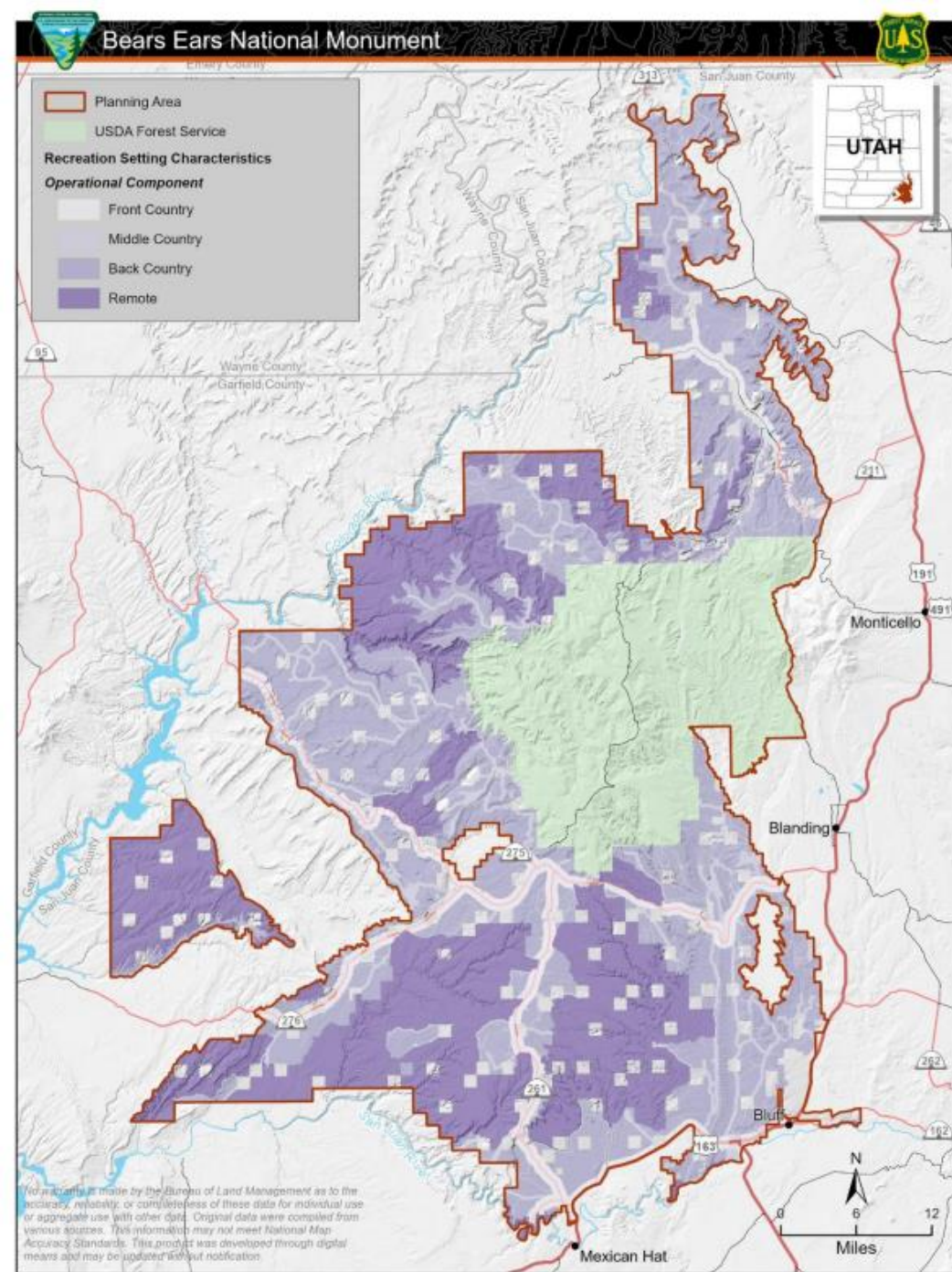
# Alternative D

- Severe restrictions to recreation access; primary management priority is landscape conservation achieved through eliminating or restricting recreation
- **BLM lands:** managed through creation of seven Management Areas
- **Forest Service lands:** based on ROS categories: primitive, semi-primitive non-motorized, semi-primitive motorized, and roaded natural
- **Travel Management:**
  - 381,239 acres open to limited OHV access
  - 982,914 acres closed to OHV access



Figure 2-36. Alternative D, off-highway vehicle area designation.





