

**To:** Betenson, Matthew J[mbetenso@blm.gov]  
**From:** Larry "E" Crutchfield  
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Monument counterpoints.docx

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**From:** Larry "E" Crutchfield (b) (6)  
**Date:** Fri, Mar 17, 2017 at 6:59 AM  
**Subject:** Counterpoints  
**To:** "Staszak, Cynthia" <cstaszak@blm.gov>

Cindy,  
Attached are some of the counterpoints I noted; I will develop more when I get back from my dental appointment.

v/r  
Larry

## Kane County Commission statement on review of the GSENM

The proposal is a straightforward request to evaluate which lands best fit a monument proclamation as intended by the 1906 Antiquities Act and benefit from its designation as there is now 20 years of history to give context from which to examine the arguments for and against these designations. Our assertion is that much of the area within the monument benefits from its designation and should remain within the boundaries but that the inclusion of some spaces adds additional layers of regulations to management policies resulting in some primary concerns related to: 1) cultural preservation, 2) tourism development 3) heritage industry retention and expansion 4) archeological and paleontological resources and 5) environmental conservation and stewardship promotion. We hope that the review process will consider incorporating cultural legacy activities within the area.

Specifically, historical road closures (the MMP TMP went through the public planning process and was signed off by Kane County(?). It was challenged in court & in 2009(?) and found by the court to be valid. More than 900 miles of roads are open for recreational use. Another (?)miles are open to permitted uses, primarily ranching but also includes power-line ROW, communication sites, research permits, etc), such as the 130 year old Paria canyon road (the Paria River corridor runs through the Paria Hackberry WSA & was not cherry-stemmed or a designated as a way. However, in the final WSA report to DOI, BLM recommended that it be removed from wilderness consideration and remain open to OHV use because of its historic values), as well the current proposal to close 2/3 of the historical roads now being regularly used for access into monument lands (no such proposal to close 2/3 of the roads now being used is in the works or planned) are serious issues for our citizens. These closures impact not only residents but limit the ability for tourists to explore and engage with the landscape as well. Similarly, current group size limits (presently 12, in the majority of the monument lands) (True), restricting OHV use on many unclosed roads (True. The MMP has more than 900 miles open to recreational use; with less than 600 miles open to non-street legal ATVs) and requiring permits for overnight camping (True. The permits are free and provide information to assist rescuers in the event of an emergency. The information also helps Monument staff better understand use of the lands to help inform management decisions) unnecessarily constrain traditional activities enjoyed by residents such as family outings, scout campouts and day use by other local recreation groups. While it may seem easy to point out the abundant amount of accessible wilderness in the surrounding area, many of the locations within the monument represent a sense of place and history that is directly associated with residents' cultural well-being and modes of environmental interaction. Preserving these types of uses is a primary driver in our review of the current designations and our hope is that some modifications could be made to the boundaries and the management plan to create a better solution for our future that is both healthy for our environment and our local culture. In addition to prohibiting traditional culture uses, current regulations that prevent any competitive activities (true, the current MMP does restrict competitive events, but the MMP went through the public planning process, which included a consistency review with the governor's office, and was not found to be inconsistent) in the monument stifle opportunities to enhance our tourism industries' shoulder season by hosting athletic events. For instance, these regulations inhibit our ability to hold a half marathon on the paved Johnson Canyon road (not true) and require the Grand to Grand Ultra Marathon and other such events to make unusual and inconvenient route corrections to avoid crossing monument lands, effectively diminishing not only our economic potential but our visitor experiences as well. Also, to reiterate again, historical road closures will also almost certainly infringe on the capability of certain tourist demographics to access and enjoy sites

within the monument lands effectively hobbling Kane County's growing environmental tourism brand (More than 900 miles of roads are open to recreational use on the Monument. What is hobbling the growing tourism brand more is the Utah legislature telling the world that the Monument closed all the roads. When the Monument co-hosted the local ATV clubs annual Fun Run, many people attending were surprised that the Monument would allow ATV use because everything they've read in the newspapers and from their legislature was that the Monument was closed to ATVs). Finally, it is clear to us that many wilderness areas benefit from monument designations, which are preservation oriented and offer additional careful review processes for objects intended to be conserved with little to no human impacts. However, current management policies (this is true) don't facilitate the improvement of the lands resulting in the encroachment of pinion and juniper areas, which can lead to excessive erosion, degradation of the water tables, reduction of feed for livestock and wildlife and increased risk of wild fires. Opening some of these lands for multiple uses with active land management can serve the dual purpose of curtailing these issues as well as aiding in expanding our heritage cattle industry and providing an avenue for culturally appropriate and diverse economic growth beyond the tourism sector. Small scale, limited impact and community based livestock management and its subsequent best practices also stand to increase already existing stewardship ethic and conservation ideals among local resource users. Further, many activities, such as the current county project to stabilize the Johnson Canyon wash emergency watershed project (what could we have done better/faster/allowed that we didn't), could be better accomplished with policy revisions. Kane County has very limited gravel resources and with the current regulations many of these resources are restricted (how did the Monument limit or prevent the county from getting gravel?). These many issues are challenges because of the underlying designations of the lands as they currently are. Our request stems from the opinion that perhaps they could be better managed with some changes. We would like to explore the review of these lands and believe that a more optimum land management and preservation solution could be developed and are seeking help to find solutions to co-addressing these issues related to our cultural preservation, tourism development, heritage industry expansion (coal, as ranching is ongoing; logging, no appreciable logging resources exist on the Monument...only slightly more than 1,000 acres of Ponderosa & only market for PJ is as local fuel wood), archeological and paleontological resources and environmental stewardship.

While the Monument lands were withdrawn from mineral extraction by the designation, the proclamation protected valid existing rights. The mining leases on the Monument at the time of designation could still be mining today – they made a business decision based on economics to relinquish the leases. To prove this point, for many years after Monument designation, a family-owned alabaster mine operated on the Monument; and Citation Oil currently operates five producing oil wells on the Monument. It is true, no new leases can be let; but as it regards coal, the cost of extracting the coal & getting it to market makes it uneconomical when compared to natural gas. The local Navajo generating plant, which gets its coal from the nearby Kayenta mine will close at the end of 2018 because it cannot compete with natural gas.

Develop points on wildlife reintroductions, water improvements that benefitted both wildlife and livestock; grazing comparisons – in 18 years, on average, KFO has used 55.7% of its active permitted use

compared to the Monument's 54.4% (the slight difference may be explained by the eastern side of the Monument getting less rain in recent years)...also, look into the KFO's RMP...how many AUMs did it reduce from the old plan? KFO also may have a higher percentage of suspended AUMs than the Monument. How many reintroductions has KFO done?

Develop points on SRPs – diversity of SRPs; increases in numbers; development of programmatic EA for SRPs to speed up permitting process. Development of heritage EA.

Develop points on economic development– Monument model pushed economic support structure off-monument.