

To: James_Cason@ios.doi.gov[James_Cason@ios.doi.gov]
Cc: Adam Cramer[adam@outdooralliance.org]
From: Louis Geltman
Sent: 2017-05-26T14:35:34-04:00
Importance: Normal
Subject: Fwd: Outdoor Alliance comments in support of Bears Ears
Received: 2017-05-26T14:36:01-04:00
[OA Bears Ears Review.pdf](#)

Hi Jim,

A colleague passed along your contact, and I wanted to be sure to loop you on Outdoor Alliance comments on the ongoing monument review. Thanks for your consideration.

Best,

Louis Geltman

----- Forwarded message -----

From: Louis Geltman <louis@outdooralliance.org>
Date: Fri, May 26, 2017 at 9:39 AM
Subject: Outdoor Alliance comments in support of Bears Ears
To: Douglas <douglas_domenech@ios.doi.gov>, Downey Magallanes <downey_magallanes@ios.doi.gov>, timothy_williams@ios.doi.gov
Cc: Adam Cramer <adam@outdooralliance.org>

Doug, Tim, and Downey,
Passing along comments submitted today from Outdoor Alliance on the review of Bears Ears. Thanks for your consideration...

Best,

Louis Geltman

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Louis Geltman
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OUTDOOR ALLIANCE

Monument Review
MS-1530
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Outdoor Alliance support for Bears Ears National Monument

Dear Madam or Sir:

Outdoor Alliance is a coalition of eight member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, and the Mazamas and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes.

While directed primarily at the protection of invaluable cultural resources in the Southeast Utah region, the designation of Bears Ears National Monument also protects world class recreation opportunities. Protecting outdoor recreation is an important part of designation under the Antiquities Act because it is through activities like hiking, climbing, paddling, and camping that Americans have the opportunity to experience the objects of historic or scientific interest protected under the Act. Recreation also improves the lives of participants and benefits rural and gateway communities through the \$887 billion outdoor recreation economy.

Throughout the years-long process leading up to the designation of Bears Ears National Monument (as well as the designation of numerous other Monuments under review) Outdoor Alliance, alongside our member organizations, local affiliates, and partners, shared information on recreation resources (locations, use estimates, economics, conditions, etc.) with the previous administration, both in the field and in Washington, D.C. We are gratified to have seen such a robust public process, including a wide range of essential stakeholders, leading to the protection of this invaluable landscape in a way that recognizes its recreational value alongside its cultural and historic resources.

In addition to working with the previous administration toward the ultimate protection for the Bears Ears region, Outdoor Alliance also participated extensively in efforts to craft a more far-ranging vision for our country's public lands in Utah through the Public Lands Initiative (PLI). We appreciate Rep. Rob Bishop's efforts in this process, and although the initiative could not yield a successful plan, we view this process as having facilitated



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even further input regarding the future of this landscape, with the boundaries of the Bears Ears National Monument closely tracking conservation proposals contained in the PLI.

To the degree that this administration believes it is necessary to reevaluate the process and scope of the designation, we believe that the designation may, in fact, be smaller than appropriate to protect the region's resources and values. The Antiquities Act requires that the size of each National Monument be "compatible with proper care and management of the objects to be protected." 54 U.S.C. § 320301(b). During the original, extensive public outreach and review process leading up to designation of Bear Ears National Monument, the Inter-Tribal Coalition recommended that 1.9 million acres be included in the Monument to assure adequate protection of the "objects of historic or scientific interest" that this Monument was established to preserve. As the Inter-Tribal Coalition documented at the time, the 550,000 acres omitted from the final Monument designation contain significant natural, cultural, and scientific features that fully warrant protection, including many extraordinary archaeological and cultural objects of immense importance to the Native American community.

Of particular concern for the outdoor recreation community is the omission of the extraordinary geologic features of the canyon between Comb Ridge and Mexican Hat that were carved out to make final Monument boundaries more consistent with compromises contained in Rep. Bishop's PLI proposal. This omission also excluded a large segment of the San Juan River upstream of Mexican Hat despite its outstanding recreational and cultural value as a continuous multi-day river trip from Sand Island to Mexican Hat.

Attached, please find a submission shared by Outdoor Alliance with the previous administration and others in Spring of 2016. We include this both as an example of one of the many pieces of information welcomed and considered by the previous administration from a wide array of stakeholders, but also as a cursory illustration of the world-class recreation assets protected by the Monument. As this administration learns more about the tremendous level of support enjoyed by Bears Ears, the first-rate public process that led to its designation, and the unmatched historic, scientific, cultural, and recreational resources contained within it, we are happy to continue sharing any information that will be of assistance.