# Alternative E

- Most recreation access eliminated throughout BENM
- Maximizes considerations of Tribal perspectives on managing the landscape; emphasis on resource protection, use of Traditional Indigenous Knowledge and perspectives on the stewardship of the landscape
- **BLM & Forest Service lands:** SRMAs and ERMAs would be eliminated; recreation managed based on a zoned approach
- **Four zones:** Front Country, Passage, Outback, and Remote
  - 794,181 acres open to limited OHV access
  - 569,971 acres closed to OHV access



Figure 2-25. Recreation setting characteristics for operational components.

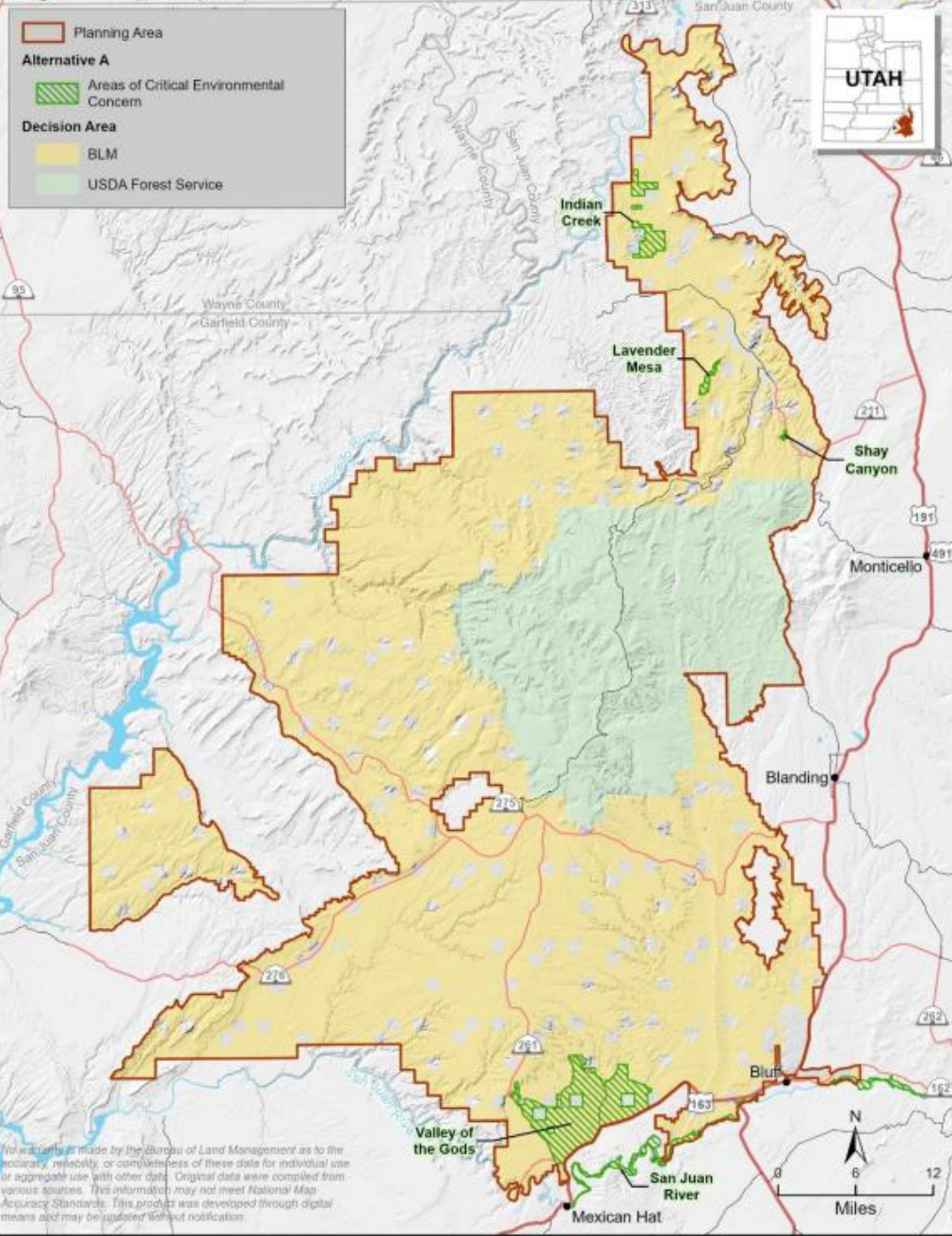


