

From: Miller, Ann
To: [Bowman, Randal](#)
Subject: Bears Ears documents for FS
Date: Tuesday, May 23, 2017 5:07:08 PM
Attachments: [3.d.Timber_Production_2012_2016.pdf](#)
[InitialDataRequestRelatedtoReviewofNationalMonuments_BENM.docx](#)
[BENM_Additional_Data_Request_052217.docx](#)

Hi Randy,

Here are a couple of Word documents with some summary information from BLM as well as information they sent us on timber activities.

Ann

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Monticello Field Office- Timber Production												
		Report FY	2016	2016	2015	2015	2014	2014	2013	2013	2012	2012
Resource Area Name	Category	Unit Measure	Standard Units	Received	Standard Units	Received	Standard Units	Received	Standard Units	Received	Standard Units	Received
Monticello FO	Christmas Trees	Number	11.00	\$110	16	\$160	15	\$150	17	\$170		
Monticello FO	Wood Products (posts)	Cubic Feet	7,092	\$1,138	5,228	\$1,147	5,469.24	\$1,215	3,535.72	\$1,410	1,765	\$489
Monticello FO	Wood Products (firewood)	Green Tons	3,398	\$9,995	3,333	\$9,685	2,993	\$8,795	3,260	\$9,610	1,115	\$3,290
Monticello FO	Total	Total	n/a	\$11,513	n/a	\$11,124	n/a	\$10,205	n/a	\$11,392	n/a	\$3,787

May 22, 2017

To: Ann Miller

Re: BENM Data Call Follow-up Questions

Oil & Gas:

1. Is there any information about the area that the proposed San Juan Master Leasing Plan would have encompassed? It is our understanding that it would have overlapped with at least part of what is now Bears Ears National Monument (BENM).

Please see the attached Excel file (Attachment 1. MLP_BENM_Acres.xls). A map can also be provided by tomorrow 5/23.

2. Is it possible to provide information on why acres nominated for leasing for O&G within what is now BENM were not included in quarterly lease sales? Is there any sense of levels of interest in lease nominations prior to 2014?

Information related to nominated acres prior to 2014 is only available in hardcopy format. Collection of this information would require an extensive record review. In an attempt to provide additional information, we have gathered information from BLM oil and gas files from 2010 to 2014. The year 2010 was selected as the starting point because this is when the BLM started offering lease sales on a rotating schedule among field offices. Since 2010, lease sales have been held each February in the Canyon Country District (i.e., Moab and Monticello Field Offices). Between 2010 and 2013, up to 108,375 acres within the area that is now BENM may have been nominated. Because we do not have GIS data for this time period, generic legal descriptions (Township and Range) were used to identify nominated acreage *in and around* the BENM.

The BENM boundaries are not tied to legal descriptions or public lands survey system land lines. Only portions of some township/ranges fall within the BENM. Therefore, 108,375 nominated acres is likely an overestimation of what was actually nominated within BENM. Existing data does not allow for a more accurately calculate nominated acreage.

3. Are all existing wells on BENM now abandoned? While the last producing well was drilled in 1984, when did production actually cease on what are now monument lands?

All 250 wells previously drilled in BENM are plugged and abandoned. The last producing well was plugged and abandoned in October of 1992. The attached spreadsheet (Attachment 2. BENM_OGWells.xls) shows total oil and gas production for all wells in BENM.

Minerals:

4. What material is being produced at the one commercial mineral materials site?

Sand and Gravel is being produced at the site.

5. What are the land use decisions that precluded processing of potash prospecting applications prior to designation?

Between 2008 and 2015, the BLM received 35 potassium (potash) prospecting permit applications (PPAs) in the area that is now BENM. In December of 2016, the BLM completed the Moab Master Leasing Plan (MLP). Within the MLP, the BLM made new decisions on mineral leasing and development for potash. Under the MLP, potash leasing is only allowable in identified Potash Leasing Areas (PLAs). There are no PLAs in the BENM. All PPAs submitted prior to completion of the Moab MLP (2016) have been rejected. The attached document (Attachment 3. BENM Potash PPAs.docx) includes a list of the PPAs submitted in the BENM.

