

## Comments on NOI to Prepare Management Plans for Bears Ears National Monument

March 23, 2018

Mr. Lance Porter  
District Manager  
Bureau of Land Management  
365 North Main  
Monticello, UT 84535

Dear Mr. Porter:

The undersigned organizations appreciate the opportunity to submit comments on the Notice of Intent (NOI) to prepare a monument management plan (MMP) for the Indian Creek Unit and one for the Shash Jaa Unit (jointly with the US Forest Service) of the Bears Ears National Monument. The NOI describes the planning area in San Juan County as encompassing nearly 170,000 acres of BLM lands and nearly 33,000 of National Forest System lands.

Our organizations have a long-standing and vested interest in access and opportunities on Federal public lands for our members to enjoy hunting and recreational shooting. We are signatories to the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) with the BLM. The purpose of the MOU is to build a partnership with the signatory organizations, the BLM, and the other signatory Federal agencies “for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands.”

Our understanding is that hunting and recreational shooting are allowed throughout the planning area. We strongly support maintaining the same level of access and opportunity in the MMPs. In addition, we support the continued use of traditional ammunition for hunting and shooting activities and recognize the continued role of the Utah Division of Wildlife Resources in managing fish and wildlife on the Monument lands.

Keeping the Monument lands open to hunting, fishing and recreational shooting will be compliant with Executive Order 13443, the Facilitation of Hunting Heritage and Wildlife Conservation, that calls on Federal land management agencies to “facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat.” And, it will also be compliant with Secretary Zinke’s national monument recommendations to the President, released in December, 2017, wherein the Secretary recommended that an ongoing review be maintained on monuments created by the Antiquities Act to ensure that more hunting and fishing in national monuments is encouraged through public access.

We also recommend that the MMP be developed in a manner that is consistent with the directives outlined in Secretarial Order 3356 (Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories). The following directives are particularly relevant in the context of developing the MMP:

**Sec. 4, b. (1):** With respect to Department lands and waters, the responsible bureaus and offices within the Department shall amend the National Monument Management Plans to include or

expand hunting, recreational shooting, and fishing opportunities to the extent practicable under the law;

**Sec. 4, b. (6):** With respect to Department lands and waters, the responsible bureaus and offices within the Department shall incorporate analysis of the impacts of Federal land and water management actions on hunting, fishing, and recreational shooting access in planning and decisionmaking;

**Sec. 4, d. (2):** With respect to working harmoniously with our state, tribal, territorial, and local partners, bureaus and offices shall coordinate with state, tribal, and territorial wildlife management agencies to identify opportunities for increased access to Department lands and waters, including identifying opportunities for access through adjacent private lands;

**Sec. 4, d. (3):** With respect to working harmoniously with our state, tribal, territorial, and local partners, bureaus and offices shall collaborate with state, tribal, and territorial fish and wildlife agencies to attain or sustain wildlife population goals during Department land-management planning and implementation, including prioritizing active habitat-management projects and funding that contribute to achieving wildlife population objectives, particularly for wildlife that is hunted or fished, and identifying additional ways to include or delegate to states habitat management work on Federal lands;

**Sec. 4, d. (4):** With respect to working harmoniously with our state, tribal, territorial, and local partners, bureaus and offices shall work cooperatively with state, tribal, and territorial wildlife agencies to enhance their access to Department lands for wildlife management actions;

**Sec. 4, d. (7):** With respect to working harmoniously with our state, tribal, territorial, and local partners, bureaus and offices shall work cooperatively with state, tribal, and territorial wildlife agencies to ensure that hunting and fishing regulations for Department lands and waters complement the regulations on the surrounding lands and waters to the extent legally practicable.

We look forward to participating in this important planning process and as a MOU partner, we are available to assist the BLM in ways that benefit wildlife conservation, habitat improvement, and access and opportunity for hunting and recreational shooting.

Sincerely,

Boone and Crockett Club  
Congressional Sportsmen's Foundation  
Council to Advance Hunting and the Shooting Sports  
Mule Deer Foundation  
National Rifle Association  
National Shooting Sports Foundation  
Safari Club International  
Wildlife Management Institute