# Recreation Access: Key Issues

- Designation of 2 new “areas of critical environmental concern” (ACECs) comprising >97k acres
- Broadscale closure or limitation of OHV access
- Prohibition of competitive mechanized and motorized events
- Restriction to permitted-only use of new bolts, anchors, and fixed gear for rock climbing
- Recreational target shooting banned or heavily restricted
- Strict visual resource designations to limit light pollution and “preserve or retain the natural landscape character”







# ACECs by Alternative

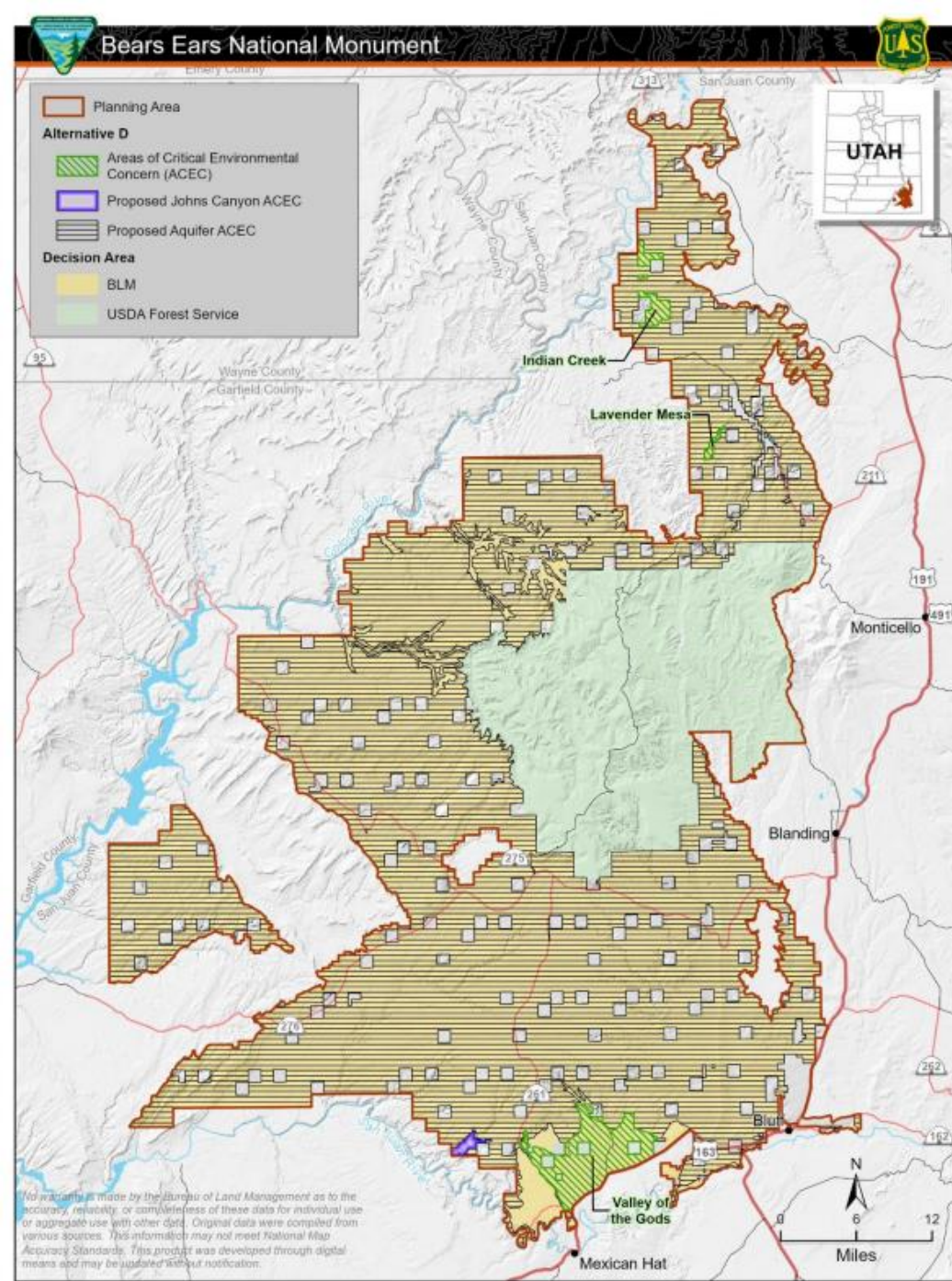
**Table 3-38. Acres of Designated Areas of Critical Environmental Concern per Alternative**