Recreation:

6. While generally visitation increased substantially between FY15 and FY16, a couple of activities in particular increased as a percentage of total visitation. Notably: “driving for pleasure” increased from 5,445 visitor days in FY15 (2% of total visitor days) to 33,496 visitor days in FY16 (6% of total visitor days) and “climbing - mountain/rock” increased from 4,132 visitor days in FY15 (1% of total visitor days) to 29,363 visitor days in FY16 (6% of total visitor days)

Is there any insight into what is driving these jumps? I am mostly curious because in FY12-FY15, the top 5 activities by visitor day were consistently camping, backpacking, hiking/walking/running, row/float/raft, and viewing-cultural sites; but in FY16, driving for pleasure and rock climbing unseated row/float/raft and viewing-cultural sites in the top 5 activities.

The Recreation Management Information System (RMIS) is BLM’s official repository for data relating to the recreational and social use on public lands and waters, including National Conservation Lands. It is an internal system accessible only by BLM personnel. Data within the system includes, but is not limited to, the number of recreation visits, recreation visitor days, type of activities, permits issued, recreation site details, Travel and Transportation Management Areas (which contain the off-highway-vehicle designation acreage), and partnership agreement details.

The RMIS Database uses formulas developed by field staff (usually Outdoor Recreation Planners) that are designed from observational data coupled with visitor use estimates to

account for the time visitors spend participating in different activities. RMIS automatically converts this data into estimates of visitor hours and visitor days.

A full overview of BLM's RMIS process is available

here: <https://www.ntc.blm.gov/krc/viewresource.php?courseID=313&programAreaId=180>

Annually, the mid-year RMIS data calls require BLM offices to review Visitor Use Formulas and make adjustments, as necessary. Additionally, the Monticello Field Office experienced turnover in the key positions that input RMIS data between 2015 and 2017. Likely the variances noted above are the result of new recreation specialists adjusting the formulas based on their observational experiences in the field.

7. Is Kane Gulch the only ranger station in BENM? Can visitation to Kane Gulch ranger station be considered a fairly representative proxy for visitation to BENM?

Kane Gulch is the only ranger station in BENM. It is primarily used for pick-up of overnight backpacking permits for Grand Gulch and day-use Moonhouse permits, as well as for long-term parking. The Ranger Station is only open during high-use season (spring and fall) and is only guaranteed to be staffed from 8 am to noon during its operating season. Kane Gulch is located in the Cedar Mesa area, at the southern end of the monument. The majority of recreational use occurs in the Indian Creek area, at the northern end of BENM. Thus, visitation to Kane Gulch is not a representative proxy for visitation to BENM.

Timber:

8. We have not yet received information on timber production from the Forest Service regarding timber activities in Manti-La Sal National Forest. Do you know if commercial timber production is permitted in Manti-La Sal NF?

A cursory web review indicates that the Manti-La Sal National Forest does periodically analyze commercial timber sales but the BLM has not yet asked the Forest Service to verify the information as part of this data request.

<https://www.fs.usda.gov/wps/portal/fsinternet/cs/projects/mantilasal/landmanagement/projects?archive=1&sortby=1>

Cultural Resources:

9. What surveys and catalogues have been developed for cultural resources? Maps that have been shared with us indicated that only 9.2% of BENM has been inventoried for archaeological resources. Are there plans to survey the remainder of the monument?

In 2016, the Monticello Field Office contracted with SWCA, Inc. to complete a Class I - Existing Information Inventory (Class I). The purpose of this Class I, scheduled to be completed in fall of 2017, is to gain a comprehensive view of all of the known archaeological, historic, cultural and traditional places within the field office. Part of this contract is also to gather public input from consulting parties.

Also in 2016, the Monticello Field Office started an ethnographic literature review of the field office. The field office selected Living Heritage Anthropology to compile and summarize all ethnographic studies and sources within one document. The estimated completion data for this document is early 2018.

