

Comments on Notice of Intent to Prepare RMPs for Grand Staircase-Escalante NM and Other Lands

March 23, 2018

Mr. Matthew Betenson  
Associate Monument Manager  
Bureau of Land Management  
669 South Highway 89 A  
Kanab, UT 84741

Dear Mr. Betenson:

The undersigned organizations appreciate the opportunity to comment on the Notice of Intent (NOI) announcing the preparation of resource management plans (RMPs) for the Grand Staircase-Escalante National Monument-Grand Staircase, Kaiparowits, and Escalante Canyon Units, and federal lands previously included in the Monument that are excluded from its boundaries by Proclamation 9682. The NOI states that the planning area, located in Kane and Garfield Counties, encompasses approximately 1.87 million acres of public land.

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.”

The NOI states that the RMPs will replace the existing Grand Staircase Escalante National Monument Plan of 1999, which implemented Presidential Proclamation 6920 that created the National Monument in 1996. On page 5 of the plan it notes that:

While much of the Monument exhibits qualities where the Earth and its community of life show little evidence of human influence, it is also true that generations of people have used lands within the Monument for many different purposes. The Proclamation directed that the Monument remain open to certain specific uses under existing laws and regulations. These include valid existing rights, **hunting, fishing**, grazing and preexisting authorizations. To the extent consistent with existing rights, these uses will be managed in a manner that protects Monument resources. (Words highlighted)

We fully support the incorporation of the above statement in the new RMPs. It is our understanding that these lands are open to hunting and recreational shooting except in developed recreation areas. We do not support restrictions to these traditional activities beyond those already in place. In addition, we support the continued use of traditional ammunition in hunting and shooting and recognize the continued role of the Utah Division of Wildlife Resources in managing fish and wildlife on the Monument and other Federal lands comprising the management area.

Keeping the Monument lands open to hunting, fishing and recreational shooting will also be compliant with Executive Order 13443 (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 RMPs 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 RMPs:

**Sec. 4, b. (1):** With respect to Department lands and waters, the responsible bureaus and offices within the Department shall amend 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, fishing 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