ACEC	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
San Juan River ACEC (portion within Planning Area)	1,555	0	0	0	1,555
Indian Creek ACEC	3,936	3,936	3,936	3,936	3,936
Lavender Mesa ACEC	649	649	649	649	649
Shay Canyon ACEC	119	0	0	0	119
Valley of the Gods ACEC	22,716	22,716	22,716	22,716	22,716
John's Canyon Paleontological ACEC	0	0	0	1,542	11,465
Aquifer Protection ACEC	0	0	0	1,012,371	85,856
<b>TOTAL</b>	<b>28,975</b>	<b>27,301</b>	<b>27,301</b>	<b>1,041,214*</b>	<b>126,296</b>

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification.

**Figure 2-6. Alternative A, Areas of Critical Environmental Concern.**





# ACECs – Alternative D

## Aquifer Protection ACEC

- Encompasses \*all BLM lands\* within the monument = **1,012,371 acres**

## John's Canyon ACEC

- 11,465 acres



Figure 2-8. Alternative D, Areas of Critical Environmental Concern.



# ACECs

ACECs are frequently used as justifications to close roads

- Even though the BLM has previously said that roads are allowed in an ACEC

Recently the BLM published the new Conservation and Landscape Health rule that prioritizes designating ACEC's on public lands

- However, this rule was not finalized before they released the draft proposals for BENM

A new ACEC designation is proposed in BENM: an Aquatic ACEC

- Water within BENM is already protected under numerous laws and acts: the Utah Department of Environmental Quality, Clean Water Act, and NEPA
- Designating over a million acres as an ACEC is unwarranted and will be used to justify more public access closures and restrictions



# Key OHV Routes at Risk of Closure

- Arch Canyon
- Peavine Corridor
- Hotel Rock
- Chicken Corners
- Lockhart Basin
- Beef Basin
- Bridger Jack Mesa
- Lavender Canyon
- Davis Canyon
- Lavender Mesa
- Moqui Canyon
- Mike's Canyon
- Comb Ridge
- Routes for Easter Jeep Safari
- Routes for off-road jamborees
- Access to Utah's backcountry







# Rock Climbing

- Bears Ears is a premier destination in Utah
- Top sites: Indian Creek, Valley of the Gods
- RMP would create restriction to permitted-only use of new bolts, anchors, fixed gear
- Climbing routes in proximity to cultural sites would be closed



# Wood Gathering

## Private wood harvesting:

- Permitted only in authorized areas, through a permit system

## Wood gathering for camping:

- Permitted only within 150 feet of campsite, pre-authorization to gather will be required





# Target Shooting

## The most “permissive” alternatives:

- Target shooting would be “permitted generally,” but, it also cites an exhaustive list of where it will be banned, which is the vast majority of the monument
- “If problems with recreational shooting occur in the future, the BLM would consider future restrictions or closures”

## The most restrictive alternatives:

- Target shooting will be closed throughout the entirety of the monument



# Sacred Land / Exclusive Access

- **Sacred lands** - spiritual, cultural connections are not exclusive to a single group
  - Outdoor recreation and public land access is broadly acknowledged as beneficial for mental health, spiritual/life balance
- **Antiquities Act** - not intended to close public land access to protect monument objects
  - Public land access and stewardship is both a right and a responsibility for all US citizens
- **“Museum Management”** – creates exclusivity, banishes many subgroups from access and enjoyment of our public lands

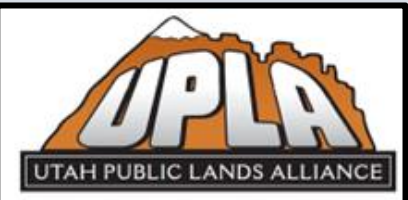




# Substantive Comments – The “Do’s”

## Comments that qualify as “substantive”

- Use facts to question the accuracy, method, or assumptions of the analysis
- Propose reasonable new alternatives, or revisions to proposed alternatives
- Refer to planning document pages, maps, statements
- Present information that is missing in the plan
- Include your knowledge, experience, evidence related to your comments
- Provide GPS readings or landmarks when referring to specific locations
- Avoid statements like “I don’t like this” or “I do like this”