Maps that have been shared with us indicated that only 9.2% of BENM has been inventoried for archaeological resources. Are there plans to survey the remainder of the monument?

Since the designation in December 2016, BLM has not completed a full strategic plan to survey the rest of the monument. Because conducting Class III survey can be costly and time consuming (~\$50/acres or more than \$2,300/mile for linear surveys), the field office has focused Class III surveys to areas of high cultural resource visitation, where archaeological site stabilization will occur or where special recreation permits for motorized activities will be permitted.

The Monticello Field Office Record of Decision - Resource Management Plan (2018) directs the field office to prioritize new cultural resource survey in areas where there is little previous survey. The overall majority of Class III survey conducted in the field office and new monument boundaries has occurred because of federal undertakings related to the development or permitted use of public lands and their related National Historic Preservation Act - Section 106 compliance.

Almost on a yearly basis, the field office conducts Class III-Intensive Pedestrian Surveys (Class III), to facilitate route designations or to permit special-recreation permits for motorized events such as the San Juan County ATV Safari or Easter Jeep Safari.

10. Did BLM buy out any grazing permits with the designation of the monument?
No.

11. We noticed a significant drop in mineral production from 44,444 cu yds in 2014 to 2,914 cu yds in 2015 - is it possible to provide any insight to this drop?

The current permit allows the permittee to extract 200K cubic yards over a 10 year period. The amount extracted on an annual basis is not dictated by the agency (generally subject to market forces and however much is remaining out of the 200K cu yds.)

Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

1. Documents Requested
 - a. Resource Management Plans/Land Use Plans
 - i. Bears Ears National Monument (BENM) has not yet initiated a Monument Management Plan (MMP). The 2008 Monticello RMP will be followed in the interim. The entire Monticello RMP (DEIS/FEIS/ROD) can be accessed here: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=68097&dctmId=0b0003e880befb7c>. A copy of the 5-year RMP Evaluation is also in this folder (1.a.Monticello_RMP_Evaluation_September_2015.pdf).
 - b. Record of Decision
 - i. BENM has not yet initiated a Monument Management Plan. The 2008 Monticello RMP will be followed in the interim. The ROD is in this folder (1.b.Monticello_Final_Plan_ROD.pdf) and can be accessed here: https://eplanning.blm.gov/epl-front-office/projects/lup/68097/85493/102694/Monticello_Final_Plan.pdf. Approximately 1,000 acres of BENM is within the Moab Field Office. The Moab RMP is located here: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=66098&dctmId=0b0003e880bf5947>
 - c. Public Scoping Documents
 - i. Public scoping has not yet been initiated for a BENM MMP. The first public comment period post- designation associated with BENM is the DOI Notice of Opportunity for Public Comment.
 - d. Presidential Proclamation
 - i. Proclamation 9558 of December 28, 2016 is in this folder (1.d.Bears Ears Presidential Proclamation.pdf).
2. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present (Designation date for BENM is December 28, 2016 - information is not yet available for most of FY17)**
 - a. Recreation - annual visits to site
 - i. The BLM uses the Recreation Management Information System (RMIS) to report visitor use. Full reporting for annual visitation 2017 will not be available until the end of September.
 - ii. Specific visitation information to the BENM is not available at this time. The

Monticello Field Office confirms that:

- Requests for overnight reservations in the Cedar Mesa area and day use permits for the Mcloyd Canyon/Moonhouse area, which are both popular recreation spots within the BENM, have increased since monument designation.
- Campgrounds in the Moab and Monticello Field Offices have remained full through much of this spring season, even on non-weekend days, and the number of overnight visitors is higher compared to this same time last year.

Detailed visitor data for the Monticello Field Office is available in this folder (2.a.RMISData_SelectInfo_2012_2016.pdf).