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In short, we fully support both the designation of Bears Ears National Monument and the process that lead to the designation, and we oppose any steps that would diminish protections for this landscape.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Adam Cramer, Executive Director, Outdoor Alliance
Brady Robinson, Executive Director, Access Fund
Wade Blackwood, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Dave Wiens, Executive Director, International Mountain Bicycling Association
Mark Menlove, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Phil Powers, Executive Director, American Alpine Club
Lee Davis, Executive Director, the Mazamas



OUTDOOR ALLIANCE

Southeastern Utah Recreation and Land Protection

March 25, 2016

Southeastern Utah is a world famous and unique landscape for human-powered recreation. Besides being home to several destination national parks, such as Arches and Canyonlands, it has world-class rock climbing, mountain biking, whitewater paddling, canyoneering, hiking, and skiing. The region has countless cultural resources and significant traditional value. In addition, the area has the potential for uranium and potash mining, as well as oil and gas development. Because of the world-class recreation, ecological, and cultural resources found in southeastern Utah, we believe that the Bears Ears region should be permanently protected from impacts caused by resource extraction and high-impact public use.



The Bears Ears region is treasured by the rock climbing community, and attracts tens of thousands of climbers from around the world each year. The climbing experience in eastern Utah is highly-valued, not only because of the unique sandstone cliffs and remote desert towers and bluffs, but also because the landscape is relatively undeveloped and provides outstanding opportunities for solitude. Important climbing areas in the Bears Ears region include Indian Creek, Lockhart Basin, Arch/Texas Canyon, Comb Ridge, and Valley of the Gods (see map). These are irreplaceable recreation resources that are sensitive to the pressures of encroaching resource development. Over the past decades, climbers have committed to conserving the Bears Ears region through years of on-the-ground stewardship, engagement in conservation initiatives, and continued advocacy for natural and cultural resource protection.

The greater Moab area, just north of the Bears Ears region, provides more than 1,000 miles of outstanding mountain biking opportunities which have significantly helped to grow the regional economy. The San Juan, Colorado, and Green Rivers provide nearly 200 miles of exceptional whitewater and flatwater paddling opportunities. These rivers are not only critical to the ecological integrity of the region, but are also highly valued by the paddling community. In fact, these river trips are so popular that the San Juan River has implemented a lottery-based permit system because the demand greatly exceeds capacity. The Bears Ears region includes three mountain peaks that are used by backcountry skiers during the winter season (see map). In addition, the region also provides hikers and canyoneers with hundreds of opportunities to experience wild desert landscapes.

Because of the importance of the Bears Ears region to the outdoor recreation community, Outdoor Alliance has been engaged in general planning and legislative initiatives that affect eastern Utah. We have supported the Moab area BLM Master Leasing Plan, participated in the Public Lands Initiative process, and engaged with the Bears Ears National Monument Support Group.

In general, our organizations prefer that legislation protect areas in need of permanent protection instead of using the Antiquities Act. If the Administration uses the Antiquities Act to designate a Bears Ears National Monument, we request that the world-class recreational opportunities located within the Bears Ears proposal boundaries, including specific climbing, mountain biking, river running, and skiing locations, be acknowledged in the presidential proclamation. Additionally, we hope that the proclamation will acknowledge the recreational importance of key locations like Indian Creek, Lockhart Basin, Arch/Texas Canyon, Comb Ridge, Valley of the Gods, and the San Juan, Colorado, and Green Rivers. Having this acknowledgment in the proclamation is essential to ensuring appropriate protection of recreation opportunities as agencies develop a monument management plan.



Geospatial Data Attachment

Outdoor Alliance is happy to provide geospatial data for climbing, mountain biking, paddling, and skiing in southeastern Utah. The extent of the data (see map package) matches the concentration of recreation resources, as well as the current conservation proposals for the area. Please contact Erik Murdock at erik@accessfund.org with any questions or comments regarding the geospatial data or southeastern Utah human-powered recreation resources.