# Substantive Comments – The “Don’ts”

## Comments that DO NOT qualify as “substantive”

- Craft an emotionally compelling story without any facts
- State only your agreement or disagreement with a plan, analysis, or policy
- Ask vague or open-ended questions
- Comment on unrelated projects





## Sample Comment Letter (Template):

Date: [insert date]

Monument Planning  
BLM Monticello Field Office  
365 North Main, Monticello, UT 84535

RE: Bears Ears National Monument Resource Management Plan & Draft EIS (Document #DOI-BLM-UT-Y020-2022-0030-RMP-EIS)

Dear Monument Planning Team,

I am writing to provide public comment on the Bears Ears National Monument Resource Management Plan & Draft EIS (Document #DOI-BLM-UT-Y020-2022-0030-RMP-EIS). I recreate at Bears Ears National Monument (BENM), and I have concrete plans to continue visiting BENM on a regular, recurring basis in the future.

[Note something about you or your family's history and love for recreation at BENM, your favorite sites to visit in BENM, your favorite activities to engage in there, how OHV and/or outdoor recreation benefit your physical, mental, and spiritual health, how OHV and/or outdoor recreation allow you to have meaningful connections with your family and friends and build your sense of community with others.]

[If you live near BENM or in the State of Utah, note how closures to public access at BENM may negatively impact your community and local economy. IE: drive outdoor recreation to other areas and cause businesses that support outdoor recreation (such as OHV dealers and repair shops, outdoor recreation supply stores, hotels, restaurants, guide services, etc.) to decline or go out of business.]

[Use the talking points above to cite your concerns here, or add in other points from your own research and perspective.]

In closing, I urge the Monument Planning Team to create a new "Access" or "Recreation" alternative for the public to consider and comment on for the BENM Resource Management Plan. This new alternative would truly balance protection of public access for enjoyment of the landscape and outdoor recreation, with protection of monument objects, and active stewardship of natural and cultural resources. I urge the Monument Planning Team to:

- Cite a short summary of the points in your letter as bullet points here...
- Point #2...
- Point #3...
- Etc...

Thank you for reviewing my concerns and recommendations.

Sincerely

# Comment Letter Template

- A comment letter template is available in the chat box
- Use this to structure your comment
- Individual letters are the most effective way to comment



# Comment Submission

(Form Letter Method)

- **Deadline to comment: June 11**
- <https://www.sharetrails.org/category/state/utah/>
- Click on article title to submit a form letter

**Be sure to add personal comments at the top of the form letter**



Oppose New Areas of Critical Environmental Concern in Bears Ears National Monument

May 26, 2024 | Action Alert, ATV, BLM, Dispersed Camping, National Monument, Off-Roading, Operation Accessible, Overlanding, SXS, USFS, Utah, Withdraw the Rule







## Bears Ears National Mon

DOI-BLM-UT-Y020-2022-0030-RMP-EIS

Home

Documents

Maps

How to Get Involved

Timeline

**Participate Now**

### Project Information

<b>NEPA Number:</b>	DOI-BLM-UT-Y02
<b>Project Name:</b>	Bears Ears Nation
<b>Project Type:</b>	RMP - Environme
<b>NEPA Status:</b>	In Progress - Pub
<b>Lead Office:</b>	Monticello FO
<b>Last Updated:</b>	05/28/2024 12:22

### What's New

**May 5, 2024:** Two virtual public meetings ha  
available below:

- [4/16/24 BENM Draft RMP/EIS Virtual](#)
- [5/2/24 BENM Draft RMP/EIS Virtual P](#)

**Last Updated:** 5/28/2024, 12:22:21 MDT

# Comment Submission

(Individual Letter Method)

- **Deadline to comment: June 11**
- <https://eplanning.blm.gov/eplanning-ui/project/2020347/510>
- Click on “Participate Now”





# QUESTIONS?

**TOGETHER WE WILL WIN - *But We Can't Do it Without You!***