- iv. The number of recorded visitors to the Kane Gulch ranger station during the months of March and April was higher than in previous years. Included below are visitor numbers from the Kane Gulch ranger station.
 - 2013 - 3,484 visitors
 - 2014 - 3,730 visitors
 - 2015 - 4,344 visitors
 - 2016 - 4,848 visitors
 - 2017 - 6,535 visitors
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
 - i. There are no producing oil and gas wells and no coal developments in BENM. While public lands in the monument are now withdrawn from mineral leasing, valid existing rights were protected under the proclamation. Therefore, development on existing leases could occur.
 - ii. There are 25 authorized federal oil and gas leases (29,416 acres) that are partially or wholly contained within the area that is now the BENM. The effective date on these leases ranges from 1972-2012. There are no authorized or pending APDs associated with these leases.
 - iii. Since 1920, 250 wells have been drilled in the BENM. The last wells were drilled in 1993. Of the 250 wells drilled, three wells have produced economical quantities of oil and gas. The last producing well was drilled in 1984.
 - iv. Since designation of the BENM, there has been no new construction of energy transmission infrastructure.
- c. Minerals - annual mineral production on site
 - i. There are no active mining operations in the BENM. There is one commercial mineral materials site. The permit for this site was renewed on March 13, 2016,

for a 10-year period. Production over the next 10 years is limited to 200,000 cubic yards (cu yds) at a rate of \$1.08 per cu yd. Due to the short timeframe since designation (five months), it is not possible to calculate the annual mineral production since designation.

- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - Timber production in the BENM is limited to non-commercial Christmas tree cutting permits, and permits for the collection of wood products (i.e., posts and firewood). Due to the short timeframe since designation (five months), it is not possible to calculate the annual timber production since designation. Collection of forest products, and firewood for personal noncommercial use is allowed under the monument proclamation.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
 - i. There are 20 allotments wholly or partially contained within BENM. These allotments include 50,469 permitted Animal Unit Months (AUMs). Allotment boundaries do not coincide with the BENM boundary, and therefore it is not possible to calculate the number of AUMs currently permitted within the monument. Due to the short timeframe since designation (five months), it is not possible to calculate the annual AUMs sold.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. Subsistence activities are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. BENM does provide for the collection of certain natural materials, including firewood by Native American Indians, under BLM permit. Information regarding firewood collection is included under the discussion of timber production.
 - ii. RMIS data provides the number of permitted/guided and recreational hunting activities and fishing activities (BENM_5YearRecreationData). These numbers do not reflect the actual number of licensed hunters/fishermen. That data is available from the State of Utah Division of Wildlife Resources. The entire BENM is open for hunting and fishing, which is regulated by the State of Utah Division of Wildlife Resources.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available

- i. The Bears Ears Inter-Tribal Coalition requested designation of the BENM. The Inter-Tribal Coalition, which includes the Hopi, Zuni Tribe, Navajo Nation, Ute Mountain Ute, and Northern Ute, have stated that the entire 1.35 million-acre BENM includes important cultural values. The importance of these values, which was recognized in the monument proclamation, are discussed in the Inter-Tribal Coalitions monument proposal. (2.g.Bears-Ears-Inter-Tribal-Coalition-Proposal.pdf), which was submitted to the department on Oct. 15, 2015. The cultural values of the area are also explained in the proclamation.
- ii. Tribes use the BENM for ceremonies and to visit sacred sites. Traditions of hunting, fishing, gathering, and wood cutting are still practiced by tribal members, as is collection of medicinal and ceremonial plants, edible herbs, and materials for crafting items like baskets and footwear. The BLM issues free use permits for collection of materials for ceremonial purposes.
- iii. According to the Utah State Historic Preservation Office (SHPO), as of Feb. 6, 2017, there are 8,480 recorded archaeological sites and four archaeological districts within BENM. According to the National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties, a “district” is a grouping of sites, buildings, structures, or objects that are linked historically by function, theme, or physical development or aesthetically by plan. The following archaeological districts are either completely within or partially within the BENM: Butler Wash, Grand Gulch, Natural Bridges, and the Salt Creek Archaeological District.
- iv. More than 70 percent of these sites are prehistoric (pre-dating the 1800s). These prehistoric sites include pottery and stone tool (lithic) scatters, the remains of cooking features (hearths), storage features such as adobe granaries and subsurface stone lined granaries, prehistoric roads, petroglyphs, pictographs and cliff dwellings. Historic sites include historic debris scatters, roads, fences, uranium and vanadium mines from World War II and the Cold War.
- v. The BLM has not completely surveyed the monument. The total percentage of the BENM that has been surveyed for cultural resources is 9.2 percent.

