

April 10, 2018

Bureau of Land Management  
Attn: Matthew Betenson  
669 S Highway 89A  
Kanab, UT 84741

Dear BLM Planning Team,

The Conservation Alliance, Outdoor Alliance, and Outdoor Industry Association offer these comments for the public scoping process for the Grand Staircase-Escalante National Monument (GSENM) management plan. Our organizations represent outdoor industry companies that make and sell products for outdoor recreation and the human-powered outdoor recreation community. We value the public lands and waters that provide important outdoor recreation opportunities for our customers and recreationists, and our community directly, and the gateway communities in Utah, enjoy the protected public lands that comprise the Grand Staircase-Escalante National Monument.

Our organizations and community strongly oppose President Trump's action to change the boundaries of Grand Staircase-Escalante National Monument, and we believe those changes to be illegal. The monument's boundaries had been in place for more than 21 years, and have been codified by Congress. We are confident that court challenges to boundary changes will confirm that President Trump's actions were illegal, and that only Congress has the authority to revoke or reduce a national monument. Consequently, we maintain that the Bureau of Land Management (BLM) is premature in initiating a management planning process for a national monument whose boundaries are being challenged in court. The BLM should refrain from any planning efforts until the legitimacy of the boundaries is settled.

If the BLM is determined to prematurely pursue a planning process, we ask you to develop a plan that protects the recreation opportunities, archaeological sites, and areas of scientific interest within the original boundaries of the GSENM as set forth in Presidential Proclamation 6920, dated September 18, 1996. That proclamation specifically calls out the GSENM's geology, paleontology, archaeology, human history, and unique plant and wildlife species, and outdoor recreation is the means through which Americans have the opportunity to experience and enjoy the monument's protected objects. These values make GSENM, as originally designated in 1996, a rich destination for outdoor recreation and adventure. Any management plan must protect these experiences and resources throughout the areas included in the original proclamation as well as the reduced areas proposed by President Trump.

The BLM should look to the current national monument management plan, which went into effect in February, 2000, for guidance on how to protect important and sensitive resources in both the original proclamation area and in the areas proposed by President Trump's proclamation. These resources include cultural sites, natural and ecological values, rare paleontological and geological resources, and

tribal sacred lands as described in Proclamation 6920. The existing management plan has served the landscape well for more than 18 years, and should guide any management decisions moving forward.

The proposed timeline for the public comment period makes it difficult for Americans to participate. We ask you to 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. 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.

The GSENM is among the crown jewels of our public lands system, and an important economic driver for communities dependent on outdoor recreation with a clearly demonstrable and proven recreation economy that developed because of its national monument status. A Headwaters Economic study from 2001 to 2015 in the GSNM region shows that population grew by 13 percent, jobs grew by 24 percent, real personal income grew by 32 percent, and real per capita income grew by 17 percent. According to a study by the Outdoor Industry Association, outdoor recreation in Utah \$12.3 billion in consumer spending, 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. As long as our natural resources and outdoor infrastructure are properly managed and protected, our economy will continue to boom. Protecting the lands within the original boundaries of the GSENM is an investment in our economic future.

Finally, basic maps depicting the outdoor recreation resources within the monument area are attached. Outdoor Alliance has extensive GIS data covering recreational opportunities within the monument area, which we are happy to share with the planning team on request.

Thank you for considering our perspective.

Sincerely,



John Sterling  
*Executive Director*  
The Conservation Alliance



Adam Cramer  
*Executive Director*  
Outdoor Alliance



Amy Roberts  
*Executive Director*  
Outdoor Industry Association