Southeastern Utah Recreation

Climbing: Southeastern Utah is highly valued by the rock climbing community. The area attracts tens of thousands of climbers from around the world each year due to the dry weather, high quality rock climbs and exceptional landscapes. There are approximately 400 discrete climbing sites (cliffs or towers) that contain thousands of sandstone and limestone climbing routes in the southeastern Utah region (reference the data extent). Several world class climbing areas, such as Joe's Valley, San Rafael Swell, Fisher Towers and Castleton Valley, are found just north of the Bears Ears region (as defined by national monument proposals). Important climbing areas within the Bears Ears region include Indian Creek, Lockhart Basin, Arch/Texas Canyon, Comb Ridge, and Valley of the Gods. These are irreplaceable recreation resources that are sensitive to the pressures of encroaching resource development. Over the past decades, climbers have committed to conserving the Bears Ears region through years of on-the-ground stewardship, engagement in conservation initiatives, and continued advocacy for natural and cultural resource protection. For example, in 2004, climbers established Friends of Indian Creek, an Access Fund affiliate, to work with land managers to promote responsible climbing and to provide resources that help alleviate recreation's impact on the region. The Access Fund has helped to develop climbing management strategies, and has organized many stewardship projects to control erosion and camping impacts. The American Alpine Club has provided grants for educational kiosks and human waste disposal.

Paddling: The Colorado and Green Rivers and their tributaries have provided exceptional experiences for adventure and exploration for well over a century. After General John Wesley Powell's First Expedition down these rivers in 1869, river-running became an important part of western-american adventure and exploration. In the decades that followed, river-runners on the Colorado, Green and Dolores Rivers, used wooden boats to navigate hundreds of miles of contiguous whitewater - the experiences leading to new industry, manufacturing, and a profound commitment to protecting these wild places. Whitewater recreation exploded in popularity with the availability of rubber rafts in the 1950s and further increased with the transition from fiberglass to plastic kayaks in the 1980s. Collectively these rivers provide hundreds of miles of opportunities for multi-day adventures that draw river runners from across the country and around the world. In fact, these opportunities are so popular, that many sections of the Colorado (Westwater Canyon, Cataract Canyon), Green (Desolation Canyon, Gray Canyon, Labyrinth Canyon, and Stillwater Canyon), and San Juan Rivers have implemented lottery-based permit systems because demand for the experience these rivers provide exceeds capacity. On tributaries such as the Dolores, streamflows are so highly controlled that when opportunities to explore the river by boat occur, enthusiasts arrive in droves to experience the River - many for the first time in decades. Other tributaries including Muddy Creek, San Rafael, and Escalante provide opportunities for more advanced whitewater boaters and cayoneering. Part of the draw for these river trips is that there are few places left in this country where one can still spend a week floating down a river and have a backcountry recreation experience, a true American pastime. River trips serve as a means of experiencing the unique geography and cultural history of the area, with many sites along the rivers where one can view Native American rock art and archeological sites that speak to the long history of the region pre-dating European settlement.

Mountain biking: The cycling opportunities in southeastern Utah span the spectrum from challenging single track for experienced riders to incredible introductory terrain that can be enjoyed by anyone. The Moab area also provides approximately 150 trail segments, totaling more than 1,000 miles of outstanding mountain biking opportunities, which have inarguably helped to grow the local economy. World-class mountain bike trails such as Porcupine Rim and Kokopelli Trail are valuable recreation assets that deserve landscape-scale protections. Within the Bears Ears region, the single track is primarily in alpine terrain of the Abajo Mountains, and in the far northern section on the Amasa Back Trail system. The introductory riding takes place on all the unpaved roads in the area, including the Lockhart Basin Road which connects the Needles District of Canyonlands National Park and the gentle climb to the Bears Ears themselves. Traveling through the region by bike is one of the best ways to truly experience the land and its history. With the challenges involved in managing vehicle traffic in so many of our parks and monuments, there is a great opportunity to encourage and support visitation to the Bears Ears region by bike. A transportation and recreation plan should designate the roads and trails where non-motorized, mechanized vehicle use will be permitted. Natural surface trails for mountain biking and hiking may be developed within this transportation and recreation plan that will provide for interpretive experiences for backcountry travelers who seek to experience the many cultural and historical artifacts in the region.

Skiing: The Abajo Mountains in southeastern Utah provide an unexpected treat for skiers in the midst of the red rock desert. Skiing Utah's legendary powder snow high above the red rock desert, with views stretching from Cedar Mesa to Ship Rock, is a unique experience not to be missed. The easiest access point for human-powered skiers is outside of the town of Monticello at the abandoned Old Blue Mountain ski area. The old standing chairlift poles and run-down guard shack still bear testament to the history of skiing in the desert. Another popular destination is Abajo Peak - the highest in the range. From this summit you have unbroken views of Beef Basin, the Needles District of Canyonlands, and the impressive La Sal Mountains. This hidden gem of Utah skiing is not included within the boundaries of the Public Lands Initiative proposed NCA, making it even more important to protect the Abajos.