3. Information on activities occurring during the **5 years prior to designation**

- a. Recreation - annual visits to site
 - i. The BLM uses the RMIS to report visitor use. BENM is a subset of the Monticello Field Office. RMIS data for the Monticello Field Office is included in the folder (2.a.RMISData_SelectInfo_2012_2016.pdf).
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

- i. There was no energy production from coal, oil, gas, or renewables during the five years prior to designation (2012-2016). The last producing oil and gas well was drilled in 1984. The last well was drilled in 1993.
 - ii. No energy transmission infrastructure was constructed within the BENM during the five years prior to designation. There are 13 existing power transmission lines that intersect the BENM. These lines were constructed from 1969-1984. There are four oil and gas pipelines or related facilities that were constructed in 1963. Additional information on energy transmission infrastructure and other lands and realty actions is attached (3.b.Lands_and_Realty.pdf).
- c. Minerals - annual mineral production on site
 - i. During the five years prior to designation, mineral production was limited to one mineral material site. The permit for this site was renewed on March 13, 2016, for 10 years. Production over the next 10 years is limited to 200,000 cubic yards (cu yds) at a rate of \$1.08 per cu yd. Production numbers for the past five years are included below. This production occurred at a rate of .90 cents per cu yd.
 - 2011- 16,000 cu yds
 - 2012- 12,000 cu yds
 - 2013- 31,622 cu yds
 - 2014- 44,444 cu yds
 - 2015- 2,914 cu yds
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - i. During the five years prior to designation, timber production in the BENM was limited to non-commercial Christmas tree permits, and permits for the collection of wood products (i.e., posts and firewood). Production information for the site can be found the folder (3.d.Timber_Production_2012_2016). Information provided is for the entire field office and is not limited to the area that now part of the BENM. The BLM does collect location information.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
 - i. There are 20 allotments wholly or partially contained within BENM. These allotments include 50,469 permitted AUMs. Allotment boundaries do not coincide with the BENM boundary, and therefore it is not possible to calculate the number of AUMs currently permitted within the monument boundary. AUMs sold during the past five years are included below.
 - 2012- 27,836 AUMs
 - 2013- 29,175 AUMs
 - 2014- 32,193 AUMs
 - 2015- 32,129 AUMs

- 2016- 36,402 AUMs

f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available

i. As previously mentioned, subsistence activities are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. BENM does provide for the collection of certain natural materials, including firewood by Native American Indians, under BLM permit. Permits issued to American Indians for collection are accounted for in the annual timber production numbers.

g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available

i. See response to 2.g.

(b) (5)

[Redacted text block containing multiple paragraphs of information, all obscured by black bars.]

(b) (5)

[REDACTED]

1. *Journal of the American Medical Association*, 2000; 283: 2689-2696.

(b) (5)

5. Changes to boundaries - dates and changes in size

- i. There have been no changes to boundaries.

6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment

- i. The public process preceding BENM designation is outlined in the document 6.Bears Ears Fact Facts QA.pdf (released with the DOI/USDA joint press release on 12/28/16) in this folder. Secretary Jewell held a public meeting in Bluff, Utah in July 2016. See also: <https://www.doi.gov/pressreleases/secretary-jewell-under-secretary-bonnie-join-utah-local-leaders-public-meeting-hear>.

7. Terms of Designation

- i. Refer to Proclamation for the terms of designation. No additional background (e.g., legislated land exchanges or Congressional budget provisions, etc.).